

Development Control Committee Main Schedule

Schedule of Applications for
Planning Permission

28th March 2008

The Schedule of Applications

This schedule is set out in five parts:

SCHEDULE A - contains full reports on each application proposal and concludes with a recommendation to the Development Control Committee to assist in the formal determination of the proposal or, in certain cases, to assist Members to formulate the City Council's observations on particular kinds of planning submissions. In common with applications contained in Schedule B, where a verbal recommendation is made to the Committee, Officer recommendations are made, and the Committee's decisions must be based upon, the provisions of the Development Plan in accordance with S54A of the Town and Country Planning Act 1990 unless material considerations indicate otherwise. To assist in reaching a decision on each planning proposal the Committee has regard to:-

- relevant planning policy advice contained in Government Circulars, Planning Policy Guidance Notes, Development Control Policy Notes and other Statements of Ministerial Policy;
- the adopted provisions of the Cumbria and Lake District Joint Structure Plan;
- the City Council's own statement of approved local planning policies including the Carlisle District Local Plan;
- established case law and the decisions on comparable planning proposals
- including relevant Planning Appeals.

SCHEDULE B - comprises applications for which a full report and recommendation on the proposal is not able to be made when the Schedule is compiled due to the need for further details relating to the proposal or the absence of essential consultation responses or where revisions to the proposal are awaited from the applicant. As the outstanding information and/or amendment is expected to be received prior to the Committee meeting, Officers anticipate being able to make an additional verbal report and recommendations.

SCHEDULE C - provides details of the decisions taken by other authorities in respect of those applications determined by that Authority and upon which this Council has previously made observations.

SCHEDULE D - reports upon applications which have been previously deferred by the Development Control Committee with authority given to Officers to undertake specific action on the proposal, for example the attainment of a legal agreement or to await the completion of consultation responses prior to the issue of a Decision Notice. The Reports confirm these actions and formally record the decision taken by the City Council upon the relevant proposals. Copies of the Decision Notices follow reports, where applicable.

SCHEDULE E - is for information and provides details of those applications which have been determined under powers delegated by the City Council since the previous Committee meeting.

The officer recommendations made in respect of applications included in the Schedule are intended to focus debate and discussions on the planning issues engendered and to guide Members to a decision based on the relevant planning considerations. The recommendations should not therefore be interpreted as an intention to restrict the Committee's discretion to attach greater weight to any planning issue when formulating their decision or observations on a proposal.

If you are in doubt about any of the information or background material referred to in the Schedule you should contact the Development Control Section of the Department of Environment and Development.

This Schedule of Applications contains reports produced by the Department up to the 14/03/2008 and related supporting information or representations received up to the Schedule's printing and compilation prior to despatch to the Members of the Development Control Committee on the 17/03/2008.

Any relevant correspondence or further information received subsequent to the printing of this document will be incorporated in a Supplementary Schedule which will be distributed to Members of the Committee on the day of the meeting.

SCHEDULE B

SCHEDULE B

SCHEDULE B

SCHEDULE B

SCHEDULE B

SCHEDULE B

SCHEDULE B: Reports Requiring Further Information

07/1127

Item No: 1

Date of Committee 28/03/2008

Appn Ref No:
07/1127

Applicant:
Stobart Air Ltd

Parish:
Irthington

Date of Receipt:
15/10/2007

Agent:
Scott Wilson Ltd

Ward:
Stanwix Rural

Location:
Carlisle Lake District Airport, Carlisle, Cumbria, CA6
4NW

Grid Reference:
348000 561000

Proposal: Construction Of Replacement Runway With Associated Instrument Landing Equipment And Reconfigured Taxiways And Hard Standing; New Development To The South Of The Runway Including Warehousing And Distribution Facilities, New Passenger Terminal, Offices, Hangars, New Air Traffic Control Centre, Aircraft Apron And Car Parking, With New Road Junction And Access From The A689, And Other Associated Infrastructure And Facilities, Including Aviation Fuel Storage, Local Refuelling Facility For The Distribution Operations And Improved Drainage.

Amendment:

1. Addendum to Economic Appraisal received which includes references to two further relevant background reports: Cumbria Economic Plan 2008-2011 (*issued in September 2007*); and the Consultation Draft Document "Growing Carlisle- An Economic Strategy for the Carlisle City Region" (*issued on 4th October 2007*).
2. Receipt of Revised Landscape Plan (Drwgs D116772/LA001 and LA002) together with submission of amended Figure 9.19 (within Environmental Statement: Volume 3) to take account of revised obstacle surface information relating to runway 01-19.
3. Receipt of Addendum to Environmental Statement: Chapter 10- Water Quality and Drainage correcting errors in the descriptions of the existing drainage situation contained in paras 10.48, 10.59, 10.64, 10.124 and providing an amended version of Figure 10.1 [received on 19th October].
4. Receipt of revised Figures 13.1 and 13.2 of Environmental Statement which are updated to clarify those areas shown thereon as "Spadeadam Danger Area" and "Area of Intense Aerial Activity" [received on 3rd December].
5. E-mail from agents confirming further discussions with Cumbria Constabulary and dealing with two matters:
 - the applicants wish to retain the fencing specification contained within the

- application as opposed to the Police Authority recommendation but would accept a planning condition requiring approval of fencing details if thought by LPA to be appropriate; and
- confirming that, for security reasons, it is not appropriate to submit details of the intended CCTV system but that the Police Authority would be involved in the process of developing the system [received on 19th December].
6. Submission of amended Figures 6.1, 6.2, 6.3, 6.4 of Environmental Statement relating to daytime noise contours (with and without helicopter movements) for years 2007 and 2016 plus revised Figure 6.5 illustrating daytime noise contours for year 2016 with 25% increase in passenger and cargo aircraft movements. Accompanying letter states that text in the ES and references to the new figures are correct [received 20th December].
7. Receipt of copy of Supplementary Information on the Transport Assessment, previously sent to Cumbria CC (Highways) providing:
- Details of the exact location of the proposed access from the A689 and showing the required visibility splays (Drawing NoD116772/TA02/100)
 - Technical Note presenting details of TRANSYT analysis of the operation of M6 junction 44 for the “year of opening” (2009) and at future year (2019)
 - Explanation of the derivation of predicted Air Passenger Numbers and related surface traffic trip generation
 - Detailed car parking plan of the spaces required for offices; storage and distribution uses; and air passenger parking (short and long stay parking) on Drawing No D113877/SK/001
 - Plan showing the timing and phasing of the operations of the traffic signals proposed on the Irthington and Laversdale roads together with prospective queue lengths (Figures 42 and 43 cross-referred to pages 33 and 34 of the Transport Assessment)
 - Particulars of measures proposed to ensure road space between the traffic signals are clear during take-off/landing movements.
 - Measures proposed to make the site more accessible by sustainable transport including bus services including provision of a Travel Plan Framework document together with confirmation of on-going discussions with local bus operators and agreement to provide more information as soon as it is available [received on 27th December].
8. Letter addressing proposals in relation to the Government’s publication in December 2007 of the Climate Change Supplement to Planning Policy Statement 1 (PPS1) [received 14th January].
9. Letter and further details, responding to matters raised by English Heritage in its consultation response, comprising the following:
- Confirmation that Report of the Archaeological Evaluation undertaken by North Pennines Archaeology was issued to EH in December 2007
 - Submission of a Method Statement on the strategy to be used in undertaking tree felling/removal of roots within Watchclose Woods

- Details including a Plan of the location and extent of ground disturbance during construction works
 - Clarification of absence of photomontages relating to Viewpoints 3, 6 and 10 described in the ES Chapter 9 coupled with revised Figure 9.9. Confirmation that the additional photomontages for the 3 viewpoints will be provided shortly
 - Revised versions of photomontages from viewpoints 7, 8, 9 (all showing impacts of proposed fencing and lighting columns) and 11
 - Clarification of likely increased noise levels within the World Heritage Site (WHS) and effects on public appreciation of the site.
 - Comment on the effects of increased carbon footprint and resultant effects on climate change as a consequence of the expansion of Carlisle Airport [received on 15th January].
10. Letter and table clarifying anticipated job growth (in response to observations made by the North West Development Agency when commenting on the application) [received 16th January].
11. Letter and further details addressing comments made in the consultation response from Environmental Services, the matters covered being:
- The factors considered in the determination of aviation noise impacts, including information on daytime and night-time noise
 - Clarification of how the increase in annual aircraft movement of 23% has been derived
 - Confirmation whether the appropriate sub-script has been used for the noise levels quoted in Table 6.7 of ES
 - Current and future visions of the Airport and contractual arrangements between the Airport and MoD, protocols, roles and responsibilities for implementing controls to mitigate against noise
 - Further information to demonstrate “robustness” of passenger and freight throughput figures
 - Confirmation from Cumbria CC Highways Dept that traffic data used in modelling and derived from the Transport Assessment is acceptable plus details of the input data used for the assessment
 - Response to the request for comparative analysis undertaken for the assessment year 2016 to take account of predicted traffic growth with, and without, the proposed development
 - Response to request for additional studies relating to risk assessment to determine land contamination, pollutant linkages (sources, pathway, receptors) and the representation of those in a conceptual model; proposals for undertaking a Phase 2 investigation to fulfil requirements of PPS23; and remediation scheme to be prepared prior to undertaking any remediation measures
 - Documentation from competent lighting engineer to substantiate type, location and positioning of lighting is unlikely to cause intrusion into neighbouring premises [received 18th January].
12. Letter in response to request for clarification of proposed floorspace [received 21st January].

13. Letter addressing "Frequently Asked Questions" derived from review of public comments on planning application [received on 30th January].
 14. Letter responding to:
 - comments made by City Council Urban Design Officer on the proposed design approach to the development;
 - comments made City Council Tree/Landscape Officer in relation to the landscape impacts and mitigation;
 - Cumbria County Council Committee Report with reference to landscape impact;
 - Revised proposals for partial retention of Watchclose Woods;
 - Details of proposed additional woodland planting of 3 no. "woodland mix" blocks;
 - Enhanced planting of avenue trees adjacent to entrance road and terminal approach; andAmendments to proposed species mix [received on 31st January].
 15. Letter with further clarification of landscaping proposals in response to City Council Tree/Landscape Officer together with additional landscaping measures in relation to car parking areas, pedestrian approaches to proposed terminal and the eastern site boundary [received 5th February].
 16. Letter, plan and supplementary note from Agents identifying reduction in the areas of car parking initially provided coupled with a proposal for planning condition requiring preparation of a car parking strategy prior to opening of the Airport (dated 26 February).
 17. E-mail and related revision to Masterplan showing, as "inset" plans, a proposed alternative roundabout junction for site access from the A689 together with the revised location and configuration of SW and dirty water lagoons at Watchclose Woods (received 3rd March)
 18. Letter and plan showing revised landscaping and car parking details from the Agents dated 14 March 2008.
-

REPORT

Case Officer: Alan Taylor

Reason for Determination by Committee:

The application is brought before the Committee for the following reasons:

1. It is an application of major importance and has attracted considerable public interest;
2. The proposals would be a "Departure" from the Development Plan; and
3. A number of persons have given notice of their intention to address the

Committee under the "Right To Speak" policy.

1. Constraints and Planning Policies

Joint St. Plan Pol ST1: A Sustainable Vision for Cumbria

Joint St. Plan Pol ST3: Principles applying to all new devel.

Joint Str. Plan Pol ST5: New devt & key service centres

Joint Str. Plan Pol ST7: Dev. to sustain rural communities

Joint Str. Plan Pol ST8: The City of Carlisle

Joint Str. Plan Pol ST9: North Cumbria

Joint St. Plan Pol L54: Retails, leisure and office dev.

Joint Str. Plan Pol EM13: Employment land provision

Joint St. Plan Pol T24: Transport Networks

Joint St. Plan Pol T26: Ports and airports facilities

Joint St. Plan Pol T27: Public passenger transport

Joint St. Plan Pol T30: Transport Assessments

Joint St. Plan Pol T31: Travel Plans

Joint St. Plan Pol T32: Car parking standards

Joint St. Plan Pol E34: Areas&feat. nat. & int.conservation

Joint St. Plan Pol E35: Areas&feat.of nature conservation

Joint St. Plan Pol E36: Landscapes of County Importance

Joint St. Plan Pol E37: Landscape character

Joint St. Plan Pol E38: Historic environment

Joint St. Plan Pol E39: Enhancement of built & nat. environ.

District E8 - Remainder of Rural Area

District E12 - Wildlife Sites

District E19 - Landscaping New Dev.

District E20 - Development in Floodplain

District E22 - Sewers & Sew. Treat. Work

District E24 - Ground Waters etc

District E26 - Buffer to Hadrian's Wall

District E28 - Ancient Monuments

District E29 - Archaeological Signif.

District EM1 - Employment Land

Rev Redeposit Pl. Pol DP1 - Sustainable Develop. Locations

Rev Redeposit Pl. Pol DP3 - Carlisle Airport

Rev Redeposit Pl. Pol CP1 - Landscape Character/Biodiversity

Rev Redeposit Pl. Pol CP2 - Trees And Hedges On Dev. Sites

Rev Redeposit Pl. Pol CP4 - Design

Rev Redeposit Pl. Pol CP8 - Dev. Energy Cons. And Efficiency

Rev Redeposit Pl. Pol CP9 - Sustainable Drainage Systems

Rev Redeposit Pl. Pol CP10 - Protect. Ground/Surface Waters

Rev Redeposit Pl. Pol CP11-Foul/Surf Water SewerSewage T/ment

Rev Redeposit Pl. Pol CP12 - Pollution

Rev Redeposit Pl. Pol CP14 - Accessibil.Mobility & Inclusion

Rev Redeposit Pl. CP15 - Public Transp. Pedestrians Cyclists

Rev Redeposit Pl. Pol CP16 - Planning Out Crime

Rev Redeposit Pl. Pol EC20 - Employ./Comm.Growth Land Alloc.

Rev Redeposit Pl. Pol LE2-Sites of International Importance

Rev Redeposit Pl. Pol LE3 -Sites Of Spec.Scientific Interest

Rev Redeposit Pl. Pol LE6-Hadrian's Wall World Heritage Site

Rev Redeposit Pl. Pol LE7- Buff.Zone/Had's Wall World Her.Site

Rev Redeposit Pl. Pol LE8 - Archaeology On Other Sites

Rev Redeposit Pl. Pol LE10 - Archaeological Field Evaluation

Rev Redeposit Pl. Pol LE12-Schedule/Nat.Imp.Ancient Mons.

Rev Redeposit Pl. Pol LE30 - Land Affected By Contamination

Rev Redeposit Pl. Pol T1 - Parking Guidelines

Rev Redeposit Pl. Pol LC15 - Percent for Art

Rev Redeposit Pl. Pol IM1 - Planning Obligations

2. Summary of Consultation Responses

Irthington Parish Council: the comments made cover a number of matters, as follows-

Runway:

The proposed new re-aligned runway is essentially a replacement for an existing one, and the Parish Council has no objections to it, in itself.

Due to the proximity of the new runway thresh-holds to the adjacent roads, the provision of the ILS landing aids requires the installation of traffic lights on these roads. The traffic studies which support the assertion that this will not cause unacceptable queue lengths were carried out during a single week in autumn. These roads are in a rural area, where the traffic density is seasonal due to farming procedures. Studies carried out in spring and summer could give a very different result. Further studies are needed.

If ILS is installed at this airport situated in a quiet, uncontrolled airspace, it will be an attraction to trainee pilots wishing to practice ILS approaches. This would mean many more occasions than currently anticipated when the traffic lights stop traffic on these roads, because all aircraft regardless of size are treated similarly by ILS rules. This will be of considerable detriment to the villagers of Laversdale and the businesses located on the Watch Cross to Laversdale road.

This runway alignment, and the positioning of two of the drainage lagoons, involves the near destruction of Watchclose Woods. The Carlisle Airport Development Brief consultation draft October 1999 reported a study which stated that *"Watchclose Woods is probably the single most valuable piece of wild life habitat on the site"*. While this draft has not been adopted as policy, the facts have not altered. It is interesting that the City Council's own Landscape Architect/Tree Officer has commented critically regarding this aspect of the planning application.

The PC notes, with interest, that Cumbria Wildlife Trust, in connection with planning

application 07/1090, have objected strongly to development in this area of the airport, to the point of requesting the planning authority to issue the developer with a stop notice.

The Parish Council does not approve of this aspect of the development and wish to see a revision preserving this wild-life habitat.

The approach lights at the northern end of the runway are a matter of concern to villagers, because they will be sited very close to some of the houses at the southern end of the village of Irthington. The lights nearest the village are mounted on poles about 50ft high, and will be very visible from adjacent houses. If any significant number of night flights occur this will cause these villagers a considerable loss of amenity. Provision should be made to shield these houses from these lights.

A bridle path crosses the line of these proposed approach lights. This is unacceptable. Some provision is needed to prevent horses being startled by aircraft on approach passing low overhead. Alternatively, re-routing of the bridleway may be possible following consultations with representatives of the walking and riding community and this Parish Council, and any land owners affected.

It should be a condition of any grant of permission that this runway improvement and associated landing aids should be constructed before work commences on the terminal/warehouse/distribution complex.

Airport Operations:

The possibility of commercial flying resuming from Carlisle Airport causes some anxiety among local residents. The number of day and night aircraft movements outlined in the proposal is not excessive. The Parish Council believes, however, that growth in the number of movements is expected. If permission for this development is granted then some limitation on the number of commercial movements per day should be imposed. Night movements should remain limited to eight, between the hours of 11.00 p.m. to 06.00 a.m. and be part of this total.

The developer should be required to provide financial assistance for sound-proofing of the homes of those living nearest to the flight path of arrivals and departures. This should apply to those living in proximity to the airport on all sides, as well as to all the residents of the village of Irthington.

Distribution Site and New Terminal:

This building is very large and of starkly modern appearance. Policy DP3 of the Local Plan (2001-2016) revised redeposit draft states *"Proposals for development at Carlisle Airport will be supported where they are related to airport activities and in scale with the existing infrastructure and minimise any adverse impact on the surrounding environment."* The guidelines laid down in the Development Brief Consultation Draft, which provide a more complete explanation of this statement, have not been followed. This said *"In the case of the redevelopment and relocation of the operational facilities the height of the buildings are to be generally limited to two storeys to minimise impact on the landscape."* This four-storey building is of a height, general scale and design so as to be completely out of keeping with this

quiet, attractive rural setting. The building should be redesigned to provide a less intrusive appearance to those people travelling through or living in the vicinity. It should be reduced in height and in floor space. No justification has been offered for requiring such a large building.

The Parish Council notes that the City Council Urban Design Officer is of the similar opinion. He says *"The main airport building itself is monolithic and unrelieved by obvious architectural input. It appears to me to be very much at the 'functional' end of transport infrastructure design and will be an uninspiring point of arrival and departure for visitors. I would consider that a clear and imaginative architectural solution would be appropriate for a development of this nature and scale."*

The planned landscaping is inadequate to screen this potential eyesore from the public. It is also inadequate as mitigating planting to compensate for the severe loss of woodland habitat, both at Watch Close Woods, referred to above, and also within the immediate surroundings of the airport complex. Significant improvements to this scheme are required if permission is to be granted. The Parish Council note and agree with the comments made by the City Council's own Landscape Architect/Tree Officer in this respect.

The Parish Council question the adequacy of the drainage provisions for this new, large area of rainwater catchment, and the disposal arrangements, particularly under storm conditions. This large new development will also add a considerable load to the foul drainage provision in the area. The PC is concerned that not enough attention has been paid to this aspect of the proposal and draws attention to the objection to this planning proposal from United Utilities (dated 08.11.07, their ref: 07/5166) which mentions the lack of information regarding foul sewage disposal, and the inadequacy of the Irthington Waste Water Treatment Works for this purpose.

Traffic & Road Safety:

Not enough consideration has been given to the effect of this development on road safety and the impact of the increased and changed nature of traffic locally. Whilst recognising that factors affecting the road system are properly the responsibility of the County Highways department, the Parish Council feels that these matters should be given considerable weight when evaluating this application.

This Parish Council has, for a long time, sought for improvements to the layout and sight-lines at the three A689 junctions at Watch Cross, Irthington Lane Ends and Newby Lane Ends. These junctions are dangerous because high speed traffic approaching from the east has only limited opportunity to see traffic emerging from these junctions before arriving at them. Similarly, traffic emerging from these junctions does not have adequate visibility of traffic approaching from the east. (Indeed, on the very day of the open-meeting to discuss this proposal there was a serious accident of this type at Newby Lane Ends.)

The insertion of the new junction will do nothing to improve this situation. Providing a roundabout in an off-road position is a missed opportunity to provide some safety improvements. The provision of a roundabout on the A689 at Irthington Lane Ends, with an access road to the new terminal building from the Irthington Road would

have been a safer solution. It would probably also help the safety of the Newby junction, by slowing traffic from the west. Improvements to the Watch Cross and Newby Lane Ends junctions should go hand-in-hand with this development. Improved sightlines for traffic emerging onto the A689 and central safety lanes for right turning traffic from the A689 are requirements at both these junctions.

Although the traffic studies seem to indicate excess road capacity, this does not correspond to the daily experience of users of the A689. At peak traffic times it can be extremely difficult for vehicles to emerge from any of the above mentioned junctions or from adjacent properties onto the A689. This development, along with the projected opening of the CNDR and the current up-grading of the "Cumberland Gap" will increase the traffic density still further. Increased traffic will inevitably lead to more accidents, unless the road junctions are up-graded.

The re-siting of Eddie Stobart Ltd. at the airport has been justified on the grounds that this site has good connectivity to the motorway system. In fact, it is significantly further from the motorway than the existing Kingstown site. The need to vacate the Kingstown site is a result of the actions of Eddie Stobart Ltd in selling their lease. This should have no material bearing on this planning application. The Parish Council contend that there are a number of alternative suitable sites nearer to the motorway system, for instance on the Kingmoor Park development. The developer has not established a need to move to this site. The move to the airport site will cause loss of amenity, due to increased heavy vehicle traffic, to many more people and communities through which they will then have to pass, than the use of one of these alternatives.

The PC notes that the North West Regional Assembly Principal Planning Officer calls into question whether the location of offices, warehousing and distribution facilities can be justified at this location. Citing Policies DP1, EC8 and draft Policy W3, the Officer says that a stronger justification is needed with respect to the offices. In relation to the warehousing, the Officer also says that the applicants need to demonstrate that there are no other, more sustainably located sites for the warehousing development. This is also Irthington Parish Council's view.

The PC has concerns that the increased number of heavy goods vehicles and of lighter vehicle traffic associated with this development will impose an unacceptable load on the surrounding rural road system. It must be a condition of permission that all heavy vehicles arriving at, or departing from this airport complex must do so by a prescribed route, which does not allow passage through any of the local villages, particularly Irthington, Laversdale, Newtown or Newby East. A copy of this route should be presented to each driver intending to use this site, and enforcement provisions made.

Many of the local roads are already used as "rat-runs" by vehicle users wishing to take a short cut between the A69, A689 and/or the A6071. The development will make this situation worse. In mitigation of this the Parish Council would expect, at minimum, 30mph speed limits in place for each of the above villages, where they are not already present. Traffic calming arrangements on the approaches to these villages, similar to those recently installed at Newby East, should also be provided. A weight limit on vehicles allowed to pass through these villages should be imposed, set at such a weight that it does not inconvenience current agricultural traffic, but

prevents access by heavy goods vehicles.

Conclusion:

While being supportive of the airport-related development of Carlisle Airport facilities and services, Irthington Parish Council feel that there are so many difficulties associated with the warehousing and distribution aspects of this proposal that it requests that the Planning Committee give careful consideration to these matters;

Stanwix Rural Parish Council: the Parish Council has a number of comments on the application-

Introduction:

The magnitude and complexity of this application are such that detailed analysis of its content is far beyond the realm of a Parish Councils experience and expertise.

Stanwix Rural Parish Council therefore takes a wide view of the above application and comments only in broad terms. However, it reserves the right to amend, or refine, any of its comments should it consider that to do so would be in the interests of the community it serves. The Parish Council also reserves its right to speak at the meeting of the Development Control Committee when the application will be decided.

Though lengthy and verbose the application reveals little detailed information. Numerous requests by Statutory Consultees for further information, or clarification of that which is provided, or their criticism of provided information, lend weight to this view.

The Parish Council fully supports the principle of ensuring the commercial viability of the airport and securing its long term future, for the benefit of the local area and its inhabitants. However, it harbours major concerns regarding elements of the current application which, until they are satisfactorily addressed, it believes must delay the immediate granting of planning consent.

The applicant has not ruled out the possibility of the airport being used by aircraft carrying radioactive nuclear material. Although it is aware that under certain circumstances an LPA may be overruled, the Parish Council urges Carlisle City Council to do its utmost to ensure that Carlisle Airport is not involved in the transport of any nuclear material other than for routine medical uses.

The Parish Council believes that the airport's freehold should always remain in the ownership of the City Council acting on behalf of the people of Carlisle and that the terms of any lease should fully commit the lessee to maintaining the site primarily as an airport. The Parish Council therefore seeks assurances that should the proposed "*facilities that will permit the potential of air travel to be realised*" (Para. 1.1 Applicants Economic Appraisal) prove unsuccessful, then:

- the lessee must fully uphold the requirements of the airports licence to operate and;
- that the airport must continue to remain open and;

- that the site will not become an overly developed sprawl of buildings.

The Parish Council understands that the applicant is engaged in a dialogue with various statutory consultees and as a result some of the issues it raises may already have been resolved or be close to a resolution. The Parish Council hopes that this process will facilitate acceptable compromises and affect a satisfactory outcome for all interested parties.

Non-Airport Related Activities:

Paragraph 1.1 of the applicants Economic Appraisal states:

"The initial focus of this development will be The relocation of ESL into a building that will accommodate Carlisle operations The movement of W A operations to the same site; and creation of facilities that will permit the potential of air travel to be realised to the benefit of the Carlisle and Cumbria sub regional economy."

The applicant places development of the airport's primary function third, almost as an afterthought following the relocation of the applicants other non airport related interests. However, the applicant fails to provide adequate proof that no alternative and more sustainable sites exist for the relocation of the company's non airport related activities. A view supported by the Principal Planning Officer of the North West Regional Assembly who states, *"However it is not clear that the non airport related offices, warehousing distribution facilities can be justified in this location."*

The applicant also states in paragraph 1.1 that Eddie Stobart Limited (ESL) *"is currently based at a site in the centre of Carlisle"*. However the company operates from Kingstown Industrial Estate, approximately 2¾ miles from the centre of Carlisle almost on the line of the proposed Carlisle Northern Development Route and only 1 mile by road from J44 of the M6.

Following relocation ESL vehicles needing to access the M6 will be obliged to make an additional journey of approximately 8½ kilometres (more than 5 miles) in each direction, an additional 10 miles per vehicle per round trip, an increase hardly commensurate with the demands of sustainable development

WA Developments is described on the company's website as being *"Leaders in the maintenance and enhancement of the UK rail network"* offering, *"a complete package encompassing structures, earthworks, lineside infrastructure, geotechnical, drainage and permanent way works."*

The proposed re-location of WA Developments has very recently been refused permission to operate at the airport, the reason for refusal being: *"The proposal is for a use that is neither related to 'airport development' or 'airport activities' nor is it an employment use. As such, it is considered to be contrary to Policies DP3 and EC20 of the Carlisle District Local Plan Revised Redeposit Draft 2001-2016."*

The precedent of this entirely appropriate refusal must now provide an obstacle to approval of the company's wholesale relocation of to the airport.

Traffic and Highway Safety:

Warehousing, distribution and office activities of the magnitude proposed will undoubtedly generate, quite independently of air operations, a significant increase in vehicle movements on the A689 and other parts of the road network local to the airport.

In common with other minor roads in the area there is a marked seasonal variance in traffic density on roads between the A689 and Laversdale and the A689 and Irthington, yet the applicant's traffic study appears to be limited to only one off-peak week.

In order to facilitate the safe operation of the proposed Instrument Landing System (ILS) traffic lights will be installed on roads crossing the line of the new runway, each aircraft approach may then initiate the traffic lights for a period of time. An aircraft such as ATR 72 making an ILS approach of 10 miles at an approach speed of say 132 mph (115 knots) might then activate the traffic lights for up to 4½ minutes, during which time vehicles would have to remain stationary.

These traffic lights in association with the above mentioned seasonally elevated road traffic flows may then cause vehicles to queue from the western end of the runway as far as, or even onto, the A689. Such queuing would then greatly inconvenience local residents and commercial interests and may also significantly hinder the movement of emergency vehicles. These possibilities and their attendant negative impacts upon the wellbeing of local communities and upon road safety appear to have been overlooked by the applicant.

Further work is therefore required in order to properly address and mitigate these issues.

The proposed development will certainly generate significant increases in traffic density on the A689. The opening of the Carlisle Northern Development Route (CNDR) and improvements to the M6 will further enlarge this volume of traffic. These increases will greatly enhance danger levels at the already hazardous junctions at Laversdale, Irthington and Newby East lane ends where high speed traffic on the main road and limited sight lines from the minor roads have conspired to cause several serious road accidents. These factors apply particularly to the Irthington and Newby East lane ends, where drivers approaching at speed from the east may suddenly encounter slow moving or even stationary vehicles just a few yards ahead.

These dangers must be mitigated, perhaps by moving the proposed off road roundabout to the A 689 and making significant improvements to the road junctions including enhanced sight lines and further measures to give advance warnings to drivers on the A689. It may even be possible to incorporate the Irthington and Newby East junctions into the new airport access roundabout.

Effective and non-polluting lighting will also be required at junctions of the A689 with the Crosby-on-Eden road. The A689/B6264 roundabout at Linstock lane end will require improvements to sightlines and possible increased radii, especially if longer and heavier HGV's are introduced.

Several minor roads link the airport and the A689 to other main routes in the area

these are:

- A689 to A69 via Newby East and Warwick Bridge
- A689 to A69 via Crosby-on-Eden
- A689 to A6071 via Irthington
- A689 to A6071 via Laversdale
- A689 to A695 via B6264

Increasing numbers of vehicles including HGV's are now using these roads as 'rat-runs'. Even the narrow and twisting lane from Newby East to Crosby-on-Eden is now regularly used by HGV's which have no legitimate claim of access.

The Parish Council urges that conditions be placed upon operator's licences to ensure that 'rat-running' by HGV's through local settlements and communities, or their use of minor roads, may result in the loss of the licence.

Due the generally increased traffic level which will result from the development and it's likely impact on the lives and wellbeing of the inhabitants of local communities, an overall review of traffic control in local settlements should be initiated; with consideration being given to the possible imposition of weight and or speed limits and traffic calming measures.

The Parish Council endorses the comments of Irthington Parish Council in respect of the Bridleway (Irthington, paragraph 6)

Visual Impact of Proposed Terminal Buildings:

The Parish Council fully concurs with the opinion of the Carlisle City Council Urban Design Officer that the proposed building *"is monolithic and unrelieved by obvious architectural input.", appearing to be, "at the 'functional' end of transport infrastructure design", is "uninspiring" and that, "a clear and imaginative architectural solution would be appropriate for a development of this nature and scale."*

The proposed main building has a footprint approximately equal in area to 6½ FIFA regulation size soccer pitches and, with the necessary exception of the control tower, is of a height and massing entirely inappropriate to its proposed location.

The proposed landscaping is inadequate and fails to mitigate either the brutal visual impact of the proposed building, or the loss of wildlife habitat which would occur. The Parish Council requests that prior to the commencement of any work a full review of the proposed landscaping be undertaken by the applicant, to be approved by the Carlisle City Council Landscape Architect and Tree Officer and by Natural England.

As the applicant does not appear to adequately explain the need for a building of such huge proportions, a more imaginative re-design is required which reduces its overall size and adverse impact. The exclusion, or substantial reduction, of non airport related activities, would be an enabling measure in attaining such a reduction.

Wildlife Habitat:

The greatly enhanced level of human activity, noise, and disturbance, will be prejudicial to the future wellbeing of many species comprising the biodiversity of the site.

A draft airport development brief was prepared by Carlisle City Council in 1999. Although this was never adopted it is referred to in supporting paragraph 2.31 of Policy DP3 - Carlisle Airport of Carlisle District Local Plan 2001 - 2016 Revised Redeposit Draft. The draft brief evidences a wildlife survey undertaken in 1999 which concluded that: *"Watchclose Woods is probably the single most valuable piece of wildlife habitat on the site"*

The Parish Council urges that Watchclose Woods be protected and retained as much as is possible in its natural condition.

The proximity of the woods to the proposed runway and the construction of two new balancing lagoons, one of which is designated as a containment for polluted water, will require extensive works within the woods. These works will have a major adverse impact upon the environmental integrity and habitat value of this wildlife site which has already suffered from recent unauthorised activity by WA Developments.

The Parish Council understands that a graduated reduction in the canopy height of Watchclose Woods is required by the Civil Aviation Authority. Such work, if undertaken with sensitivity to the nature of the site, may allow an appreciable recovery of natural cover. The Parish Council therefore requests that such works be kept to a minimum.

However, construction of the two lagoons will require full clearance of the area they will occupy, a significant proportion of the wood's total area. The Parish Council urges that the lagoons be re-located, perhaps near the pumping station to the north of the woods.

Although some environmental impact assessment has been made by the applicant the Parish Council notes the comments of Cumbria Wildlife in respect of the inadequacy of the assessment.

The proposed landscaping fails to mitigate the loss of habitat and does nothing to ameliorate any that may be fortunate enough to be retained.

The airports wider envelope embraces nationally and internationally important environmental and wildlife sites. As the proposed development will have impacts upon these the Parish Council believes that a more comprehensive and fully independent impact assessment should be made, to determine their severity.

Lighting:

The installation of new approach lights at the northern end of the runway will have a significant impact, even during the day upon homes in their illumination zone, especially in Irthington. As these lights will be very bright and mounted above ground level up to a height of 50 feet they will be highly visible and complaints from homes some distance from the airport should be expected.

These lights should be designed and installed in such a way as to avoid creating a nuisance to householders especially during the hours of darkness. The nuisance effect of these lights will be enhanced commensurately with their usage therefore a stringent condition restricting the number of night flights should be imposed. Local residents who suffer a nuisance from these lights must be adequately compensated by the applicant.

The rural area around Carlisle enjoys one of the least light polluted skies in Britain. The overall airport lighting requirement will generate a greatly enhanced level of sky-glow. Should permission be granted then strict conditions must be imposed at the outset, to limit light pollution to an absolute minimum.

Noise:

An elevated noise level from an increased frequency of air movements must be expected, but even if air movements are restricted the noise of ground based operations may become a nuisance to nearby residents and businesses. Ground running and ground testing of aircraft engines must be strictly controlled.

The applicant's Economic Appraisal forecasts 70-80 seat aircraft will, by 2016, carry approximately 200,000 passengers per year to and from the airport. This would mean slightly fewer than 7 aircraft movements per day. Although this number of daily passenger aircraft movements is low, the Parish Council is concerned that no meaningful projections appear to be made in respect of cargo handling.

Advances in design and technical innovation allow aircraft manufacturers to produce lighter airframes and engines, thus permitting larger aircraft with short take off and landing capability. The Parish Council is concerned that such advances in aircraft design and payload capability will allow progressively larger and noisier aircraft to operate from Carlisle Airport without any need to extend the runway or seek further consent.

The applicant has expressed a desire to secure a share of the cargo handling market by pursuing niche opportunities. If this strategy proves to be successful the daily number of cargo flights could significantly and very quickly exceed the number of passenger flights.

The Parish Council is concerned that a substantial and perhaps rapid increase in aircraft movements would result in elevated noise levels that would then have a detrimental impact upon the lives and well being of local people. Greater noise levels would also have adverse impact upon the peaceful rural nature of the setting of the Hadrian's Wall World heritage Site.

Should ESL be permitted to re-locate then both 24 hour warehousing and transport operations would be clearly audible over some distance, especially at night. These operations could easily generate sufficient levels of noise to become a nuisance to households within earshot of the source. The applicant should therefore make provision for mitigating such nuisance through the implementation of effective on site measures to suppress such noise, or by compensating any households proven to be affected.

Drainage and Disposal of Surface Water:

Extended hard surfacing and massively increased roof areas will create a significantly enhanced volume of surface water run-off. The intention appears to be to discharge surface water, via balancing lagoons and a series of outfalls and drainage ditches, to the Rivers Eden and Irthing, highways drains, and Irthington Waste Water Treatment Works.

Although the applicant's Flood Risk Assessment examines issues of fluvial and groundwater flooding and discusses run off rates for short periods during 30 and 100 year storm events, no mention seems to be made of fluvial flooding arising from prolonged spells of persistent rain over the massively increased impermeable surface areas which are proposed.

This, combined with ground saturation above the shallow layer of impermeable clay soil that underlies the site, may lead to surcharging of ditches and subsequent local flooding; especially if the drainage ditches, upon which much of the drainage system seems to rely, are restricted.

Large discharges of surface water are certainly possible via the proposed outfalls, which have an average diameter of approximately 30 inches (Flood Risk Assessment Drawing D116772 DR 01)

Much of the local agricultural drainage network that the proposed drainage scheme will utilise also drains land to the west and south of the airport, toward Newby East and Crosby-on-Eden. The Parish Council is concerned regarding the potential effect of greatly increased surface water discharges from the airport upon this local land drainage network and possible increases in local flooding in or around Crosby-on-Eden, a village which suffers from an entirely inadequate drainage system.

The Parish Council also notes the comments of United Utilities regarding the applicant's lack of clarity in respect of foul sewage disposal and the inability of the "tiny" waste water treatment works at Irthington to cope with increased discharges from the airport.

The Parish Council is further concerned regarding possible discharges of pollutants into the surface water drainage system and then into tributaries of the River Eden SAC.

Archaeology and the Hadrian's Wall World Heritage Site:

The airport has several important archaeological features including Watchclose Temporary Roman Camp a scheduled monument, The Stanegate Roman road, and evidence Neolithic settlement. English Heritage states that: *"The proposed development of Carlisle Airport affects an area of very high archaeological and historic sensitivity. English Heritage is particularly concerned about the potential impact of this development in the following areas:*

- *Directly on archaeological remains, including that of Watchclose Roman camp*

- *Indirectly on the setting of historic assets, including the Frontiers of the Roman Empire (Hadrian's Wall) World Heritage Site and other archaeological features such as Watchclose Camp."*

The Parish Council notes the comments of the County Council Archaeology Dept. that: *"The area of the proposed pumping station and two water lagoons on the western edge of the airport was not included in the archaeological evaluation."*

This is the area of Watchclose Woods and is of particular importance as the location of the Stanegate, the remains of which are believed to form an upstanding earthwork at this point. It is the view of English Heritage that if this earthwork is the remains of the Stanegate then it should be preserved in situ and not disturbed by development. The Parish Council fully supports this view.

It is of great concern to the Parish Council that due, to the applicant's failure to provide agreed and essential information, English Heritage has been unable to offer informed substantive advice on the proposal's impacts on setting.

The main building appears to have a proposed height of 65 – 70 feet or approximately 7 storeys, therefore the Parish Council wishes to draw attention to the comments of Hadrian's Wall Heritage Ltd that: *"UNESCO is particularly concerned about tall buildings within the buffer zones of World Heritage Sites."* and *"There was concern about the visual impact of hangars needed for a previous scheme that involved handling Boeing 737 aircraft and possibly larger ones, that would be equivalent to a 7 storey building,"*

It is also important to note the statement by the Chief Executive of Hadrian's Wall Heritage Ltd (HWHL) that: *"Without having seen the detailed design I can't comment, but provided that the proposed new buildings, particularly a possible hotel, are kept within a height scale (possibly two or three storeys) that is commensurate with the surroundings and minimises any visual impact on the WHS, HWHL would see this as consistent with protecting the values of the WHS."*

The Parish Council considers that the height and massing of the proposed building would have a severe detrimental impact upon the character and appearance of the Buffer Zone of Hadrian's Wall World Heritage Site and also would be greatly prejudicial to landscape views from the Ancient Monument itself;

Hayton Parish Council: does not wish to make any representations on the proposals;

Brampton Parish Council: the Parish Council is supportive of the development although is concerned at the proposal for a new junction along the A689;

Scaleby Parish Council: no response to consultation;

Civil Aviation Authority: has indicated no formal written response will be provided as planning consultations are now dealt with by the relevant operational airport. However, since the applicants are the operators of the Airport, CAA staff have been able to assist with "technical" enquiries directed to them on an informal basis;

Cumbria County Council (Strategic Planning Authority): a Report on the application was considered by the Development Control & Regulation Committee of the County Council on 22nd January. The Committee resolved to raise no objection to the proposals subject to the City Council having regard to the matters contained in the County Council Officer Report and including requirements for the developers to provide the following-

- additional bus services to serve the development at peak times; the cycle facilities and the inclusion of mode share and trip generation targets to be included in the Travel Plan; the reduction of the staff car parking facilities; the amendment of the access onto the A689 to a roundabout; further assessment of the impact of the traffic signals proposed on Laversdale Road and Irthington Road and undertake safety audits for the access and the proposed traffic signals on Irthington Road and Laversdale Road (Paragraphs 3.23 – 3.37 and Annex 1 & 2).
- a further archaeological investigation (pre determination), archaeological evaluation and the implementation of a programme of archaeological work in accordance with a written scheme agreed by the Local Planning Authority (Paragraphs 3.38 – 3.43 and Annex 1).
- an improved ecology survey and statement of the effects of the development on nature conservation interests both on and off site, an improved biodiversity protection, mitigation, compensation and enhancement package and the implementation of an agreed Biodiversity and Enhancement Plan (Paragraphs 3.44 – 3.53).
- Proposals to mitigate the adverse visual impact of the development and the provision of design and landscape measures to minimise the adverse impact on local landscape character and wildlife interests (Paragraphs 3.54 – 3.59).

The County Council may also wish, in the event that Carlisle City Council makes a contrary recommendation, to have further discussions at a joint Member meeting;

Ministry of Defence/Defence Estates: there is no safeguarding objection in relation to the Ministry's facilities at Eskdalemuir.

Subsequent to that comment, the Ministry was specifically asked to advise upon the potential impacts of the proposals on the MOD Electronic Warfare Training facilities at RAF Spadeadam. The response states that there are *"no concerns with the actual building of the new runway at Carlisle Airport but RAF Spadeadam would wish to be consulted on operations"*;

Development Services Planning & Housing Services - Access Officer: The following comments are made regarding accessibility issues:-

- Car parking should be provided as near to the building as possible.
- Lifts will need to comply with the provisions of AD Part M 3.29/3.34, regarding size, controls, voice notifications etc.
- Automatic doors, door widths, level thresholds and ramp details need to be considered.

- Low level reception details, the position of the reception desk, knee recesses, induction loops will be required.
- Signage into the building and around it.
- WC details - wheelchair accessible, ambulant disabled and extra wide will be required. Baby changing facilities.
- Ambulant disabled stairs will be required.
- Colour contrasting to walls, floors, ceilings, doors, leading edges of doors, door handles.
- Details of lobbies.
- Corridor width and door widths will have to be looked at.

The scheme is at an early stage at present but the final building will have to be fully compliant for Access for all. The designers should be aware of their duties and responsibilities and will have to give consideration to this in due course;

Dumfries & Galloway Regional Council: has no detailed comments other than to say that Dumfries and Galloway Council has been supportive of plans to develop Carlisle Airport over a number of years as it will support economic regeneration in this area;

Community Services - Environmental Quality: due to the nature of the proposal submitted there is a significant volume of information to review and examine. The Environmental Quality Section has considered the application details against its statutory guidance for air quality, contaminated land and statutory nuisance.

There is, however, limited information available to demonstrate the factors considered by the applicants in the determination of aviation noise impacts and it is anticipated that further information will be necessary to support the information that has been provided to date. This will include further particulars relating to likely daytime and night-time aircraft noise.

The Environmental Quality Section also advises that further information is required concerning the input data used in the prediction of baseline and forecast air traffic data to validate the information submitted. Information must also be supplied to confirm the types of aircraft that have been used to determine both current aircraft numbers (used in baseline data) and those used in the forecast data. Information must also be submitted of the actual levels of traffic using the present air space arrangement, as this is likely to be different to the baseline data. Documented information on the factors taken into consideration when forecasting growth in air traffic within the Environmental Statement Volume 1 Chapter 6 must also be provided.

It is noted that paragraph 6.16 of Chapter 6 advises of an increase in annual aircraft movement of 23%. Clarification is required whether this is a year on year increase or, if not, to which year this percentage increase has been predicted.

The applicant has also submitted information on operational ground noise. Prior to further comment on the information supplied, confirmation is required whether the appropriate subscript has been used for the noise levels quoted in table 6.7 of the Environmental Statement. Further information is also required regarding the input data used to determine the likely duration of ground noise sources as no

timescales/duration of such sources is provided.

The report provides limited information with reference to the current and future vision of the airport. In addition information is required about the contractual arrangement (existing and future predicted) between the airport and MOD, together with information on the protocols, roles and responsibilities of each to implement controls to mitigate against noise.

The environmental impact from Aviation is, however, a specialist field of work and it may be advisable for the Planning Authority to engage consultants experienced in this area of work, to assess, comment and advise on the noise impact arising from the application.

With regard to Air Quality there are two main pollutants that should be considered in respect of airport developments; these are Nitrogen Dioxide and Particulates (PM₁₀). Both are present in road traffic and aircraft emissions.

Government guidance, Local Air Quality Management Technical Guidance (TG03), sets out clear trigger criteria to assist local authorities in deciding whether an airport may present a risk to the health based air quality objectives (as set out in the Air Quality Regulations 2000) being exceeded for these two pollutants. In respect of Nitrogen Dioxide, the trigger criteria is 5 million passengers per annum (mppa) and for particulates the criteria is 10 mppa.

Note: An equivalence factor is provided in the guidance to convert freight to equivalent passengers per annum. Tonnes of freight is converted to an equivalent number of passengers using 100,000 tonnes = 1mppa.

Where predicted and projected figures approach these trigger levels then there is a potential for the health based objectives to be exceeded.

The information provided in Chapter 7, paragraph 7.77 of the Environmental Statement, quotes that (as a worst case scenario) the maximum total equivalent million passengers per annum by 2016 will be 0.3 which is clearly well below the trigger criteria mentioned above.

There is, however, very little detail within the Environmental Statement regarding how the mppa figures have been calculated/predicted and there is particular concern about the figures presented for the potential freight throughput. The assessment states that freight throughput will be equivalent to 0.1 mppa which, following TGO3 guidance, suggests an annual freight throughput of 10,000 tonnes per annum, which seems low. It is therefore recommended that further details are submitted to demonstrate that the passenger and freight throughput figures are 'robust'.

For road traffic the applicant has undertaken a modelling exercise to predict the impact of road traffic on relevant locations. The model used for the assessment is the Design Manual for Roads and Bridges (DMRB) and the modelling results are presented in the Environmental Statement, Volume 1, Chapter 7, Tables 7.14 and 7.15. The relevant receptors identified are detailed in Table 7.09 of the report. The prediction of Nitrogen Dioxide and Particulates (PM₁₀) concentrations have been carried out using the baseline year (2007) and year of opening (2009) data.

Before the Environmental Quality Section can comment on the results of the DMRB modelling, confirmation must be received from County Council Highways Department that the traffic data used in the modelling and derived from the transport assessment is acceptable. In addition details of the actual input data used for the assessment must also be supplied.

It has also been noted that the road traffic assessment focuses on the opening year rather than the assessment year of 2016. The report states, correctly, that emissions from road transport will reduce in the future due to improving vehicle technology. It is however necessary for a comparative analysis to be undertaken for the assessment year 2016 to take account of predictive traffic growth, with and without, the proposed development.

Planning Policy Statement 23 (PPS23) requires any proposed development to ensure *“that development is safe and suitable for use, for the purpose for which it is intended”*. As part of the planning process the developer must carry out an adequate investigation, in the form of a risk assessment to determine any land contamination, the pollutant linkages (sources, pathway, receptor) present, and represent this information in a conceptual model.

This risk assessment should also identify whether the development proposed will create new linkages and whether new vulnerable receptors (e.g. residents) will be established; the action needed to break linkages, avoid new linkages and deal with unacceptable risks should also be included.

Chapter 12, of the Environmental Statement, Volume 1 details the information available on land contamination as a result of a desk study and site walk over that was undertaken. This study is referred to as a Phase One, Environmental Assessment, Desk Study. In order for the developer to fulfil the requirements of PPS23, the developer must now submit a proposal for the carrying out of a Phase Two investigation.

This proposal should be agreed with the Local Planning Authority before commencement of any site works. The Phase Two intrusive ground investigations should include an investigation of both targeted and non-targeted sources, as well as, the various fuel storage tanks and other potential hot spots at the Airport, even though these fall outside of the area being developed. Ground gas and ground water monitoring proposals must also be included in the Phase Two investigation proposal.

Following approval by the Planning Authority and the undertaking of a Phase Two intrusive investigation, the developer must submit, and obtain agreement in writing from the Local Planning Authority to, a Remediation Scheme prior to the undertaking of any Remediation measures. Upon completion of Remediation measures a report must be submitted to the Local Planning Authority, which shall include the verification programme of post Remediation sampling and monitoring which is required to demonstrate that Remediation has been fully achieved.

It is anticipated that following the above approach to the identification and remediation of contaminated land will lead to successful mitigation of ground

contamination. If, however, ground contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted to and obtained written approval from the Local Planning Authority of a written addendum to the original remediation scheme. The addendum to the scheme must detail how this unsuspected contamination shall be dealt with.

The Council has a statutory duty to deal with lighting, which is causing a statutory nuisance. Light nuisance predominantly arises from glare and light spillage and in rural areas, where lighting is minimal, lighting at night can have a significant impact on adjacent and neighbouring residential properties. The Environmental Statement, Volume 1, Chapter 9, considers the visual impact of light from the development.

The report highlights the potential for lighting to cause visual intrusion during operation of the airport in times of darkness and low light levels. Chapter 9, Table 9.5 provides information on the properties likely to be affected by runway lighting and the report also discusses lighting from car parks and the mitigation measures which could be implemented. Prior to the implementation of any lighting, a competent lighting engineer should provide written documentation to substantiate that the type and location and positioning of lighting is unlikely to cause intrusion into neighbouring premises;

Community Services - Food, Health & Safety: has no comments to make on these proposals;

British Horse Society: no response to consultation;

Environment Agency (N Area (+ Waste Disp)): the Agency has been involved in pre- application discussions with the applicants' consulting engineers in the provision of information pertaining to the production of the Flood Risk Assessment (FRA) which is a component of the Environmental Statement (ES).

The site is located within Flood Zone 1 - Low Probability as defined in Table D.1 of Planning Policy Statement 25 - Development and Flood Risk (PPS 25).

The proposal to develop the existing airport could be classified as 'Less Vulnerable' as defined in Table D.2 of PPS 25. Within Flood Zone 1 all development types are appropriate in this Flood Zone.

However, according to the Agency's Flood Risk Standing Advice it should be consulted on FRA's for planning applications for operational development of 1 hectare or greater.

In Flood Zone 1, where the risk of flooding from rivers or the sea is classified as low, a Flood Risk Assessment is still required for this type of proposal but it should be focused on the management of surface water run-off. Development that increases the amount of impermeable surfaces can result in an increase of surface water run-off, which in turn can result in increased flood risk both on site and elsewhere within the catchment. This is particularly important for larger scale sites, which have the potential to generate large volumes of surface water run-off.

The Agency has advised that the management of surface water should be designed in accordance with the Environment Agency's Greenfield Run-off Criteria- A Specification Summary For Developers.

The FRA has been produced in accordance with the current guidance and adequately addresses the main areas of concern at this stage.

The FRA details an outline strategy for the management of surface water run-off generated by the proposed development. It is proposed that surface water run-off be managed by a combination of traditional and sustainable drainage techniques including balancing lagoons, swales and oversized pipes. Pending the results of further ground investigation, the Agency believes it may be possible to utilise infiltration techniques for clean uncontaminated surface water, which would assist in groundwater recharge.

The FRA adequately demonstrates at this stage that it should be possible to manage surface water run-off on a source, and site level basis, for the separate sub catchments within the site which contain the development areas, without exacerbating flood risk elsewhere. Additionally, the use of Sustainable Urban Drainage Systems (SUDS) techniques should improve the quality and reduce the quantity of surface water leaving the site that will be generated by the proposed development. The Agency, therefore, has no flood risk objections in principal to the development as proposed, providing the recommendations made in the FRA are taken forward into further detailed design work. A planning condition, relating to this aspect, is recommended.

The potential for land contamination as a result of previous airport activities should be investigated both beneath the building footprint and outside the building footprint where this is applicable. The site investigation works are required to refine the conceptualisation of risk, based on the existing desk study. A more detailed risk assessment based on impact to "Controlled Waters" can then be evaluated and appropriate remediation applied, as necessary, to the satisfaction of the Planning Authority.

The site investigation should target soils, perched groundwater, groundwater in the underlying aquifer and surface waters.

The likelihood of hot spots from localised contamination has been identified in the report in the vicinity of storage tanks, transformers and fuel spills. Areas of made ground will also require investigation in order to assess the degree of organic, inorganic and radiological contaminants.

A geophysical survey is recommended before intrusive investigations commence to ensure the potential for the presence of ordnance, structures, and made ground, from Ministry of Defence occupation have been assessed, and in order to help evaluate the most appropriate intrusive investigations.

Piling methodology will need to be agreed with the Agency to protect groundwater. SUDS design will be dependent on the findings of the ground investigation. SUDS are generally not acceptable on land identified as contaminated.

Two conditions relating to the investigation of potential contamination and the need for a method statement in relation to piling operations are recommended.

The Agency believes that Carlisle City Council will need to carry out an Assessment of Likely Significant Effect under the Habitats Regulations 1994.

In Volume 1 of the Environmental Statement sections 8.124, 8.125, 8.197, 8.214, 8.216 and 8.277 all appear potentially relevant to the Upper Solway Flats & Marshes SPA, Ramsar.

Additionally, section 8.191 refers to the otter interest on the River Irthing as being of "local value". This species is of European interest within the River Eden SAC (& hence on the River Irthing). There are no records for otters within the boundary of the airport, though there would be some potential for them to use some of the semi-natural habitats around the edge of the airport as holts or lying up sites. Further assessment of potentially impacted habitats is required. This might be considered relevant to the River Eden SAC and advice should be sought from Natural England.

Any discharges to watercourses leaving this site are potentially relevant to the River Eden SAC, and thus should also be included in the Assessment of Likely Significance and, if necessary, full Appropriate Assessment.

The re-use of treated (crushed or screened) inert waste materials on site will need to be in compliance with the Waste and Resources Action Programme (WRAP) protocol for the production of recycled aggregates from inert waste.

Any waste material that is brought onto the site for use in construction, e.g. as a sub base, must be done so in accordance with the relevant exemptions from the Waste Management Licensing Regulations.

Waste oils from aircraft maintenance and asbestos from demolition must be disposed of in accordance with the Hazardous Waste Regulations. Specifically the premises must be registered with the Agency prior to the removal of any more than 200 kg of hazardous waste off the site in any one year.

The developer must ensure that all waste arising on site that is removed from site for recycling or disposal is done so in accordance with the 'Duty of Care'. Specifically, all waste must be removed by a registered carrier to an appropriately licensed site with transfer notes being kept.

Brief reference is made to "waste management" in Section 15.5 of the Environmental Statement. Under ideal conditions a Site Waste Management Plan should be produced as a means of eliminating, reducing, or re-cycling waste arising as a result of construction and demolition waste. Whilst this is not yet mandatory the likelihood is that it will become so in April 2008, and will be considered industry best practice.

Paragraph 3 of Circular 3/99 states: *'when drawing up sewage proposals, the first presumption must always be to provide a system of foul drainage discharging into public sewer. This should be done in consultation with the sewage undertaker of the*

area'.

The Agency recommends that the developer liaises further with United Utilities in order to fully investigate the continued use of the existing connection to the public sewer network, and to discuss the possibility of the developer making a contribution to United Utilities for upgrading the existing infra-structure / works if required. The airport site currently has infrastructure / connection to the Irthington Waste Water Treatment network and this should be maintained.

If connection to the foul sewer network is shown not to be feasible, the Agency would consider a valid application for a consent to discharge treated sewage effluent. However, the application would have to be assessed under the Habitats Regulations.

The Environmental Statement details the means of treatment intended for contaminated drainage i.e. treatment lagoons. These lagoons ideally should be discharged to public foul sewer; however, any non-mains discharges from these facilities would require the formal legal consent of the Agency. Additionally, further information would also be required in relation to volume, nature of effluent and treatment methods employed.

The Agency acknowledges that planning consents and discharge consents are covered by separate legislation and that consents should seek to complement, and not to duplicate each other. However, PPS23 (Planning and Pollution Control) recommends close co-operation between planning authorities and regulating bodies. In this regard strong emphasis is placed on the need for pre-application and on-going application discussion particularly in relation to this aspect of the development.

Adequate bunding should be provided for all chemical/fuel/oil storage facilities.

Surface water drainage systems serving car/lorry parks should be provided with interceptors prior to discharge to watercourse. All vehicle washing facilities and freight loading/off-loading areas should have effluent containment or be connected to the foul sewer.

Run-off from runways, which have been treated with de-icer, should pass to foul sewer. If this is not possible, this run-off would need to be treated prior to discharge to a watercourse. These discharges would need to be consented by the Agency; therefore, details of the chemicals to be used, and the proposed treatment method, would need to be provided to the Agency at an early stage.

Three further conditions, relating to drainage and protection from pollution measures, are recommended;

United Utilities (former Norweb & NWWA): objects as it is not clear what the plans are for foul disposal and, if it were planned to connect to the present public sewer serving the site, it would discharge to the tiny Wastewater Treatment Works at Irthington which would be totally overwhelmed by the extended facilities at the airport.

Although the initial response made no reference to the available capacities of both the local water and electricity supplies, UU was asked to specifically address these matters in view of local concerns.

United Utilities has subsequently advised that, in providing its consultation response, all three of its service streams i.e. Electricity Distribution, Water Supply and Wastewater was consulted and both the Electricity and Water Supply units have advised that network reinforcement works would be required at the expense of the applicants but that UU does not *"have an overall Electricity Distribution or Water Supply capacity concern in feeding this development"*;

English Heritage - (Hist Bldg & Monuments): EH welcomes the fact that the applicant has undertaken considerable archaeological evaluation work. This has demonstrated that it should be possible to mitigate the impact of much of the new construction on archaeological remains. However, concern remains about the potential impact of some works, including the provision of lighting, fencing and tree felling, particularly on the line of the Stanegate Roman road. EH therefore advises that further details on the location and scope of such work should be provided by the applicant. This, together with the submission of the report on the archaeological evaluation work, will then allow EH to offer properly informed advice on the impact of the proposal on archaeological remains.

EH also considers there is not yet sufficient information to offer informed advice on the impacts on setting. The photomontages provided represent an incomplete set, missing out some key viewpoints agreed on site on 6th September 2007 with the consultants, and also because it appears that parts of the development, including the need for fencing and lighting, have not formed part of those images. This information is essential to an evaluation of the impact of the proposal on the Outstanding Universal Value of the World Heritage Site (WHS). EH, therefore, advises that the applicant should provide additional information, to enable more substantive advice to be given, before this application is determined.

English Heritage Advice:

The proposed development of Carlisle Airport affects an area of very high archaeological and historic sensitivity. English Heritage is particularly concerned about the potential impact of this development in the following areas:

- Directly on archaeological remains, including that of Watchclose Roman camp
- Indirectly on the setting of historic assets, including the Frontiers of the Roman Empire (Hadrian's Wall) World Heritage Site and other archaeological features such as Watchclose camp mentioned above

Direct Physical Impacts On Archaeological Sites And Remains:

EH understands that a programme of archaeological evaluation of the development area has been undertaken to examine the potential for the presence of non-scheduled archaeological remains here and that, as a result of this, the County Archaeologist is broadly satisfied with the mitigation measures proposed in the EIA to address the remains revealed by this work. In addition to this, EH also understands from the EIA that the site of Watchclose Roman camp, which is legally

protected as a scheduled ancient monument, will not be affected by the proposed development, being left beneath a section of the current runway which will remain intact. English Heritage welcomes this avoidance of direct impact on this nationally important archaeological site and supports the general approach to the mitigation proposals developed with the County Archaeologist. However, there remain a number of areas of concern with reference to direct impacts on archaeology, which need to be resolved-

- The proposed works will involve the felling of a plantation on the western side of the airport, in an area where it is acknowledged that an earthwork likely to represent the remains of the Stanegate Roman road exists. In the EIA it is proposed that further investigation of these earthworks takes place, and that no removal of tree roots will take place until this has been undertaken. In EH's view, if this earthwork is the remains of the Stanegate, it should be preserved in-situ and not disturbed by development. Therefore, while in EH's experience it is usually possible with care to fell a plantation without damage to the underlying archaeology, it is concerned about the potential impact of any root removal that is necessary. EH therefore seeks clarification as to whether removal of tree roots in this area is necessary, or whether the trees could simply be cut at ground level and their stumps left to rot, a process which would avoid an impact on the possible Roman road. If this is the case, EH advise that the methodology for felling this plantation could be dealt with by an appropriate condition.
- The EIA makes reference to the need for fencing, lighting, a fuel depot, screening planting, and storm water attenuation ponds. There is a concern that such works could involve a significant amount of ground disturbance, which could impact on important archaeological remains, including the earthworks of the possible line of the Stanegate at Buckjumping (site 37, table 11.12). EH needs further details of the location and extent of the ground disturbance that such development will involve, which is not discussed in any detail in the EIA, to allow the impact on archaeological remains to be evaluated. In addition, in order to provide fuller advice EH needs to see the full archaeological evaluation report on the site.

Indirect Impacts On The Historic Environment:

Although some photomontage material has been provided in the EIA, this does not in EH's view allow a informed assessment of the impact of the proposal on the historic environment, particularly the Frontiers of the Roman Empire (Hadrian's Wall) World Heritage Site. The issues EH see arising from what has been provided are-

- The copy of the EIA Figures does not include viewpoints 3, 6 and 10. Particularly with reference to the latter figure, this information is crucial in allowing an assessment of the impact of the proposal on the Outstanding Universal Value of the WHS
- The photomontages provided appear to only include the main development, and not items such as the boundary fencing, guidance and general lighting. In order to provide proper advice on the impact of the proposal on the WHS and wider historic environment, EH considers there is a need for the photomontages to be revised to reflect the full extent and type of development proposed

- Increased usage of Carlisle airport may increase noise levels within the WHS and affect peoples' ability to appreciate the site. EH advise that the Council should consider this issue in reaching a decision
- EH further advise that the Council should consider the balance between the economic advantages of the airport expansion and the effect of any increase in carbon footprint and its consequences for climate change. At present, evidence suggests that climate change has more detrimental than beneficial effects on the historic environment and asks the Council to take this issue into consideration in reaching a decision

Recommendation: it is recommended that the additional information described above should be submitted by the applicant to enable EH to provide substantive advice to the Council on the application. Until such information is available the determination of this application would be premature, and the Council is advised to defer a decision until it has that final advice. That said, EH appreciates the urgency of deciding the application and will provide its advice as soon as possible after receipt of additional information. EH wishes to know whether the Council agree with this course of action and is able to action it.

Supplementary to these comments the applicants' agents provided the further information sought, including additional photo-montages and a Method Statement in relation to works within Watchclose Woods. EH has considered these, required some further minor changes (including text changes in the Method Statement) and now advises that *"in summary, on the basis of the information provided and analysis of it English Heritage does not object to the development scheme subject to suitable conditions being imposed to cover the issues of tree felling and further archaeological works, and that consideration is given to the issues of noise impact on enjoyment of the WHS and the carbon footprint of the development"*;

Tynedale Council: the development proposed would have a significant impact on the locality of the site which occupies a prominent position in the open countryside. However, the district boundary is some distance from the application site and it is not considered that the interests of residents or businesses of Tynedale district would be negatively affected by this proposal. On this basis Tynedale Council raises no objections to the proposal;

Council for Protection of Rural England/Friends of the Lake District: FLD has a number of major concerns in relation to a variety of issues, as follows-

Consultation:

FLD express concern that the proposal is being 'rushed through'. Pre-application consultation has been inadequate, notably with regard to the engagement of environment bodies. The applicants note (Planning Policy and Position Statement, page 2) that FLD were involved in a pre-application stakeholder meeting. We were not given the opportunity to comment upon the proposals subsequently, however, despite assurances from the applicants and their agents. FLD are concerned that no Scoping Opinion was undertaken. In its view, a development of this magnitude should allow for realistic input from the public and statutory and non-statutory

bodies, and provide a variety of options. FLD are concerned that the proposal conflicts with the Council's own guidelines, as outlined in the Carlisle Statement of Community Involvement, in this respect.

Prematurity:

Revised Redeposit Local Plan Policies DP3 and EC20 both refer to the preparation of a Masterplan for the airport. DfT guidance (Guidance on the Preparation of Airport Master Plans, para. 14) would support the preparation of a Masterplan for Carlisle. It is clear, however, that no such plan has been prepared. FLD are concerned in this respect that the supporting information gives very little information as to the intensity of future levels of development, or the intentions for growth.

In FLD's view, a development such as this, which is of strategic significance, should not be assessed solely through the planning application process. Rather, it should form part of the Carlisle LDF. A Carlisle Airport Area Action Plan would provide a strategic framework for growth, providing the basis for an assessment of relative economic and environmental factors. The statutory framework for the preparation of LDF documents would also ensure that the concerns raised by FLD, and a significant number of other parties, regarding poor pre-application consultation and inadequate environmental assessment, were suitably addressed.

Local Environment:

The application site lies within an area which is extremely rich in natural and cultural environmental assets – a factor reflected in the number and variety of local, national, European and international designations covering the locality. Given the nature of this development therefore, which is likely to have significant impacts far beyond the boundary of the airport itself, it is particularly important for the wider effects upon these sensitive areas to be fully assessed.

FLD are concerned in this respect that the submitted Environmental Statement is limited in its scope. With regard to landscape and visual impact, the applicants' assessment is based upon assessment from viewpoints which are almost exclusively directly adjacent to the boundary of the site. This is inadequate in FLD's view.

The site lies largely within an area designated 5b 'Low Farmland' by the Cumbria Landscape Classification. The Classification identifies the predominant rural/agricultural nature of this landscape type, going on to highlight the '*creeping urbanisation around Carlisle which has intruded upon previously tranquil areas*' as a vulnerability to change.

Clearly, the existing development at the airport impacts upon the landscape character described above. It is felt however, that the current proposals would significantly intensify the adverse effects. In particular, there is nothing comparable on the existing airport site, or in the local area generally, to the warehouse/distribution/hangar/terminal building which comprises the main built element of the application. The size and nature of this building would make it particularly incongruous in the rural landscape. The large areas of parking, and lighting proposals would serve to exacerbate this significantly.

The site lies within the buffer zone of Hadrian's Wall World Heritage Site. Revised Redeposit Local Plan Policies LE6 and LE7 preclude development which would have an impact upon the setting of the site. Further investigations should be undertaken as to the impact upon the WHS, with additional viewpoints identified along the National Trail. The south western boundary lies partly within a County Landscape Area. Structure Plan Policy E36 and Revised Redeposit Local Plan Policy DP9 do not permit development and land use change detrimental to such designations. Further viewpoints should be identified within the County Landscape Area in order to fully assess impact.

The site lies in relatively close proximity to two AONBs; the Solway Coast approximately eight miles to the west, and the North Pennines approximately five miles to the east. It is key to assess the impact any intensification of flight numbers would have upon these areas. The applicants argue (Environmental Statement, 9.15) that visual impact from aeroplanes is only likely to be significant within a radius of 3.7 km, but go on to note that associated noise heightens the visual effect. Noise and visual impacts upon the AONBs should be fully assessed therefore. We would note in this respect that Revised Redeposit Local Plan Policy DP8 refers to AONBs *and their settings*.

FLD also highlight the issue of tranquillity. The CPRE have produced county level maps showing relative levels of tranquillity (available online). The draft RSS acknowledges the importance of tranquillity to rural areas in Policy DP7 (Panel Report, R3.9), which states:

The natural and built environment of rural areas should be promoted by;

- *Maintaining and enhancing the character of landscapes and settlements;*
- *Maintaining and enhancing the quantity and quality of biodiversity and habitat;*
- *Maintaining and enhancing the tranquillity of open countryside and rural areas;*
- *The efficient and prudent management of natural and man-made resources.*

FLD also refer to draft RSS Policy EM1 (as amended by the Panel Report, R8.2), Revised Redeposit Local Plan Policy CP1 and Structure Plan Policies ST3 and E34-37, which provide a strong statutory framework for the protection of the environment. On the basis of the evidence submitted, in FLD's view, the proposal conflicts with these policies.

Location:

The need to locate employment sites sustainably is a key principle of the Development Plan, and is reflected in a number of policies – notably Revised Redeposit Local Plan Policy DP1, Structure Plan Policy ST3, and draft RSS Policy DP5 (Panel Report, R3.7). Locations should be identified sequentially, with a preference for brownfield land in or close to the urban area, in order to minimise landscape impact, and maximise accessibility via variety of modes of transport. The site performs badly in this respect. Public transport links are poor, the site is not accessible by pedestrians, and the applicants' provision of only four cycle stands reflects their views upon the likelihood of accessibility via such means, despite their stated commitment to "inclusive access" (Design, Access and Utilities Statement,

3.01).

FLD objected to the allocation of the airport site in the revised Local Plan on the above grounds (Policy EC20 and latterly, DP3). We would note in this respect that the revised Local Plan has not been adopted, and our objection remains outstanding. Other bodies, including the National Trust, English Heritage and the Wildlife Trust also have objections outstanding to Policy DP3. This should be taken into account when considering the material weight to be given to the allocation in determining this application.

Notwithstanding this, the revised Local Plan Policies both specify that development should be airport related. The only justification for the relocation of Stobart's Carlisle base to the airport seems to be a potential interest in "air freight". This is given no further substance however, in any of the supporting documentation. Again, this gives additional rationale for the preparation of a Masterplan AAP for the airport.

In sustainable terms, we would note that Stobart's current site performs substantially better than the airport. It is located on the periphery of the urban area, close to Junction 44 – maximising accessibility by both the haulage fleet and employees, and minimising landscape impact. FLD would also stress that the current site could potentially offer very good access to the West Coast main line. Rail freight is clearly a much more sustainable means of transportation than air freight.

Climate Change & Sustainability:

PPS1 confirms that efficient use of resources is a cornerstone of the planning system. The draft North West RSS Vision (as amended by the Panel Report, R3.2) states that:

Development will be seen in a global context, and the region will attempt to 'live within its means' and contribute to the reduction of CO2 and greenhouse gas emissions.

This is reflected in Policy DP8 (Panel Report R3.10). We would note in this respect that short haul flights are, mile for mile, significantly more damaging to the environment than road or rail travel. Given these issues, any proposals for expansion in airport activity should be fully justified in economic terms, and considered against less environmentally damaging options. This is acknowledged in Structure Plan Policy ST4. FLD do not believe that such a case has been presented. As such, it is felt that the proposal fundamentally conflicts with the aforementioned policy approach.

Summary:

In FLD's view, this proposal raises a significant number of sustainable/environmental issues, and conflicts with a variety of Development Plan policies. The issues raised by FLD are encompassed within the underlying Spatial Principles applying to all development in the North West, as outlined in draft RSS Policy DP1 (as amended by the Panel Report, R3.3). Given this conflict, therefore, this application should be refused;

Cumbria Constabulary - Crime Prevention: from a security perspective, this application encompasses two elements – the redevelopment of the airport to provide freight and passenger facilities and the relocation of a heavy goods vehicle depot to the site. In the current climate of terrorist activity targeted against the public transport infrastructure, these proposals require additional specialised risk assessment. In this regard, TRANSEC, the Department for Transport Security Team must be included in the planning process. Consequently, this report addresses only the security issues raised by the proposed HGV depot, but the existence of the airport directly influences the recommendations given.

It is disappointing to note that the submitted Design and Access Statement did not include any specific reference to the implementation of any crime prevention measures. (S87 DCLG Circular 01/2006 'Guidance on Changes to the Development Control System').

At the time of writing, Cumbria Constabulary is still awaiting a reply from the Agent in response to queries regarding the proposed security measures.

Criminal activity against the road haulage industry remains prevalent throughout the county. Offences tend to be directed towards items of value being carried in HGV trailers and against tractor units or storage facilities to obtain diesel fuel. The rising retail price of diesel is the main driver for the latter activity.

Trailers are invariably attacked in lorry parks, motorway service areas or lay-byes. Tractor units tend to be attacked at their depots. Consequently, this Unit has been engaged in several initiatives to reduce these offences and in promoting the Safer Parking Scheme. Presently, the Night Owl Truck Stop at Parkhouse Road, Carlisle is the only accredited truck park in the county and the number and frequency of offences previously experienced has been significantly reduced.

Comments are provided in relation to specific aspects of the development-

Perimeter Security: The drawings supplied refer to chain link and steel mesh fences specified to BS 1722 part 10 (Specification for Anti-Intruder Fences in Chain Link and Welded Mesh - 2006) and fitted with hostile toppings. Fences to this specification are designed for enhanced protection against intruders.

This site should be considered as a high security risk and it therefore recommended that the perimeter fences should be specified to BS 1722 part 14 (Specification for Open Mesh Steel Panel – 2006) and fitted with hostile toppings. Fences to this specification are designed to prevent scaling and breaching (with the use of hand tools). The only suitable alternative to welded mesh fencing is the expanded metal type and high security products are available.

The depot should be completely isolated from the main airport activity, with access controls (such as rising bollards or sliding gates) implemented on the access road, to prevent unauthorised access. It is appreciated that this particular company encourages visits by hobby club members and other casual HGV 'spotters' to a specialised retail outlet. Visitors of this nature must be scrutinised prior to being granted admission and escorted at all times.

Security Lighting: Drawing 405006/5001 indicates the proposals for the external

lighting and CCTV camera layout (discussed separately below). Cumbria Constabulary has also been supplied with a document that gives a general indication of the lighting levels for the main access road, airport car parks, distribution area and main building exterior. Although it is appreciated these documents do not represent the definitive lighting specification, the Constabulary is satisfied that the lighting levels proposed are sufficient for security purposes. The light sources are metal halide examples and are compatible with CCTV for good colour rendition. The design of the lighting scheme is particularly challenging in that it must not impair air traffic operations.

CCTV: The above mentioned drawing also suggests the proposed CCTV camera layout. However, there is no indication of the actual specification of the equipment or intended purpose or how it shall be monitored. Consequently, a copy of the Cumbria Police CCTV Operational Requirement Guidance has been supplied to the Agent. It is recommended that the system shall be constantly monitored/operated by dedicated security personnel and compliant with BS 7958:2005. Consideration should also be given to the deployment of Automatic Number Plate Reader technology to the cameras observing the main access road. It is requested that a condition is imposed requiring that the CCTV system (including cameras within the airport interiors) shall comply with Operational Requirements.

Refueling Facilities: It appears that the aviation fuel farm and the HGV refueling facilities are not under direct CCTV surveillance. These areas should be monitored by CCTV and fitted with electronic anti-tamper detection equipment.

Intruder Alarm System: It is recommended that the buildings are fitted with a monitored IAS conforming to PD6662:2004 Grade 4 (High risk premises). The CCTV system should be capable of providing visual confirmation of any activation.

Specialist Anti-Burglary Measures: Specialist devices, such as alarm contaminant sprays or vapour generators can protect the warehouse facility. Further information can be provided on request.

Physical Security: It is recommended that security standard door and window products, including roller-shutters, are incorporated. The current standard is LPS 1175 (Loss Prevention Standard) and administered by the Loss Prevention Certification Board. For example, products certified to LPS 1175 SR 4 have been tested to resist a series of professional attacks, each lasting up to 30 minutes, using a wide variety of battery operated power tools. All locking devices deployed throughout the development should be security standard examples. Padlocks for gates or covers to utility or communication cabinets should conform to BS EN 12320 Grade 5 as a minimum requirement.

Property Marking: It is recommended that a property-marking programme is implemented for the entire site to make all permanent items identifiable and therefore traceable, reducing their value to the criminal fraternity. Specific information is available on request;

Development Services Planning & Housing Services - Local Plans: The planning policy context for the development at Carlisle Airport is not only set by the Local Plan but also by strategic, regional and national policy. Comments have,

therefore, been derived from each of these policy levels and respective relevant policy guidance which has led to the specific policy in the Local Plan.

In general, policies support airport development and expansion. There is, however, an emphasis for such development to be "airport-related". There are also other relevant issues that are specific to the location of Carlisle Airport such as the proximity of the Hadrian's Wall World Heritage Site. The salient policy documents are:

1. The Future of Air Transport White Paper (Dec 2003)

This White Paper contained a number of positive statements regarding plans to develop Carlisle Airport, notably that it has the potential to become a fully functional sub-regional airport offering passenger flights.

"8.24 Although Carlisle is not currently a significant commercial airport, it has had commercial services in the past, and plans have been put forward to invest in the airport with a view to providing new commercial flights serving Cumbria and the southern parts of Dumfries and Galloway and the Scottish Borders. There are no major local physical or environmental constraints, and there is support from a range of stakeholders for these proposals, with little opposition."

The scale of operation and potential growth has been an issue for a number of years in the endeavours to provide a service that will cater for business and residents throughout the Borders.

"8.25 Cumbria is more remote from access to air services than any other part of the UK with a comparable population. Services from Carlisle Airport would assist economic growth in the areas within its potential catchment, and in particular could improve access for high spending inbound tourists to the Lake District and the South West of Scotland. We therefore encourage the airport operator to bring forward proposals for the development of the airport, to be considered through the normal regional and local planning processes. "

2. PPG13 – Transport

Annex B of PPG13 specifically includes a section on aviation. The PPG was published in 2001 and is based on the White Paper, A New Deal for Transport: Better For Everyone (July 1998)

The White Paper announced the Government's intention to prepare a new UK "Airports Policy" looking some 30 years ahead and to develop this within the framework of the Government's sustainable development principles.

The White Paper suggests that when preparing development plans and in determining planning applications Local Planning Authorities should consider the extent to which development is related to the operation of the airport, and that it is sustainable given the prevailing and planned levels of public transport. In that respect the PPG identifies the following:

1. the operational needs of the airport includes runway and terminal facilities,

- aircraft maintenance and handling provision, and warehousing and distribution services related to goods passing through the airport;
- 2. related development appropriate to airports includes transport interchanges, administrative offices, short and long stay parking;
- 3. less directly related development includes hotels, conference and leisure facilities, offices and retail. For such activities, the relationship to the airport related business should be explicitly justified, be of an appropriate scale relative to core airport related business and be assessed against relevant policy elsewhere in planning policy guidance; and
- 4. non-related development which should be assessed against relevant policy elsewhere in planning guidance.

It appears from this application that we have the first three components although it is difficult to distinguish how much development is related specifically to the third category and whether any is considered under category 4.

3. RSS – adopted RPG13 Regional Planning Guidance for the North West

The main policy to consider in relation to RPG13 is Policy T5: The Region's Airports. This policy refers to other policies in RPG including the Core Development Principles and the Spatial Development Framework and the Economic Policies EC1-10. In this context the policy also includes the specific statement *"Development Plans should protect the existing use of Carlisle Airport and safeguard it for possible future increased use"*.

Para 10.17 expands upon the statement in the policy. It acknowledges that the area is one of the least well served in the UK suggesting there may be future potential for the airport to develop services. The paragraph goes on to state that future opportunities could include developing freight facilities. It also states that plans should protect the existing use to allow for future growth in air traffic.

Within the Spatial Strategy of the plan, Policy SD3: Key Towns and Cities recognises the role of Carlisle as a gateway or interchange for visitors to the region and the requirement for high quality facilities to support this role.

RSS (RPG13) has been under review, the Revised Version has been through an Examination in Public and the Secretary of State has received the Panel's report. Proposed Modifications are imminent.

4. RSS - The North West Plan (Draft)

Policy RT3: Airports of the Draft RSS (issued in January 2006) states that the Local Development Framework should identify and protect an appropriate Airport boundary for Carlisle Airport to allow for possible future use and expansion. Development that would impede the operational requirements of the Airport should not be permitted within this boundary. The context of this policy refers to The Future of Air Transport White Paper (Dec 2003).

Following the Examination in Public, the Panel has recommended that the first two sentences of paragraph 10.18 should read:

“Airports generate employment, attract businesses to the area, open up markets and encourage tourism. However, regionally significant business development that is not required for the operation of an airport should be located in accordance with the criteria set out in Policy W2”.

Also of relevance from the Panel recommendations is its reference to Policy RT7: Freight Transport where an addition is recommended to read:

“Local authorities should work with airport operators to facilitate the development of air freight at the region’s airports, in line with the White Paper ‘The Future of Air Transport’, particularly having regard to the need to minimise and mitigate environmental impacts (including night noise).”

This policy amendment, if accepted by the Secretary of State, is in line with the development of Carlisle Airport.

5. Cumbria and Lake District Joint Structure Plan 2001-2016 (April 2006)

Policy T26: Ports and Airports Facilities states that the role of the County’s ports and airports in generating economic activity will be sustained through the safeguarding of land required to development their operational role or related activities, improvements to access and the favourable consideration of proposals which enhance their viability. In particular in paragraph 5.9 the permanent establishment of scheduled air services via Carlisle Airport is supported. Additional development, which may help ensure the long term viability of the services, will also be supported.

In order to facilitate this, the Structure Plan also allocates a Strategic Employment Site at Carlisle Airport under Policy EM13. Strategic Employment Sites are defined in Figure 3 (page 28)

6. Carlisle District Local Plan (1997): Saved Policies

Proposal EM1: Employment Land states in relation to Carlisle Airport that:

Carlisle Airport (strategic/local employment sites)

The 22 hectares of land allocated for the development at Carlisle Airport were previously the subject of planning permission although this has now expired. The airport has potential as strategic site for inward investment and would therefore be suitable for industrial or commercial development with the need to be located at the airport. Both PPG 13 and paragraphs 5.33 and 5.35 and Regional Planning Guidance recognise the value of the airport-related development in providing business and light aviation facilities. In addition development that is airport or transport related with a requirement to be located at the airport, or which will meet the needs of local business in Brampton area will be considered favourably. Although the airport is located over four kilometres from the centre of Brampton, the airport does provide an opportunity for extensive employment users such as hauliers, for which there is no provision in Brampton”

To assist delivery of that policy objective, the City Council began the preparation of a Carlisle Airport Development Brief and a "draft" version was made available in

October 1999. Shortly it was prepared, the ownership of the airport changed and the new owners were consulted on the Brief. The new owners appointed consultants to develop a Masterplan for the Airport which was duly started but the ownership of the Airport changed again before the work was completed. As a consequence of these ownership changes the Development Brief was never finalised and it has, consequently, never been formally adopted as Supplementary Planning Guidance (SPG) as originally intended. Hence, the draft Development Brief, whilst providing some indication of expected locations for future consideration for development, has limited weight by virtue of two points: i) the date of preparation (albeit a large amount of information is factual and hasn't changed); and ii) the enactment of the provisions of the Planning & Compulsory Purchase Act 2004 which changed the concept of Supplementary Planning Guidance to Supplementary Planning Documents (SPD). It is anticipated that the process towards adoption of a Development Brief/Masterplan would have to be re-commenced (as a SPD) should the Council wish to reinstate the intention to prepare detailed planning guidance for the Airport development.

7. Carlisle District Local Plan 2001 –2016 Revised Redeposit Draft (Sept 2006)

Policy DP3 Carlisle Airport states that

"Proposals for development at Carlisle Airport will be supported where they are related to airport activities and in scale with the existing infrastructure and minimise any adverse impact on the surrounding environment. Proposals for larger scale redevelopment to facilitate an improved commercial operation will have to take into account the impact of development on uses outside the perimeter of the airport including nature conservation interests, the historic environment including Hadrian's Wall World Heritage Site, the existing highway network and road safety. A strategic employment site has been allocated in Proposal EC20.

Proposal EC20 of the Revised Redeposit Draft Plan reflects Policy EM1 of the adopted Carlisle Local Plan and makes reference to a Masterplan being prepared for the long-term Airport development. The site's previous owners appointed consultants to undertake its preparation but this did not result in its production, although the Masterplan was begun but not progressed. The current owners have elected to submit a planning application for the Airport development rather than await the preparation of a Masterplan (as SPD) since, as the policy (DP3) is not yet adopted, this would take at least 12 months before the SPD could be formally adopted and an application could be considered against it.

Therefore, planning policy acknowledges the importance of safeguarding of Carlisle Airport for airport-related development and air services. There is a recognition that some enabling development may be appropriate but that it should ideally be "airport related". The Council's draft Airport Development Brief identified those uses that could be considered to be "airport related".

The fact the Revised Local Plan is not yet adopted raises the question of material weight that it can be attributed. The Revised Redeposit Local Plan is currently before the Inspector and his binding report, following the Local Plan Inquiry held in the summer of 2007, is not due to be made public until mid-March 2008 and formally adoption will only follow some months later. In considering the current proposals,

account must, therefore, be taken of outstanding issues arising from unresolved objections to the Plan.

There are a number of objections that are outstanding but three are considered to be significant:

The first is from English Heritage. Due to the proximity of Hadrian's Wall World Heritage Site, EH is concerned about the impact any development may have, principally that the Local Plan proposal for the airport does not identify the location of the allocation and does not specify where the 21 hectares of land will be situated. This was partly due to the absence of a specific site being identified, due to the need to undertake additional archaeological survey work and to such site being required to minimise the potential impact on Hadrian's Wall. It is therefore suggested that, in the absence of resolving English Heritage's Local Plan objection, its' comments on this application are a significant consideration.

The second is from Mr J D Steel and there are two strands to his. The first is that, at this stage, Carlisle Airport does not have potential as a strategic site for inward investment since it has been superseded by Kingmoor Park and is in a sensitive location. The second is that the airport is within Hadrian's Wall World Heritage Site Buffer Zone and development will impact on this site. He requested deletion of the Carlisle Airport Policy, its allocation and text. Although Mr Steel indicated he intended to appear at the Local Plan Inquiry, he did not attend and provided no more information to expand on his objections.

The third objection was in relation to the additional text inserted at Revised Redeposit stage and arose from the Strategic Environmental Assessment. Consideration by the RSPB of the additional text led to its view that the airport could have a catastrophic effect on Biodiversity.

Other objections were either resolved, withdrawn or were related to wider issues in the plan; however one issue raised, and which will no doubt have been raised by the application, is that Irthington Wastewater Treatment Works is close to capacity.

8. Hadrian's Wall World Heritage Site

Hadrian's Wall is a World Heritage Site, which has been inscribed on to the UNESCO list of World Heritage Sites that are of universal significance. Although there are no visible physical remains of the wall above ground in the area of Carlisle Airport, as such, any potential application is undoubtedly likely to raise the interest of English Heritage, ICOMOSUK and potentially UNESCO.

The points raised about Hadrian's Wall World Heritage Site are made in the context of the Airport being located immediately to the south of Hadrian's Wall World Heritage Site itself but the whole of the Airport being within the buffer zone of the WHS.

Conclusions:

There is significant encouragement in Policy terms for airport development at Carlisle Airport although it must be stressed that this is "airport related"

development. All levels of policy support development at the Airport for "airport related" activities subject to environmental constraints, including the likely impact of development on the significance of the World Heritage Site. Given the outstanding objection to the Local Plan policy on these grounds from English Heritage, this needs to be addressed in considering this application.

As noted, in relation to PPG13, it is the third category of development which may raise any issues in policy terms. The scale of development proposed needs to be explicitly justified for it to be acceptable at the Airport. This is the first application that attempts to provide a means of delivering these policies and associated economic growth. It must, therefore, be clear what is required to enable this proposal to be implemented. Other policies in the Development Plan (whether regional, strategic or local level) requires development to be in Carlisle rather than at the Airport unless it is required to be in that location.

Finally, there is the issue of ensuring that, if permission is granted, the "airport related" development and scheduled flights are developed alongside or in advance of any non-airport or lesser-related development;

Northumberland County Council: does not wish to make any comment regarding the application but express interest in seeing how the application is further progressed;

Development Services Planning & Housing Services - Local Plans (Trees): the area has been left pretty much undisturbed for many years. It is for this reason that it has value as a wildlife habitat. Whilst areas of woodland such as Watchclose Wood may have little value as timber their value is as wildlife habitat. The loss of significant areas of trees and woodlands with only a small amount of boundary planting by way of mitigation is unacceptable. Further consideration should be given to the retention of this habitat or suitable mitigation measures.

Proposed landscaping: the proposed landscaping around the new terminal building and car parking is weak, sparse and populated by the same old suspects in relation to the choice of species.

Trees and the development: before any development commences the applicant should submit an arboricultural method statement which would give the methodology for the implementation of any aspect of development that has the potential to result in the loss or damage to trees. It is important that this contains information relating to the protection measures for the retained trees.

Following submission of further landscaping details the Tree Officer has advised that "the retention of a portion of Watch close Wood and the replacement planting by way of mitigation for the loss of some of the woodland is an improvement. However, it would be beneficial for wildlife/ecological reasons if the new planting was to connect to the existing woodland. This would aid the migration of plant and animal species to colonise the newly planted woodland area.

Integration into the landscape and better screening of the terminal building could be achieved both by the breaking up of the mass of the car parking areas by including trees in planting pits. The tree planting along the western side of the footpath to the

terminal building should be reflected on the eastern side. Similarly the tree planting to the southern side of the perimeter road opposite the lorry park should be reflected to the north side of the road. This could be continued around the end of the terminal building, although I am aware that there are some issues regarding height restrictions in the terminal area. Further landscaping to screen the terminal building at its western end would be appropriate.

The applicants addressed these concerns in revisions to the landscaping proposals and further review of planting mitigation measures;

Cumbria Fire Service: No objection to the application providing the development and operation of the facility is in accordance with current regulations covering fire safety issues, such as standards of on site airport fire cover, fire fighting water supplies, access for fire service appliances and cooperation and liaison with local authority fire service.

Cumbria County Council - (Highway Authority):

Traffic Generation and Assignment:

1. The volume of development traffic generated is based on the number of people currently employed by WA Developments and Eddie Stobart, together with estimated number of employees at the airport. This is an appropriate methodology.
2. The distribution of car trips, for the workforce, is based on the current Eddie Stobart/WA Developments trips. A larger proportion of development trips are assumed to turn left out of the site access than might be expected. For instance, it has been assumed that 32% of traffic to Carlisle will turn left out of the site access and use the A69 via Brampton bypass or Little Corby. The results of the assignment show 41% of all development traffic turning left out of the access junction. If it is assumed that all of the Carlisle, Penrith and Wigton traffic turns right out of the access junction then the split is changed to 16% left turn out and 84% right turn out. This would give a more rigorous assessment of the performance of the access junction.
3. The number of vehicle trips generated by air passengers has been estimated using the following assumptions:
 - a. 10 air passenger movements per day (5 in, 5 out)
 - b. Carrying capacity is 70 – 80 passengers
 - c. Average occupancy will be 65%
 - d. Average car occupancy will 2.6 passengers per vehicle
4. Subsequent analysis supplied by the applicant's consultant presents an estimated maximum number of car trips per plane movements of 31, compared to the previous figure of 19. This was on the assumption that the only variable to change would be plane occupancy. Whilst this level of increase is not significant, the results depend on the assumption that a maximum of two planes per hour will use the airport (1 in, 1 out). If more planes per hour use the airport, the traffic generated would increase proportionally.

5. Another potential variable is the average car occupancy – 2.6 has been used in the assessment. The current average car occupancy produced on the DfT Website is 1.44 and for commuting trips the figure is 1.16. If the commuting figure of 1.16 is applied, together with 100% occupancy of aircraft, the total volume of trips increases from 19 (1-way) to 65 (1-way). Clearly this is a more significant increase, particularly in terms of the performance of the site access junction.
6. In practice, the car occupancy will primarily depend on the journey purpose of passengers. The more passengers who use the service for business purposes the lower the average car occupancy is likely to be. The Civil Aviation Authority (CAA) carries out airport passenger surveys on a regular basis and the most recent survey available was carried out in 2005. This presents information on the average passenger group size measured across all transport modes. If it is assumed that this figure applies to passengers travelling by car to the airport then average car occupancy can be estimated. As might be expected the figures vary significantly across different airports. The highest figure of 2.25 – Bournemouth, is significantly lower than the estimate used in the assessment. The lowest figure observed was 1.33 – Aberdeen. If this figure is used, together with 100% aircraft occupancy, then the number of airport passenger car trips increases from 19 to 56.
7. For the assignment of air passengers, a wider catchment area has been assumed, but the same methodology as used previously has been applied. In this case, 75% of trips to Carlisle are assumed to turn left out of the site access. It has also been assumed that 23% of trips to the M6 south will turn left out of the site access and use the A69 via Brampton bypass. A more onerous test would be to assume that all Carlisle and M6 south traffic turns right out of the site access (which would result in 91% of air passenger traffic turning right at the site access).

Network Impact:

8. The developer has assessed the M6 junction 44, Linstock roundabout, the site access and the roundabout on the Brampton bypass. The modelling undertaken has demonstrated that the proposal will not have a significant impact on capacity for the M6 junction 44, Linstock roundabout and the Brampton bypass roundabout (A69/A689).
9. The site access proposed is a priority ghost island junction with two lanes on the minor approach. This has been assessed for capacity using PICADY. However, this has been carried out on the assumption that 41% of development traffic will turn left out of the access. As discussed previously, a more robust assessment would be to assume that 84% of trips will turn right. A manual adjustment of the PICADY results indicates that the impact of this would be to increase the RFC to approximately 0.86. On a rural road of this type it would be desirable to achieve a maximum RFC of 0.75 (ref: Design Manual for Roads and Bridges, TD 42/95). If the number of passenger trips is also underestimated then the proposed priority junction will be even more under capacity.

10. There are also potential safety issues associated with a priority junction at this location that have not been addressed. Traffic speeds on this section of the A689 are very high and there will be a significant number of slow moving HGVs turning right out of the site (130 per day in the design year). This is likely to result in accidents.
11. An alternative design for the site access, with traffic signals has also been presented in the TA, although no capacity assessment has been carried out. The traffic lights option also has safety concerns due to the speed of traffic on the A689. Current guidance on installation of traffic signals on high speed roads states that "Signal-controlled junctions are not recommended where the 85th percentile approach speed exceeds 65mph". Although the speed limit on this section of road is 60mph it is probable that the 85th percentile speed is greater than 65mph (no information on speeds on the A689 is presented in the report). Given this, it is considered that the site access is not a suitable location for the provision of traffic signals.
12. An alternative option for the site access junction would be to provide a roundabout. Roundabouts are the safest form of at-grade junction and are especially effective where heavy right turn movements occur.
13. From a preliminary examination of the site, a roundabout could be provided but it would need to be sufficiently large to allow for spacious two lane approaches on the A689 and generous splitter islands. Avoiding the land on the south side of the A689 will result in the roundabout being within 35-40m (approximately) of the roundabout within the development site. This may be too close to provide sufficient stacking capacity on the section of road between the two roundabouts and therefore it may be necessary to provide four lanes between the roundabouts, or alternatively to replace the internal roundabout with a different form of junction control.
14. The developer is proposing to install signals on both Laversdale and Irthington Road to stop traffic when the extended runway is in operation although not both at the same time. The worst case impact of this has been assessed by assuming that all traffic is stopped for a maximum of 5 minutes.
15. This assessment has been carried out using 2007 observed flows. However, this assessment should also have been undertaken using 2019 design year flows. In addition the assessment has been carried out assuming a flat arrival rate over the peak hour for traffic. It should be repeated using a more realistic arrival pattern that allows for greater fluctuations such as the arrival patterns used within ARCADY/PICADY. For both roads, a single peak period has been assessed (AM for Laversdale Road and PM for Irthington Road) instead of undertaking the assessment over both peak periods for both roads. While this is unlikely to make a significant difference for Laversdale Road and Irthington Road northbound as a large amount of reserve capacity is available, on the Irthington Road southbound however there is only 15m of reserve space available. It would only take one additional HGV or three additional cars to use up this space. It is therefore necessary that the assessment for Irthington Road be re-done taking into the above comments.

Subsequent to the above, the applicants have produced revised junction details for the main access from the A689 showing it now proposed to be formed as a roundabout. The Highway Authority has advised that subject to a detailed design, and safety audit, that alternative access is acceptable although some re-configuration of the internal road system may need to be undertaken as the distances between the "main" roundabout and the internal "roundabout" appear to be inadequate;

Economic & Community Development Services- Tourism Officer: Cumbria Tourism has responded positively to the development of the Airport - particularly when it is to be called the Lake District Airport. However from Carlisle's tourism perspective as well, it is to be welcomed. The attraction of in bound flights will provide an exceptionally important new artery for visitors to access our area, and indeed the whole of Cumbria, from parts of the country, along with overseas countries, which are normally out of reach for short breaks. Outbound flights too could lead to overnight stays in the area whilst passengers await flight connections. In addition to the economic benefit of providing more visitors the operation of a regional airport will also raise the profile of the City and surrounding area, which in turn inevitably leads to increased investment and interest in Carlisle's tourism product;

Community Services - Drainage Engineer: there is no indication of the applicants' intentions regarding foul drainage and it is assumed this is to the foul sewer. A detailed surface water assessment has been submitted but the applicant must ensure that this complies with the requirements of the discharge requested by the Environment Agency. United Utilities should be contacted by the applicants regarding sewers which cross the site. There is no knowledge of flooding at this site;

Development Services Planning & Housing Services - Conservation/Peter Messenger: no comments received;

Cumbria Wildlife Trust: Cumbria Wildlife Trust objects to this application on the following grounds:

- Loss of breeding bird territories and damage to the value of the Carlisle Airport County Wildlife Site
- Potential offsite effects of the safeguarding area on conservation works and internationally protected site
- Potential direct impacts on the River Eden SAC and on Solway Firth SPA/Ramsar international sites feature species
- Removal of most of the woodland from the site, including Watchclose Woods
- Loss of over 5km of hedgerow
- Wholly inadequate provision of ecological information
- Wholly inadequate mitigation for loss of habitat for bats, great crested newts and birds and no survey for reptiles or invertebrates
- Lack of meaningful mitigation proposed for loss of habitat (woodland, hedgerow and grassland)
- Sustainability and climate change issues

The Environmental Statement (ES) submitted in support of this application is inadequate to determine the potential effect of the development on the biodiversity of the site and its surroundings. Little or no mitigation for the effects of the development is proposed, and the ES undervalues or does not value at all the high conservation interest of the Airport site. The rest of this letter lays out our concerns about the application on a legal, policy and sustainability basis. We do not consider that this application can be determined in its current form in the light of the inadequate information provided in the Environmental Statement.

Legal issues:

1. Birds

The proposed airport development is likely to have a significant impact on the pink footed geese and whooper swan wintering population of the Upper Solway Flats and Marshes SPA (Special Protection Area). These two species of birds are qualifying species of the SPA and they use the area surrounding the airfield for feeding. This means that they are "functionally linked" to the SPA. And therefore it is likely that the Habitat Regulations will apply meaning that an Appropriate Assessment will need to be carried out by the Competent Authority (Carlisle City Council). The survey data presented with the planning application appears inadequate to inform the Appropriate Assessment. There were no vantage point surveys undertaken, and from the data provided it will not be possible to ascertain which other bird species occur in important numbers close to the development area.

2. Bats, Great Crested Newts and reptiles

The information provided in the Environmental Statement about bats and great crested newts is inadequate and there has been no survey at all for reptiles even though the site characteristics indicate that it could have slow worm, common lizard and adder. As the applicant did not request a scoping opinion from any of the ecological organisations in Cumbria, we were unable to raise this point at the pre-application stage. Detailed mitigation for loss of habitat for great crested newts, and also loss of hibernacula and foraging habitat for bats has not been addressed in the Environmental Statement. Both bats and great crested newts are protected under the Conservation (Natural Habitat &c.) Regulations 1994 (Habitat Regulations) and bats, great crested newts and reptiles are all protected under the Wildlife and Countryside Act 1981. The NERC Act Under section 40 of the Natural Environment and Rural Communities Act (NERC) 2006 "Every public authority must, in exercising its functions have regard, so far as is consistent with the proper exercise of those functions, to the purposes of conserving biodiversity". This application is asking the Planning Authority to exercise its functions on the basis of inadequate or non-existent ecological information, and offers little or no mitigation for the acknowledged biodiversity losses.

Policies which this application goes against:

PPS 1 Key Principle 19 says that Plan policies and planning decisions should be based on:

- up-to-date information on the environmental characteristics of the area;

- the potential impacts, positive as well as negative, on the environment of development proposals (whether direct, indirect, cumulative, long-term or short-term); and,
- recognition of the limits of the environment to accept further development without irreversible damage.

Cumbria Wildlife Trust does not consider that the Environmental Statement provides comprehensive up-to-date information on the environmental/nature conservation characteristics of the area (see comment below for PPS9). We consider that the application downplays the potential long term adverse effects of the development on the environment as it does not adequately address CO2 emissions or climate change. We also think that the Environmental Statement also underplays the potential adverse consequences of a fuel spill or accident for the internationally protected Eden and Tributaries Special Area of Conservation and cumulatively with local wind farm development on the bird features of the Solway Flats and Marshes Special Protection Area.

PPS9 Key Principle (i) says that Development plan policies and planning decisions should be based upon up-to-date information about the environmental characteristics of their areas.

There has been no survey for reptiles or invertebrates on the application site. The survey for birds was too narrow to properly inform the Environmental Statement lacking both vantage point surveys and survey of the surrounding area for bird species linked to the SPA that would be using neighbouring land thus crossing the airport site. The surveys for bats and great crested newts also appear to be inadequate.

PPS9 Key Principle (ii) requires that planning decision should maintain, enhance, restore or add biodiversity interests and to ensure that appropriate weight is given to designated sites, protected species and biodiversity within the wider environment.

This application does not give appropriate weight to the extensive biodiversity interests both on an off site, and seeks to underplay the value of the species, habitats and sites that are to be affected by the development. The summary impact table (Appendix 8G) in particular undervalues the importance of the County Wildlife Site, protected species and bird territories found at the airport site. Cumbria Wildlife Trust disagrees with the developer's assessments of significance of effect of the development for the majority of habitats, sites and species discussed in the table. For a scheme that will impact so heavily on conservation interests on the site, Cumbria Wildlife Trust is extremely disappointed with the almost complete lack of mitigation for the losses that will come about through the development.

PPS9 Key Principle (vi) indicates if significant harm to the interests cannot be avoided by locating to any alternative sites, then adequate mitigation should be put in place before planning permission is granted. If significant harm cannot be mitigated, appropriate compensation should be sought. If significant harm cannot be prevented, mitigated against, or compensated for, then planning permission should be refused.

Significant harm to biodiversity interests will take place if this development goes

ahead. It has not been demonstrated that adequate mitigation will be put in place. The lack of understanding by the developer of the potential sensitivity of the site is highlighted when it is argued in Appendix 8G that they have no duty to mitigate for the loss of habitat for birds.

It is our view that significant and undeniable harm to biodiversity will occur if this application is granted permission. Therefore, in accordance with national planning policy this application must be refused in its current form.

PPS9 paragraph 12 seeks to maintain networks of natural habitats by avoiding or repairing fragmentation of natural habitats, to achieve Regulation 37 (1) of the Habitats Regulations 1994, as amended.

This application will cause the further fragmentation of many natural habitats, including woodland, hedgerow and semi-improved and marshy grassland.

PPS9 paragraph 13 requires planning authorities and developers to retain, or incorporate into development, wildlife interest that has developed on previously developed land.

The wildlife interest on previously developed land includes bats using old buildings in Watchclose Woods which are scheduled for removal.

PPS 9 paragraph 14 requires planning authorities to maximise opportunities for building in beneficial biodiversity features as part of good design in and around developments, using planning obligations where appropriate.

This application is singularly lacking in building in biodiversity features. The only "building in" that is mentioned is refugia for great crested newts of which no further details are given. The applicant indicates that landscape planting will make up for the loss of trees and hedgerows, however, the proposed landscaping is nowhere near extensive enough to provide mitigation for the loss of woodland and hedges, let alone building in extra biodiversity benefit.

PPS9 paragraph 16 requires planning authorities to take measures to protect the habitats of UK priority species from further decline, and to ensure that these species are protected from the adverse effects of development, by using planning conditions or obligations, where appropriate. Planning authorities should refuse permission where harm would result unless the need for, and benefits of, the development clearly outweigh the harm.

The habitats for UK priority species found at the Carlisle Airport site and surrounding it will not be protected by this application, many of them will be lost. Some priority species have not even been surveyed for (e.g. reptiles, invertebrates) so there is no way of knowing how much of their habitat will be damaged or destroyed by this proposed development. The list of priority species can be found at www.ukbap.org.uk.

Cumbria and the Lake District Joint Structure Plan Policy E34: Areas and features of national and international conservation importance. Development and other land use changes in areas or features of national or international conservation importance, or

within their settings, and that are detrimental to their characteristics will not be permitted.

This development is likely to have an adverse effect on the interest features of the Solway Flats and Marshes SPA. There is not enough information provided in the Environmental Statement for Carlisle City Council to reasonably undertake an Appropriate Assessment on the effects of the proposed development on the SPA feature wildfowl. More information on both the movement of birds, and also on the effects of proposed actions taken in the safeguarding zone to “discourage” birds will be needed.

More information about the potential effects of the development on the Eden SAC and its interest features (particularly otters) will be needed. The significance of otter is far more than “local” as stated in Appendix 8G as otter is an internationally protected species and an interest feature of an internationally protected site. We are extremely concerned by the statement in the Summary Impact Table that the potential impact on the Eden SAC of pollution, either temporary or worse case scenario is “Not Significant”. We fundamentally disagree with this assessment and would question the methods the consultants used to make this assessment.

The White Moss SSSI is liable to be at threat of water pollution from every day working practises at the site. A recent visit to the site found the fire practise zone in Watchclose Woods to have an uncontained oil spill which is likely to be leaking through the fractured concrete base into the water table and from there into the SSSI. This standard of management does not inspire confidence in Stobart Air or W. A Developments Ltd ability to run an airport and prevent pollution and damage to the local environment.

Cumbria and the Lake District Joint Structure Plan Policy E35: Areas and Features of nature conservation interests other than those of national and international conservation importance. Development and other land use changes that are detrimental to these nature conservation interests will not be permitted unless the harm caused to the value of those interests is outweighed by the need for the development. Where development is permitted the loss of nature conservation interest should be minimised and, where practicable, mitigation should be provided.

The proposed development will be taking place in a County Wildlife Site and harming many of the features for which the County Wildlife Site was designated. There is little or no mitigation proposed to balance the loss of breeding and wintering bird habitat on the airport site or for the loss of woodland, so at the moment this application is contrary to Policy E35 as the loss of nature conservation interest is of high magnitude and there is inadequate or no compensation proposed in the Environmental Statement to mitigate for the losses of habitats and species.

Policy CP1 of the Carlisle Local Plan: Proposals for development in the rural area must seek to conserve and enhance the special features and diversity of the different landscape character areas. Such proposals should not harm the integrity of the biodiversity resource as judged by key nature conservation principles, and proposals should seek to conserve and enhance the biodiversity value of areas which they affect.

This development will harm the integrity of the biodiversity resource as judged by key nature conservation principles (see PPS9 above). The biodiversity resource of the application area will be damaged by the development rather than enhanced as there is little mitigation proposed by the developers. This loss includes loss of 12.4ha of semi-improved and marshy grassland and 18.24 ha of improved grassland currently used by wintering birds, loss of approximately 8.5ha of woodland and scrub and loss of 5km of hedgerows currently used by breeding birds and bats. The wildlife trust strongly disagree with the concluding paragraph (8.287) particularly the assertion that “impacts are only of negligible adverse effect at most.”

Policy CP2 of the Carlisle Local Plan indicates that ... In order to protect and integrate existing trees and edges within new development, the City Council will resist proposals which cause unacceptable tree loss, and which do not allow for the successful integration of existing trees identified in the tree survey....

This application will not integrate the majority of trees on the site into the development as the Environmental Statement indicates that 84.27% will be felled. The application will also lead to the loss of approximately 5km of hedgerow which currently exists on the site.

Policy CP4 Design: The suitability of any new development or redevelopment will be assessed against the following design principles. Proposals should

Ensure where possible the retention of existing trees, shrubs, hedges and other wildlife habitats and the replacement of any environmental feature lost to development.

As it currently stands, this development does not ensure the retention of existing trees, shrubs etc and is not actively replacing the environmental features which are to be lost to the development. There were no alternative options presented to demonstrate that more woodland and hedgerow could not be retained.

Policies LE2 and LE3 (International Sites and SSSIs) of the Carlisle Local Plan See comments for Policy EC34 of the Joint Structure Plan

Policy LE4 of the Carlisle Local Plan Other Nature Conservation Sites Development which would have a detrimental effect on Regionally Important Geological/Geomorphological Sites, County Wildlife Sites and other sites of nature conservation significance, Local Nature Reserves and Ancient Woodlands will not be permitted unless:

1. The harm caused to the value of those interests is clearly outweighed by the need for the development; and
2. Where practical, any environmental feature lost is replaced with an equivalent feature.

Carlisle Airport was designated as a County Wildlife Site in 1999, for the number and species of birds which use the grassland of the airport for breeding, feeding and loafing. The proposed development will hugely reduce the amount of grassland that can be used by the birds, and active bird scaring

will further reduce the numbers of birds able to use the County Wildlife Site. The proposed development is extremely damaging to the Carlisle Airport County Wildlife Site. There are no actions proposed in the Environmental Statement to mitigate for the loss proposed in the environmental statement.

Sustainability:

Cumbria Wildlife Trust does not believe that the development of Carlisle Airport is sustainable. The true meaning of sustainability as defined by Gro Harland Bundtland is about balancing economic and environmental needs today without prejudicing the needs of future generations, it is not, as is put forward by the Environmental Statement document in Sections 3 and 4, purely about sustaining economic growth. There is a common problem that arises from confusing the noun 'sustainability' with the adjective 'sustainable'. Sustainable simply means 'capable of enduring' and is often used as a prefix to infer a link to sustainability that often is not justified. The problem is that in this context what is often being described is a process that will continue to create jobs or simply keep on making a return on investment; and whilst these aims may be perfectly laudable, in reality they have very little to do with intergenerational equity. Sustainable economic development that does not damage the quality of the lives of future generation is something to strive for. The foreword of 'Securing the Future - UK Government sustainable development strategy', provides an understanding of the approach that is necessary to meet sustainable development targets:

"Make the wrong choices now and future generations will live with changed climate, depleted resources and without the green space and biodiversity that contribute both to our standard of living and our quality of life".

This application cannot be described as sustainable by any correct use of the term.

When consulted on the Strategic Environmental Assessment (SEA) of the Carlisle Local Plan in 2006, Cumbria Wildlife Trust made the comment that the principle of airport expansion in Carlisle was unsustainable and against SEA Objectives 1 and 7. Our comments (which are attached) were not included in the Strategic Environmental Assessment and the issue was not addressed in the published document.

Air travel and air freight is one of the fastest growing contributors to climate change. Developing Carlisle Airport to increase scheduled and air freight flights will increase the emissions of gases which contribute to climate change. In light of the Stern report into the economic effects of climate change, people should be looking to travel less by air where at all possible, and local authorities should be encouraging people to choose less damaging travel options. Mile for mile, short haul flights are the most polluting for CO₂ and other greenhouse gases Carlisle already has good train links to London; there should be no reason why Carlisle Airport need to be developed to accommodate flights to and from London and other short haul destinations when there are other less environmentally damaging transport options available which are just as convenient. Air freight is also an increasing contributor to climate change, and the sort of short haul air freight flights that will be made from Carlisle Airport will be far more damaging to the environment than road or rail freight haulage.

As a signatory to the Nottingham Declaration on Climate Change, Carlisle City Council should refuse this application on the grounds of its potential to increase the emissions of greenhouse gases.

Other comments about this application:

The pre-application consultation process by the developer was extremely poor. Cumbria Wildlife Trust were not invited to put forward their opinions in a Scoping Opinion process which in light of the fact that the application site is entirely within a County Wildlife Site is very poor practise. CWT was invited to one pre-application meeting where it was claimed that there had been consultation with Cumbria Wildlife Trust, Natural England, RSPB and Friends of the Lake District. This in fact is not the case, and it appears that there was very little pre-application consultation with Natural England, the statutory body for biodiversity let alone with any of the other conservation organisations. Also the claim in section 8A.23 that Natural England and the RSPB have been consulted throughout and are continuing to be consulted with regard to mitigation is incorrect and has not happened. CWT was not asked for its opinions at any point pre-application, and it is its belief that this application is weakened because of a lack of proper scoping. A request for data is not consultation or scoping.

The application is sloppy and badly written. There are at least two sections in the document referring to Hull and the Humber (paragraph 8A.22 and table 9C.1) which indicates that parts of the document are copied and pasted.

CWT is concerned about the potential effects that the 13km radius Safeguarding Zone will have on conservation for birds within the area. There are a number of reserves owned by CWT and by the RSPB within the Safeguarding Zone where works have been undertaken in the past to enhance the habitat for birds.

CWT is also concerned that it will be prevented from enhancing nature reserves by more rigorous enforcement of the Zone. It are also concerned that this safeguarding zone will have a detrimental impact on conservation efforts on the Internationally Protected SPA sites, and therefore have an overall detrimental effect on their integrity. The Appropriate Assessment to be carried out by Carlisle City Council will need to look into this issue.

Cumbria Wildlife Trust disagrees with much of the assessment of the significance of effect for various activities in the Summary Impact Table in Appendix 8G. Many of the activities which will cause damage to biodiversity are shown as being of no significant effect, such as loss of habitat supporting breeding/wintering birds, disturbance of otters and the possible impact of the total destruction of a SAC by a pollution incident.

Other acknowledged effects are seen as negligible, such as the demolition of a bat roost and loss of bat foraging habitat, both of which affect an internationally protected species. We would question the process that the consultants used to come up with these statements and would likewise question their validity.

Section 8A.6 seems to indicate that protected species are not of conservation

importance. CWT regards this paragraph as nonsense as it is hard to think of occasions where deliberately reducing populations of protected species would not result in a loss of biodiversity; and with regards to a European Protected Species, a licence to disturb the animal or damage a resting place can only be granted if the population is maintained at favourable conservation status.

The Environmental Statement is deficient in a number of areas and CWT considers that these deficiencies must be addressed before determination. The list includes:

- A full bat survey is needed with description of habitat usage and flight routes, and full mitigation plans should be submitted. The effect of lighting on bats should also be addressed
- An improved great crested newt survey with description of habitat usage and full mitigation proposals
- Improved over-wintering bird survey
- An assessment of other species interests on the site, particularly reptiles, butterflies and other invertebrates that may be affected by the proposed development
- An improved statement of exactly where habitat will be lost and mitigation and compensatory habitat enhancement or habitat creation (including management) to make up for the losses
- Improved information regarding the impacts of the development on SAC/SPA features to enable Carlisle City Council to determine any impacts on the integrity of these internationally protected sites through Appropriate Assessment

In conclusion, CWT calls for Carlisle City Council to refuse this application on the basis of inadequate environmental information, possible harm to internationally protected sites and species, irreversible damage to a County Wildlife Site and totally inadequate mitigation for the acknowledged biodiversity losses. All of these deficiencies are contrary to National Policy which calls for an application to be refused on the basis of lack of information, and damage to biodiversity without mitigation for its loss. It also calls for the application to be refused on sustainability grounds due to the increased CO₂ and other greenhouse gas emissions that airport expansion is likely to bring in the future;

Cumbria County Council - (Archaeological Services): Carlisle Airport contains features of high archaeological importance and lies in an area of archaeological potential. The Scheduled Monument of Watchclose Temporary Roman Camp (Scheduled Monument no. 26028) lies within the perimeter of the airport and forms part of Hadrian's Wall World Heritage Site. Hadrian's Wall and vallum are situated immediately north of the airport and the visual impact zone of the World Heritage Site covers the whole site. The course of Stanegate Roman road (Historic Environment Record no. 5781) crosses the airport and evidence for Neolithic settlement has been revealed during an archaeological investigation nearby (HER no. 18978). It is noted that English Heritage has been consulted on the application and will provide advice regarding the impact of the proposed development on the World Heritage Site and the Scheduled Monument.

As a result of the high archaeological significance and potential of the site, a programme of extensive archaeological evaluation has been undertaken prior to the submission of this application. The results of this evaluation work have identified an

area of the site that contains evidence of prehistoric activity. These significant archaeological remains will be destroyed by the proposed development and the recommendations in the Environmental Statement, that they should be the subject of a programme of archaeological excavation, post-excavation assessment, analysis, and publication to provide an appropriate record, is supported.

The recommendations of the Environmental Statement, that there should be an archaeological watching brief on any significant ground works associated with the erection of the approach lights to the east and west of the airport and the erection of the security fencing on the south side of the airport, are also accepted. Furthermore, it is confirmed that the level of recording recommended for the air traffic control tower, Watchclose Farm, and air raid shelter is appropriate.

The area of the proposed pumping station and two water lagoons on the western edge of the airport was not included in the archaeological evaluation and is ignored by the Environmental Statement. This area has a high potential to contain prehistoric remains, as it lies adjacent to the Neolithic features and finds identified during an archaeological investigation. This area should therefore be the subject of an archaeological evaluation to determine the impact of the proposed development on any archaeological remains. Given the results of the evaluation over the rest of the site and the high likelihood of modern disturbance, it is recommended that this work is undertaken as a condition of any planning consent. The scope of any further archaeological work in this area would be dependant upon the results of the evaluation but if significant remains are revealed they should be the subject of a programme of archaeological excavation, post-excavation assessment, analysis, and publication.

One issue where clarification is sought concerns the extent to which the ground will be disturbed during the proposed works to the trees in Watchclose Woods. The line of Stanegate Roman road is believed to survive as an upstanding earthwork in the woods and, if this proves to be the case, it may be considered of sufficient importance to warrant preservation in situ, given Stanegate's association with the Hadrian's Wall World Heritage Site. The Environmental Statement recommends that no tree root systems are to be removed from Watchclose Woods before archaeological investigations are undertaken to demonstrate the presence or absence of the road. However, if the proposed work to the trees will require ground disturbance as part of the development, it is recommended that these archaeological investigations are carried out prior to the determination of the application. An informed judgement can then be made as to whether any planning consent will need to include provisions for the recording and, more importantly, the preservation of these potentially significant archaeological remains in situ.

Subsequent to the foregoing comments, the applicants provided a Method Statement and a revised plan identifying an area of Watchclose Woods that would be retained. The Method Statement identified that tree stumps and roots would remain in the ground during tree felling to minimise ground disturbance. Provision is also made for protection of the earthworks of Stanegate.

Subject to some changes in the terminology used in the Method Statement (which were duly undertaken) the proposals are considered acceptable. It is recommended that the outstanding archaeological work should be commissioned and undertaken

at the expense of the developer and be secured through the inclusion of a negative condition (PPG16, para. 30) attached to any planning consent that may be given;

TCCE - Econ Dev Unit - Business & Employment: the draft Economic Strategy for Carlisle includes the development of an upgraded operational airport capable of supporting scheduled services as one of its key priorities and opportunities for Carlisle. [key opportunities, para 4.2.3, section 8.3 'Distance to Markets - the Need for Action' p36 of Oct 5th draft]

The theme of the draft Strategy is 'Growing Carlisle' and the development of the Airport is seen as a potential driver of economic growth. It is expected to -

- Help transform North Cumbria's image and its popular perception as being peripheral and lacking in modern business infrastructure.
- Increase economic efficiency and competitiveness by reducing wasteful business travel time and assisting re-investment and new inward investment.
- Support the infrastructure investments in the two strategic regional employment sites at Kingmoor Park and Westlakes and, through improved connectivity, assist the development plans of the West Cumbria Energy Coast.
- Help drive up GVA through exploiting the "direct relationship between airport capacity and employment and productivity" as identified in the Northern Way Growth Strategy Connectivity Technical Report (2004) and through the opportunities for job creation at the airport itself.

The Airport will offer benefits to most of the sub-region around Carlisle and will help support the objective to develop Carlisle as a regional city. Carlisle has a 'gateway' role for the whole of Cumbria and the Airport, when developed, will not only benefit Carlisle, but also will support the 'Energy Coast' plan for West Cumbria, and economic development in South West Scotland.

The recent business survey commissioned by the Cumbria Economic Intelligence Partnership [due for publication in December 07] asked 2000 businesses in Cumbria to name local developments that would have greatest positive impact on their businesses. Carlisle Airport and the University of Cumbria were named as the two most significant. The same study identified 5 key local challenges for Cumbria - one of which was strengthening Carlisle as a stronger 'pull factor' for Cumbria including the delivery of Carlisle Renaissance, the development of Carlisle Airport and the establishment of the University of Cumbria.

These comments illustrate the significance attached to the Airport proposals by the business community. The proposals are regarded as a sign that the area will [at last] have a key piece of infrastructure in place that will enable it to compete successfully in the 21st century;

Natural England: Natural England was formed in October 2006 by bringing together English Nature, the landscape, access and recreation elements of the Countryside Agency and the environmental land management functions of the Rural Development Service.

Natural England's stated purposes are that it will work for people, places and nature, to enhance biodiversity, landscapes and wildlife in rural, urban, coastal and marine areas; promote access, recreation and public well-being, and contribute to the way natural resources are managed so that they can be enjoyed now and in the future.

Natural England is working towards the delivery of four strategic outcomes, which together deliver on its' purpose to conserve, enhance and manage the natural environment for the benefit of current and future generations.

- A healthy natural environment: England's natural environment will be conserved and enhanced.
- Enjoyment of the natural environment: more people enjoying, understanding and acting to improve, the natural environment, more often.
- Sustainable use of the natural environment: the use and management of the natural environment is more sustainable.
- A secure environmental future: decisions which collectively secure the future of the natural environment.

Natural England is a statutory consultee where development:

- is in, or is likely to affect, a Site of Special Scientific Interest (SSSI);
- is in a consultation area around an SSSI (an area named by the local Natural England Area Team as being important to protecting an SSSI);
- is in, or is likely to affect a European protected site (SPA, SAC, RAMSAR) and an assessment under the Habitats Regulations might be required;
- requires an Environmental Impact Assessment (EIA);

In addition, Natural England has a duty to inform the Secretary of State of developments prejudicial to natural beauty in National Parks and Areas of Outstanding Natural Beauty (AONBs).

Natural England must also assess whether the proposal has any significant impacts upon our other interests, including National Trails, Access Land, or the areas of search for new national landscape designations.

Natural England advises on issues relating to species protected under national and international legislation including survey requirements to identify whether there are likely to be any impacts in this respect and any acceptable mitigation measures that may be proposed.

Comments on the proposed development:

Natural England's detailed comments are set out in a number of eparate annexes, summary table and e-mails. The key areas of concern relate to:

- Nationally and internationally designated sites (nature conservation)
- Biodiversity and protected species
- Landscape and amenity
- Traffic and transport

Natural England initially advised the City Council that the Environmental Statement (ES) contained insufficient information relating to several elements of the environmental baseline and as a result it was not possible to make a robust assessment of the potential impacts. Natural England therefore objected to the application until that information was provided after which time it would review its' position.

During the period from mid-January onwards the applicants' consultants have provided more information to NE through e-mail and other correspondence and Natural England has now commented in detail as follows:

"Following initial advice to the City Council that the Environmental Statement (ES) contained insufficient information relating to several elements of the environmental baseline, Natural England objected to the application until this information is provided after which time it would review its position."

As the Council is are aware there has been an ongoing dialogue with Scott Wilson since mid-January as NE has sought further information and clarification of potential impacts on features of nature conservation importance on the site. In making the current comments, NE still lacks all of the information that it would normally expect to make a judgement on likely impacts. This is particularly true of protected and priority species and biodiversity generally. Based on its experience to date, NE does not consider that a continuing piecemeal dialogue with Scott Wilson to seek further information and clarity will necessarily be fruitful within the sort of timescales that are being pressed upon all parties in this case. NE has had great difficulty keeping track of all the sometimes conflicting information that has been provided by Scott Wilson, and rather than continued cross-referencing to previous reports and emails, feel a different approach is now needed. This would involve Scott Wilson being asked to provide the planning authority with a self-contained package of information in respect of certain of the features of nature conservation interest where there is still uncertainty about impacts. This relates primarily to the protected species.

NE's intention in this consultation response is to provide the City Council with clear guidance as to the information that NE feels is needed and the weight that should be attached to it in order to help your Officers in making a recommendation to your planning committee. NE does not intend to engage in further discussion with the applicants and their consultants, but will of course be happy to discuss the case further with the Council if you would find that helpful.

It must be emphasised just how unsatisfactory is the position NE finds itself in at this stage in the planning process when there is so much pressure from the applicants and their supporters to reach a determination of the application. This situation could have been avoided if the applicants and their consultants had carried out pre-application consultations and discussions with Natural England and the voluntary conservation bodies. The minutes of the meeting chaired by Kate Willard of Cumbria Vision on 1 May 2007 record that my colleague Alison McAleer outlined the key aspects of Natural England's remit that would require consideration in the Environmental Assessment. This was the first contact NE had with the applicants. Alison requested a separate meeting with Natural England but this was never forthcoming. At the next meeting hosted by Cumbria Vision on 4 September, NE once again expressed concern about the lack of consultation. If the pre-application

discussions had taken place, NE would have been able to explain the issues that needed to be addressed, the survey requirements, and the nature of the assessment required. In these circumstances NE has been subject to most unreasonable pressure exerted by the applicants and consultants, while it has done its utmost to provide quick responses within the constraints of other demands upon its time.

1. Impacts on River Eden SAC

Further information has been provided to Natural England in relation to the potential impacts on the River Eden SAC, specifically to inform the Habitats Regulations Assessment. Whilst this has been helpful, some additional information is still outstanding in relation to water quality issues, including the final agreement of United Utilities to the proposed temporary treatment facility at Irthington Wastewater Treatment Works (with confirmation of arrangements for treatment of trade effluent arising in surface run-off) and also full details of the results of ground investigations to consider the potential risk arising from contaminated land on site. NE advises that should this further information be provided then the City Council should be in a position to complete the Habitats Regulations Assessment for these aspects. Further detailed assessment will be undertaken as part of the necessary Environment Agency consents. If the Habitats Regulations Assessment concludes that there will be no adverse effect upon the integrity of the River Eden SAC, then Natural England will of course withdraw its objection.

In relation to otter, Natural England's original concerns were that, in the absence of any otter survey information and thereby a clear understanding of how otters use the area, it was not possible to fully assess potential impacts on otter, either as a SAC interest feature or as a European Protected Species. NE know that there is extensive use of the river corridor by otters in this area and the bridge at Ruleholme is a national otter monitoring site as well as an EA otter monitoring site. In its discussions with the EA they have confirmed that they have installed an artificial otter holt on Brunstock Beck and have evidence of otters using even the smallest drains in the area with potential for them to range significant distances from the main river channels. They are therefore not confined to the main Irthing channel. NE maintain that it would have expected a comprehensive survey of otter in the area around the airport site to provide a basis for a robust assessment of impacts, particularly in view of the proposals as submitted at the time of the application which included habitat modification and loss outside the airport boundary as well as potential disturbance factors and increased traffic. However, the information submitted by Scott Wilson in their letter to NE dated 18 February 2008 suggests that they have subsequently given this matter more detailed consideration and the habitat management proposals have 'evolved' since the original submission. They present the view that 'no potential for direct impacts exists' during the construction and operational phases of the development' and that 'physical elements of the proposed development will be constrained within the existing operational Airport's boundary'. They state, additionally, that 'there is no risk of direct impact to holts or couches'. Whilst they do not provide any specific otter survey information, they are 'confident in their conclusion that whilst otters are present within the watercourses, there are no mechanisms or pathways by which impacts associated with the proposed development may adversely affect them'. In view of the above statement that the changed habitat management proposals do not provide any mechanisms or

pathways that could result in impacts on otters, Natural England will not request further information on this subject. Should the current proposal undergo any further changes, than impacts on otters should be reconsidered. NE would like to emphasise though, that it considers that the assessment of potential impacts on otters has not followed best practice in this instance.

NE reiterates that otters are protected by the Wildlife and Countryside Act 1981 and the EU Habitats Directive as transposed into domestic law through the Conservation (Natural Habitats &c.) Regulations 1994. Under the Habitats Regulations, otters are classed as European Protected Species and therefore given the highest level of protection.

In conclusion, NE has provided you with a draft scoping for the necessary Habitats Regulations Assessment and would be happy to discuss this further as necessary.

2. Impacts on White Moss, Crosbymoore SSSI

NE's main concerns relating to White Moss, Crosbymoore SSSI were the potential for pollution arising from surface water run-off via the various drains leading from the site to Baron's Dyke and also the potential for nitrogen deposition from aircraft emissions. Scott Wilson has informed NE that there is no surface water connection to the site due to the differing levels of the connecting watercourses. NE has also received further information relating to air quality and calculation of emissions and Nitrogen deposition values for White Moss relating these to standards for raised bogs. NE does not have in-house expertise to review these figures and is unable to commission such a review. Therefore, subject to the City Council's own expert consultants agreeing to the air quality data provided, then NE is satisfied that there would be no adverse effects on the SSSI from the proposals as described.

3. Impacts on Upper Solway Flats and Marshes SPA

Bart Donato is NE's case officer for the SPA and has been considering further information provided by Scott Wilson in relation to potential impacts on SPA bird species in the area – namely Whooper Swan and Pink-footed Geese. To date he has not been provided with the comprehensive survey data upon which the consultants have based their conclusions and instead has received interpretations of the data in the various letters. His current view is that, based on the interpretations of the data provided, it would be possible to conclude no adverse effect on the SPA bird species, but advises that Carlisle City Council will need to see all the original data upon which the consultants have based their assessment in order to ensure that this is fully supported. He is also concerned about the longer term measures that could be implemented in the 'Safeguarding Zone' and potential effects on SPA bird species. NE is not aware of any established mechanisms for ensuring such measures are subject to the necessary assessment under the Habitats Regulations and therefore he has asked whether it would be possible to condition the requirement for full consultation with Natural England should such measures be considered necessary.

4. Impacts On Protected Species And Priority BAP Species

The Airport site is in a sensitive position located close to European Wildlife Sites, it

is a County Wildlife Site and a substantial number of protected species and priority BAP species have been recorded on site in association with woodlands, hedgerows, marshy grasslands, semi-improved grasslands and other features on the site. The application is for major redevelopment of the airport site with likely impacts across a whole range of species and their habitats. NE has therefore given considerable attention to the species issues concerned with this redevelopment of the airport site to ensure that they are given appropriate and proportionate attention in the consideration of the application.

In the case of badgers the concern has been primarily about potential off-site impacts through collision with traffic. In their letter of 18 February Scott Wilson have sought to assure NE that the agreed installation of a roundabout will slow traffic and thereby improve existing accident rates. They also assure NE that traffic movements will peak at times when badgers are least active. If all these predictions are accurate, then Natural England has no remaining concerns in respect of the effect of the development on this protected species. It would, however, like to see the applicants commit to monitoring badger casualties around the site, and taking action as appropriate to deal with an increased trend of collisions. This could be part of the Biodiversity management and enhancement plan referred to in section 5 below.

As regards other protected and priority species, it has been particularly difficult to keep track of the position as further information has been provided and the scheme has continued to evolve. While some of NE's questions have been answered, others have not. NE would therefore like to clarify the type of information that it would normally expect a planning authority to have received prior to determining a planning application of this nature. Provision of this information would allow the planning authority then to assess the impact on priority and protected species and would indicate what conditions should be attached to any planning permission granted consistent with government policy. While the applicants have already provided some of this information, NE has indicated earlier that it is not in a self-contained form, but rather is scattered across a range of reports, letters and emails relating to a scheme that has evolved since the application was first submitted. NE strongly urge that the City Council request the applicants to provide you with an up to date and self-contained document that brings together all of the information on the development, the locations and habitats used by the protected and priority species, expected impacts on them of the development and proposed mitigation and delivery mechanisms. The paragraphs below summarise the information NE considers is required. Its advice is that it should be possible through suitable design, mitigation and possibly off-site compensation to minimise effects on species populations. NE confirm that if the City Council is satisfied that it has sufficient information to determine the application with suitable mitigation and, if necessary, off-site compensation, then Natural England will withdraw its objection in respect of protected and priority species.

The presence of protected species is of course a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to a species or its habitat (ODPM Circular 06/2005, para 98). The Circular also gives specific advice regarding European Protected Species (para 103-117), and UK protected species (para 118-124). The Joint Structure Plan Policy E35 also affords protection to protected and priority species in the planning

process.

The following is the information that NE would normally expect to be provided and which it recommends should be in the self-contained report referred to above.

Description of Proposal

Details of the type, scale, location, timing and methodology of the proposed works, including relevant plans, diagrams and schedules.

Survey for protected and priority BAP species

Thorough and robust survey of the development site and any other areas likely to be affected by the proposals for protected species.

All surveys undertaken should be specific to the species that is being investigated. It is not sufficient to say for instance that brown hare were not observed in the course of other surveys. Whilst incidental results might show presence, the lack of incidental results should not be interpreted as absence.

The survey should include the entire site and consideration of the wider area.

All surveys undertaken should follow the best practice guidance for the species in question (as far as best practice guidance exists).

The raw data for each set of surveys should be submitted, including all the standard information such as dates, timing, duration, number of surveyors, experience of surveyors, location, exact coverage of survey area, details of finding etc.

If any potential areas have been excluded from a survey, the reasons for this should be given and justified by the results of a desk study and initial walk-over. For example, a woodland might be excluded from a survey for roosting potential, if it was established that all of the trees were of an age and structure that would not provide potential bat roosts.

Maps should be provided showing the following information for protected and priority species:

- Any potential areas or features that may be utilised by the species and the type of activity e.g. foraging, breeding, resting, commuting.
- Any survey routes taken and/or any areas covered by the survey.
- Any sightings or signs recorded.

Please note, that any other areas likely to be affected by the proposals for protected species should also be included in the survey and these areas could include off site impacts, e.g. increased road deaths due to increased traffic or the removal of hedgerows on site leading to disruption of bat commuting routes in the wider landscape.

Planning policy (ODPM Circular 01/06, para 99) states that it is essential that ecological surveys be undertaken prior to determining the planning application. If the City Council consider there to be an over-riding need to grant planning permission before all survey information has been received, NE suggest this could be dealt with through the following approach: identify all areas potentially used by the species, assume the species is present at its carrying capacity and then proceed with the Impact Assessment, Mitigation Strategy and Delivery Mechanism as described below. Please note though that this is not regarded as good practice and would not normally be endorsed by Natural England.

Impact Assessment

Clear assessment of the likely impact of the proposal upon protected species.

A robust and thorough survey should provide information on the usage of the site by the species, an indication of population size and the importance of the site to the species. This information should then be used to assess the likely impact of any part of the development on the species.

Just to give a few examples:

- Disturbance/loss of habitat used for resting/roosting, breeding or foraging by priority and protected species;*
- Reduction in the connectivity of areas utilised by a species;*
- Impacts such as light on the movement of bats;*
- Creation of new balancing ponds that could be harmful to newts.*

The impact assessment should include all aspects of the planning application, including currently on-going management. For instance, if the fire ponds containing the great crested newts are continued to be used as fire ponds, then this impact needs to be assessed as part of this application.

Again, an impact assessment should include all areas that are impacted upon by the development, both on site or off site.

Mitigation strategy

To clarify how the likely impact will be addressed in order to ensure no detriment to the maintenance of the population at a favourable conservation status of the protected species. This should be proportionate to perceived impacts and must include clear site-specific prescriptions rather than vague, general or indicative possibilities.

Once a thorough and robust survey has been undertaken and a clear impact assessment has been made, a mitigation strategy needs to be drawn up. The mitigation strategy needs to clearly say what 'will' happen and must not include terms like 'is likely to' or 'should'.

For European Protected Species, full details of the mitigation strategy can be worked out during the licence application process; however an outline of mitigation should be provided detailing the type of mitigation work that will be undertaken and

broad timing. An outline with broad timings of the European Protected Species mitigation proposal is required at this stage, to ensure that the mitigation will actually be deliverable and not result in any conflicts with any other aspects of any planning permission granted.

As there is no licensing process for priority species and species protected under the Wildlife and Countryside Act 1981 (as amended), full mitigation details for these species would normally be provided at this stage and conditioned as part of any planning permission granted.

If it is not possible to fully mitigate for impacts on site, off site mitigation should be provided as an alternative. Mitigation areas need to be safe-guarded in the long-term. If this cannot be guaranteed on site, for instance due to operational needs of the airport, secure off site compensation needs to be provided.

Again, both on site and off site impacts on species should be mitigated for.

Delivery mechanisms

To include additional information as appropriate to the mitigation strategy that will be required to ensure that the proposed mitigation works are feasible and deliverable, e.g. architects plans, licences, planning agreements, contractors' precautionary method statements.

Details of how the mitigation strategy will be practicably implemented should be provided.

5. Impacts On The County Wildlife Site And Biodiversity Considerations Generally

It has been difficult to piece together what the precise overall effect will be upon the general biodiversity of the site, though it seems clear that there will be a substantial reduction in the extent and quality of habitats and species that are using the site. The recent episode of tree clearance on the grounds of the risk to aviation from a pair of buzzards using the trees does not give NE confidence that any new woodland planting will be allowed to mature on the airport site. The extent to which any new planting can therefore be said to offset the loss of areas cleared or cut to ground level is questionable. The biodiversity value of some of the proposed hedgerow and woodland planting is also questionable, the choice of species being influenced by the desire not to attract birds, and the value of non-local or non-native species for invertebrates is likely to be limited.

In its comments to date NE has focused our comments on the safeguard of statutory wildlife sites, protected species and Biodiversity Action Plan species. Through agreement with the Cumbria Wildlife Trust, NE does not normally comment in detail on effects upon County Wildlife Sites. NE has consistently advised the applicants and their consultants that they should be having a dialogue with CWT and the RSPB concerning the County Wildlife Site that has been notified for its breeding bird populations, and lowland breeding waders in particular. It has been disappointing that the applicants have apparently disregarded this advice until very recently, and have given little weight to the interest of the County Wildlife Site. In this respect, NE draws the City Council's attention to Local Plan Policy LE4 and Policy E35 of the

Cumbria & Lake District Joint Structure Plan that afford protection to County Wildlife Sites. NE also refer your Council to PPS9 Key Principle (vi) that requires that where a planning decision would result in significant harm to biodiversity interests which cannot be prevented or adequately mitigated against, appropriate compensation measures should be sought. NE understands that Cumbria Wildlife Trust and the RSPB are now negotiating with the applicants as to what suitable compensation would be required. NE urges that the provision of compensation is confirmed through appropriate conditions or S106 agreement to ensure its long term security and sustainability. It also reminds the Council that it is recommended good practice to look for opportunities for biodiversity enhancement through the planning process, rather than simply mitigating or compensating for loss or damage.

Cumbria County Council has suggested that a condition should be placed upon the planning permission for the applicant to produce a Biodiversity Management and Enhancement Plan, to be approved by the LPA with Natural England, CWT and RSPB, for implementation during the lifetime of the Airport. NE support this recommendation";

East Cumbria Countryside Project: no comments received;

Northwest Regional Development Agency: The Agency has previously notified the region's local planning authorities of the types of development on which it wishes to be consulted in its role as a statutory consultee. This application falls within the scope of the notification since it entails the construction of a new runway which allows for additional aircraft movements and the construction of a new airport terminal to provide additional capacity.

The Regional Economic Strategy (RES) sets out a clear vision for the North West's economy. The RES Vision is of:

A dynamic, sustainable international economy which competes on the basis of knowledge, advanced technology and an excellent quality of life for all where, amongst others :

- growth opportunities around the towns and cities of Carlisle, Crewe, Chester, Warrington and Lancaster are fully developed; and
- key growth assets are fully utilised, including the regions ports and airports and the natural environment, especially the Lake District.

The RES sets out a range of actions through which this vision will be delivered. Several of the actions are especially relevant to the Carlisle Airport proposal:

Action 11: Develop skills and procurement initiatives, connect jobs with people and influence Government policy to support various sectors including distribution, aviation, logistics;

Action 55: Develop plans to capitalise on ongoing private sector investment around Crewe, Chester, Warrington, Lancaster and Carlisle;

Action 75: Support the development of more international business and in-bound tourism routes serving the region's airports;

Action 89: Deliver plans that support sustainable growth within and adjacent to the Lake District National Park;

Action 101: Improve the product associated with the region's tourism 'attack brands' and 'signature projects' as identified in the Regional Tourism Strategy, in line with market demand (the Lake District is both an "attack brand" and a "signature project", whilst Hadrian's Wall is a "signature project"); and

Action 115: Deliver sustainable growth through use of the region's heritage environments and assets – especially World Heritage Sites, the cities of Chester, Lancaster and Carlisle and the Lake District.

Actions 55, 101 and 115 are all identified as "transformational" actions and, as such, are seen as priorities for achieving the RES Vision.

A further RES Action (74) relates specifically to growth at Blackpool Airport. However, the associated reason also calls for the operator of Carlisle Airport to investigate the potential for its development. The Aviation White Paper, *The Future of Air Transport* (DfT, December 2003) similarly encourages the Airport's operator to bring forward proposals for its development to be considered through the normal regional and local planning processes. The Strategy for Tourism in England's Northwest 2003 – 2010 (Revised 2007) also indicates that *"opportunities will be taken to develop new passenger services into Blackpool and Carlisle airports"*.

The Aviation White Paper (paragraph 8.25) notes that *"Cumbria is more remote from access to air services than any other part of the UK with a comparable population"*, adding that *"Services from Carlisle Airport would assist economic growth in the areas within its potential catchment, and in particular could improve access for high spending inbound tourists to the Lake District and the South West of Scotland"*.

In September 2003, the Agency commissioned consultants (York Aviation and Price Waterhouse Coopers) to carry out an appraisal of the potential economic benefits of NWDA providing financial support to Carlisle Airport. The Airport is now under new ownership and the question of public sector funding is not relevant to the current proposal. Nevertheless, the study clearly outlined the limitations of the existing facilities and its very limited potential in the absence of substantial investment. The new runway, apron, taxiways, hangars, passenger terminal, air traffic control centre, landing equipment and new access road proposed under this application represent a substantial investment in, and major improvement to, the Airport's facilities.

The proposal entails the relocation of Eddie Stobart Limited's Carlisle operations and WA Development's corporate operations to new facilities at the Airport. Both the adopted Carlisle District Local Plan and emerging Replacement Local Plan allocate land at Carlisle Airport for strategic employment purposes. These Plans refer explicitly to the Airport providing an opportunity for extensive employment such as haulage.

The Economic Appraisal submitted in support of the application addresses the employment benefits of the proposed development. It indicates that Stobart Air predict around 50 new employees being required from 2009, with the number of

passenger movements through the airport reaching 200,000 by 2016. On this basis the Economic Appraisal suggests a further 30 to 40 jobs as a result of the indirect and induced employment effects of Airport growth.

The Economic Appraisal also refers to anticipated job growth within Eddie Stobart Ltd and WA Developments, although the NWDA has had some difficulty in trying to reconcile the number of additional jobs claimed on the planning application from with those in the Economic Appraisal.

Whilst the proposal has the potential to deliver significant economic and tourism benefits, NWDA is aware that the Airport lies within the buffer zone of the Hadrian's Wall Military Zone World Heritage Site. As noted above, this is one of the signature projects in the Regional Tourism Strategy. NWDA, in partnership with the North East RDA and others, has established Hadrian's Wall Heritage Limited to co-ordinate the protection, development and promotion of the World Heritage Site. The aim of this "not-for-profit" company is to realise the economic, social and cultural regeneration potential of the World Heritage Site and the communities and environment through which it passes.

In accordance with relevant policies in the adopted Local Plan and emerging Replacement Local Plan, the City Council will clearly need to consider very carefully the implications of this proposal for the World Heritage Site and its buffer zone, having regard to expert advice from English Heritage.

From an economic development perspective, however, the RES, the Regional Tourism Strategy and national policy all lend support to the growth and expansion of Carlisle Airport. On this basis, the Agency welcomes and supports the proposed development subject to there being no unacceptable adverse impacts on the character and/or setting of the Hadrian's Wall World Heritage Site;

Cumbria Tourism: Cumbria Tourism has been consulted by the applicant, supplied with policy and market research information and its Chief Executive, Ian Stephens, sits on the Carlisle Airport Forum. Cumbria Tourism has been impressed with the cooperation and professionalism of the applicant and its advisers, who in all our contacts have acted responsibly in a balanced and considerate manner.

Cumbria Tourism strongly supports this planning application for the following reasons:

- Official statistics indicate that demand for air travel and related tourism is predicted to grow. Cumbria must respond to the needs of visitors and take advantage of the opportunities that will result from this growth. Regional airports in the UK continue to grow and take an increasingly larger share of the total passenger traffic to and from the UK. This more dispersed growth of air travel is helpful to the remoter parts of the UK and growth of regional airports in this manner is supported by Government. Next summer, because of an identified niche demand, Lufthansa is starting a direct service from Berlin to Newquay in Cornwall. We believe that Carlisle Airport can attract niche markets in a similar way to Newquay resulting in new visitors for Cumbria. As well as assisting Cumbria's valuable Lake District brand, Carlisle Airport will also assist tourism development in the lesser known areas of Cumbria, improving brand recognition

for Carlisle itself, as well as Hadrian's Wall, North Pennines and the Scottish Borders.

- Cumbria is geographically isolated and in economic decline. In line with the Cumbria Transport Plan and recognised in the NW Regional Economic Strategy, connectivity needs to improve to assist the economy and to improve Cumbria's international/ national competitiveness. Cumbria's manufacturing and services industries need the full choice of transport modes both to reach customers and suppliers and to allow them improved access to this remote part of the UK. We believe that the Carlisle Renaissance plan and Cumbria's new economic development plan will deliver growth in business visitors to Cumbria and therefore air services to and from Carlisle Airport will be an important travel option for this sector of the market.
- The development of Carlisle Airport will assist in improving the isolated image and depressed reputation of Cumbria. There are many examples throughout Europe and the UK where improved air services are continuing to play a significant role in the regeneration of economically deprived areas and as a result improve the image and reputation of such areas. Planning Policy Guidance Note 13 on Transport supports the growth of regional airports in the UK to cater for local demand which is consistent with sustainable development.
- Whilst not specifically part of the current planning application the investment and infrastructure proposed for Carlisle airport will pave the way for additional visitor services and quality accommodation on or close to the site. Such new tourism development is urgently needed in the Carlisle and Hadrian's Wall corridor to support the growing needs and expectations of both UK and overseas visitors and will bring additional economic benefits (in terms of jobs, investment and visitor spending) to the area.
- Whilst not a significant issue from a tourism perspective, there are significant additional economic benefits arising from the proposed move of the Stobart Haulage Depot to the airport site. There are important logistical benefits arising from the move, the airport site has good road and motorway access via the A689 and there will be increased opportunities for air freight movements to and from Carlisle. Clearly, the presence of such a significant employer will help the overall viability of airport and other supporting commercial activities.
- Through Cumbria Tourism's involvement in the Carlisle Airport Forum it has been clearly demonstrated that the applicants have thoroughly considered and investigated the environmental and archaeological issues emerging from the proposed development. The applicants have undertaken all the necessary studies and investigations requested and proposed a series of mitigating and offsetting measures to address the issues and recommendations from the responsible bodies.

Cumbria Tourism believes that the expansion and development of Carlisle Airport is crucial to its viable operation in the future and will contribute significantly to the wider visitor economy of both Carlisle and Cumbria as a whole;

(Parks & Countryside - Landscape Services) Community Services -

Greenspace Team: the application raises a number of issues, as set out below-

1. Ecology and Nature Conservation

While there are no sites of nationally designated importance for nature conservation within the envelope of the plan, the presence of species identified in the Cumbria Biodiversity Action Plan (BAP) is significant. Summer bat roosts are valuable wildlife resources which should not be lost from the locality. Bat species enjoy a high level of protection under the Wildlife and Countryside Act, protection which extends to their roosting sites.

If the proposal requires the destruction of existing roosts, then serious conservation effort must be made to replace these roosts. Artificial roosts have been successful elsewhere and can be constructed as low-level 'bunkers' which would be eminently suitable to the airport environment.

The woodland within the airport development is not of the highest quality and therefore is of limited value for nature conservation. However, this value would have increased as the woodland matured, so there needs to be a sufficient level of compensatory planting elsewhere. If there are over-riding safety reasons for not planting trees anywhere on the development site, then a comparable area of planting should be undertaken at a suitable off-site location, with a commuted sum to ensure the establishment of a mature woodland in coming years.

Little attention has been paid to the grassland on the site. While it may be of limited ecological value, experience at other former World War II airfields has shown that grassland plant and invertebrate communities may survive on these sites due to relative lack of agricultural improvement on the post-war years. It would be useful to see the results of a summertime survey.

Ponds and still water habitats have declined markedly in the local landscape, and could be incorporated into this development with relative ease. Small permanent ponds could be designed so as not to attract wildfowl (reducing risk of bird strike) and they would provide breeding sites for amphibians and insects.

2. Landscape and Heritage

The Landscape Character map devised by the (then) Countryside Agency and the Landscape Character Assessment produced by Cumbria County Council are at too large a scale to be useful in assessing this application.

Airfields are, by definition, large areas of land with even topography. Any new buildings, therefore, would normally have an immediate visual impact. The proposed freight depot and office complex would need to be designed to fit into the landscape with minimum adverse impact. Carefully considered siting, design and landscape planting will all contribute to this.

The lighting of the new facilities at night and the potential impact of light pollution should be taken into consideration. The airfield occupies a relatively elevated situation and any bright lights will be visible for some considerable distance. Rural communities usually value the relative darkness of night skies as an asset to be

retained and every effort of design and technology should be made to retain this.

The greatest attention needs to be paid to the historical and archaeological value of this landscape. It is within the zone of Hadrian's Wall World Heritage Site, and the conservation of the integrity of these world-class assets should be paramount. Nothing that disturbs or permanently defaces this part of our historical heritage should be contemplated, let alone allowed. Hadrian's Wall National Trail has proved to be tremendous asset for rural businesses - maybe there could be some link between the development and the Trail that could be mutually beneficial.

3. Carbon Sequestration

Increased flights by larger aircraft operating from Carlisle Airport will increase the City's carbon footprint. It would be extremely supportive of the applicants to consider a significant gesture to off-set the carbon contribution that will be made during construction and during the operational lifetime of the airport.

One way of achieving this would be to identify and plant a significant area of woodland, which also ties in with the need to replace the loss of woodland habitat described above. A suitable site would include opportunities for wildlife conservation and informal recreation for the public, and would be located away from the airport development. It should be possible to calculate approximately the size and extent of woodland that would be required as a sequestration sink for the carbon that will be produced by this development. Alternative methods of carbon sequestration are available, but to do nothing is to abdicate responsibility for a significant global problem;

RAF Spadeadam: The expansion of the airport at Carlisle and subsequent runway re-alignment is a project the RAF Spadeadam is monitoring with interest.

Whilst this unit is not directly involved in the planning and execution of this project, we are aware that the re-alignment of the runway at Carlisle will take into account numerous factors, one of which will be the interaction between aircraft operating at RAF Spadeadam and aircraft operating at Carlisle Airport. As such, the position and alignment of the runway will be made with public safety as its first and foremost priority to ensure that aircraft on approach to Carlisle, generally 10-12 miles from landing on an ILS, do not enter the Danger Area associated with RAF Spadeadam. The planned 3 1/2 degree re-alignment should increase public safety in this respect.

The current phase of the proposal seems to deal with the infrastructure and ground layout rather than any ATC specific procedures that may change as part of the expansion. As such, the planning request submitted does not have an operational impact on RAF Spadeadam activity and therefore RAF Spadeadam have no objections;

Northwest Regional Assembly: As you are aware the Adopted RSS Regional Planning Guidance for the North West (RPG13) now forms an integral part of the Development Plan and should be given due consideration when assessing planning applications. In addition the Submitted Draft Regional Spatial Strategy for the North West of England has now undergone a number of periods of consultation, with an Examination in Public which ended in February 2007. The panel report was

published in May 2007. As the document is now somewhat progressed towards its adoption, it should also be given consideration when assessing planning applications.

The proposals are generally in line with adopted and draft RSS transport policy. Trips generated appear to be well within the capacity of the links and junctions already in existence or proposed as part of the scheme. The proposed development of the airport itself is in line with RSS aviation policies.

However, transport policies do stress the importance of public transport. Although provision is proposed for buses and coaches on site, further work could be done to promote public transport. There is scope for office staff to use public transport as many will commute from Carlisle. Further work could be done with Stagecoach to look at potential services. Also consideration should be given to requiring a workplace travel plan.

Passenger flights to Carlisle Airport may potentially play a role in boosting tourism to Carlisle itself and to the Hadrian's Wall World Heritage site (see draft RSS Policy W6).

Policy DP1 in both adopted and draft RSS stresses the importance of development locations following the sequential test, locating development preferably within settlements and where it is well served by public transport. This applies particularly to the proposed office development - adopted Policy EC8 and draft Policy W3 direct office development to town and city centres. It is not clear from the planning application how much of the office accommodation actually needs to be located at this site. A stronger justification is needed for the proposed location of the offices, in relation to the sequential test.

In relation to the warehousing, Policy EC7 acknowledges that urban areas are not always appropriate for this type of development. However the applicants still need to demonstrate that there are no other, more sustainably located sites for the warehousing part of the development. There is a good justification for any warehousing related to airfreight on site, but it is not clear from the application how much this will be.

NWRA welcome the flood risk assessment and proposed drainage improvements, in line with adopted Policy ER8 and draft Policy EM5. However, NWRA consider more could be done to incorporate sustainable design elements into the proposals. Policies L4, EM5, EM15, EM16 and EM17 of the draft RSS continue the approach in adopted RSS promoting sustainable water use, sustainable construction, energy efficiency measures, use of renewable energy sources and combined heat and power (CHP). Policy EM17 also requires major developments to incorporate renewable energy production to provide at least 10% of requirements. The North West Best Practice Design Guide, published by NWRA, provides good practice examples, advice, and information on sustainable design issues.

In summary, the airport related development fits with RSS policy. However it is not clear whether the non-airport related offices, warehousing and distribution facilities can be justified in this location.

Subsequent to these comments the applicants furnished additional information in a letter elaborating on the intended use of buildings and the further views of the NWRA were sought. Those indicated that while noting some aspects of the development were supported by RSS policy, it wasn't wholly clear how much of the office accommodation actually needed to be located at this site, whether there were sequentially preferable sites for the warehouse element, what inter-relationship there was between the warehouse element and air freight, how much of the development was airport-related, and the intended timescale for the development including the redevelopment of the airport.

These matters were conveyed to the applicants to address and a further letter in response was provided. NWRA was asked to consider the comments made and now advises that:

"As stated in the Assembly's original response, the proposals for airport related development are in line with RSS policy, and they would contribute to its implementation.

The (latest) letter:-

- *States that the relocation of ESL operations and ESL / WAD offices to this location is essential to support the redevelopment of the airport*
- *Indicates that the applicant has been unable to find another suitable location in the area for the non-airport related aspects of the development.*
- *Indicates that the warehouse and office use will be airport related or used by ESL / WAD, and that there will be no non-airport related speculative development.*
- *Provides a timetable showing that the airport development is part of the overall redevelopment process, rather than following after the office and warehouse aspects have been completed.*

If the Council is satisfied that the applicants have adequately demonstrated these matters to be the case, and /or that they can be controlled by conditions or agreements, then the proposal should be broadly in line with RSS policy";

Urban Design Officer: The applicant proposes a large, warehouse-like structure to the north of the A689 and extensive associated works. The Design & Access Statement for this substantial application is inadequate, lacking as it does any indication of design philosophy, design approach or adequate description of materials and rationale behind the proposal. The submitted plans also lack adequate indication of proposed materials for the main airport and hangar buildings. The materials schedule and an appropriate Design Statement should be vital elements in a scheme of this scale and the single paragraph devoted to 'appearance' is wholly inadequate.

The main airport building itself is monolithic and unrelieved by obvious architectural input. It appears to be very much at the 'functional' end of transport infrastructure design and will be an uninspiring point of arrival or departure for visitors. A clear and imaginative architectural solution would be appropriate for a development of this

nature and scale.

Some nominal landscaping and planting are proposed but this will do little to lessen the impact of the prominent 2.8m security fence which envelops the site, or to soften the extensive car parking and hardstanding associated with the scheme, or to mask the prominence of this development.

Colleagues in Local Plans and in Environmental Health may be better placed to comment on the likely implications of the airport in contributing to increased CO2 emissions, climate change etc;

Dept of Transport (Highways): in view of the scale of the proposals and the need for assessment to be made of the highways and transportation issues tied up with this proposal and implications for the trunk road network, the Agency has sought the opinion of its consultants Faber Maunsell. In addition to examining the accompanying Transport Assessment, they have also reported their conclusions and advice on the additional TRANSYT analysis submitted by the Agents.

It is recognised that the primary route for vehicles generated to and from this proposed development would be via the A689 and then Junction 44 which links to the north and south carriageways of the M6. From the necessary analysis which has been completed and the modelling exercises which have been carried out, the Highways Agency is satisfied that there is sufficient spare capacity at this junction for the additional traffic generated by the submitted proposal in the immediately foreseeable future. However, the Agency wishes to reserve its position vis a vis the implications for the strategic highway network in the medium to longer term, especially in view of the lack of firm information regarding the expansion of the Airport for other freight/commercial traffic than that being operated by the applicants.

Accordingly, the Agency would be keen to be involved in any discussion at the earliest stage for any further expansion phases of the Airport which might be put forward in the future. Such matters which would maybe then need addressing could relate to travel demand management measures, car occupancy issues, proposals for increasing civil passenger flights, any future significant impact upon Junction 43 of the M6 also, and sustainability in terms of HGV journeys potentially saved on the network.

In conclusion, the Highway Agency would not wish to raise any objections in principle to the proposals submitted for planning permission;

Ramblers Association: provided the planned development does not expand beyond the perimeter as described and that there is to be no interference with the public right of way over nearby public footpaths (FPs 119001, 119002, 119004, 119008 and 119016) there is no objection to the proposal;

Dept of Transport (Aviation Security): to date the DfT has not received an official project registration documents for a new Terminal development at Carlisle Airport. However, Transec have visited and had sight of proposals and made some general comments. If and when an official application is made Transec will of course be having detailed discussions and address any security concerns.

Any proposals of this nature must be formally registered with the DfT to meet with the requirements of the Single Direction To Aerodrome Managers as follows:

"23. The aerodrome manager shall ensure that any proposed construction or changes at the airport with relevance to the security of the restricted zone or zones, including configuration of the restricted zone, perimeter and ramp security, pass and access control systems, location and procedures of pedestrian and vehicle searching and screening and hold baggage security are formally submitted to the DfT for approval using the form provided at Schedule 3^[1]. Such approval shall be received in writing from the DfT before work commences";

Hadrian's Wall Heritage Ltd: offer strong support for the proposed development of Carlisle Airport.

Hadrian's Wall Heritage Limited has been set up with the support of the Regional Development Agencies for the North East and the North West of England, English Heritage and Natural England to act as the strategic body to facilitate sustainable tourism based economic development and sustainable jobs along the Hadrian's Wall corridor.

The Hadrian's Wall corridor extends from Wallsend and North Tyneside to Carlisle and the Solway and down the Solway Coast to Maryport and Ravenglass. HWHL firmly believes that the development of Carlisle Airport will significantly help it achieve its objectives by positioning Hadrian's Wall Country, Carlisle and West Cumbria as one of the 'must-see' destinations in Britain for domestic and international visitors. Additional transport infrastructure offering air access to the corridor will help position Hadrian's Wall Country strongly to potential visitors.

Potential for growth:

- HWHL is aiming to increase both visitor numbers and, critically, visitor length of stay to improve the economic potential of the corridor for the people who live in the north of England.
- These increases are targeted at + 5%-8% per annum for the next five-ten years; this target is aiming to out perform the natural tourism growth of the north of England significantly.
- The opportunity to deliver an additional £200m per annum to the region exists if strategic, focused marketing takes place. Upwards of 2000 new jobs could be developed should the increased spend in the corridor be realised. HWHL estimate 45% of all results will be for west and north Cumbria.

Hadrian's Wall Heritage Ltd has developed the following plans in line with the NWRDA Strategic Plan, West Cumbria Spatial Plan, Cumbria Vision, West Cumbria Development, Copeland and Allerdale Borough Councils, Carlisle City Council and Cumbria Tourism.

The following themes of investment are critical to achieve HWHL objectives as outlined above HWHL have highlighted the way in which they could assist the Carlisle Renaissance Economic Development Strategy as a response to the Strategy Consultation. The Airport would play a significant part in many of the initiatives outlined overleaf:

Hadrian's Wall Heritage projects	Opportunities to work in partnership on:
<p>Visitor Orientation and Information</p> <p>Increasing the amount of interpretation in villages, towns and cities across the corridor</p>	<ul style="list-style-type: none"> • Developing sustainable communities • Increasing and broadening the impact of culture, to enrich individual lives, strengthen communities and improve the places where people live, now and for future generations. • Tourism and recreation
<p>Building a Business Network</p> <p>Creating 'Know Your Hadrian's Wall Country' network of businesses knowledgeable about our destination and able to improve our visitor experience</p>	<ul style="list-style-type: none"> • Micro-enterprise development • Creating sustainable communities and business opportunities • Tourism and recreation • Promoting economic well-being
<p>Quality Accommodation Project</p> <p>Improving grading and customer care and welcome</p>	<ul style="list-style-type: none"> • Micro-enterprise development • Sustainable communities • Tourism and recreation • Promote economic wellbeing
<p>Sustainable Transport and Access</p> <p>Improving access to the Wall sites and communities</p>	<ul style="list-style-type: none"> • Sustainable farming and forestry • Building inclusive and stronger communities • Tourism and recreation • Promote economic well-being
<p>Hadrian's Wall Locally Produced Scheme</p> <p>Encouraging local accommodation suppliers, local people and visitors to develop a taste of 'Hadrian's Wall Country'; increase supply chains and growth and purchase of these products</p>	<ul style="list-style-type: none"> • Micro-enterprise development • Sustainable communities • Tourism and recreation • Promoting economic wellbeing • Sustainable farming and forestry • Re-energising our sense of wellbeing within a socially inclusive community
<p>Events Development</p> <p>Increase the number of appealing events which bring to life our Roman and Reiver heritage, create meaningful cultural experiences and increase the number and type of arts activities across the corridor</p>	<ul style="list-style-type: none"> • Micro-enterprise development • Promoting economic wellbeing • Sustainable communities • Tourism and recreation • Building inclusive and stronger communities • Re-energising our sense of wellbeing within a socially inclusive community • Children and young people agendas
<p>Marketing Hadrian's Wall Country</p> <p>Building our brand, enticing domestic and international visitors, building our economy</p>	<ul style="list-style-type: none"> • Micro-enterprise development • Sustainable Communities • Tourism and Recreation • Promoting economic well-being
<p>Community Engagement</p> <p>Engaging our communities in meaningful heritage, arts, cultural and economic activities building networks and capacity</p>	<ul style="list-style-type: none"> • Sustainable communities • Re-energising our sense of well-being within a socially inclusive community • Healthier communities for all • Children and young people agendas
<p>Tourism Skills Routeway</p> <p>Helping create a vibrant, engaged workforce with skills for the future and opportunities for life</p>	<ul style="list-style-type: none"> • Micro-enterprise development • Sustainable communities

The views of Hadrian's Wall Heritage Ltd with regard to the protection of the World Heritage Site are listed below:

1. It is an existing airport and has been there since the 1940s. Cognisance of that was made both in 1987 when HW was inscribed as a WHS and in 1995/6 when the first Management Plan defined its precise boundaries for the first time.
2. The proposed level of traffic is no more than it has been at times within the last 20 or 30 years, and using Jettstream 41 turbo prop aircraft or similar.
3. The Airport lies within the Buffer Zone of the WHS, not the WHS itself. The proposals do not impinge on the remains of the WHS itself. There is a small Roman camp which was known from aerial photography that lies underneath the west end of the current runway that is part of the WHS. However by constructing a new runway to the south, this will avoid the scheduled area of the Watchtowers temporary camp.
4. PPG15 and the WHS Management Plan state that formal environmental impact assessment should be carried out for significant development within the Setting or Buffer Zone and that whenever there is uncertainty as to whether an area affected by a proposed development contains significant archaeological deposits, there will need to be evaluation, if necessary in the field, before a decision by the local planning authority grants permission. Both these requirements have been complied with.
5. The current centre of operations, particularly the control tower, is in the centre of the airfield and is fairly visible from the line of HW, and from the National Trail which here follows the line of the Wall very closely. However there are no upstanding surviving remains of the Wall within visibility of the Airport. The proposal would shift the centre of operations to the south to be near the A689 road and with the local topography it is probable that the completed development would actually have less visual impact on the WHS. (The Environmental Impact Assessment will cover this).
6. UNESCO is particularly concerned about tall buildings within the buffer zones of World Heritage Sites - this was the reason for the recent ICOMOS visit to the Tower of London. Without having seen the detailed design HWHL cannot comment but, provided that the proposed new buildings, particularly a possible hotel, are kept within a height scale (possibly two or three storeys) which is commensurate with the surroundings and minimises any visual impact on the WHS, HWHL would see this as consistent with protecting the values of the WHS. The same should apply to any new freight facilities and to any new aircraft hangers. HWHL's understanding is that the plans put forward involve a building further away from the current centre of operations on a lower level piece of land. There was concern about the visual impact of hangars (needed for a previous scheme that involved handling Boeing 737 aircraft and possibly larger ones) that would have been equivalent to a 7 storey building, which would have been situated near the current centre of operations and thus highly visible from HW.

In short, HWHL does not see the designation of HW as a WHS and the development proposal site being within the Setting or Buffer Zone as an obstacle to the proposed development. The correct steps will have been undertaken to demonstrate that development of the existing airfield facility will not have an increased detrimental impact on the WHS, and there are opportunities through design, particularly the height of any new buildings, to actually reduce the visual impact which will be in a part of the airport not currently used and further away from the line of HW. Issues of night flights which may be of concern to the local population would not in HWHL's view impact on the World Heritage values of the WHS.

HWHL discussed, in its internal meeting about tourism etc for its new management plan, how probably the greatest threat to Hadrian's Wall WHS comes from climate change, and considered that any new developments which are built or converted should aim to be carbon neutral. This could probably be addressed through the Building Regulations, but it would add to the case for the development if the design and construction of particularly a possible new hotel were both to result in carbon neutral solutions. The whole nature of the new operations should demonstrate that the freight interchange between air and road will be sustainable in terms of carbon emissions reduction.

Taking the economic arguments, which will increase job opportunities, visitor access to the WHS and particularly retain a very major employer within the Carlisle district who would otherwise move their entire operations to Preston in 2009, which weigh heavily in favour of the development, this is a development which HWHL backs wholeheartedly and offers considerable new marketing and communications potential whilst re-positioning the north and west of Cumbria – the heart of Hadrian's Wall Country;

NATS (Air Safeguarding): the proposed development has been examined from a technical safeguarding aspect and does not conflict with safeguarding criteria. Accordingly, there are no safeguarding objections to this proposal.

This response applies specifically to the consultation based on the information supplied at the time of the application. If any changes are proposed to the information supplied in regard to this application, which becomes the basis of a revised, amended or further application for approval, then (as a statutory consultee) NATS requires that it be further consulted on such changes prior to any planning permission or any consent being granted;

Friends of the Earth: comments have been made through both the "local" group and via the national organisation-

Carlisle Friends of the Earth Group express concerns and opposition to the above planning application. Its main objection regards the issue of climate change which local authorities must increasingly take into account when reviewing planning applications. The group point out that climate change was recently accepted as an argument against the expansion of regional airports in the case of Uttlesford District Council versus Stansted Airport, given that aviation is the fastest growing contributor to climate change. The group states that climate change impact is tripled by the

aviation industry. Figures from the Tyndall Centre for Climate Research underline that flying currently contributes to 3.5% of global warming emissions world-wide and this is expected to rise to 15% by 2050. If airport expansions such as Carlisle's go ahead, the Government, and indeed the local authority (a signatory to the Nottingham Declaration on Climate Change), will simply be unable to hit any of its targets on carbon reduction.

Many ancient woodlands and natural habitats are at risk as a result of this expansion project. Air pollution around the area of the airport will inevitably rise very significantly. The Group believes that, as a society, we desperately need to start reducing our carbon emissions, and this expansion project will do nothing at all to address concerns about pollution. Indeed, the expansion of Carlisle Airport will inevitably result in more car traffic, and it has already been stated in the plans that new and wider roads will be required to deal with this. It is the Group's belief that more and bigger roads will be required in the future to cope with the increased traffic. There is no doubt that this is a major expansion, which goes well beyond existing plans. Indeed, it is its concern that attempts will be made to grow the airport as far as possible, particularly regarding air freight. Friends of the Earth is concerned that night flights will have an adverse effect on the communities near the airport, and indeed, on the city of Carlisle itself. Moreover, it is concerned about the potential for a major incident in the future given issues of Public Safety Zones.

National Friends of the Earth comments:

1. Summary

The application, and information provided with it, does not permit a proper understanding of: (i) whether the principal purpose of development is for airport related, or non-airport related, uses; and

(ii) the scale of future operations at the application site.

Consequently, it is not possible to identify with the necessary precision, in view of the future implications of permitting airport development, how the application relates to the planning framework and what impacts it might have. Furthermore, there is no suggested conditioning that encompasses an agreed understanding between the applicant and the local planning authority as to how the scale of future operations at the airport site should be managed and controlled.

2. Recommendation

That the application should be rejected on the grounds of insufficiency of information concerning the future scale and adverse impacts of the potential uses at the site.

3. Background and the Development

The application appears to emerge from a recent process of consolidation and expansion by Stobart/ WA Developments/ Westbury – which is creating a logistics company with multimodal potential and ambitions – combined with a recent company decision to sell their existing main haulage operation site at Kingstown (which is however conveniently located near to junction 44 of the M6). They are therefore required to remove to a new site for haulage purposes by June 2009. Whilst the application is nominally for the development of the airport, in practice the majority of the workforce that will be located there will be for the existing non-airport related businesses. Consequently this creates an

uncertainty as to whether the main purpose of the application is to develop the airport for aviation purposes, or alternatively to provide a new operational base for the predominant road haulage business by their self-imposed 2009 deadline.

4. Lack of Information

As a basic comment, FoE make the point that although the information provided with the application (and principally the Scott Wilson environmental assessment) is apparently extensive, it is in fact inadequate in the crucial respect of allowing objectors (and the LPA) to understand the scale and nature of future operations on the site. Since the application, in its present form, would probably allow the applicant almost carte blanche to expand either the aviation, or the road haulage, aspects of their business (or both in combination) without restraint; and since an aviation/transport use has a range of intrusive impacts that are exceptional in their negative consequences beyond the application site, this is not an acceptable situation.

Nonetheless a number of the assumptions governing expansion are set out in the Environmental Assessment (EA) paragraphs 2.61; 2.63-65; 5.8-5.10; 5.34-35; 5.41; table 6.1 and the Economic Appraisal (EcA) section 4.2. FoE will not repeat this factual information at length in this objection, but it should be assumed that the comments made are properly informed by it.

The inadequacy of the information provided principally concerns:

- (a) the scale of future aviation passenger and freight activity

FoE submit that the main planning assumption for passenger use of the airport is implausible:

"The Airport operation adopts a robust assumption of passenger throughput from day one at an estimated 189,800 passengers per annum. ... There is no increase in expected passenger throughput as the 189,800 figure is regarded as the maximum that could be achieved by 2016." EA 5.9-10

The LPA is being asked to accept that the airport will, in its opening year, receive the same number of passengers as 7 years later; and such a small number (when combined with freight movements) can justify the investment of very large amounts of capital in airport modernisation. Nor is there any information provided about potential air services from the site, or airlines/operators interested in providing such services.

There is also a mismatch between the extraordinarily large size of what is described on the plans as 'cargo hangars' / 'airport freight distribution centre', and the relatively small number of daily air freight ATMs (*"a maximum of 1,000-2,000 commercial cargo ATMs will take place per year on average by 2016"* EA 2.65). The air freight use takes up 5/6 of a 50,000 sq m development (EA paragraph 2.35); only the height of the building is provided (19m) but the footprint computes to approximately 150 x 300 metres. The extreme scale of the building can also be made out in the photomontages from Viewpoints 4 and 11 in vol.3 of the EA. It appears to be similar in size and footprint to the consolidated DHL Hub at East Midlands airport, which after Heathrow has the largest air freight operation in the UK (around 300th tonnes p.a). If the statistic that DHL handles some 60% of that total EMA throughput via that Hub is correct

www.uk-airport-news.info/nottingham-east-midlands-airport-news-031005.htm ,

then it indicates the extent of the over-provision being proposed at Carlisle.

So not only is there wholly inadequate information provided about the numbers of passengers, potential services by airlines and air freight operators, types of aircraft, etc; but consequently this creates uncertainty about (i) the main purpose of the application: is it aviation or road haulage?; (ii) whether indeed airport operations will be expanding to any extent; whether the runway and cargo centre investments will actually take place - for air purposes, that is; and (iii) the economic viability of the development: whether the small quantity of aviation use proposed can justify the size and investment that the company is claiming it will make, including a realignment of the main runway.

This uncertainty, and the scepticism it prompts, is only reinforced by the recent comments to the LPA from Peter Elliott (until earlier this year apparently aviation consultant to the applicant), which claim that the applicant may have ambitions for expansion that are not disclosed in the documentation. This objector also points to differences between the typical size of aircraft identified in the application (such as BAE 146), and the larger size depicted on the plans (Peter Elliott identifies these as Boeing 737/767s).

- (b) The impact of aviation or road haulage operations, either during the daytime or night-time.

As just one example, ES para 5.8 simply identifies that 'the airport' will operate between 6-24 hours (that is to say, up to midnight); whilst the surface logistical business will be a 24-hour operation 'with traffic movements throughout the period'. Whilst the surface access assessment has been undertaken on the bases of 102 HGV movements a day, it is not clear where that number has been derived from, and how it relates to reality. It is understood that there is already in existence licensing for a number of night-time ATMs, although we think this is not disclosed in the documentation.

Consequently, it is not possible to identify appropriate conditioning that needs to be applied to any planning permission, for example relating to the permitted number of passenger numbers, freight tonnage, passenger or freight ATMs (all at identified future dates); hours of day or night time airport operation; airport night-time operating regime; number of lorry movements; and so on. As it stands, the application could simply be paving the way for future open-ended expansion; voluntary assurances to the contrary, as recently provided by the applicant, are not sufficient.

- Highways impact: There appear to be five aspects to this - (i) the impact of relocating the main haulage business lorry movements to the airport site; (ii) of other commercial movements which will be immediately relocated, or which (iii) will be attracted to the site in the future – including air freight; (iv) employee travel movements; and finally (v) air passenger surface access movements. Whilst information relating to some of these movements has been provided, complete information about all forms has not; nor is there supplied a suggested Travel Plan regime which would have the responsibility of managing all these movements, making them more sustainable and reducing their impacts.

5. Relationship to the Planning Framework

Consequently because of the inadequate information provided with the application, and therefore the uncertainty created as to future predominant use

and scale of use, it is also not possible to clearly understand how the local planning framework should be applied to the application.

The proposed wording of "core" Policy DP3 in the Revised Redeposit Local Plan (Sept 2006) draws a distinction between proposals which *'relate to airport activities and [which are] in scale with the existing infrastructure and minimise any adverse impact on the surrounding environment'*, and larger scale redevelopment which would *'facilitate an improved commercial operation; these will have to take into account the impact of development on uses outside the perimeter of the airport including nature conservation interests, the historic environment including Hadrian's Wall World Heritage Site, the existing highway network and road safety.'*

The explanatory paragraph for Policy EC20 relating to the airport states that the airport site *'would be suitable for industrial or commercial development including development with a need to be located at the airport'*. It argues that other aspects of planning framework *'recognise the value of airport related development'*; and consequently development that is *'airport or transport related with a requirement to be located at the airport, or which will meet the needs of local businesses in the Brampton area will be considered favourably'*. Note however that the support cited from RPG, the Structure Plan and the Aviation White Paper only relates to *'business and light aviation facilities'*, not freight or passenger.

In addition, FoE note the interaction between the development proposal and the Hadrian's Wall World Heritage Site, governed by Policies LE6 and LE7. The Military Zone (LE6) lies just 200 m to the north of the airport; the Buffer Zone (LE7) actually covers the entire airport site (figure 9.1 EA vol.3).

Policy states that: *"any development which will cause an unacceptable impact on the World Heritage Site and Buffer Zone will not be permitted, unless the need for development outweighs the environmental cost"*; and the EA notes variously that the development *'will introduce a new landscape element and result in the loss of elements characteristic of the wider landscape'* (EA page 9-16); that it will have *'a moderate effect on the landscape character'* of the buffer zone (EA 9.150) and a *'a minor adverse visual impact on Hadrian's Wall and vallum'* (EA 11.103); that *'there will be an increase in the levels of aircraft movement compared to the existing baseline situation [which will] ... create some increase in noise and visual intrusion compared to the existing conditions, but this is considered to be a negligible impact as it will remain within acceptable levels'* (EA 11.109); that the development will introduce substantial new sources of lighting into what is predominantly now a dark area (EA 9.131-132); and that *'Overall the impacts on the World Heritage Site are assessed as minor adverse.'* (EA page 11-37); which can then be mitigated by *'the colour scheme for the new building [which] will be designed to reduce visual intrusion on the setting of the World Heritage Site'* (EA 11.107).

In view of the uncertainty about the scale of future operations noted above, FoE suggest that the limited scale of impact identified by the Environmental Assessment cannot be substantiated or relied upon; and furthermore that the judgment about the future impact on a World Heritage Site of such importance

– in that it extends across the breadth of the entire North of England, with tourism benefits also equally spread - should not be left to this applicant.

So this leaves two questions about the planning framework:

- i) Clearly it does support aviation uses for the site, but only those which are *'in scale with the existing infrastructure and minimise any adverse impact on the surrounding environment'*. Since it is not at all clear to what scale the uses are actually going to be developed, the support of this policy must be in doubt. FoE emphasise the great importance of understanding how the potential future scale of aviation operations could impact on the Hadrian's Wall World Heritage Site; and of all operations on the surrounding environment and highways.
- ii) Equally, it would appear to support the co-location of several freight modes together in order to create a new logistics hub. But since the overwhelming majority of the freight movements either immediately or through to 2016 would comprise a very large number of Stobart lorry movements, plus any other road use logistics movements that a planning permission might sanction, or which the company might intend (but has not disclosed), it has to be questioned whether the new location for these movements – some five miles away from the M6 and along the A689, is suitable on highway and environmental grounds as the policy requires. This new location is certainly not as well suited as the company's existing location, which they have deliberately chosen to relinquish.

6. Economic Benefits

It is not FoE's intention to provide a detailed critique of the economic benefits that are being claimed for this application by the Economic Assessment provided by the applicant, except to say that (i) in its' judgment they are very substantially overestimated and generalised, particularly in view of the uncertainty surrounding the type and scale of future airport operations. To put it in simple language: you cannot obtain even localised benefits from an airport if the airport itself is not used by services, and that at the moment the applicant has not provided any evidence as to the certainty of future aviation use. (ii) It should be noted that the headquarters of the Stobart operations is moving considerably further away from Carlisle town centre, and this might well have an economic disbenefit for the town. FoE would hope that this will have been considered by the Council.

And in terms of expanded tourism and general business benefits, the Council should be giving greater weight to the recent major national investment in the West Coast Main Line, which already provides Carlisle direct but sustainable access to London.

7. Ecology

FoE support the request of the Environment Agency (letter dated 14/11/07) that there should be an assessment under the 1994 Habitats Directive in relation to the Upper Solway Flats & Marshes SPA and RAMSAR.

8. Hazard Assessment

FoE support the concerns being expressed by local residents in Irthington.

9. Climate Change

This is the principal ground of objection by FoE's Carlisle local group, and with good reason; the national organisation has not focused on it in its' submission because it is not, regrettably, a material issue for the planning determination. Nonetheless, it is hoped that the Council understands that the promotion of aviation expansion, however large or small, will undermine in future years so many of its other economic and social objectives, as the proportion of aviation emissions within the UK carbon budget continues to rise. The latest Department for Transport latest forecasts indicate that between 2005-50, the Government's plans for UK aviation expansion will result in an additional 2.2-4.4 billion tonnes of CO2 emissions being generated. Not to weigh up this matter in the Council's overall consideration would be, FoE suggest, an act of negligence and recklessness.

Conclusions

Because:

- of the inadequacy of the information provided by the applicant in relation to the future scale operations at this site;
- airport uses, once granted an initial planning permission, are extraordinarily difficult to subsequently control in terms of their attempted large-scale expansion;
- the applicant's intentions, whether for a predominantly aviation or alternatively road haulage use, cannot be properly discerned in relation to the local planning framework;
- the relocation of what may well prove to be the predominant road haulage use to this new site is to a less suitable location in surface access terms
- of the potential future impact on the World Heritage Site;
- the environmental intrusiveness of an expanded aviation operation;
- of the substantial visual and landscape impacts of the sheer scale of the major proposed building; and
- finally because of the absence of any suggested conditioning to control the type and amount of uses (particularly aviation) on the site

Friends of the Earth believes it would be wholly unsafe for the local planning authority to determine this application and, accordingly, that it should be rejected;

Cumbria County Council- Economic Development Unit: support the application by Stobart Air Ltd. It is acknowledged that the County Council has been formally consulted on this proposal as a Category 1 Planning Application, but the EDU is taking this unusual step of writing separately in light of the importance of this development to the economy of Cumbria.

There is a strong economic and strategic policy fit with this proposed development at a national, regional and local level. The Government White Paper 'Future of Air Transport 2003' anticipates significant growth at the North of England's airports and supports the development of additional capacity to cater for it. Whilst it recognises Carlisle is not currently a significant commercial airport it acknowledges there are plans for investment to provide new commercial flights for Cumbria and Southern Scotland and states "*there are no major local physical or environmental constraints*

and there is support from a range of stakeholders for the proposal, with little opposition”.

The White Paper recognises that Cumbria is more remote from access to air services than any other part of the UK with a comparable population and states: *“Services from Carlisle Airport would assist economic growth in the areas within its catchment and in particular improve access for high spending inbound tourists to the Lake District and SW of Scotland”.*

At a regional level the North West Regional Strategy 2006 identifies Carlisle as one of 5 towns in the NW with private sector growth potential and development opportunities which can contribute to the sustainable economic growth of the region. Equally the draft Regional Spatial Strategy 2006 supports building on the City’s significant potential to attract development into Cumbria, with the City enhancing its role as the sub regional centre for business, commerce, higher education, shopping, leisure, culture and tourism. It also recognises the need to improve Cumbria’s internal and external transport links in line with the priorities for transport investment. Specifically in relation to Carlisle Airport it proposes the Local Development Framework should identify and protect an appropriate airport boundary to allow for possible future use and expansion.

The Strategy goes on to state that in formulating plans and strategies, *“Local authorities should take account of the contribution general aviation makes to the regional and local economies”.* It adds *“Airports are an important focus for development of regional and local economies as they attract businesses to the area, general employment, encourage in- bound tourism and open up wider markets”.*

Unsurprisingly these views are shared even more strongly at the sub regional level where a priority objective of the Cumbrian Strategic Partnership’s “Sustainable Cumbria 2004 – 2024” strategy is to *“promote commercial re opening and development of Carlisle Airport”.* It advocates that such action would provide a further spur to the development of the City commercially and culturally.

Likewise Cumbria Vision’s Economic Plan 2007 contains as one of its strategic infrastructure objectives *“supporting the development of Carlisle Airport and improve surface access”.* The plan acknowledges that for Cumbria to become economically competitive, the perception of remoteness and isolation needs to be reduced. The development of the Airport is seen as one of a number of key infrastructure projects aimed at enhancing connectivity between Cumbria, the UK and the rest of the world in order to support economic growth and encourage inward investment.

In economic terms Cumbria was the slowest growing sub region in the UK from the mid 1990s to 2002. Whilst growth rates have since improved, Cumbria is still 11% behind the NW and 23% behind the UK in terms of Gross Value Added/head. The County Council is committed to reducing this gap and one of its 6 key themes in the Council Plan 2007 is *“Making Cumbria More Prosperous”* through improving economic infrastructure, increasing economic activity and optimising investment and business growth.

To this end the Local Transport Plan 2006-2011 gives a top priority to transport measures that assist economic development. Within Carlisle it states that one of its

seven priorities will be given to *“surface transport measures that support the development of Carlisle Airport where necessary”*. It adds the County Council will *“support any priority given to the development of the Airport by the NWDA, Cumbria Inward Investment Agency and Scottish Enterprise”*.

Equally the Cumbria and Lake District Joint Structure Plan reinforces the proposition that upgrading the transport system to support jobs and regenerate communities is critical throughout Cumbria and will require major investment in infrastructure. The Plan gives its support to the permanent establishment of scheduled air services via Carlisle Airport and Policy T26 states that the role of the *“County’s ports and airports in generating economic activity will be sustained through the safeguarding of land required to develop their operational role or related activities, improvements to access and the favourable considerations of proposals which enhance their viability”*.

The case for developing the airport in economic development policy terms is indisputable. If Carlisle is to realise its ambitions to be an economic growth pole for the sub region it needs to significantly enhance its competitive performance. One potential driver of a step change in the area’s future growth could be the development of the Airport which will also complement and support the flag ship capital projects which form part of Carlisle Renaissance. The Airport is also cited in the Masterplan for West Cumbria as an important component in regenerating “Britain’s Energy Coast” by ensuring it can interact with new markets and benefit from globally competitive knowledge and expertise.

Transport and communications are an important and growing industrial sector in North Cumbria and the Airport and related freight activity gives Carlisle a potential competitive edge to strengthen its role as a centre for distribution and logistics. Transferring W A Developments to the Airport and consolidating Eddie Stobart’s corporate HQ, together with associated warehousing facilities, will help ensure one of the UK’s most prestigious transport and logistics companies remains in Cumbria. This will secure a substantial number of highly paid jobs in Carlisle and provide opportunities for expansion.

The development of air services will provide Cumbria with a “modern” business infrastructure and improve the competitiveness of the County’s “offer” in a global market place. Cumbria has a heavy dependence on a number of multi-national branch plants and poor connectivity, which reduces profitability, has been cited in many instances in recent years as a reason for businesses leaving the County. The Cumbria Business Survey 2007 by BMG cited the proposed expansion of air services at Carlisle Airport as the most important positive factor, after the development of the University of Cumbria, which would affect their business.

In conclusion, the EDU believe the proposed development at Carlisle Airport has the potential to positively transform Cumbria’s image and popular perception as a peripheral business location, increase economic efficiency and competitiveness by reducing wasteful business travel and assist with re-investment and inward investment, support Carlisle Renaissance and the regeneration of Britain’s Energy Coast, help boost Cumbria’s static tourism performance, contribute to improvements in Cumbria’s GVA and help secure and strengthen the future presence of the Stobart Group in Cumbria.

The EDU urges Carlisle City Council to give due consideration to the foregoing economic arguments in determining the application. It should be made clear that these are Officer views based on existing plans and policies which recognise the economic importance of the development of the Airport to Carlisle and Cumbria. As a consultee on strategic planning applications the County Council, through its Development Control and Regulation Committee, will consider the application taking into account all material planning factors and the Committee's views will be submitted to you in due course.

3. Summary of Representations

Representations Received

Initial:	Consulted:	Reply Type:
[REDACTED] Steadfolds	18/10/07	Objection
[REDACTED] The Chase	18/10/07	
[REDACTED] 1 The Courtyard	18/10/07	
[REDACTED] 2 The Courtyard	18/10/07	
[REDACTED] 3 The Courtyard	18/10/07	
[REDACTED] Beanlands	18/10/07	
[REDACTED] Pilgrims Rest	18/10/07	Objection
[REDACTED] Redhills	18/10/07	Objection
[REDACTED] Stablehills	18/10/07	Comment Only
[REDACTED] Redbank House	18/10/07	Objection
[REDACTED] Oakfield House	18/10/07	Objection
[REDACTED] Red Bank House	18/10/07	Comment Only
[REDACTED] Oakfield House	18/10/07	
[REDACTED] Redhills Cottage	18/10/07	
[REDACTED] Wall House	18/10/07	Comment Only
[REDACTED] Garden House	18/10/07	Comment Only
[REDACTED] The Old Vicarage	18/10/07	Objection
[REDACTED] Acorn Grange	18/10/07	Comment Only
[REDACTED] The Beeches	18/10/07	
[REDACTED] Whitrigg	18/10/07	
[REDACTED] New Vicarage	18/10/07	
[REDACTED] St Catherines Cottage	18/10/07	
[REDACTED] Rosewood	18/10/07	
[REDACTED] Hurtleton Farm	18/10/07	Objection
[REDACTED] EMC Ltd	18/10/07	
[REDACTED] Scotia Safari Ltd	18/10/07	
[REDACTED] Carlisle Flight Training	18/10/07	Support
[REDACTED] Teck Nite Ltd	18/10/07	
[REDACTED] Old Walls	18/10/07	
[REDACTED] Romanway	18/10/07	
[REDACTED] Romanside	18/10/07	
[REDACTED] The Cottage	18/10/07	
[REDACTED] The Bungalow	18/10/07	
[REDACTED] East Old Wall	18/10/07	
[REDACTED] Haulage Contractors	18/10/07	Support
[REDACTED] Laversdale Timber Co.	18/10/07	
[REDACTED] Dundee Tyres Ltd	18/10/07	
[REDACTED] Unit 3	18/10/07	
[REDACTED] System Group Ltd	18/10/07	Support
[REDACTED] Gillmorran	18/10/07	
[REDACTED] Gill House Farm	18/10/07	

[REDACTED], Watch Close	18/10/07	
[REDACTED], 2 Cherry Brow	18/10/07	
[REDACTED] Lane End Farm	18/10/07	Objection
[REDACTED] Fernlea	18/10/07	Objection
[REDACTED] High Syke	18/10/07	
[REDACTED] Brackenfield	18/10/07	
[REDACTED] East Wing	18/10/07	
[REDACTED] Watch Cross	18/10/07	
[REDACTED] Military Cottage	18/10/07	
[REDACTED] Ryecroft	18/10/07	
[REDACTED] The Golden Fleece PH	18/10/07	
[REDACTED] Romanway	18/10/07	
[REDACTED] Ruleholme Cottage	18/10/07	
[REDACTED] Over The Way	18/10/07	
[REDACTED] The Bungalow	18/10/07	
[REDACTED] Netherfield Cottage	18/10/07	
[REDACTED] Netherfield Farm	18/10/07	
[REDACTED] The Lodge	18/10/07	Comment Only
[REDACTED] Highfields House	18/10/07	
[REDACTED] The Stables	18/10/07	Objection
[REDACTED], 2 Cherry Brow		Undelivered
[REDACTED], Henderson's Croft		Support
[REDACTED] Wall Cottage		Support
[REDACTED] Hollinstone Farm		Objection
[REDACTED] Greystones		Support
[REDACTED] Croft House		Support
[REDACTED] Lorton House		Support
[REDACTED], Unit 8		Support
[REDACTED] 256 Chesterholm		Support
[REDACTED] Buttermere Pavillion		Support
[REDACTED] Douglon		Support
[REDACTED] Burtholme East		Support
[REDACTED] Etive House		Objection
[REDACTED] Strathaven Airfield		Support
[REDACTED], 46 Irthing Park		Support
[REDACTED] 53 Main Street		Support
[REDACTED] Flat 2, Darley House		Support
[REDACTED] West Lakes Renaissance		Support
[REDACTED] - Upperby		Objection
[REDACTED] 5 Helsfell Hall		Support
[REDACTED] 57 Coledale Meadows		Objection
[REDACTED] Barney Nook		Support
[REDACTED] The Croft		Comment Only
[REDACTED] Scotstown		Objection
[REDACTED] 21 Whiteclosegate		Objection
[REDACTED] Beckstones		Support
[REDACTED] Mintsfeet Place		Support
[REDACTED] Low Holm		Objection
[REDACTED] 7 The Old Brewery		Objection
[REDACTED] 23 Millriggs		Objection
[REDACTED] Damhead		Support
[REDACTED] Roman Lea		Objection
[REDACTED] Main Band House		Objection
[REDACTED] Hillcrest		Support
[REDACTED] 12 Wentworth Drive		Support
[REDACTED], C/O Woodrow		Support
[REDACTED] Hall		
[REDACTED] 3 Kingwater Close		Support
[REDACTED] Orchard House		Support
[REDACTED] 47 Westmorland Street		Objection
[REDACTED] Solway Industrial		Support
Estate		

[REDACTED] The Swan Hotel	Support
[REDACTED] Corbett House	Support
[REDACTED] 278 Yewdale Road	Support
[REDACTED] West Lakes Dairy Park, Unit 8	Support
[REDACTED] Hawthorns	Objection
[REDACTED] High Syke	Objection
[REDACTED] 13 Watermans Walk	Support
[REDACTED] 1 The Barrel House	Support
[REDACTED] Gateside	Objection
[REDACTED] Solway House, Dumfries	Support
Enterprise Park	
[REDACTED] 14 Michaelson Road	Support
[REDACTED] 18 Holme Fauld	Comment Only
[REDACTED] 44 Belah Crescent	Support
[REDACTED] 75 Townfoot Park	Objection
[REDACTED] Meadow View	Support
[REDACTED] Quarry Hill House	Support
[REDACTED] 64 Guildford Crescent	Objection
[REDACTED] 5 Hall Moor Court	Objection
[REDACTED] 17 Nook Lane Close	Objection
[REDACTED] 29 Brougham Street	Objection
[REDACTED] 25 Croftlands	Support
[REDACTED] The Strand House	Support
[REDACTED] 78 Fellview	Support
[REDACTED] 74a John Street	Support
[REDACTED] 25 Taunton Avenue	Support
[REDACTED] 10 Distington Park	Support
[REDACTED] 20 Knowe Park	Support
Avenue	
[REDACTED] 62 Hilltop Road	Support
[REDACTED] 8 Low Road Close	Support
[REDACTED] 37 Station Close	Support
[REDACTED] Cairnvale	Objection
[REDACTED] Doosan Babcock energy Limited	Support
[REDACTED] Hillcrest	Comment Only
[REDACTED] Keystone	Support
[REDACTED] 37 Carlisle Road	Objection
[REDACTED] Lane End Farm	Objection
[REDACTED] Langthwaite	Comment Only
[REDACTED] Etive House	Objection
[REDACTED] The Cops	Comment Only
[REDACTED] 9 Ridley Gardens	Objection
[REDACTED] 101 Castlesteads Drive	Support
[REDACTED] The Nook	Objection
[REDACTED] Roman Lea	Objection
[REDACTED] Barras Top Banks	Support
[REDACTED] 123 Tribune Drive	Support
[REDACTED] 7 Scawfell Road	Objection
[REDACTED] 22 Becksides Gardens	Support
[REDACTED] 4 Chapel Burn Cottages	Comment Only
[REDACTED] South House	Comment Only
[REDACTED] The Elms	Support
[REDACTED] Nook Cottage	Objection
[REDACTED] 7 Irthing Court	Objection
[REDACTED] 53 East Dale Street	Objection
[REDACTED] 89 Scotland Road	Support
[REDACTED] 116 Hurley Road	Support
[REDACTED] Seymour House	Support
[REDACTED] Rise Mill Hill	Support
[REDACTED] 11 The Banks	Objection
[REDACTED] Carlisle Glass Limited	Support
[REDACTED] Voluntary Action Cumbria	Support

[REDACTED] Rose Bank Sawmill	Support
[REDACTED] 28 Castle Green Lane	Objection
[REDACTED] 4 Gatefoot Cottages	Objection
[REDACTED] 92 Windermere Road	Objection
[REDACTED] Ascent Marketing Communications Limited	Support
[REDACTED] Cumbria Vision	Support
[REDACTED] Highcroft	Objection
[REDACTED] 2 Cherry Brow	Support
[REDACTED] 2 Humphrey Cottages	Objection
[REDACTED] 3 Airethwaite	Objection
[REDACTED] 1 Hillside Road	Objection
[REDACTED] 7 Whinfell Drive	Objection
[REDACTED] 12 Cliff Terrace	Objection
[REDACTED] Cumbrian Newspapers Ltd	Support
[REDACTED] 6 Dale View	Comment Only
[REDACTED] PO Box 160	Support
[REDACTED] Sawyers Constructions	Support
[REDACTED] Pilgrims Rest	Objection
[REDACTED] 74 Brook Street	Comment Only
[REDACTED] Milnthorpe Road	Support
[REDACTED] Carlisle Friends Of The Earth	Objection
[REDACTED] 47 Laurel Gardens	Objection
[REDACTED] 36 Victoria Road North	Objection
[REDACTED] 17	Objection
[REDACTED] Entry Lane	
[REDACTED] 3 Stanegate	Support
[REDACTED] 8 Castle Crescent	Objection
[REDACTED] Bleatarn Park	Objection
[REDACTED] Allerdale House	Support
[REDACTED] The Orchard	Objection
[REDACTED] The Orchard	Objection
[REDACTED] Nook Cottage	Objection
[REDACTED] Project	Support
[REDACTED] Officer	
[REDACTED] 14 Irthing Park	Support
[REDACTED] 46 Kirkbie Green	Objection
[REDACTED] Sellafeld Site	Support
[REDACTED] Robinson House	Support
[REDACTED] Left On The Shelf	Objection
[REDACTED] 26 Tullie Street	Objection
[REDACTED] Mitre House	Objection
[REDACTED] Vallum Barn	Support
[REDACTED] Fifteen Rosehill	Support
[REDACTED] Oakfield House	Objection
[REDACTED] Victoria Place	Support
[REDACTED] 7	Objection
[REDACTED] Grizedale Avenue	
[REDACTED] 17 Nook Lane Close	Objection
[REDACTED] The Lodge	Support
[REDACTED] 197 Scotland Road	Support
[REDACTED] 2 Ashford Way	Support
[REDACTED] Town Head Barn	Support
[REDACTED] 256 Willow Lane	Objection
[REDACTED] 8 Low Wood	Objection
[REDACTED] Appleby Business Centre	Support
[REDACTED] Pinewood Farm	Objection
[REDACTED] Blackrack Barn	Support
[REDACTED] Lakeside	Support
[REDACTED] Derby Road	Support
[REDACTED] 3A The Crescent	Support

[REDACTED] St Ninian's Road	Support
[REDACTED] Appleby Business Centre	Support
[REDACTED] Mayfield	Objection
[REDACTED] Pirelli UK Tyres Ltd	Support
[REDACTED] Low Blackburn Bank	Objection
[REDACTED] 30 Fletcher Hill Park	Support
[REDACTED] Complete Engineering Services	Support
[REDACTED] 40 Oaktree Crescent	Objection
[REDACTED], Sustainable Brampton	Objection
[REDACTED] Etive House	Objection
[REDACTED] Capita	Support
[REDACTED] The Arches	Support
[REDACTED] Maidenway	Objection
[REDACTED], The Old Byre	Objection
[REDACTED] Swarthmoor Lane	Objection
[REDACTED] 1st Floor Flat	Objection
[REDACTED] Middle Cottage	Objection
[REDACTED] 1 Hillside Road	Objection
[REDACTED] The Brambles	Objection
[REDACTED] 2 Lamley Gardens	Objection
[REDACTED] Owsen Place	Objection
[REDACTED] Low Luckens	Objection
[REDACTED] 4 Lynstead	Objection
[REDACTED] 2 Thornthwaite Cottages	Objection
[REDACTED] Bleatarn Farm	Comment Only
[REDACTED] Little Barco	Objection
[REDACTED] 5 Spring Gardens	Objection
[REDACTED] Clint Mill	Support
[REDACTED] 1 Coastguard Cottages	Objection
[REDACTED] 54 Dale Street	Objection
[REDACTED] Strathmore	Objection
[REDACTED] 12 Whinlatter Way	Objection
[REDACTED] M-Sport Ltd	Support
[REDACTED] 20 Riselaw Terrace	Objection
[REDACTED] 45 Jackson Road	Objection
[REDACTED] Seymour House	Support
[REDACTED] 16 Highfield Road	Objection
[REDACTED] The Chapel House	Objection
[REDACTED], 6 Greenbank	Objection
[REDACTED] High Grassrigg Barn	Objection
[REDACTED] Hillcrest	Objection
[REDACTED] Granary Cottage	Objection
[REDACTED] 71 Tribune Drive	Support
[REDACTED] 6 Irthing Court	Objection
[REDACTED] Story Construction Limited	Support
[REDACTED] Irthing House	Comment Only
[REDACTED] Crag Foot	Objection
[REDACTED] Chiswick	Objection
[REDACTED] 6 Quarry Howe	Objection
[REDACTED] 28 Castle Crescent	Objection
[REDACTED] 17 Entry Lane	Objection
[REDACTED] Merbeck	Objection
[REDACTED] Emerson House	Support
[REDACTED] Cleugh Head	Comment Only
[REDACTED] Red Gables	Support
[REDACTED] Sandysike	Support
[REDACTED] 12 Hall Moor Court	Objection
[REDACTED] 4 Irthing Park	Comment Only

- 3.1 The application has been subject to extensive publicity comprising the display of Site Notices displayed at 5 locations around the airport perimeter, the publication of Press Notices and written notification to occupiers of a number of properties within Irthington and in the immediate vicinity of the Airport.
- 3.2 The Statutory Notices (Site and Press) referred to the application being accompanied by an Environmental Statement and also that the application is a "Departure" from the Development Plan. The Site and Public Notices have been published/displayed on two separate occasions with the date when comments were required to satisfy the statutory period on the latter of those being 7th December. However, this Report makes reference to all observations received up to and including 7th March.
- 3.3 The foregoing measures have resulted in 234 persons or businesses submitting letters or e-mails relating to these proposals, 111 of these raising objections with 105 expressions of support. The remainder of correspondents have simply provided "comments" on aspects of the application without indicating either agreement or disagreement with the proposed development.
- 3.4 The **objections** cover a number of matters and these are summarised as follows:

Environmental Issues:

1. Unsustainability of increased air traffic.
2. Impact on climate change.
3. Impact on River Eden SAC.
4. Impact on Solway Firth SPA.
5. Impact on Ramsar International Site's Feature Species.
6. Removal of most of woodland from site including Watchclose Woods.
7. Loss of over 5km of hedgerow.
8. No detailed mitigation for loss of habitat for bats, great crested newts or birds. No survey for reptiles or invertebrates and incomplete or suboptimal timing for surveys or other fauna.
9. Loss of breeding bird habitat.
10. Damage to the value of Carlisle Airport County Wildlife Site.
11. Potential offsite effects of the safeguarding area on conservation works and internationally protected sites.
12. Inadequate provision of ecological information.

13. Lack of meaningful mitigation for proposed loss of habitat.
14. Environmental Statement is inadequate to determine potential effect of the development on bio-diversity of site and its surroundings.
15. Environmental Statement undervalues or does not value at all the conservation interest of the Airport site.
16. Application is contrary to national policies including PPS1 and PPS9.
17. Application is contrary to Policies CP1, CP2,CP4 and LE2, LE3 and LE4 of the Carlisle Local Plan.
18. The Environmental Impact Assessment figures contain flaws.
19. Aviation White Paper which was published 4 years ago is out of date.
20. Application is contrary to current urges to reduce flights and CO2 emissions.
21. There is already damage to the non-statutory County Wildlife Site.
22. Present owners show a cavalier attitude to the environment.
23. Increased air pollution.
24. Cumbria County Council has a carbon emission policy which the development contradicts.
25. Environmental report needs to be quantified in terms of how electricity, water, disposal of sewage, waste water and ground water is provided.
26. Water pollution.
27. Increase in pollution and other noxious substances.
28. There is little mention in the application about Watchclose Wood.
29. Impact on the Lake District.
30. The River Irthing and surrounding agricultural fields are open to serious contamination.
31. It will cause land degradation.
32. Rare marshes will be destroyed.
33. Increased air traffic would cause stress to locally protected nature reserves, which could also have an impact on flying safety for both pilots and surrounding dwellings should a bird strike occur.

34. Increase in light pollution.

Transport Issues:

1. Increased volume of traffic.
2. Road safety.
3. Environmental impact of increased traffic.
4. Pedestrian and cycle access is not illustrated on the plans.
5. Cycle storage is not covered therefore there are concerns that people wont use cycle facilities.
6. Planned facilities for cycling are not linked to any wider walking/cycling network.
7. A travel plan should be undertaken.
8. Developers should make a Section 106 contribution to improving cycling/walking infrastructure to the site along A689/A69.
9. The Airport is not linked to the rail network.
10. The A689 is not adequate for the increased capacity of traffic.
11. The Report mentions that A689 is a national cycle way but there is no risk assessment in the report for cyclists.
12. The Report gives a low traffic estimate.
13. Other traffic movements need to be taken into account.
14. The road will also accommodate traffic from the Northern Development Route which will entice west Cumbrian shoppers away from shopping in Carlisle to shop in the Metro and Newcastle.
15. The potential impact on the surrounding roads.
16. The roads will become grid locked with lorries.
17. There is more parking spaces than what is required.
18. There is no forecast in the Traffic Impact Assessment for increase in road accidents.
19. There is a risk in reduction of rail services from Carlisle.
20. Public transport links in this area are ineffective.

21. There will be an increase in traffic on Warwick Road in Carlisle.
22. There are no proposals to introduce traffic restrictions.
23. Traffic lights placed on the end of Bleatarn Road will restrict day to day movements.
24. The road passing through Irthington will appear as a rat run.

Economic:

1. Threat of job losses on the railway.
2. There will be job losses at the airport.
3. Concerns about job losses in Irthington.
4. The benefits do not outweigh the costs.
5. There will be no economic benefit to Carlisle.
6. Experience shows that fewer jobs created at airports than promised.
7. Loss of local tourism as a result of increased noise pollution.
8. There is a massive tourism deficit from aviation.

Council:

1. The Local Plan is 10 years old.
2. The Council is been blackmailed by the company developing the airport.
3. The application contradicts the Carlisle District Local Plan Revised Redeposit Draft.
4. There has been lack of consultation.
5. The public have been misled by the hard-sell publicity generated by the developers.
6. Cumbria County Council's Community Strategy states that greenhouse gas emissions are to be cut.

Need for an Airport:

1. There is sufficient capacity of airports in the North of England already.
2. There is no evidence that existing passenger facilities at Newcastle, Manchester and Glasgow are not sufficient for the local population.

3. More work could have been done on the public consultation exercise to get a representative sample.
4. There is no economic case for passenger flights.
5. There are numerous airports within easy reach by use of rail services.

Technical Comments:

1. No runway plans or data have been provided.
2. The runway is described as a 'replacement runway' which it is not.
3. The runway proposed will be able to take larger aircraft than those stated in the plans.
4. The full certification runway plan which is to be lodged with the CAA is not disclosed in the application.
5. The noise and vibration study should assess larger aircraft landing at the airport.
6. The air quality study is flawed.
7. Confusing information has been submitted with regard to the type and size of freight planes.
8. The Environmental Statement bears no relation to the scale of the proposed airport terminal and freight handling buildings.
9. The application presents a glossy approach and lacks detail.
10. The buildings proposed are not in keeping with the local environment.
11. The planning application is difficult to understand.
12. The criteria for determining the correct PSZ contours are misleading.
13. The size of the building bears no relation to the estimated air traffic movements.
14. Lack of consultation with owner of land at the western approach to the runway. The Applicant needs to sign certificate B.
15. Drawings are not to scale.
16. There is a discrepancy between scale and size of passenger and freight terminal, investment of £30 million, size of car parks, the alignment of the runway and no. of shops in the plan.
17. The drawings submitted are flawed. They are not to scale, residential

houses are missing from the drawings and field boundaries are shown which do not exist.

18. The correct criteria for public safety zones has not been followed.
19. Radar facilities are non existent.
20. Carlisle Council should employ independant specialist consultants.
21. Environmental Statement is not an independant document.
22. No archeological study has been undertaken.

Impact on Neighbours/Surrounding Area:

1. There will be noise disturbance at night.
2. There will be an electrical blackout of 20 minutes in Brampton/Longtown due to the runway beacon lights in operation.
3. Carlisle citizens will go thirsty and dirty from lack of water as airport will use all the water.
4. The realignment of the runway will bring aircraft closer to Brampton urban area.
5. Residents of Irthington, Brampton and Carlisle will be affected by noise.
6. Flight paths are over Lanercost Priory, Hadrian's Wall World Heritage Site and buffer zone. Concerns about impact on these sites.
7. There will be larger and nosier aircraft than what is allowed at present.
8. The location of landing lights at eastern end of the runway are to be placed in a field adjacent to six properties. There is concern about visual impact.
9. The volume of water coming from Carlisle Airport will flood Bleatarn Park Farm.
10. It is against Human Rights
11. Concerns about the impact of noise on horse riders on the adjacent bridle way.
12. Visual impact from airport lighting.
13. Proposal has not noticed 'The Old Viacarge' situated directly at the end of the proposed run way lights.
14. Effect of aircraft noise over Irthington School. Concerns about children's

ability to learn and impact on children's sleeping patterns.

15. There will be disturbed sleep patterns which will impact on privately owned B&Bs.
16. Health and Safety Risk Assessment and Environment Impacts in the statement would become inadequate to cover the potentially much higher risks from increased plan movements, e.g. a crash.
17. The increase in noise pollution can affect performance e.g. reading, attentiveness and can lead to aggressive behaviour. There is a link between noise and mental health problems by the demand for tranquillizer's and sleeping pills.
18. It will lead to further social exclusion as poorer people are unlikely to be able to fly and increased pollution will affect the poor to a greater extent.
19. There will be increased noise levels from wagons loading/unloading at the ESL depot throughout the day and night

Services:

1. How will the Council provide the massive amounts of electricity that is required?
2. Environmental report is short in detail about provision of electricity.
3. A lot of water will be used by people flushing toilets prior to taking a flight/lorries been washed down.
4. Local treatment plants are unsuitable for sewage and waste water
5. Local landfill sites will be filled beyond capacity.
6. Nation wide airport activities generate a lot of waste which is not possible to recycle.
7. No plans to develop existing utilities.

Non Planning Issues:

1. Carlisle Airport was not on the agenda for the Neighbourhood Forum meeting in Brampton. There was also limited time to ask questions at this meeting.
2. There was lack of consultation at the neighbourhood meetings.
3. Compensation to surrounding properties is required.
4. Comparisons have been made to Exeter airport.

5. Planning Committee Members, if they approve the application, will be held personally responsible for any subsequent loss of life or severe injury.
6. At the neighbourhood meetings at Newtown Village Hall the landing lights were not mentioned.

3.5 The points made in **support** of the proposals are:

1. The Airport will be beneficial to local businesses which have to use frequent air travel since travel time will be reduced.
2. The airport will bring more tourists to the Lake District and the West of Scotland.
3. The airport will boost the local economy.
4. Living standards of all those living near to the airport will be improved.
5. There will be better connections to London.
6. The airport will lead to increased employment and inward investment.
7. The development of the airport will put Carlisle on the map.
8. The airport will help maintain the younger generation in the North.
9. The North/South divide will be reduced.
10. It will enable West Cumbria to be better connected to national and international markets.
11. It will help allow students to travel to the University of Cumbria.
12. The airport will make Carlisle/Cumbria a sustainable and attractive location for local, national and international businesses to invest.
13. The airport will lead to the development of cultural tourism.
14. The airport will help to retain and develop high value jobs and employment in Carlisle.
15. The airport will allow for future strategic growth
16. The loss of the airport and WA Developments/Stobart would result in a loss of jobs, costing the economy £15 million and a further £40 million in local spend.
17. The airport development will boost the Dumfries and Galloway area.
18. Development should complement improved road infrastructure provided

by the Cumberland gap and the future Northern Relief Road.

19. Noise inconvenience is currently not experienced. The proposal is unlikely to increase such movements to any level of concern.
20. There will be less noise than when the site was first used in the 1960s.
21. One person has stated that the airport will help reduce Cumbria's carbon footprint as Cumbrians will no longer be using vehicles to travel to other airports/places in the country. Furthermore another consultee has asked the Council to ensure that there is proper road drainage.

3.5 The **comments** cover a number of matters and these are summarised as follows:

1. There will be benefits for Cumbria.
2. The Airport will sustain the local economy in terms of inward investment and job security.
3. The Airport will boost prosperity and travel need for Carlisle.
4. It will put Carlisle/Cumbria on the map.
5. It will take make Cumbria an easier place to travel from and to.
6. It will boost the local economy.
7. It will add to a long needed service to Carlisle and Cumbria.
8. Regular passenger flights to London will be beneficial.
9. Carlisle will become more attractive to national companies.
10. There has been many failed attempts for commercial passenger flights from Carlisle Airport.
11. The Economic appraisal ignores other regional airports.
12. Only 70 jobs will be created.
13. It is impossible to make economic sense of Mr Tinkler's plans.
14. The running costs of the airport will be very high.
15. Flights to London/Stansted will not appeal to either leisure or business users.
16. Would like a condition attached ensuring that under no circumstances can the runway be extended further to take large planes as this would spoil the whole area and become detrimental to the village, countryside and

residents alike.

17. The application regards the trees/hedgerows in Watchclose Wood as of little importance.
18. Growth of suggested planting is exaggerated
19. Suggest that removal of existing trees should be less than the application asks for and there should be strict monitoring of this. New trees should be established to compensate for any that must be removed.

Transport:

1. Reduce road haulage
2. There will be an increase in traffic.
3. There will be road safety issues.

Impact On Neighbours/Surrounding Area

1. There will be an increase in noise levels.

Questions Raised:

1. What are the intentions in terms of aeroplanes that are going to be used for moving airfreight?
2. Are larger planes going to be used?
3. The prospect of a hotel/filing station is remote.
4. The airport is to serve ESL's road haulage business which is nothing to do with an airport related business.
5. Suggestion of providing office accommodation for WA Development is irrelevant.
6. Application is a departure from the local plan.
7. Is it possible to impose a monitoring fee?
8. There is a lack of consultation.
9. The planning application is hard to understand.
10. Public meetings for the planning application were badly publicised.
11. The current planning application is mis-leading.
12. The Environmental Statement is not an independant document.

13. Risk Assessment of public safety zones are defective and misleading.
14. Are the noise contours correct?
15. The terminal is larger than required.
16. The public consultation period should be extended.
17. Will all documents be published on Carlisle Council's website.
18. No flight paths are illustrated in the Environmental Statement.
19. The Environmental Statement contradicts itself.
20. The Environmental Statement only looks at the risks associated with relatively low usage of the airport.
21. If an airplane was to declare an emergency and needs to dump fuel where would this happen?
22. The final proposal differs from that published in the Stobart Air brochure.
23. Is there plans for a hotel and conference facility?
24. Can anything be done to save the control tower and hangers? what are the plans for these buildings?
25. Is it possible to fly into London Docklands?
26. Is the application big enough to accommodate 25% growth in warehousing and 30% growth in airport?
27. Is there provision for observation/photographic area?
28. No reference to "The Lodge" is made in the proposals.
29. Concerns about public safety zones.
30. Have all consultees been given copies of the plans?
31. Concerns about consultation period.
32. No Scottish bodies have been consulted. Will there be any flights over Scotland?
33. Which aircraft will fly from the airport?
34. What flight path will be used?
35. Are the airport's proposals commercially rational?

36. Plans are unclear as to where the ESL Business is located and where the air freight is to be located.
37. Who decides if the application is a departure from the Development Plan, and if it is deemed a Departure what happens next?
38. What procedures are in place to ensure the application is decided on its merits?
39. Is it ok to express details of concerns to Committee members prior to the application been determined?

4. Planning History

- 4.1 The Air Ministry opened Crosby-on-Eden in February 1941 as a wartime training base for RAF pilots and it remained as a military airfield until its closure in 1946.
- 4.2 It was, for a short period of time, thereafter used by British European Airways who operated flights from Carlisle to the Isle of Man but when that service ceased it reverted to agricultural use.
- 4.3 An application by Carlisle Corporation for Planning Permission to create a civil airport and erect buildings thereon was made to Cumberland County Council in January 1959. Following an Appeal, against that authority's failure to give a decision within the statutory period a Public Inquiry was held in Carlisle in September 1959. The Minister of Housing and Local Government issued his decision in December 1959 advising that he allowed the Appeal and granted planning permission. The permission was subject to one planning condition that the siting, design and external appearance of any buildings, and the location and design of any accesses, and the the extension or alteration of any existing buildings shall be as may be agreed with the Local Planning Authority.
- 4.4 The land was duly purchased from the Air Ministry by the City of Carlisle in 1961. Transferred to the City Council following Local Government Reorganisation in 1974, Carlisle Airport was thereafter run for many years by a directly appointed Airport Manager and related support staff. The Airport provided commercial scheduled services, principally between Carlisle and London, but also at various times between Carlisle and other UK destinations such as Aberdeen, Dundee, Belfast and the Isle of Man, until the mid-1990's although charter public transport category services continued until 2004.
- 4.5 There have been a number of applications involving development at the Airport, the most significant of which was made by the City Council and sought Outline Consent for new development including the provision of small industrial units, flying training facilities, a high security area, small business park, a new terminal complex and support facilities. That application was approved in October 1989 but was never implemented and has lapsed.

- 4.6 Also in 1989, under planning application 89/1140, full planning permission was granted for a new flying training facility incorporating small hanger, workshop and amenity facility, and the erection of a maintenance workshop.
- 4.7 In 1994, full planning permission was granted for the erection of a hanger to house and maintain police support aircraft and for the temporary siting of 3 no. portacabins for use as office and stores.
- 4.8 In 2001, full planning permission was granted for the erection of a new hangar to house aircraft.
- 4.9 In 2001, full planning permission was granted for an extension to the existing fire station, adding 3 no. 6m bays, to house further fire vehicles.
- 4.10 Haughey Airports obtained a 150 year lease of the Airport in 2001 but that Company was subsequently acquired by WA Developments. The Airport is now managed by Stobart Air Limited, a subsidiary of WA Developments.
- 4.11 The Airport is used now by private flying clubs and pilot training on a regular basis, aviation club activities including use by the Solway Aviation Museum, private and business aviation and occasionally by the Ministry of Defence for military exercises in the area. The applicants have stated that in 2006 there were approximately 23,000 Air Traffic Movements at Carlisle Airport associated with these uses.

5. Details of Proposal/Officer Appraisal

Introduction

- 5.1 This application seeks Full Planning Permission for a major and extensive scheme of development and related infrastructure works within the existing perimeter of Carlisle Airport, together with further off-site works on adjoining land to the east of the approach road to Irthington and west of the road leading to Laversdale. The latter works are associated with the proposed provision of improved landing facilities and lighting and would utilise some land outside the applicants' ownership.
- 5.2 The application is supported by a range of detailed specialist studies including a Transport Assessment; a Design, Access and Utilities Statement; an Economic Appraisal; a Flood Risk Assessment; an Arboricultural Assessment; a Planning Policy and Position Statement together with a set of plans and particulars of the intended site layout, buildings, plant, equipment and infrastructure. Since the development falls within Part 10(e) of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999, the application requires to be and is accompanied by an Environmental Impact Statement (variously abbreviated by consultees to EIA, ES or EA).
- 5.3 The Environmental Statement comprises Volumes 1, containing relevant

chapters on key issues such as archaeology, nature conservation, air quality, noise and vibration; Volume 2 providing Technical Appendices; and Volume 3 which provides a compendium of plans, photographs and Figures referred to in Volumes 1 and 2. As required by the Environmental Assessment Regulations the applicants have also provided a “Non-Technical” Summary of the Environmental Statement.

- 5.4 Since the application was initially received, in October 2007, the applicants have submitted a series of revised Tables, Plans and Technical details together with supplementary information addressing key topics raised by the application or through consultation responses. These amendments or addendum to the original submission are listed at the heading to this Report.

Background

- 5.5 Carlisle Airport lies approximately 8.5kms (5.3 miles) north-east of Carlisle and about 3.5kms (2.2 miles) west of Brampton. Its' current operational site extends to about 176 hectares and straddles a low east-west ridgeline within generally open countryside, the nearest settlements being the villages of Irthington and Laversdale that respectively lie about 0.5kms and 0.6kms to the north-east and north of the existing Airport perimeter.
- 5.6 In many ways the Airport is little changed from when it was first built in 1941 and began operations as RAF Crosby-on-Eden, a wartime training base for pilots. The three asphalt runway strips (all known by their magnetic bearings), namely the principal runway 07/25 which is aligned broadly north-east to south-west; the shorter 01/19 which has a north-south axis; and 13/31 which is orientated south-east to north-west, are all very evident as are the linking taxiways, aprons and hard standings. Only the first two are still used by aircraft with the latter being now just used for storage and vehicle parking. Likewise, the cluster of low, 1940's buildings with their taller, adjacent control tower still dominates the immediate area close to the northern site boundary and in relation to the more recent, but more scattered, additional hangers and fire fighting facilities close by. Other features such as abandoned air raid shelters and structures near to the western boundary also provide a reference to the Airport's origins and first use for military purposes.
- 5.7 The Airport is set within a predominantly agricultural landscape of small farmsteadings but there are, to the west of the Laversdale road (close to Watchclose Woods) and immediately opposite the existing Airport administration buildings adjoining the northern site boundary, clusters of industrial/commercial development occupying sheds/sites that were formerly part of the Airport but were sold off some years ago.
- 5.8 The existing site area is almost wholly enclosed by roads with most of the southern site boundary possessing a lengthy frontage onto the most significant, in highway terms, the A689 which is a strategic road link from the A69(T) west of Brampton to the M6/A7/M74 junction at Kingstown (Junction 44 of the M6) at the northern fringes of Carlisle. Currently, there is no direct vehicular access from the A689 to Carlisle Airport with all traffic using the minor roads to Laversdale (skirting the west and north fringes of the Airport)

or, to a much greater extent, the more direct access leading from the road to Irthington.

- 5.9 While in its wider setting the Airport sits within a generally rolling and undulating landscape, its' immediate environment is fairly open and featureless, the only significant visual interest being created by Watchclose Woods at the western perimeter. However, it occupies a very important position from both an archaeological and nature conservation perspective due to its proximity to the Hadrian's Wall World Heritage Site (WHS) and the River Eden Special Area of Conservation (SAC), the River Eden and Its Tributaries SSSI and more distantly to the west, the Upper Solway Flats and Marches Special Protection Area (SPA).
- 5.10 Although no part of the proposed development area actually lies within the World Heritage Site, the whole of the Airport is within the "Buffer Zone" of the WHS. It has further archaeological potential and, indeed, interest, due to the presence within the site of the Watch Close Roman Camp (a Scheduled Ancient Monument near the south-west boundary) and the remains of part of Stanegate Roman road, an associated feature of the Wall and Vallum, which are present within Watchclose Woods. Likewise, whilst the application site is not within a national or internationally designated area of nature conservation importance (the Airport being a County Wildlife Site while Watchclose Woods is a non-statutory "local" wildlife site) it is very close to the River Irthing (0.4km to the east) which forms part of the River Eden SAC and is also within the River Eden & Its Tributaries SSSI designation.

Details of The Proposals

- 5.11 The application site area (182.5 hectares) is actually larger than the current operational boundary of the Airport as it incorporates additional land beyond the eastern and western site boundaries, including the site of a derelict farmstead, which it is intended to demolish, situated to the west of the Laversdale road. The entire site is, therefore, not owned by the applicants and the appropriate statutory Notices have had to be served on other affected land owners (land on which the approach lighting is proposed). There are a number of components of the overall proposals which are described as respectively "Airside" and "Landside" and "Other Development". These are as follows:

Airside:

1. The Construction Of A Re-Aligned Main Runway

- 5.12 The existing principal runway (07/25) is in poor physical condition as a result of which the Civil Aviation Authority license currently limits the weight of Public Transport category aircraft able to use Carlisle Airport. That is not a new situation: the previous Airport owners (Haughey Air) commissioned investigations into the feasibility of re-surfacing the runway to enable reinstatement of scheduled passenger air services and the North West Development Agency examined the case for regional funding to help restore scheduled passenger air services to Carlisle.

- 5.13 Rather than re-surface the existing 07/25 runway, however, the current proposals seek its re-construction on a slightly modified alignment, rotating it 3.5 degrees clockwise. This would result in a slightly shorter runway length than currently exists (1771m instead of 1839m) but it would have a wider operational area (45m as opposed to 30m). The Civil Aviation Authority's current imposition of a 12.5 tonne weight restriction on the public transport category movements because of the surface condition of the runway would not apply to the reconstructed runway. The re- configured orientation will also enable the installation of an Instrument Landing System (ILS) without encroaching within the airspace of RAF Spadeadam. An ILS installed on the present alignment would position approach aircraft within the "Danger Area" of the electronic warfare training ranges at Spadeadam, which lie about 5-6 nautical miles to the north-east, when making their final approach.
- 5.14 The new alignment would allow the applicants to safely install an ILS, without which they state the prospect of attracting commercial operators with passenger services would be significantly lessened. Since approximately 90% of aircraft approaches are from the east i.e. runway 25, due to the prevailing west/north-westerly winds, the main focus of investment in better landing aids is to assist aircraft landing from that easterly direction.
- 5.15 Virtually all of the existing 07/25 runway would be physically removed, with the exception of its extreme western end which would remain undisturbed to avoid any risk of damage to the archaeological remains of the below surface Scheduled Ancient Monument at Watch Close (Roman temporary camp).

2. The Installation Of An Instrument Landing System

- 5.16 The proposed new runway would be fitted with precision landing equipment (ILS) to Category 1 standard for the 25 approach, with non-precision landing equipment i.e. Non-Directional Beacon (NDB) and Distance Measuring Equipment (DME) for the 07 approach. These new systems would allow aircraft to land safely in a greater range of weather conditions than is the case at present.

3. The Installation Of Ground Lighting

- 5.17 Coupled with the foregoing new runway alignment and landing systems, the applicants propose the installation of Aeronautical Ground Lighting (AGL) to the runway, taxiways and aprons. For understandable reasons, the Civil Aviation Authority requires that all lighting must not be a hazard to pilots on approach to and on the runway and so it must be designed and installed to be downward directional.

4. Installation Of Approach Lighting

- 5.18 The Airport currently has a limited form of approach lighting within of the existing Airport boundary but this is inadequate and is proposed to be upgraded, principally at the approach to the 25 runway end i.e. towards and to the north-west of Irthington. While based upon the Category 1 lighting

standard that allows landings in mist or thin fog, which would normally entail approach lighting installed from 900m back from the runway threshold, Carlisle Airport cannot achieve full Cat 1 standard. This is due to the fact that the “crossbar” lighting that is required on approach for full Cat 1 level would extend to 4th and 5th sets and would adversely affect many properties within Irthington. As a reference point, Category 2 lighting allows landings in “thick fog” while Category 3 lighting allows landings in “extreme fog”. The type of lighting proposed for Carlisle Airport is clearly not capable, nor is it licensed, to deal with seriously adverse weather conditions. The applicants also advise that the provision of approach lights is not mandatory for clear visibility landings (day or night) provided other visual aids have been provided on or immediately adjacent to the runway. However, if approach lights have been installed the regulations indicate that they should be “energised”, but at low brilliances (typical clear night setting is 1% of maximum) and that they need only be energised for 15 minutes prior to an aircraft landing and for 15 minutes after an aircraft departure.

- 5.19 The application actually proposes a more limited version of Cat 1 that will consist of, initially, a linear series of twin lights, spaced 1.5m apart on single support posts with 30m spacing between each post on the approach to the runway. Each approach luminaire is designed for a maximum of 20,000 candelas at the origin of the lamp although in daylight/twilight that level would only be selected in more misty conditions. In clear daylight the lights would be extinguished while in clear twilight the setting is 10% and in misty twilight it is 30% of brilliance. In clear night conditions the setting is 1% with options to raise brilliance levels up to a maximum of 30% in fog (Cat 1). The lens system that the luminaire uses is designed to concentrate the beam into a conical eclipse so that the 20,000 candelas has a confined spread of 30 degrees horizontal and 20 degrees vertical. Additionally, the beam is directed upwards by a minimum of 5.5 degrees, gradually increasing for lights further from the runway with the furthest lights being tilted to a maximum of 7 degrees. It is self-evident that intense lights, directed upwards so that they would create a glare for a pilot on landing, are simply not tenable so the localised light impacts that the applicants have described seem credible. Members should recognise that the Civil Aviation Authority will have additional control over the standard of approach lighting installed under its licensing regime.
- 5.20 The siting of the twin-lamps mounted on posts, aligned with the centre point of the landing area, was originally proposed to commence 600m north-east of the threshold to the runway reverting to a single lamp fixed on the centre-line from a point 330m out from the threshold. However, due to the presence of inhabited dwellings close to the 600m point, the applicants have subsequently revised the proposals and now propose to install the first set of approach lights at a point 570m from the threshold.
- 5.21 The landform north-east of the Airport is undulating, resulting in that first set of the series of twin lamps, located to the north and north-west of residential dwellings at “Red Hills”, “Stable Hills”, “Red Bank House”, “Oakfield House” and “Red Hill Villa” and south-west of “The Vicarage” being elevated on a post 8.4m higher than the existing ground levels. That is substantially lower

than the intended post height of the lights at 600m shown on the initial submission (they were 15m above ground). Now, the most elevated structure on the landing approach from the north-east is a twin set of lamps, on the 360m mark, which is 13.6m high but is sited within a fold in the landscape. All other twin lamps are generally much lower in height with single lamp centre-line lighting on the approach from the 300m point being lower again with each post diminishing in height as aircraft descend.

- 5.22 At intervals of 150m from the threshold, i.e. at 150m, 300m, and 450m back from the threshold to runway 25, the "centre-line" lights will be supplemented with "crossbar" lights, where the number of lamps, and their height above ground, will reduce the closer an aircraft is to the touchdown area. The "crossbar" lights, which at the 300m and 450m points are illustrated as a series of posts with pairs of lamps spaced 2.75m apart, form a horizontal line when viewed from the cockpit of an aircraft approaching to land.
- 5.23 Thus, 450m out from the threshold, the crossbar lights would contain a 37.5m wide line consisting of 6 no. lamps each side of the twin centre-line lamps, reducing to a 30m line of 5 no. lamps each side of a single centre-line light at a point 300m from the threshold, with the third set comprising a 22.5m wide line of 4 no. lamps each side of a single centre-line light 150m from the threshold. Similarly, in the sequence of "crossbar" light groups viewed on descent, the lamps are about 7m high above existing ground level at the 450m mark; 6m high above existing ground at the 300m mark; and are inset in the runway pavement at the 150m point.
- 5.24 The proposed lighting has attracted objections from nearby residents who are concerned about the potentially intrusive presence of a series of lights near to their homes. The applicants have sought to address these concerns by the revisions to the lighting proposals to the slight detriment (for operational reasons) of approach lighting that would now be provided. Recent additional drawings and technical information supplied by the applicants' agents, however, indicates that with the changes now proposed, the effects upon neighbouring homes would reduce to the point where, at the receptor properties, the light impact falls to 1 Lux. The applicants describe that light level as being insufficient to illuminate any walls or structures.
- 5.25 Additionally, it is proposed to install a more modest approach lighting system at the opposite end of the main runway i.e. 07 runway at the western end of the Airport. This would entail the installation of lighting from 420m west of the threshold principally as a linear series of post-mounted lamps positioned at 30m metre intervals and aligned to correspond with the centre-line of the runway. The heights of posts would vary from about 0.4m to 1.4m above existing ground levels but at 300m from the threshold on the western approach, and just beyond the "field" side of the hedgerow on the west side of the Laversdale road, it is proposed to install a 30m wide "crossbar" (0.6m high) consisting of 5 no. lamps, spaced 2.75m apart, on either side of the centre-line lamp. From that 300m point the approach lighting reverts to a single lamp spaced at 60m intervals but at diminishing heights before being inset into the surface area at about the 180m mark (from the threshold).

5. The Installation of a Surface Water Drainage System.

- 5.26 The applicants' consultants calculate that in 2007 there were 37.6 hectares of impermeable surfaces within Carlisle Airport i.e. runways, taxiways, aprons, roofs to buildings, car parks, etc and that, with the development proposed, this will increase overall to 45.3 hectares of impermeable areas (+7.7 ha) allowing for removal of some existing areas of runway and taxiway areas within the existing site layout but increased areas of new runways, taxiways and aprons plus the substantial footprint of the proposed buildings and related vehicle parking areas.
- 5.27 The potential impacts of those changes have been assessed within the applicants' Environmental Statement and Flood Risk Assessment and these have outlined the basis of a surface water management scheme. It proposes the retention and use of existing outfalls serving the present drainage arrangements to certain sectors of the site, coupled with the installation of a new surface water drainage system to serve the proposed redeveloped areas. That latter aspect is still under review but is proposed to embrace a variety of traditional drainage methods and sustainable drainage techniques, including installation of storm water balancing lagoons, swales, temporary flood basins (for longer return period storm events) and temporary discharges to grasslands.
- 5.28 The submitted layout plan identifies the location of two lagoons close to the west site one acting as a storm water balancing lagoon and the other being a polluted airside run-off balancing lagoon. Although indicated as two "detached" lagoons when the application was lodged, recent amendments indicate that these could be provided as two "in-line" lagoons running parallel with the new runway and located 150m to the north-west of its centreline. These lagoons would be around 5m deep but only the bottom 2-3 metres would contain water and their precise surface water will be minimised, through use of oversized pipework within the on-site drainage system, underground tanks and surface infiltration features (where no pollution is present). The lagoons will require to be covered and/or netted to prevent birds, and in the case of the polluted run-off lagoon to prevent wildlife in general gaining access. Additionally, it is proposed to construct a separate storm water balancing lagoon close to the site frontage with the A689 which would serve the "landside" development (see Para 5.50). Although a "Proposed Surface Water Drainage Masterplan" has been submitted, it is very much at an "indicative" stage and needs much more detailed research, calculations, refinement and firm proposals to emerge.

6. Creation of New Fuel Farm.

- 5.29 Carlisle Airport already possesses a "fuel farm" situated to the north of the existing runway 07/25 and about 300m north-east of the existing Air Traffic Control tower. It will be retained but will be slightly re-located northwards. However, a new "fuel farm" is also proposed to be built 170m south of the replacement runway just inside the proposed new security fence separating "airside" and "landside" activities and adjoining the truncated section of existing runway 13/31, which is retained as a taxiway/apron and access route.

7. Construction of New Security Fence.

- 5.30 The Department of Transport requires that security fencing is erected to separate "airside" and "landside" functions at operational airports. The applicants accordingly propose the erection of a 2.4m high zinc coated chain link mesh fence surmounted by 3 strands of barbed wire on the "landside" of the posts, spaced 3m apart, and which are cranked 45 degrees facing towards landside. This gives a total height to the fence of 2.88m.

Landside:

1. Provision of New Access Road and Junction From the A689

- 5.31 The application proposes the creation of an entirely new access to the site, formed off the site frontage onto the A689. It would be located about 350m west of the junction with the road leading to Irthlington (and the minor road affording the existing main access to the Airport) and about 750m east of the junction with the road to Laversdale. It was, initially, proposed to be formed as a ghost island priority T-junction with a view to future upgrading to a signalised junction. As first submitted, the junction design allowed for a left filter "in-lane" for traffic approaching from the west coupled with a left turn slip road for traffic leaving the Airport and heading east. The ghost island design was intended to enable right turning traffic from the east i.e. from the Brompton direction to queue while waiting for a gap in the traffic flow on the A689 and a single lane was proposed for the right turning "out" movements.
- 5.32 The Highway Authority considered that proposal inadequate to deal with the likely proportion of right turning movements, i.e. towards Carlisle and M6 motorway, which were under-estimated in the traffic assignment exercises the applicants' agents had undertaken. The County Council advised that, when this under-estimate is corrected, the priority junction would not have sufficient capacity to cater for design year traffic. That Authority also had safety concerns regarding this form of junction in this location due to the combination of high traffic speeds on the A689 and the large number of right turning HGV movements expected from the proposed development. Similarly, due to the high traffic speeds on the A689, the future signalisation proposal was also not appropriate and the Highway Authority clearly stated that *"a roundabout therefore has to be provided"*. In responding as Highway Authority, the County Council saw further benefits in a roundabout arrangement in that it would better aid bus services to access the site and would be visually more in keeping with the rural location. This was, accordingly, an aspect of the submission that the applicants were asked to revise and this has subsequently yielded revised proposals for a 3 arm roundabout junction.
- 5.33 From the entry to the site via the proposed new roundabout access from the A689, a mini-roundabout is proposed that would separate traffic accessing the passenger terminal drop-off/pick-up area, taxi rank/bus stops and to the short-stay and long-stay car parking areas and cycle parking facilities (all to the north of the roundabout and west of the terminal bay). Traffic destined for

the proposed office accommodation and related staff parking areas, HGV parking areas for warehousing and distribution facilities, HGV fuelling and wash-down facilities all of which would be located to the east of the roundabout and generally south of the building, would right-turn at the mini-roundabout .

1. The Construction of Offices, Passenger Terminal Building, Air Traffic Control Centre, Hangars, Air Freight and Distribution Warehouses.

- 5.34 The single most significant element of the proposals, from the point of view of physical scale, visual appearance and likely landscape impact, is a proposed new 6 x twin-bay building that is proposed to be sited near to the southern end of the site. Orientated on a north-east to south-west axis it would be positioned immediately west of the minor road to Irthington and north-east of the new internal access road. The building, which would have a footprint of almost 290m by 180m and be 19m high, would accommodate the proposed terminal facilities and offices in a twin bay at its south-western end with warehousing, an air freight distribution centre, cargo hangars and a new Visual Control Centre (i.e. Air Traffic Control facilities), occupying the remaining bays. The proposals also include a new 26m tall Control Tower positioned at the north-east corner of the building.
- 5.35 The application indicates that this would be a "phased" development which would cumulatively provide 60,967 m² (656,250 ft²) floorspace, most at ground floor level but with some 1st, 2nd and 3rd floor level offices and other accommodation (totalling 12,439 m²/13,389 ft²) over the twin bays at the south-western end. It is, clearly, a large building, the overall size of which can perhaps best be appreciated by comparison with the Lanes Shopping Centre, which contains approximately 450,000 sq. ft. sales floorspace.
- 5.36 The application further provides for future expansion of some aspects of the terminal and related office administration facilities at that south-west end of the building e.g. for baggage handling, "arrival" and "departure" streams. The proposed footprint would not be extended, however, since those facilities would be provided by fitting out areas that would initially be voids within the overall shell of the building.
- 5.37 A breakdown of the proposed floorspace has been requested that "assigns" the various levels of floorspace for the individual operational areas within the building, which, in addition to providing replacement terminal facilities (including toilets/ departure/arrival areas/security and space for customs and immigration), is mainly intended to be occupied by Eddie Stobart Limited (ESL), Stobart Air, WA Developments (WAD) and WA Development International (WADI).
- 5.38 The wider disposition of floorspace that is proposed gives the following:
 1. Stobart Air Airport Hangarage 17,197m² (185,109 ft²)
 2. Stobart Air Leased Offices 5,181m² (55,768 ft²)
 3. Stobart Air Passenger/Air Freight 12,963m² (139,534 ft²)
 4. Stobart Air Office/Mtg Rooms 1,298m² (13,972 ft²)

5. Stobart Air Leased Airport Freight/ 24,328m² (261,867 ft²)
Distribution Warehouses

- 5.39 Correspondence from the Agents indicates that the proposed office floorspace is in part required to accommodate the re-location of the existing WAD/WADI Group and ESL operations from Kingmoor, Appleby and Kingstown (4112m²/44,262 ft² in total) which accounts for the greatest part of the 5181m² of office floorspace that is proposed to be occupied by WAD/WADI/ESL within the development.
- 5.40 The balance of the office floorspace is stated to be required to accommodate anticipated growth in employment. However, the applicants advise that the scheme also provides for *"an adequate amount of high standard office accommodation to serve the Airport operation and other airport related businesses likely to be attracted to the site. Such businesses will contribute to the overall airport operation and provide income to support the aviation activity. This is important as the Airport is in need of capital investment, which will be secured through the proposed development and ensure its future as an Airport."* It is accepted that the provision of an element of lettable office space for prospective aviation industry users at any operational Airport is not, in itself, to be unexpected nor, indeed, is it objectionable.
- 5.41 The applicants further indicate that the proposed floorspace to be occupied by Stobart Air Passenger and Air Freight (12,963 m²) absorbs the floorspace already provided (1,293 m²) within the existing inadequate original buildings, i.e. close to the northern site boundary, but will displace and enhance those to reflect the size, level and range of facilities *"passengers expect in a new, modern airport today. The proposed terminal makes provision and introduces space to comply with current security obligations"*. The Design and Access Statement states that the *"the size of the proposal is dictated by the functional requirements of the warehouse and the structural bays required to house this. Overall building heights are subject to similar restrictions, and also take into account the limits imposed by aircraft manoeuvres."*
- 5.42 Supplementary correspondence states that the proposed terminal will accommodate secure check-in facilities; baggage handling areas and systems (outbound and inbound); passenger and staff security check areas and systems; secure airside passenger departure facilities; car hire desks; ancillary shop facilities; cafe facilities; crew briefing and rest areas; airline operations offices; airport operations and admin offices; freight operations offices; a heritage interpretive facility; stairs, elevators and escalators to upper floors; meeting and briefing rooms; customs facilities; police facilities; executive lounge; additional and enhanced toilet facilities and a gateway foyer area for departing passengers, hosts, meeters and greeters commensurate with the aim to be a prime example of modern, efficient and friendly regional airport and a point of entry to the region for business people and visitors. Whilst all of those elements would be welcome facilities within any airport, it is rather surprising and disappointing that none of the drawings that have been submitted actually show how, or where, they are to be provided but instead simply show a large expanse of floorspace mainly at ground level but with some more limited floorspace at upper floor levels. Very

little of these floor areas are specifically identified as meeting the needs of air users.

- 5.43 The orientation of the building presents its principal or "public" facade on the south-western elevation: the Design & Access Statement identifies that the architectural treatment and proposed finishes to that end, containing the Terminal and office accommodation, will employ large areas of curtain wall glazing in powder coated aluminium framing, with composite cladding panels (coloured "oyster") to the remainder of that external skin. Vertical columns and roof projections over that end of the building will be articulated using pre-formed aluminium cladding sections coloured to match the "oyster" cladding and it will have a self-finished aluminium roofing system. The glazing which features on the central section of that main Terminal elevation is largely "full-height" over the 4 floors of accommodation that are proposed and the whole south-western end is surmounted by a continuous fascia, returning in curved form at each end. The words "Carlisle Lake District Airport" are prominently centred on that fascia, viewable from the car, coach and taxi approaches to the proposed Terminal entrance.
- 5.44 The greater part of the building- containing the warehouse and hangar areas- is much more utilitarian and would be expressed differently using profiled, coated steel sheet cladding (coloured "albatross") and would employ a similar roof finish but with insulated "composite" panels. The layout of that space is defined by the intended uses such that the largest amount of the proposed floor area (warehousing and distribution) faces towards the highway, i.e. the road to Irthington, with the areas anticipated to be used for aircraft hangarage being located on the "airside" facing elevation i.e. to the north-west and the new runway. The agents state that the proposed 24,328 m² described as Stobart Airport Freight/Distribution Warehouse will principally accommodate the ESL Warehousing that is proposed to be re-located from Kingstown (23,366m²) but will have an additional 962 m² to be used for air freight warehousing.
- 5.45 The detailed ground floor plan and the illustrations in the Design & Access Statement suggest, and further correspondence has confirmed, that there is a significant degree of flexibility in the design: the two "airside" double bays closest to the Terminal are shown as aircraft hangars but the matching 3 no. double bays on that side are illustrated as having HGV loading bays (these are identical in service access to the 5 no. double bays on the "roadside" elevation) yet, paradoxically, each is labelled as "aircraft hangar". Similarly, the "Masterplan" showing the overall layout plan for the development (including the approach lights on adjacent land) annotates the two "airside" double bays nearest the Terminal as "cargo hangars" but the remaining 8 double bays (3 "airside" facing and 5 "roadside" facing) are all annotated as "airport freight distribution centre". Clarification of these areas, and their intended use, has been sought from the agents and their response suggests that the initial available area for "air freight" purposes will comprise the 962 m² described in para 5.44, the rearmost section of the passenger Terminal, together with floorspace provided by the 3 no "airside" double-bays. A specific floorspace figure for that area is awaited. It is further stated that the *"true volume of air freight is unknown at the moment but the whole building is*

designed and will be managed so that future air freight requirements are accommodated in the warehousing and hangars as future demand arises".

- 5.46 A further area where clarity has been sought relates to what, if any, of the proposed accommodation would actually provide "hangarage". In the submission, the agents state that the existing amount of aircraft hangarage at Carlisle Airport (3,000 m²/ 32,300 ft² in 3 existing hangars) is already inadequate to deal with the Airport's accommodation demands, such that Stobart Air has a waiting list of owners of 16 aircraft requiring storage/parking space at Carlisle. It is further stated that significant potential revenue is being lost through that lack of existing facilities and that some specialist training providers at the Airport are losing business because there is no available hangarage. While some building work is underway at the Airport at present (under the "Permitted Development" rights that operational airports possess) it is unclear whether that will address all the aircraft storage/parking demands that have been described in the current application or whether this current planning application is intended, in part at least, to provide enhanced aircraft storage/parking.

3. Car, Coach, Cycle and HGV Parking Areas

- 5.47 The submission includes proposed barrier-controlled passenger car parking facilities situated to the west of the Terminal building, which would (if all spaces were provided) accommodate 180 short-stay and 310 long-stay spaces. In addition, the layout proposes to provide 10 no. coach parking bays and a taxi set-down area to the immediate north of that car park while cycle parking is proposed close to the Terminal entrance. Adjoining the passenger car parking areas, on its eastern side, is a separate staff parking area for employees of WA Developments/Stobart and it is shown as accommodating, if fully provided, 357 cars. As described under para 5.33 it has a separate access off the road system leading to the offices/warehouses/ distribution and HGV fuelling/wash facilities. Adjacent to the south-east side of the proposed warehouse/distribution areas it is proposed to provide 60 no. HGV parking bays. All parking facilities would be provided with downward directed lighting.
- 5.48 No information has been supplied about the intended surface treatment of all access routes or car, coach or HGV parking and circulation areas. Landscaping proposals have been submitted for the western side of the Terminal and for the site in general but the initial details were not regarded as particularly beneficial in landscaping terms and the applicants have subsequently been requested to review what is an important aspect of the development and revised plans were received on the 14 March 2008.

4. Construction of Electrical Sub-Stations, LPG Store and Sprinkler Tank

- 5.49 A new electrical sub-station is proposed to be erected almost opposite to the entrance to the staff car parking area while an LPG store and sprinkler tank are to be located close to the south-eastern corner of the building, adjoining the HGV parking, fuelling and wash-down areas. No information has been provided about the size or capacities of those facilities or their finishes.

5. Construction of Surface Water Storage Lagoon

- 5.50 Just as the extensive hard surfaces that are "airside" have been evaluated within the ES to address the impacts of surface water run-off from them, so also has the issue of surface water discharges from the substantial roof areas of the proposed Terminal, warehousing and hangarage, plus the related car, coach and lorry parking areas and the proposed access road system, been considered within that document and the related Flood Risk Assessment supporting the application.
- 5.51 At the present time, the southern part of the taxiways and hardstanding area drains south to an outfall which connects to an unnamed ditch south of the A689, flowing south to join the River Irthing upstream of its confluence with the River Eden. The 6.72 hectares of impermeable surfaces that drains to the south represents the third highest flows from the 4 drainage "zones" dealing with existing surface water from the Airport as a whole. It is a relatively small part of the existing overall surface water flows from Carlisle Airport: most of those flows discharge to the west and north-west while there are also lesser flows to an outfall to the east of the Airport.
- 5.52 The proposed re-location of the Terminal facilities close to the southern perimeter of the Airport, coupled with the substantially increased overall footprint which its aggregation with the related warehouse and hangar facilities creates, generates a significant additional flow at this sector of the site. When the extensive areas proposed for parking, roads and general circulation are added, this results in a cumulative increase of 7.8 hectares of impermeable area draining to the south i.e. from the existing 6.7 hectares to 14.5 hectares. That is the drainage sector that will receive the highest increase in run-off flows as a result of the proposed development
- 5.53 The preliminary drainage proposals devised by the applicants' consultants are to attenuate these flows to "Greenfield" run-off rates using sustainable drainage techniques, where possible. It is anticipated that this will result in reduced peak flows to the unnamed receiving ditch with a likely reduction in scour and, thus, a moderate beneficial impact.
- 5.54 Some of that increased run-off is hoped to be addressed through the construction of swales but the most significant feature would be the installation of a lined and netted storm water balancing lagoon which is proposed to be sited to the west of the new access road, between the A689 and an existing area of the Airport paved surface system. The detailed design work for that element of the drainage system has yet to be undertaken but the general principles are believed to be broadly acceptable to the Environment Agency and United Utilities.

6. Construction of New Perimeter Fencing

- 5.55 A new security fence to meet Civil Aviation Authority requirements will be erected around the perimeter of the Airport. The applicants have proposed the erection of 3.2m high zinc coated chain link/weld mesh fencing surmounting a 450mm by 800mm in situ concrete base. The top of the fence

would have additional triple strands of razor wire on each side of the Y-section fence posts that are proposed. The fence is designed to BS1722 Part 10 specification but the Architectural Liaison Officer of Cumbria Constabulary has requested that this be replaced with fencing to the specification set out under BS 1722 Part 14 which has a welded mesh or extruded finish and is regarded as more secure (while still visually acceptable). The applicants have agreed to consider that and suggest it be dealt with as a condition of any planning consent that may be given for the development.

Other Development:

- 5.56 The Civil Aviation Authority imposes safety standards upon the operation of all airports and in order to meet these standards, the overall proposals will require the implementation of an Obstacle Limitation Surface (OLS). In essence, this defines heights of obstacles (which can include trees, buildings or other objects) at different distances from the sides and ends of the runway. The proposed realignment of the runway and intended installation of the precision landing equipment alter the current OLS for runway 07/25 and hence a revised OLS is needed.
- 5.57 Some aspects of the revised OLS are relatively insignificant and un-contentious, such as the requirement to demolish the redundant farm buildings and former farm house at Watchclose on the west side of the Laversdale road or the removal of a Nissen hut and semi-buried air raid shelter near the western boundary. Similarly, the existing fuel farm near to the eastern end of the proposed new runway is to be re-positioned slightly to the north while 3 existing hangars and the existing air traffic control tower, again all close to the east end of the replacement runway will need to be reduced in height.
- 5.58 Hedgerows at the eastern and western ends of the replacement runway, and in fields where approach lighting is to be located, together with a number of trees and hedgerows to the north-west and to the south-east of the new runway are also affected by the proposed OLS and will require removal or reduction in height. A section of the hedgerow fronting the A689 would be removed in order to provide the proposed new access road. In total, approximately 5 km of hedgerow removal/ reduction is proposed.
- 5.59 Initially, the most significant and, arguably, unwelcome feature of the revised OLS concerned the proposals in relation to the woodland area of Watchclose Woods, a Local Wildlife Site, where it was suggested that all of the 5.7 hectares of woodland would need to be removed. Both the potential loss of that area, and the methodology for the removal of the trees, led to objections from wildlife organisations and, due to the likelihood of damage to surviving archaeology caused by removal of tree stumps and roots, from English Heritage and the County Archaeologist.
- 5.60 The applicants have, accordingly, been required to reconsider this matter in terms of how the physical impacts would minimise damage to archaeological interests and with regard to the nature and extent of works required within

Watchclose Woods, and in relation to the extent of hedgerows being removed/reduced, to satisfy the requirements imposed by the new OLS.

- 5.61 The applicants now confirm that the area to be felled to ground level, at the southern end of the woodland, would extend to 3.7 hectares, 1.8 hectares of a band of woodland in the centre of Watchclose Woods would be reduced in height, while at the northern end 0.26 hectares would be retained/undisturbed. To compensate for that general loss of woodland it is also now proposed to undertake additional woodland belt planting in 3 blocks adjacent to the north-western site boundary. These blocks would consist of two mixes of species selected from oak, silver birch, hazel, ash, field maple, poplar and pine. A linear woodland mixed planting strip would also be planted inside the site's frontage onto the A689 while extensive hedgerow planting is also now proposed adjacent to the north boundary. The applicants state that prior to any development at the Airport, existing woodland planting amounts to 8.39 hectares in extent but that the combination of retained/ reduced in height existing woodland and the totally new woodland planting that is proposed would result in there being 10.56 hectares of woodland post-development. They state that this would represent an increase of 2.17 hectares (circa 25.9% more than is currently present).
- 5.62 The other significant feature of the proposed revised Obstacle Limitation Surface relates to the proposals to install sets of signalised Traffic Controls on both the Laversdale road and on the minor spur leading from the road to Irthington. These signals are intended to be activated by Air Traffic Control and are designed to avoid any risk of larger vehicles using these minor roads becoming "obstacles" when large aircraft are taking off or are landing using the main runway (07/25). The lights will not be utilised for all take-offs or landings but when they are required to be used it will be traffic on either one or the other road that will be affected, and not both.
- 5.63 The lights controlling traffic on the Laversdale road will be installed approximately 130 metres south and 240 metres north of the centre-line of the proposed new runway while those to the east, on the minor road from the Irthington road, will be installed about 140 metres south and 220 metres north of the centre-line of the runway.
- 5.64 The southernmost lights on the Laversdale road are proposed to be located about 270 metres north of the junction with the A689 while the equivalent set at the "Irthington" end would be located about 90 metres north of the junction with the road to Irthington from the A689.
- 5.65 The proposed Traffic Controls are illustrated within the submission. They would comprise a rectangular back panel with two red and one amber flashing lights and text below these stating "STOP when lights show", fixed on a post set in the highway verge. The back panel would be surmounted by the standard national road sign in use on local roads at airports throughout the UK (including Carlisle Airport) i.e. an aircraft symbol within a red edged "warning" triangle.

Assessment of the Proposals

- 5.66 Members will realise from the extent of representations made about this application, that there is no real consensus of public opinion about the proposals with those supporting the development being slightly out-numbered by those persons who object to the application. There are also a number of people who have made observations without leaning in favour of the submission or being opposed to it.
- 5.67 It is considered that any evaluation of the application needs to begin with an appreciation of what the historical use of the Airport has been, what the applicants are legally entitled to do now (from a planning perspective) and, where restrictions on the use of the Airport exist, why they have been imposed.
- 5.68 An aerodrome has existed at the site for much of the last 70 years and has been in operational use as a Civil Airport for almost the last 50 years. Although scheduled commercial passenger flights ceased in 1994, chartered public transport category services continued until 2004. The Airport has also been used for commercial cargo operations in the past but that has decreased since 1995 from the 200-2,000 Air Traffic Movements (ATM's) of previous years. At the present time, the Airport is used for aviation training and test flights using fixed wing aircraft and helicopters; aviation club activities; private or leisure flights; business aviation; air ambulance service and, from time to time, for military exercises (the Airport has a current license with the MoD which permits up to 7 exercises on the ground each year, not necessarily involving flying). The applicants state the total ATM's at Carlisle Airport from all of those activities amounts to between 20,000-30,000 per annum.
- 5.69 There are no "planning" restrictions governing either the type of flights, the aircraft used, the frequency of flights or the hours when flights may take place. Under the terms of the "lease", however, a maximum of 8 night-time aircraft movements are permitted i.e. between 23.00 hours and 06.00 hours the following morning. The lease does not define any limit on the size, weight or type of aircraft that may operate during those times nor does it distinguish between passenger or cargo movements. For the purposes of the lease a "movement" is defined as being any of the following:
1. An aircraft landing between 23.00-06.00 hours that remains on the ground for the rest of that period; or
 2. An aircraft which lands between those hours and also takes off again within those hours; or
 3. An aircraft which is already on the ground prior to 23.00 hours but takes off between that time and 06.00 hours the next morning.
- 5.70 Distinct from the control exercised by the lease in relation to night-time flights, there are no controls over how the Airport may operate during the rest of the day.

- 5.71 The Civil Aviation Authority exercises separate regulatory control over operational civil airports. Carlisle Airport currently has a full CAA "Public Use" license, which permits flights to take place on seven days a week during the Airport's published opening hours (09.00 to 19.30 hours). Since about 1999/2000 when the condition of the runway began to seriously deteriorate, the CAA has imposed a weight restriction of 12.5 tonnes on "Public Transport Category" movements i.e. aircraft carrying passengers for reward such as scheduled passenger flights or chartered flights. It is understood that subject to the necessary improvements being undertaken to the runway surface, whether "repair" on its existing alignment or through reconstruction on the proposed new alignment, that weight restriction would be removed.
- 5.72 It must be appreciated that were the applicants simply proposing to re-surface the existing runway to remove its existing defects (as previously envisaged by Haughey Air) there would not even be a planning application before the Council as those works would constitute "repair". The current application is required because of the combination of the construction of the entirely new runway, the related terminal, warehousing and freight distribution facilities and the new access road, car, coach, lorry parking and drainage proposals.
- 5.73 The proposals raise a number of issues and these are considered in turn:
1. The Nature of the Replacement Runway, The Need for It and the Use of It By Aircraft
- 5.74 The proposal before the Council is to rebuild the main runway at Carlisle Airport on a slightly altered alignment and to physically smaller dimensions than is the situation at present (1771m by 45m "paved" surface as opposed to the existing 1837m by 45m "paved" surface of runway 07/25). While the current maintained width is 30m for "operational use"- in other words what the CAA records show as the runway width at Carlisle- it is currently surfaced as wide (45m) as is proposed for the new runway. The CAA has confirmed, in discussions, that there is nothing exceptional in a 45m wide runway: it is the "standard" width of most runways.
- 5.75 Similarly, due to operational constraints largely imposed for safety reasons, not all of the 1837m attributed as the length of the existing runway can be used. Hence, allowing for safety margins at either end, the "Declared Distances" for take-off and for landings relate to a much smaller length. Thus, even although it has an existing paved surface of 1837m, the official declared Landing Distance Available (LDA) is currently 1469m for aircraft landing from the west and 1321m for aircraft landing from the east. The restrictions imposed on take-off also curtail the usable length of runway with the declared Take Off Run Available (TORA) being 1714m for aircraft departing to the east and 1659m for aircraft taking off to the west.
- 5.76 The application proposes a shorter length of "paved" surface to the replacement runway (1771m). From calculations undertaken by the applicants and with preliminary input from the CAA, it is indicated that the equivalent LDA with the new runway in place would be 1433m (from either

east or west) with the TORA for flights departing to the east being 1608m and a slightly lesser TORA of 1598m for aircraft departing to the west. Both of these take off distances assume the proposed traffic lights on either the Laversdale road or the short spur from the Irthington road are in operation and hence represent the "maximum" take off distances the proposals are expected to achieve. Both these TORA's are shorter than the existing declared distances. The new runway would have a slightly longer LDA for flights approaching from the east but slightly shorter LDA for landings from the west than the existing 07/25 runway.

- 5.77 The applicants have also been asked to clarify the proposed construction standard of the re-aligned runway and have responded that it will be to the standard required by CAA CAP 168: Licensing of Aerodromes, a Civil Aviation Authority publication (latest edition issued in February 2007) which provides guidance on the standards required at UK licensed aerodromes relating to physical characteristics, assessment and treatment of obstacles, visual aids, rescue and fire fighting services and medical services. The applicants add that the load bearing is likely to have a Pavement Classification Number (PCN) of 54 which is described as allowing a comfortable margin for all weights of aircraft likely to use the airport and reduce maintenance costs.
- 5.78 Members should appreciate that a number of factors determine the ability of different sized aircraft to operate from any airport. The declared LDA and TORA are just two of several variables, with others factors such as the elevation of the airport, air temperature, runway gradient and runway surfacing also being relevant. It is clear, nonetheless, that the length of runway available is a critical factor in determining the aircraft types generally capable of using an airport, even allowing for payload restrictions such as reduced numbers of passengers, fuel load, and whether they carry cargo. The greater the payload restrictions imposed, the lesser is the economic viability of the use of a larger aircraft on a particular route.
- 5.79 One of the major areas of speculation raised by objectors to the proposals concerns the likelihood of the Airport being used for larger aircraft than has previously been the case. Indeed, many people are concerned that they would be larger than those aircraft types discussed in the appropriate sections of the ES or other technical submissions, correspondence, etc. from the applicants or their agents and that the likely impacts of the proposals are, therefore, mis-represented. Much of that suspicion seems to emerge from the application's use of the silhouette and plan view of Boeing 737/Boeing 757 aircraft in the architectural illustrations used on the submitted floor plans, elevations and in the pre-application brochure prepared by the applicants.
- 5.80 In particular, it is alleged that the new runway is capable of receiving flights from aircraft such as the Boeing 737 and that the applicants should be required to provide noise impact figures for that and equivalent aircraft, as they would present a "true" picture of how the proposals would affect the community. Some objectors regard the Council's consideration of the application as "remiss" in not insisting on that information being provided.

- 5.81 The wider issue of Noise and Vibration, together with potential impact on Air Quality are addressed later in this Report. The consultants appointed by the Council to advise on those specialist areas of concern have been specifically asked to consider whether the applicants have correctly assessed the likely impacts from aircraft that could use the new runway. They have also been asked to review the relevant sections of the ES to ensure that they have been correctly “scoped” and hence addressed the salient issues.
- 5.82 What does seem clear, from other specialist studies such as that commissioned by the Dept of Transport, Local Government & the Regions into the possible extension of runways at Glasgow and Edinburgh Airports is that substantially greater runway lengths are normally required to enable use by the type of larger aircraft referred to by objectors. For instance, the Glasgow/Edinburgh Airport study includes a table displaying the type of aircraft currently able to operate from those airports, based on the runway length required for take-off. Both these airports have a TORA of about 2600m and, for the purposes of the Table, the assumption is made that the relevant aircraft are operating at their Maximum Take Off Weight (MTOW) i.e. fully fuelled, contain cargo and have a passenger load factor of 100%.
- 5.83 The Boeing 737 has a number of variants but even the variant requiring the shortest runway length (the 737-300) requires a runway length of 1990m for take-off when operating at its MTOW. That is about 400m longer than the TORA calculated to be achieved at Carlisle Airport.
- 5.84 While it is true that payload restrictions can mean that an aircraft type might be capable of operating from a shorter TORA and LDA, there is a balance to be struck in operating such restrictions and making the use of that aircraft viable. For example, it is understood that Ryanair has recently commenced a Stansted to Belfast City Airport service using Boeing 737-800 variant aircraft. However, due to the restricted length of runway available at Belfast City (its declared LDA's are 1767m and 1737m and TORA's are 1917m and 2029m) Ryanair has a load penalty on take-off which restricts the number of passengers able to be carried to 160, instead of the normal maximum capacity of 189 passengers, and that is on a short haul flight with less than maximum fuel. Given the much shorter LDA and TORA that the Carlisle Airport proposals will deliver, it is hard to envisage a situation where operators of aircraft of that size would be likely to, let alone want to, use the proposed new runway, especially with the inevitably greater payload restrictions that would be needed.
- 5.85 In summary, it can be argued that some smaller Boeing or similar aircraft types could land and take-off on the proposed new runway; however, for daily scheduled flights the catchment area for the Airport will not deliver sufficient passengers to achieve the average loads needed to make the operation of such aircraft economically viable. So, while in theory such aircraft landing and taking off would in some cases be possible, in practice it would be at a take-off weight that would restrict the passenger load and fuel carried to a level which would make no business sense and would be uncompetitive on a regular scheduled basis. In the Airport's own assessment, the only scenario which could be envisaged when such aircraft might use Carlisle Airport would

be an ad hoc day charter, for example for supporters of Carlisle United to a short-haul destination with very limited baggage, and even that might be weight penalised.

- 5.86 The other principal area where the “technical” case for the new runway has been challenged concerns the necessity for the new alignment. In that regard, many objectors believe that the orientation has been determined by a longer term objective of increasing the runway length rather than for purely operational reasons.
- 5.87 Although it is understood that the applicants have previously commissioned studies/contemplated proposals for the possible longer term extension of the runway length, it is not part of any proposal before the City Council at the present time. Should any such future ambition materialise it would require another planning application, which would be considered entirely on its own merits at that time. In short the Council can only deal with what is before it and not what might, or might not, happen in the future.
- 5.88 Certainly the “technical” case for re-aligning the runway to enable the installation of an Instrument Landing System (ILS) that ensures aircraft on final approach when landing do not enter the Spadeadam “Danger Area” is validated by the response to consultation with the Royal Air Force base at Spadeadam. Discussions with the CAA have also indicated that the new alignment provides a substantially better approach path given the risks to passenger aircraft from high speed fly-through military aircraft activity in the Spadeadam area.
- 5.89 In terms of the changes arising from the new alignment, the applicants have stated that, as now, 90% of the aircraft will take-off to the west and land from the east due to the prevailing north-north-westerly wind direction. Arriving aircraft, using the new navigation aids that are proposed, will join the “extended” centre-line of the proposed runway approximately 4-8 nautical miles (about 4.6 to 9.2 miles) from the runway threshold. Landing from the east will thus entail an approach path passing just to the north of Lanercost, continuing just south of the Crooked Holme bridge over the Irthing and over Irthington. The degree of deviation from the existing flight path on a landing approach to runway 07/25 is obviously greater the further from the runway threshold but in the final approach over Irthington the difference is very marginal.
- 5.90 Aircraft taking off towards the west will, again as now, follow a flight path towards Deans Cross navigation beacon, near Cockermouth. That flight path will pass to the south of Crosby-on-Eden, to the south of Linstock, between Rickerby and Whiteclosegate and over the city of Carlisle just to the east of the Sands Centre and Eden Bridge. That is slightly further to the north than the existing take-off flight path on runway 07/25 (it would currently pass over the suspension bridge over the Eden at Stoneyholme).
- 5.91 The applicants state that the number and type of passenger and cargo air traffic movements will depend entirely on the operators, who have not yet been identified and so only estimates are provided at this stage. By 2016 it is

anticipated that there may be approximately 3,650 passenger air traffic movements (ATM's) per year. These would be unlikely to be spread evenly throughout the year as there will be seasonal and weekday/week-end variations. The applicants state that they cannot provide a schedule of flights as this will be determined by the operating airline(s), the availability of slots at destination airports, and the rate of progress over the first few years in establishing new routes. For the purposes of the ES it has been assumed that, taken over a whole year, these would reach a daily average of 10 passenger ATM's (5 arriving and 5 departing) during the recognised daytime operating hours (07.00 to 23.00 hours).

- 5.92 As for passenger operations, the details and predictions for air freight movements are stated to be determined by the operators. For the purposes of the ES, the applicants have assumed that, taken over a whole year, these would reach a daily average of 4 air freight ATM's (2 arriving and 2 departing). The applicants also state the quota of night-time flights the airport is permitted to have is not used at present and is not expected to be used in the future due to the high costs associated with operating an Air Traffic Control centre and rescue and fire fighting services 24 hours a day.
- 5.93 It has been suggested that the benefits of the proposed alignment could also be achieved by the construction of the new runway on another alignment, such as a parallel runway or re-orientating the eastern i.e. runway 25 end so the new alignment pivots and means aircraft do not fly over Irthington or Brampton. The applicants maintain, however, that the proposed alignment keeps the existing Airport in operation while work is in progress, affords the best option within the operational area of the existing Airport, best addresses the prevailing wind conditions, and best avoids disturbance to important archaeological and nature conservation features.
- 5.94 Certainly when viewing the extent of the application site within the Airport's ownership, and having regard to the limitations afforded by roads at either end, the maximum distances available for the runway are achieved on a south-west to north-east axis. Similarly, the proposed approach lighting for landings from the "east" is, on the proposed alignment, best able to minimise impact on the closest residential properties in Irthington. Pivoting the runway 25 end would bring approach lighting much nearer to those properties.
- 5.95 It is, accordingly, concluded that the specific re-configured alignment for the new runway is the best achievable within the limitations afforded by:
- the extent of the site;
 - the desire to retain use of the Airport for flying purposes while work is in progress;
 - the objective of installing precision landing equipment to enable safer approaches for aircraft when landing while avoiding the airspace associated with RAF Spadeadam;
 - the need to install appropriate approach lighting without causing undue intrusion to nearby properties;
 - the need to avoid potential adverse intrusion into important archaeological remains; and
 - the desire to retain as much of the woodland area associated with

Watchclose Woods as is possible.

2. Access, Traffic and Parking Issues

- 5.96 The application has been supported by a Transport Assessment (TA). It has been reviewed by Cumbria County Council, as local Highway Authority, and by the Highways Agency of the Department of Transport, which has responsibility for the operation of the national Motorway and Trunk Road system.
- 5.97 The County Council has considered potential impacts of traffic generated by the application proposals upon the local roads, the likely operation and safety of the proposed access, the projected assignment of traffic going to and from the site, and the capability of the network in general to deal with that traffic. The Highway Agency has had particular concerns regarding the potential impacts upon the operation of the M6 motorway Junction 44 (at Kingstown) and the links afforded by the A689 to the A69 (T) at Brampton.
- 5.98 Both Highway Authorities required the applicants' traffic consultants to undertake further analysis to support the conclusions within the TA and, in the case of the Agency that has been reviewed by its own consultants prior to the Highway Agency's formal response to this application. Both Cumbria County Council and the Highways Agency accept that development traffic associated with these proposals can be satisfactorily accommodated within the existing highway capacities at Junction 44 and on the A689.
- 5.99 The County Council has, however, challenged the traffic assignments within the Transport Assessment, believing that the extent of right turning traffic leaving the Airport would be greater than that attributed by the applicants' traffic consultants' analysis. It was also unhappy at the proposals for a ghost-island priority junction with potential future upgrading to a signalised T-junction on the grounds that it is neither a safe junction proposal, nor an efficient one nor is it visually appropriate to introduce at a later stage a traffic signalled junction in an open rural location like this. The County Council, accordingly, made it clear that the junction design should be modified to a roundabout arrangement. It has also required the applicants to validate the likely frequency and anticipated queuing distances of waiting traffic while the traffic lights would be in use on the Laversdale road and spur from the Irthington road i.e. for certain take-off and landings.
- 5.100 Cumbria County Council has responded to consultation as the "strategic" planning authority and, in considering "highway" issues as part of that response has resolved to raise no objections but has identified measures that are considered essential to ensure the development operates satisfactorily. These include the need for the junction to be a roundabout, the provision of bus services to serve the development at peak times, the need for a Travel Plan that incorporates targets for cycle facilities, mode share and trip generation and the undertaking of safety audits for the proposed access and for the traffic lights on the two side roads.
- 5.101 Although the County Council's consultation response recommended a

planning condition requiring the new access to be re-designed as a roundabout, it is not normally appropriate to use a planning condition to make "acceptable" something that is a fundamental, detailed design element of a full application proposal, which in its submitted form is regarded as unacceptable. Accordingly, the applicants have been asked to come forward with an alternative junction design employing an appropriate roundabout: those details have recently been received and, subject to the caveat that a full detailed design and safety audit to validate the design is still to be done, is regarded as broadly acceptable by the Highway Authority.

- 5.102 The County Council's Officer Report also identified deficiencies within the Travel Plan, notably the paucity of measures that might act as incentives to the use of modes other than the private car to access the development or even to encourage shared car journeys, notably by staff at ESL, Stobart Air or WAD. The Travel Plan lacks any targets or incentives, neither does it really explore the propensity for staff transferring from the existing ESL/WAD operations to consider alternative modes, nor does it address their current travel patterns in any real depth. That is, clearly, disappointing given the substantial provision the scheme makes for car parking: 357 spaces for staff employed at the Airport with 490 spaces allocated for passengers. Perversely, the number of employees that would be based at the development at "year of opening" i.e. 2009 is 295 which, were all spaces to be provided at the outset, would yield a high parking ratio of 1.21 car spaces per employee. Even by the scheme assessment year (2016) employee numbers are only predicted to have risen to 363 so the development had proposed to build now a level of car parking that broadly equates to 1 car space per employee when future predicted employment growth is achieved.
- 5.103 Understandably, the Highway Authority and City Council Planning Officers believe that such over-provision would be a deterrent to any staff ever contemplating the use of public transport for their journey to work. The County Council Officer Report thus advocates that the number of spaces proposed should be reduced, certainly in the first instance, while retaining flexibility to allow for future expansion related to employee growth. Revised drawings showing a reduction of provision have now been received.
- 5.104 While trip prediction for employees expected to be based at the development is reasonably capable of assessment, the Highway Authority accepts that it is less easy to determine the likely car trips generated by air passengers. Nonetheless, the applicants' estimates of air passenger car trips makes a number of broad, and perhaps questionable assumptions: 10 flights per day, each with a passenger occupancy figure of 65% and each car trip conveying 2.6 persons per vehicle. Those assumptions as a whole are bold but the latter figure is particularly at odds with CAA surveys of airport usage which tend to show car occupancy rates for passengers travelling by car falling within a range between 1.33-2.25 persons per vehicle.
- 5.105 There are, moreover, no named commercial passenger or cargo operators identified within the submission though the applicants have stated that they are in discussions with potential air service providers. It is, thus, impossible to reconcile the number of proposed car parking spaces for passenger use with

an actual, or even the "likely", level of aviation activity that the application anticipates, certainly in the early years when it is assumed there will be a small number of flights using, for example, 30 seat aircraft.

- 5.106 It is accepted that if a particular service becomes established there may be greater demand for it, and in those circumstances the application speaks of possible increased aircraft size to 40-50 seat or 70-80 seat aircraft. It is also true that popular services could generate more than one return flight per day. However, the overall car parking provision as first proposed seems much in excess of what would be needed. Similarly, it is odd that while the internal floor plans provided of the proposed building have (within the "Terminal") a considerable amount of "reserve" space for future aviation sector growth, the car parking proposals were intended in full at the outset.
- 5.107 One of the particular difficulties presented by these proposals has been establishing the level of "certainty" within the constituent elements of the proposals, notably those aspects where policy support is strongest. It would be greatly beneficial to have some form of detailed, logical, sequential structure to the overall works that would reflect a fledgling, ambitious sub-regional airport with a realistic programme for paced growth and which could, therefore, provide the confidence sought. Much is made of what might happen if "demand" leads to, for example, larger aircraft on a particular service but the impacts that the proposals would deliver, certainly at the outset and for an indeterminate period thereafter, seem likely to derive more from the warehousing and distribution activities of ESL and WAD, rather than being associated with the aviation sector as might be anticipated of an "airport-led" development.
- 5.108 Although further information about the staging of the component parts of the development has been requested, all that can currently be relied upon is a section within the ES where it is stated that construction was to be undertaken in one phase, anticipated to commence in February 2008 with completion by March 2009. The construction of the warehouse would begin first with its planned completion by January 2009. Construction of the terminal part of the building, access roads and airside elements of the proposed development including the replacement runway and apron is anticipated to begin in June 2008 with completion by March 2009. Testing of the runway would take place at that time for up to 6 months duration. Commercial passenger and cargo movements were expected to start later in 2009. Clearly, the re-location of Eddie Stobart Limited and WA Developments/WADI would all pre-date the bringing into use of the runway (apart from possibly "testing").
- 5.109 The ES envisages a gradual increase in passenger air traffic movements (ATM's) from the initial period after opening to a maximum of 200,000 passengers passing through the Airport per year by 2016. That prediction is based on the relatively small population catchment the Airport will serve and assumes an average of 3,000-4,000 commercial passenger ATM's per year, using up to 80 seat aircraft and allowing for seasonal fluctuations in seat occupancy.

3. Drainage

- 5.110 Although the application has endeavoured to address proposals for drainage, through constituent parts of the Flood Risk Assessment and the relevant chapter of the ES, at the time this Report was drafted there remains an objection to the application from United Utilities in relation to foul disposal. Similarly, while there have been discussions with the Environment Agency and an indicative strategy for dealing with surface water is provided (including a "Drainage Masterplan") all of the relevant statutory consultees (including Natural England due to the potential impacts on designations of international importance) remain uncertain as to what the applicants' proposals would comprise and what their effects might be.
- 5.111 This presents a number of difficulties: while there is an existing and quite crude (in comparison with modern drainage methods) system in place at the Airport and it could be argued that anything new would be better, the extent of hard surfacing i.e. impermeable areas will be greater and hence the amount of surface water run-off (without attenuation) would be larger. That has the capacity to have significant impacts on local hydrology if not managed properly; moreover, the proposed investment in developing the Airport for operational aviation means that it could well be much more intensively used than has been the case for a decade or more. It is, thus, essential that a full and comprehensive surface water drainage strategy and detailed drainage scheme is provided that addresses these matters.
- 5.112 It has been acknowledged for the last 50 years that this area compares poorly with other parts of the UK in relation to provision of air services. It was, indeed, commented upon by the Inspector's Report to the Minister who granted planning permission for the civil aerodrome at Crosby on Eden in 1959. In the passage of time, sadly, very little has changed locally yet the picture has change quite considerably in national terms with successful small airports like Bournemouth, Newquay, Humberside, Durham-Teesside, Blackpool, Exeter and Norwich being examples where the regions have access to air services that were not previously available. The growth in aviation and particularly the growth in aviation from smaller "regional" airports that has happened elsewhere in the UK during that period might be mirrored at Carlisle Airport as a result of this investment and, hence, could present a more optimistic future for it than has been the case for some time.
- 5.113 It is, therefore, conceivable that one or more of the smaller Airline operators, or charter companies, might be attracted by the opportunity to open up new scheduled services into a part of the country where there are none at present. Similarly, the applicants have made it clear that they see the Airport as having potential for air freight movements and, as specialists in logistics, presumably see a business opportunity for an air freight/road freight transport facility. It is quite possible that the intensity of activity at the Airport might well increase beyond that experienced, at least in recent years.
- 5.114 It is, thus, vitally important that proper drainage arrangements are in place and that they are adequate to deal with all the demands the development might generate. That includes a proper means of dealing with the foul

sewage associated with a major employment centre, geared to provide jobs for almost 300 people in its year of opening and projected to provide more jobs in future years, plus the related foul drainage required for the proposed associated development of the Passenger Terminal.

- 5.115 At present United Utilities say that the Irthington Waste Water Treatment Works (WwTW) would be overloaded by the development. Similarly, there are concerns that even with some form of temporary treatment system adjacent to the WwTW, the receiving watercourse could not cope with the flows from the development, which represent a 60% increase in the domestic population currently treated by the works. Discussions have been held between the applicants, United Utilities and the Environment Agency and, at the time this Report was written, the applicants' firm proposals and acceptance of them by United Utilities were awaited.
- 5.116 Additionally, there is an issue of the possibility of contaminated run-off from the aprons, aircraft stands, taxiways and runways and how it could be dealt with in an environmentally acceptable manner. The proposed fuel and wash-down areas for HGVs might also bring potential problems of contamination through spilled fuels, oils, etc. Arrangements for adequately safeguarding against, or being able to contain, collect and treat materials in the event of any form of spillage, or other incident, have yet to be settled.
- 5.117 There are obvious potential problems associated with re-fuelling of aircraft but there is a further concern derived from the particular difficulties recognised with the use of de-icing agents for aircraft. Glycol (ethylene glycol) has a damaging biological oxygen deficit which, if entering into local watercourses, would have a seriously detrimental effect on fish and, in particular, trout and migratory fish. It also destroys aerobic bacteria that are a key part of the treatment process at any receiving wastewater works and, so, cannot be conveyed within the conventional foul treatment system.
- 5.118 An option is to capture all such materials from aircraft stands and store it in lagoons either for collection and treatment at a dedicated on-site treatment plant or (after a suitable period of time when a degree of natural bio-degradation to enable treatment will occur) at an adjacent WwTW or at a suitable, probably larger, off-site facility. At the present time, it is unclear what the applicants plan to do but given the acutely sensitive bio-systems associated with the River Eden & its Tributaries SSSI/Special Area of Conservation (and the protection afforded under the Habitats Directive) this is a matter that must be resolved. Acceptable proposals for the containment, collection and treatment of all de-icing used on aircraft stands or other potential pollutants are awaited from the applicants.

4. Employment

- 5.119 The application form states that at the present time there are 50 persons employed by Stobart Air at Carlisle Airport. The proposed re-location of Eddie Stobart Limited (ESL), which employs 175 persons, and WA Developments (WAD), which employs 70 persons, would bring an initial increase in employment totals by the transfer of these businesses. That section of the

form goes on to state that the predicted change in employment for those 3 companies, by 2016, would result in a total of 70 persons being employed by Stobart Air; 219 persons being employed by ESL; and 88 persons being employed by WAD.

- 5.120 The Economic Appraisal, one of the documents supporting the planning application, optimistically states that the proposals would *“secure the continued growth of the Eddie Stobart Limited business as a key component in a growth activity in the area. It believes that securing its future operations in this way supports its market positioning which may lead to at least a further 200 jobs in the area”*. That Study adds that *“Whilst ESL lay no stress in immediate growth arising from re-location it is clear that over and above benefiting Carlisle from a regeneration standpoint the re-location offers smoother connection for ESL to arterial roadways without interfering with the centre of Carlisle”*.
- 5.121 The Study also regards the proposals as leading *“to opportunities to expand Stobart Air operations, which it is predicted will result in circa 50 new employees being recruited in the existing business from 2009 and with increases in that workforce which relate to the level of growth of passenger and freight transit over succeeding years.”*
- 5.122 The impact of the transfer of the WAD operations is also assessed. The Economic Appraisal had stated that WA employs about 270 people although the agents had elsewhere made reference to it employing 70 people. That latter figure has now been confirmed as authoritative but the Economic Appraisal states that *“it is believed that the move will result in their employing circa 30 more people”*.
- 5.123 Dependent upon the success in attracting passenger services, and the throughput of passenger movements using them, the Study indicates that by 2016 this could yield possibly about 70 new jobs directly employed as a result of the proposals. It adds that indirect and induced employment usually produces additional employment in the order of 40 to 60% of the direct employment and that a similar pattern in the case of Carlisle Lake District Airport would result in a further 30 to 40 jobs.
- 5.124 The disparity between the employment benefits portrayed within the Economic Appraisal and the much more modest growth estimates described on the application form has been noted by the North West Regional Assembly and is referred to in its consultation response. The Agents acting for the applicants, by way of clarification, state that the figures quoted within the application form relate to the estimates of job creation within the applicants' companies and state that the estimates within the Economic Appraisal refer to *“likely effects of the proposal on potential employment and uses comparison with economic modelling used in support of development at other Airports. It provides a more strategic view of job creation resulting from major transport related investment and takes into account both indirect and induced employment creation”*.
- 5.125 In summary, it appears that by 2016 the combined presence of Stobart Air,

ESL and WAD at Carlisle Airport would provide an estimated 377 jobs (an increase of 82 above the "year of opening" i.e. 2009 employment levels). While the Economic Appraisal states that the proposed development may lead to the creation of 200 jobs in the area, the Agents consider that *"this is a conservative estimate of the consequences of the proposed changes based upon studying what has happened where other Airport development has taken place. As a company ESL is well placed to benefit from the expansion of Airport activities because its key operations are in logistics. Any secondary development at the Airport may give rise to additional freight handling requirements of one sort or another. It is usual to anticipate the development of induced and associated employment as a result of increased Airport activity."*

- 5.126 That said, the Agents request that for the avoidance of doubt, any reference to anticipated job creation should quote the more conservative figures stated in the application form i.e. the initial 295 jobs expected at 2009 rising to 377 by 2016.
- 5.127 Whilst the investment of £30m which the applicants state they are making might lead, over time, to the creation of a significant number of additional jobs at Carlisle Airport, it is fair to say that is based on hope rather than any certainty or firm forecasts. It is, of course, paramount in the applicants' submission that they be permitted to re-locate existing employment provided by ESL and WA Developments and it is axiomatic that existing jobs will, accordingly, be protected and some growth in those activities might follow. Members may consider that to be, in itself, a significant factor in the determination of the application.

5. The Scale of Airport Related and Non-Airport Related Development

- 5.128 In policy terms, Policy EM13 of the Structure Plan identifies the land required to meet employment needs within Cumbria up to the end of the plan period (2016). Amongst the range of sites the policy specifically lists, land at Carlisle Airport is expected to provide a Strategic Employment Site for the county sub-area of North Cumbria. The policy envisages that site coming forward through provision of 6 hectares between 2001-2006, 6 hectares in the 5 year period from 2006-2011 with the remainder coming forward in the latter part of the plan period i.e. 2011-2016. Strategic Employment Sites are defined as sites in excess of 5 hectares that cater for larger scale development, accommodate uses within Classes B1, B2 and B8 of the Use Classes Order, give access to the primary road network, have the potential to be served by public transport, have good links to Key Service Centres and which should be "master planned" to incorporate landscaping. The presumption is that Use Class B1(a): Offices should be ancillary to the overall development of such sites.
- 5.129 Policy EM13 has been carried through to the emerging District Local Plan: its Policy EC20 provides for the Strategic Employment Site at Carlisle Airport delivering 1.96 hectares of land from 2001-2006, 8.0 hectares following on over the period 2006-2011, with a further 11.20 hectares being made available between 2011-2016. That policy, with some minor changes in text,

is essentially a “retained” policy from the Carlisle District Local Plan (Policy EM1) which was adopted in September 1997. The Report of the Inspector, who conducted the Local Plan Inquiry into the review of the District Local Plan over several weeks in the summer of 2007, including the objections made to Policy EC20 (and Policy DP3), is expected to be released in April.

- 5.130 Assuming the Local Plan provisions are supported, the proposals for Carlisle Airport under Policy EC20 need, however, to be read in conjunction with the specific objectives of Policy DP3 of the emerging Local Plan. It requires that development proposals at Carlisle Airport must be airport-related, be in scale with the existing infrastructure and must minimise any adverse on the surrounding development. As a “core” Policy of the new Local Plan it has a pre-eminent position in policy terms i.e. where individual Policies within the document as a whole are in “conflict”, the Development Principles (DP Policies) of the Plan take precedence.
- 5.131 That is not to say that general development proposals that accord with Policy EC20 cannot be considered acceptable under Policy DP3. In fact the sub-text to the Policy accepts that there may be circumstances where this might occur *“proposals for larger scale redevelopment to facilitate an improved commercial operation will have to take into account the impact of development uses outside the perimeter of the airport including nature conservation interests, the historic environment including Hadrian’s Wall World Heritage Site, the existing highway network and road safety”*.
- 5.132 Members, as a first principle, accordingly have to be satisfied that the development as proposed will “facilitate” an improved commercial operation at the Airport and, if so satisfied, must then be convinced that the effects of the development do not harm the nature conservation, heritage and other interests identified under Policy DP3.
- 5.133 To assist in making that judgement, the agents acting for the applicants have been asked to elaborate on the intended use of the floorspace to which this application relates, by reference to the individual components e.g. the submitted plans show 5 “airside” bays and 5 “landside” bays with a central access/service corridor between them to the north-east of the offices/ terminal bays. A key issue is, thus, that of the total floorspace, how much is “air freight” space, how much is aircraft “hangarage” space, how much is associated with the ESL warehouse/distribution re-location from Kingstown, and in relation to the “offices” how much is WAD space (re-located from Kingmoor), how much will be specifically associated with the passenger/freight movements of aircraft and, finally, how much would be available for other “airport- related” uses that might be attracted as a consequence of the upgrading of the Airport to entice commercial passenger services, air freight use or by chartered services.
- 5.134 A detailed break-down of that floorspace, and at which stage it would be provided, would clearly assist in distinguishing both the “airport-related” from “non airport- related” elements but, as importantly, in clarifying the extent to which aspects of the overall development could be regarded as essential for “enabling” purposes, how and when they might support airport development

and, hence, whether they could "trigger" further such development in future years.

- 5.135 The most recent response from the applicants' agents emphasises that the accommodation of the overall uses proposed within this application is indivisible if the proposal is to have a viable chance of succeeding. They add: *"the relocation of the ESL/WAD/WADI operations is key to the whole proposal and provides the necessary investment to secure the future of the Airport. In addition to providing accommodation for the road haulage element of business, the relocation will allow the development of an air freight business using the opportunities arising at an operational airport with the logistics expertise of ESL. The development of airfreight is the subject of significant support, particularly as identified in the consultation responses of both the County Council's and City Council's Economic Development departments. Eddie Stobart Ltd has numerous blue chip clients with whom discussions are underway to utilise air freight opportunities at the Airport. Such discussions are commercially confidential and, in some circumstances, will not be finalised until it is certain that the proposed development will go ahead. As such, the volume of air freight is not yet quantified but the building as a whole is designed to allow a necessary level of flexibility between hangarage and airfreight operations to 2016."*
- 5.136 The response goes on to address the usage of the floorspace and indicates that, as initially built, 2 of the 5 "hangar" bays facing "airside" would be brought into use immediately as there is demand for them; the central bay of the remaining 3 "hangar" bays would be brought into use as demand rises but that would be anticipated to happen within the first 5 years of construction; the other 2 bays of "hangars" would be brought into use within 10 years. In the meantime, it is stated the 3 hangars would be capable of use for air freight, for maintenance and airport-related storage until such time as the demand for hangarage arises.
- 5.137 The "mirroring" 5 bays on the "landside" of the development would be warehousing accommodation to accommodate the transfer of ESL from Kingstown. In addition, it is stated that the ESL/WAD office accommodation that would transfer to the Airport currently occupies 4112 sq. m. floorspace: the new area assigned to those uses would provide 5181 sq. m. with the difference representing *"a reasonable level of office space associated with the relocated Companies with an allowance for expansion over the life of the proposal as assessed – to 2016"*. In addition there is 2954 sq m gross floorspace of airport related office space which, again, it is stated includes a level of expansion to 2016, plus on-site conference/meeting room facilities for travellers in addition to offices for security, customs, car hire and other office users normally found at airports. The agents add that *"there is no office space proposed that cannot be allocated to the existing or future needs of the airport or relocated companies to 2016. There is no speculative office space"*.
- 5.138 The case for the overall development is also justified, in the agents terms, by the purchase of Haughey Airports by WA Developments in April 2006, at which time, they contend there became an even more pressing requirement for the Group to be accommodated on one site. The agents add that *"given*

the operational connections between the haulage industry and the potential to develop air freight facilities, Carlisle Airport was considered to be the only site capable of accommodating these operations. Even more importantly, the relocation of the Group to Carlisle Airport would ensure the future of the Airport and catalyse airport related development. Given that the Airport is currently losing approx £0.5m a year, the absence of any alternative sites (and none have been recommended by the City Council, County Council or any other consultee) shows that the future of the Airport can only be secured by consolidating the business and operational requirements of the Group at the Carlisle Airport site”.

5.139 It is fair to say that the latter point i.e. absence of alternative sites is not borne out by fact in relation to locating ESL/WAD/WADI at one operational centre: the Regional Investment Site at Kingmoor Park has an extensive range of sites and buildings available and is in a more sustainable location. The only real locational benefits that might accrue from the application proposals are entirely associated with the linkage with Stobart Air and, hence, the potential to inject investment into the Airport so that it becomes a catalyst for airport-sector development including, principally, the restoration of scheduled passenger services coupled with an element of road/air freight transfer.

5.140 That is the crux of the matter: by permitting the development in its entirety with the clear indication that the runway reconstruction will not receive the initial investment but will follow on, the Council is exposed to the risk that it might not happen at all. That concern is a very real one and in order to try to provide greater comfort, the applicants have been requested to firm up the sequence of development with associated timescales. They now state that the following timescales will be followed:

- Month 1 - construction of access road and warehousing begins
- Month 5 - construction of terminal, car parking and apron begins
- Month 8 - construction of runway and airside infrastructure begins
- Month 11 - anticipated opening of warehouse
- Month 17 - anticipated completion of runway and airside infrastructure

5.141 This presents, at face value, some encouragement but, to give a further level of assurance, the applicants have been asked to clarify how it is envisaged the development would proceed e.g. would it be a single construction contract for all civil engineering work (including the new runway) alongside the shell and fit out works for the main buildings? Has that contract been let (subject to planning permission)? Given the very acute time pressures the applicants have stated they need to meet to enable re-location from their premises at Kingstown, it is not unreasonable that such contractual arrangements are in place (or are in draft ready for signing) but it would be of great assistance to the Council to know that such certainty existed. In response to that matter, the agents have stated that *"the current preferred method of procurement has been and remains that of a traditional contract to deliver the whole project. As (the Council) know there is a deadline for the successful relocation of the WAD/WADI/ESL operations from their current sites and delays with the planning application could result in a different form of contract for the replacement accommodation. The warehousing and infrastructure are*

required to be available for the beginning of January 2009".

6. Archaeology

- 5.142 Carlisle Airport contains a number of features of high archaeological importance and lies in an area of archaeological potential. Watchclose Temporary Roman Camp, which forms part of the Hadrian's Wall World Heritage Site, is located at the western end of the present runway and is designated a Scheduled Monument. Hadrian's Wall and vallum lie immediately north of the airport and the visual impact zone of the World Heritage Site covers the whole site. Hadrian's Wall and vallum are scheduled in discrete sections and the portion that runs through the study area (a 500m buffer zone around the airport) is represented by three separate listings. The course of the Stanegate Roman Road crosses the airport and a short section has been scheduled. The remains of Hadrian's Wall and its associated milecastles, together with the Watchclose Temporary Roman Camp and the Stanegate Roman Road survive as low earth works and below ground remains within the landscape.
- 5.143 Previous archaeological excavations and finds from the study area indicate some level of prehistoric activity in the vicinity of the airport, which have been dated to the Neolithic period. Recent trial trench evaluations within the footprint of the proposed development have revealed a number of features of potentially Neolithic date.
- 5.144 PPG 16: Archaeology and Planning (Nov 1990) states, at paragraph 18, that the desirability of preserving an ancient monument and its setting is a material consideration in determining planning applications whether that monument is scheduled or unscheduled. Paragraph 27 states that where nationally important archaeological remains, whether scheduled or not, and their settings, are affected by proposed development there should be a presumption in favour of their physical preservation *in situ* i.e. a presumption against proposals which would involve significant alteration or cause damage, or which would have a significant impact on the setting of visible remains. The case for the preservation of archaeological remains must however be assessed on the individual merits of each case. Paragraph 28 acknowledges that there will be occasions when planning authorities may decide that the significance of the archaeological remains is not sufficient when weighed against all other material considerations, including the need for development, to justify their physical preservation *in situ*, and that the proposed development should proceed. In such cases, planning authorities will need to satisfy themselves that the developer has made appropriate and satisfactory arrangements for the excavation and recording of the archaeological remains and the publication of the results. If this has not already been secured through some form of voluntary agreement, planning authorities can consider granting planning permission subject to conditions which provide for the excavation and recording of the remains before development takes place. Local planning authorities may, as a matter of last resort, need to consider refusing planning permission where developers do not seek to accommodate important remains.

- 5.145 The Regional Spatial Strategy for the North West (RPG13 – March 2003) contains policies that seek to protect the built and historic environment. Policy ER1 states that planning authorities should promote positive management of the Region's natural, built and historic environment and protect it from development likely to cause harm. It goes on to state that all-important aspects of the landscape, including regionally and sub-regionally distinctive features and special sites should be protected for their own sake. Policy ER3, which deals with the Built Heritage states that planning authorities will identify, protect, conserve and, where appropriate, enhance the built heritage of the Region, including those features and sites (and their settings) of historic significance to the North West, including Hadrian's Wall World Heritage Site and the wider historic landscape that contributes to the distinctiveness of the Region. Policy EM1 of the Submitted Draft Regional Spatial Strategy for North West England (Jan 2006) is similar to Policy ER3 of the adopted RSS.
- 5.146 Policy ST3 of the adopted Cumbria and Lake District Joint Structure Plan (April 2006) deals with the principles applying to all new development. Criterion 6 states that all proposals for development, including alterations to existing buildings and land use change, will be required to avoid the loss of or damage to, and wherever possible, enhance important or distinctive conservation features including archaeological sites. Policy E34 prevents development and other land use change in areas or features of national or international conservation importance (e.g. World Heritage Sites, Scheduled Ancient Monuments), or within their settings, where it is detrimental to their characteristics. Exception is made when there is an overriding need for the development to meet local infrastructure needs which cannot be met elsewhere and which is sited to minimise environmental impacts and meets high standards of design. Policy E38 requires measures to be taken to identify, record, protect, conserve or enhance areas, sites, buildings and settings of archaeological, historic and architectural importance. Proposals which damage, obscure, or remove important archaeological sites or historic features will not be permitted unless the harm caused to their importance and intrinsic interest is clearly outweighed by the need for the development.
- 5.147 The Carlisle District Local Plan (Sept 1997) contains a number of policies which deal with archaeology. Policies E25 and E26 seek to prevent development that would have an unacceptable adverse effect on the character and/or setting of the Hadrian's Wall Military Zone World Heritage Site. Policy E27 seeks to protect proposals for major development, which would have an adverse effect on the character of the World Heritage Site, within the outer visual envelope beyond the Hadrian's Wall Military Zone World Heritage Site, unless the need for the development outweighs the environmental costs. Policy E28 seeks to protect scheduled and nationally important ancient monuments and their settings from unacceptable development. Policies E29 to E31 seek to ensure that the archaeological aspects of development proposals are examined and evaluated before planning applications are determined. Planning permission will not be granted without adequate assessment of the archaeological implications. These policies cover sites that are archaeology significant and sites where there are reasonable grounds for believing archaeological remains are

present. All of these policies have been carried forward into the Carlisle District Local Plan Revised Redeposit Draft (Sept 2006).

- 5.148 During construction there will be direct physical impacts upon archaeological assets. These will include the removal of Neolithic remains, which have been identified by trial trench evaluation, on the line of the replacement runway. Potential archaeological remains may also be removed by construction of the security fencing to the south of the replacement runway; by construction of the relocated fuel depot to the north and foul and storm water attenuation ponds and pumping station; the laying of drainage and cabling; and by groundworks associated with lighting installed outside the airport boundary.
- 5.149 There will be no physical impacts that would affect the individual integrity of the archaeological assets that constitute the Hadrian's Wall Military Zone World Heritage Site. There will be no impact on the contextual integrity of the World Heritage Site as the development will not sever any existing inter-relationships between monuments. Whilst the replacement runway lies between Watchclose Temporary Roman Camp and Hadrian's Wall and Vallum, it constitutes, in broad terms, a like-for-like replacement of the existing runway, and there will be no significant change in the existing spatial relationships of the monuments.
- 5.150 There will be an impact on the setting of the Watchclose Roman Temporary Camp from the construction of the proposed development to the south of the runway and the construction of security fencing to the south of the replacement runway. This Scheduled Monument does not have upstanding earthworks and is largely situated beneath part of the current airport runway which is to be retained.
- 5.151 In order to minimise the impact on the Neolithic remains, detailed archaeological excavation and recording will be undertaken prior to the start of construction works for the replacement runway. A targeted Watching Brief, consisting of a programme of observation, investigation and recording of archaeological remains will be implemented during or alongside construction of the security fencing, the relocated fuel farm, foul water and storm water attenuation ponds, the pumping station and groundworks associated with the laying of drainage, cabling and installation of lighting outside the airport boundary.
- 5.152 Section 2 of this Report summarises the consultation responses received. The County Archaeologist considered that the area of the proposed pumping station and 2 water lagoons on the western edge of the airport should be included in the archaeological evaluation, due to the high potential of this area to contain prehistoric remains and also sought clarification of the extent to which the ground will be disturbed during the proposed works to trees in Watchclose Woods. English Heritage also indicated concern about the impact of development on the remains of the Stanegate Roman Road, in Watchclose Woods, and sought further information. English Heritage also requested further details of the location and extent of ground disturbance that such development will involve, to allow the impact on archaeological remains to be evaluated, together with additional photomontages so that the impact of

the full proposal on the historic environment, particularly the Frontiers of the Roman Empire (Hadrian's Wall) World Heritage Site, could be fully assessed. The City Council's Greenspace Team considers that nothing that disturbs or permanently defaces this part of the area's historical heritage should be permitted. Hadrian's Wall Heritage Ltd does not see the designation of Hadrian's Wall as a World Heritage Site and the development proposal site being within the Setting or Buffer Zone of the WHS as an obstacle to the proposed development. Friends of the Earth emphasise the great importance of understanding how the potential future scale of aviation operations could impact on the Hadrian's Wall World Heritage Site.

- 5.153 The agents have subsequently responded to the foregoing issues. A Method Statement describing the strategy to be used during the tree felling works within Watchclose Woods has been prepared, describing the mitigation measures proposed during tree felling operations on the line of the Stanegate Roman Road, through preservation in situ of any archaeological remains. Since the submission of the Environmental Statement further work has been undertaken and it is now known that the northern part of Watchclose Woods can be retained. Replacement planting is to be provided to compensate for the loss of part of Watchclose Woods. A new plan has been submitted which shows the areas of woodland to be retained and lost. A plan showing the areas that will be affected by ground excavation has also been produced. The earthwork within Watchclose Woods representing the line of the Stanegate Roman Road will be preserved in situ. To achieve this, tree felling operations will proceed without the removal of tree stumps or root systems.
- 5.154 The proposed balancing pond at the southern edge of the airport lies adjacent to an area that has been evaluated as part of the pre-planning process but did not contain any archaeological remains. This area contains hardstanding dispersal points and has been subject to a high level of ground disturbance caused by the construction of the original airfield. As a consequence, no further archaeological work has been recommended by the agents prior to, or during, the construction of this balancing pond.
- 5.155 The pumping station and balancing pond on the western edge of the airport lie within Watchclose Woods. Extensive root activity for over 100 years is likely to have caused considerable disturbance to potential below ground remains in the area. In addition, pre-determination evaluation of this area is not feasible due to the presence of the woodland. Given the general paucity of archaeological remains identified by previous evaluation within the airport and the disturbance caused by root systems, the agents recommend that construction work on the pumping station and lagoons be preceded by a programme of archaeological strip, map and sample.
- 5.156 The ground works for the approach lights will have limited impact and the agents, therefore, consider that evaluation is inappropriate. The most appropriate mitigation for the ground disturbance caused is an archaeological watching brief to be carried out during construction works. The route of the cabling for the lighting is flexible, enabling important archaeological remains to be preserved in situ if revealed. Consequently, construction work for the approach lighting will not impact on the Buckjumping Earthwork.

- 5.157 In agreement with the County Archaeologist, other areas of significant ground disturbance will be subject to an archaeological watching brief.
- 5.158 Additional photomontages, to show the impact that the proposed development will have on views from various important vantage-points, have been produced. The photomontages, which show the key view points from Hadrian's Wall, have been amended to include the proposed fencing and lighting columns. The agents believe that these additional and revised photomontages do not alter the conclusions of the landscape, visual and cultural assessments presented in the Environmental Statement.
- 5.159 The increased use of the airport is forecast to increase noise levels within parts of the World Heritage Site. The forecast future noise levels are not, however, high. The effect of airport noise is constrained to areas close to the Airport. Oldwall is approximately 1 km from the proposed replacement runway, although it is closer to the helicopter training areas. The agents consider that the combined noise of aircraft and helicopters will be within acceptable noise limits. The nearest well known visitor attraction is at Banks East Turret and Pike Signal Tower, over 8 km from the airport. This development should not adversely affect people's ability to appreciate the World Heritage Site, but will improve access.
- 5.160 In relation to the impact of the development on the carbon footprint and climate change, the Government recognises that aviation emissions must be considered at national and international levels and not at the site specific/ project level.
- 5.161 Following receipt of the plan which indicates the line of the earthwork in Watchclose Woods and the submission of further details on tree felling methods in this particular area, the County Archaeologist is now satisfied about the proposals for Watchclose Woods, subject to the imposition of appropriate conditions.
- 5.162 In terms of the lagoons, the County Archaeologist considers that they are located sufficiently away from the proposed line of Stanegate and, although they have a high potential to contain archaeological remains it is appropriate if these are 'preserved by record'. The County Archaeologist has, therefore, recommended that an archaeological evaluation and, where appropriate, a programme of archaeological recording be undertaken as a condition of any planning consent. Revised drawings showing the relocation of the lagoons were received on the 3 March from the Agents. English Heritage have raised concerns that the suggested location appears to place the lagoons particularly at the southern end very close to the line of the Roman road, in an area not previously evaluated and where its line is uncertain. English Heritage therefore consider that the changed location of the lagoon should be the subject of pre-determination archaeological evaluation in order to clarify its impact on the archaeological remains relating to the Roman road.
- 5.163 English Heritage is also satisfied that the revised methodology for tree felling at Watchclose Woods provides an adequate level of detail to ensure that

damage should not occur to the earthworks of the possible line of the Stanegate Roman Road.

- 5.164 English Heritage is satisfied that the significant levels of further ground disturbance planned in connection with this proposal, above those which were the subject of the earlier evaluation work, can be dealt with by an appropriate condition.
- 5.165 Having now been provided with montages from all the viewpoints, English Heritage is satisfied that the Outstanding Universal Value of the World Heritage Site will not be affected by this proposal, and it does not wish to sustain an objection to the proposal on World Heritage Site setting grounds.
- 5.166 With reference to noise impacts on the enjoyment of the World Heritage Site and the carbon footprint of the development, English Heritage considers that these are issues for the City Council to reach a view on.
- 5.167 In summary, on the basis of the information provided the County Archaeologist and English Heritage, with the exception of the relocated lagoons, do not object to the development scheme subject to suitable conditions being imposed to cover the issues of tree felling and further archaeological works. With regard to the relocated lagoons English Heritage require a pre-determination archaeological evaluation in respect of the Roman road. They have also requested that consideration should be given to the issues of noise impact on enjoyment of the World Heritage Site and the carbon footprint of the development.

7. The Scale, Design and Appearance of the Buildings

- 5.168 When assessing the design and appearance of any proposed building relevant considerations comprise the functional/operational and practical requirements it must satisfy as well as its formal qualities such as proportion, scale, rhythm, appearance, unity and integration with its setting. Having regard to those attributes, it is considered that the current proposals give rise to three inter-relating issues of relevance, namely, a) the operational requirements of an effective airport including the runway(s) and terminal; b) the practical requirements to minimise potential on- site and off-site environmental impacts; and c) whether the design of buildings and/or ancillary structures take proper account of the setting.
- 5.169 When considering operational requirements, the International Air Transport Association (IATA) provides a helpful and regularly updated reference manual on airport development, the most recent version of which dates from January 2004.
- 5.170 In the case of runways the key items that affect capacity are typically its length, strength, the availability of exit taxiways, aircraft type, ATC approach spacing, the spacing between runways/intersections, and the mode of operation (i.e. segregated or mixed arrangements for dealing with passengers and air freight). Contemporary passenger terminals generally have gate stands because they provide for the more rapid and comfortable handling of

passengers. There is also a need to take account of any "home-based" aircraft which would remain at their stands overnight.

- 5.171 From the information contained on the submitted "Master Plan" the number of taxiways is restricted, there is no apparent segregation between passenger and freight aircraft, and no terminal gate stands appear to be provided or seem to be envisaged.
- 5.172 Within a passenger terminal expected requirements normally include basic facilities such as passenger and baggage check-in; baggage recovery; customs/security controls and gate check-in. In effect, there needs to be areas for passenger processing; areas reserved for waiting; security/customs/health areas; baggage processing; areas for meeters and well-wishers; provision of catering/retail facilities; provision for any in-flight kitchen or catering, together with essential or operational facilities such as public toilets (including those that meet the needs of the disabled and provide baby-changing facilities) and stores. Optional facilities might include a children's play area and/or CIP/VIP lounge. The IATA advice also emphasises the need to have separate/segregated provision for arriving and departing passengers with further segregation between landside and airside activities.
- 5.173 As indicated already in para 5.42, the submitted plans for the Terminal provide little and in some respects no information about the facilities it would, or might be expected to, provide. The floorspace specifically devoted to handling passenger activity is condensed into one corner of the ground floor and is almost completely devoid of detail: there is no identified passenger/baggage check-in provision, security or passenger screening areas, passenger lounge or CIP/VIP lounge, no catering or other passenger amenity/services provision, no health/medical room and no staff facilities or amenities. It is unclear how arriving and departing passengers are to be segregated. In addition, the proposed ground floor does not have any toilets facilities for passengers, the only toilets shown being within the ESL/WADI offices which will occupy a much larger area located at the opposite corner of the Terminal, continuing along part of the main facade and repeating that footprint at 1st, 2nd and 3rd floor levels, within each of which much more detailed utilisation of space is identified. A very substantial ground floor area, larger than the passenger handling areas for arrivals and departures combined and described as "Foyer/ Terminal", takes up just less than 1/3rd of the ground floor space but it is difficult to comprehend how it would function in relation to the "terminal" floor areas as between it and the passenger handling areas is another sizeable space described as "Terminal Expansion", suggesting it would only become useable at some future date.
- 5.174 Similarly, toilet provision in the upper floor areas is located within the office areas to be occupied by those companies. There is a single ground floor retail unit specified, an Eddie Stobart shop, although it is sited next to the entrance and reception serving the company's offices. An area described as "Aviation Office Space" is provided at the "Airside" end of the first floor with an intervening area, defined as "office expansion", between it and the ESL/WAD first floor offices. The second floor plans incorporate a "restaurant

and retail space" on the second floor but this appears to represent only a future possibility, it is distant, disjointed and hence seems to be unconnected to the use by the public/passengers of the terminal. Toilet facilities are proposed on the second floors but these have no doors connecting to the public concourse area or the prospective restaurant/ shops but would entail users entering through the "back of house" upper floor office areas occupied by ESL/WAD, which would be highly irregular and quite unlikely.

- 5.175 In summary, the current design of the terminal building appears to be overwhelmingly aimed at re-locating the existing businesses and providing associated warehousing and offices. In terms of handling passengers, the submitted plans lack detail, the facilities that would be expected have either not been considered or are not shown, and what has been indicated does not have any obvious logic.
- 5.176 In relation to minimising the environmental impacts of the scheme or embracing modern technologies in relation to energy conservation, rainwater harvesting, or any other innovative ecological or "green" initiatives, the submitted plans show little ambition, apart from stating that having 4 occupiers within one building shell will minimise heat loss and thus limit CO₂ emissions. Beyond the proposed hangars and the freight/distribution warehouse being served by roof lights there is no indication that the applicant has considered the possibility of using the design of the building to mitigate its environmental impact. For example, Schiphol Airport uses a green roof system to ameliorate surface water run-off and to provide wildlife habitat. There is also potential in disguising the bulk of the building through use of a green wall system, or contributing to on site power provision through photo-voltaic panels or, on site combined heat and power. The building employs no such features or seeks to adopt any "carbon-neutral" initiatives which is disappointing in relation to a 21st century, potentially major public building.
- 5.177 In relation to its architecture generally, there is no real indication that the applicant has considered articulating the vast bulk of the structure to create more interesting elevations. Possibilities exist for the use of colour and materials to create something more attractive than the unrelieved expanses proposed. The applicants have indicated they would be amenable to a planning condition requiring agreement on the final colour scheme and would consider the opportunity to break up elevations with differing tones to help blur out edges, tops and corners. It is, however, considered that the very industrial and utilitarian proposed north, south and east elevations particularly require some additional articulation.

8. Landscape Impact and Landscape Mitigation

- 5.178 In relation to landscape impact, it should be appreciated that the proposed building would have a uniform height, excluding the control tower which is taller, of 19 metres and would occupy a footprint of about 55,200 sq. m. At its western end its' height translates into four floors of office space. That height is the equivalent of a domestic property with at least six floors and, as such, the development will be dominant in the local landscape and from longer

viewpoints given its location within open countryside. It will not only be a significant new feature in the landscape but that landscape will itself be substantially altered with the most significant existing landscape feature, Watchclose Woods, all but disappearing with only a very small area remaining undisturbed. Although replacement planting is proposed adjacent to the site's northern perimeter, that will take time to establish and will only offer some screening from that aspect.

5.179 The visual impact is likely to be most apparent, and indeed will be emphasised, from the siting of the building in relation to the A689 and, closer still, the Irthington road. Opportunities to provide continuous, meaningful screening from the latter road are negligible as the site ownership precludes any extended depth of planting between the site limits and the access road serving the road haulage warehouse, fuel stores and parking areas. It thus amounts to a single row of trees spaced at intervals along the eastern or "public" side of the internal access road.

5.180 Similarly, while there is some attempt to provide a degree of landscape screening along the A689 frontage via a linear 10m deep woodland belt, this is also fairly limited and is likely to produce minimal visual mitigation. The applicants have been asked to review both that aspect, for example it could be of variable depth so has a more amorphous form, and to provide increased planting along the north-eastern perimeter of the building (facing towards the Irthington road). Revised drawings were received on the 14 March and address some of these concerns. It is considered that enhanced landscaping measures are necessary in order to comply with Policies E37 and E39 of the Structure Plan and with the requirements of Policy CP4 of the District Local Plan Revised Redeposit Draft.

5.181 The proposed vehicle parking areas also represent extensive expanses of tarmac which, to minimise their prominence in this rural location, need to be "broken-up" by suitable landscaping. Recent discussions with the applicants have led to a review of the level of car parking being provided, with some land being "reserved" to enable more parking to be provided (in accordance with a parking strategy) if future demand for flights, and also growth in employment, occurs. The overall area, within the public car, coach and taxi parking zone, and within the staff parking provided in the ESL/ WAD parking zone, is quite extensive and the applicants have been asked to re- design the layout of those areas to include intermediate planting within those zones, as well as providing more substantial planting belts at their perimeter. Scope appears to exist to achieve those together with better planting to roadside frontages and revised proposals were received on the 14 March, which address some of these concerns. At this stage, although it would be preferable to have full planting proposals, it could equally be possible to agree the principles of those enhanced planting measures with the precise details of planting being dealt with as a planning condition.

9. Public Safety Zones

5.182 A number of objectors make reference to "Public Safety Zones" (PSZ) and contend that the Council should weigh up public safety/public liability risk and

designate such an area or areas.

- 5.183 Public Safety Zones are areas at the ends of runways at the busiest civil airports within which there are certain planning constraints. Their purpose is to restrict new development proposals for land or property with the PSZ. In essence, their objective is to prevent any increase in the number of people living, working or congregating in the PSZ. It follows that, where they exist, they are only relevant in relation to planning applications within the PSZ rather than being a constraint to development within the associated airport itself.
- 5.184 The necessity, or otherwise, for a Public Safety Zone is not a matter for the Local Authority to decide but is a specific responsibility of the Department for Transport (DfT) once certain levels of risk have been reached. PSZs are established as soon as possible at all airports for which modelling work produces 1 in 100,000 individual risk contours of a sufficient size to justify doing so.
- 5.185 In the case of Carlisle Airport there are no areas, which fall within the 1 in 100,000 individual risk contour and only one small area within the 1 in 1,000,000 risk contour. At present there are no PSZ's established at Carlisle Airport and the advice Officers have obtained from the Department for Transport is that, based on the Civil Aviation Authority Air Traffic Movements for 2006, the level of activity associated with Carlisle Airport would not generate a sufficient PSZ.
- 5.186 Members, accordingly, will appreciate that this is not a relevant planning consideration to be taken into account when evaluating the merits of the application but is entirely a matter for the DfT to address under its own regulatory regime.

10. Noise and Vibration

- 5.187 Following submission of the application, and review of the relevant section of the Environmental Statement (Chapter 6) as part of the planning consultation, the Council's Environmental Protection Service (EPS) provided a number of comments (see Section 2 of this Report) but also indicated concern because of their limited experience of dealing with aircraft noise as a discipline, as this area of noise is not normally dealt with as a statutory nuisance .
- 5.188 Accordingly, in relation to matters covered by Chapter 6 and also within the following Chapter of the ES dealing with Air Quality, the Council has appointed a firm of Consultants with a substantial background in dealing with Airport development proposals throughout the UK to provide specialist guidance in relation to the matters addressed in those two Chapters and their related Technical Appendices.
- 5.189 The Consultants (TRL based in Wokingham) undertook a review of the relevant Chapters, identified areas where they required further clarification from the applicants' consultants, secured those responses and compiled a Draft Report which was furnished to EPS Officers to consider. From that

evaluation, EPS Officers identified two further sets of additional questions that emerged from the Consultants work and/or where supplementary clarification was needed. TRL have responded to those and have now completed their work for Carlisle City Council with a full response to the issues identified. That has led to EPS requesting the applicants to clarify several further points, particularly with regard HGV activity during the night time and early morning periods.

- 5.190 In broad terms, TRL are in agreement with the assessment carried out by the consultants commissioned by the applicants to undertake the Noise and Vibration analysis (Chapter 6) included within the Environmental Statement. That Chapter considered that *"the Airport is generally well located in noise terms as it has only a small number of noise sensitive dwellings close by and under the immediate departure and arrival paths"* In relation to development impacts during construction it states that *"this initial assessment indicates that the considerable construction work related to the proposed development can be undertaken without exceeding the usual construction noise limits. Construction noise impacts will be adequately controlled by a construction management plan"*.
- 5.191 The conclusion to Chapter 6 continues *"no significant ground aircraft noise impacts are predicted, due to the considerable separation between the aprons and local noise sensitive amenity"*.
- 5.192 *"The air traffic noise assessment has shown that there is approximately a 4dB increase in daytime aircraft noise at locations in the vicinity of the Airport. No residential buildings, schools, colleges or hospitals are enclosed by the contour representing the onset of community annoyance due to noise currently or in the future. Due to the increase in number of aircraft movements involved, the overall impact of air noise changes between 2007 and 2016 are predicted to be marginal and the overall level of air noise should not be problematic"*.
- 5.193 The ES also concludes, in relation to Noise and Vibration, that *"the proposed development does not produce the level of air noise that would require mitigation measures. Therefore, no mitigation measures are proposed. It will be prudent, however, for the Airport to use good practice to operate as quietly as possible"*.
- 5.194 TRL's assessment on behalf of the Council, whilst not demurring in great measure from those conclusions, nonetheless cautions in relation to the following matters:

Construction noise: it is advised that, pending consultation with the Local Authority, some form of monitoring at the most exposed site during the construction phase should be undertaken and form part of the construction management plan, if agreed necessary;

Ground aircraft noise: providing it can be shown that the assessment is based on adverse wind conditions then it is agreed that there should be no significant impacts;

Road traffic noise: it is accepted that the daytime assessment of road traffic noise will not give rise to any perceptible increase in noise levels at properties. However, due to night time activity of HGV's leaving the site (almost 1/3rd of all HGV movements are expected from midnight to 06.00 hours), a separate night time assessment should be carried out including an appraisal of the road surface in the vicinity of the Airport to ensure there are no problems associated with body noise. It is also advised that the HGV's operating at the site follow the recommendations given in the "Control of Body Noise from Commercial Vehicles" published by the DETR in 1999. This information has been requested;

Aircraft noise: it is agreed that the assessment relating to aircraft noise is in line with current Government advice on the noise impacts from aircraft. However, it has been shown that there is a growing body of research which suggests that this approach may be underestimating impacts and, given the uncertainty in the actual level of activity and types of aircraft operating from the Airport in the future, it is recommended that the planning application should have some restriction on the number of annual movements, or an agreement on the area of a designated contour (e.g. the 54 dB Laeq 16h contour) to ensure that the impact from future growth complies with the impact assessment described within the Environmental Statement.

5.195 TRL have identified, should planning permission be granted, conditions which could potentially be imposed to ensure the future operation of the Airport and any impacts that duly arise from the development is consistent with the predictions made within the ES. Supplementary to receiving their overall advice and in response to queries/ clarification that arose from it, the applicants have been specifically requested to provide further information on the following matters so that Officers can make informed judgements:

1. Confirmation of the Input Data used to model and predict ground aircraft noise levels, including the location, number of types of activities and the sources, strength and duration;
2. In the absence of much information to advise on the frequency and number of engine testing activities likely to be carried out on site or, indeed, where exactly this activity would be carried out, clarification of the expected frequency and number of anticipated engine testing activities, its location on site and measures to be applied to mitigate against impacts;
3. Acknowledging that both routine and unplanned maintenance will be required at the Airport, all of which might have the potential to give rise to noise, dust or odour, clarification of the likely duration and time periods when such maintenance would occur so that the potential impacts of those can be fully considered. In addition, the ES provides no information about the level of maintenance work that would be required to aircraft and this should also be advised.

5.196 Responses to these matters were still awaited at the time when this Committee Report was prepared. They would enable EPS Officers to provide

a complete and comprehensive consultation response including advice in relation to planning conditions that may be required if planning consent is granted.

11. Air Quality

5.197 TRL has also been required to comment on Chapter 7 of the ES, dealing with Air Quality following some preliminary input from the Council's Environmental Protection Service staff.

5.198 With respect to air pollution arising from the proposals, the ES reaches the following main conclusions:

- The construction works have the potential to create dust, but any effects will be temporary and relatively short-lived. During construction it will therefore be necessary to apply a package of mitigation measures to minimise dust emission. Overall the potential effects during the construction phase are judged to be "minor adverse";
- During the operation of the Airport, the effects on local air quality will range from "negligible beneficial" to "minor adverse";
- In terms of the eco-systems related to emissions from roads, the effects will range from "no significant effect" to "minor adverse";
- Emissions from airport sources are considered unlikely to have significant effect with respect to either local air quality or sensitive eco-systems;
- Both road traffic and airport sources may affect greenhouse gas emissions. However, it is not possible to assess the significance of local changes that will take place in the national context that is relevant to carbon dioxide emissions.

5.199 Again, it is advised that *"overall, the methodology adopted by Air Quality Consultants (the applicants' consultants who prepared the Chapter of the ES) is comprehensive and thorough. However, as with the noise assessment, it should be noted that this overall commendation assumes that the operation of the Airport and the levels of traffic have been properly assessed elsewhere in the environmental statement"*.

5.200 TRL accordingly agree with the conclusions of the ES but suggest 3 slight modifications to the text of Chapter 7 to incorporate justification for recommending short-term monitoring of one of two potential pollutants at the nearest receptors during the construction phase; acknowledgement within the ES that, just as CO₂ emissions might be reduced as a result of the development (people driving to a local airport) it is equally conceivable that CO₂ emissions could increase as, in relation to comparative emissions, it is generally better to drive further than to fly; and a rough estimate of the overall modelling uncertainty would be useful.

12. Nature Conservation

- 5.201 Within the Environmental Statement, the applicants have identified the presence of a suite of statutory and non-statutory designated nature conservation sites within a 15 km radius of the proposed development at Carlisle Airport.
- 5.202 To put this in context, Carlisle Airport lies 0.4 km from the edge of the River Eden Special Area of Conservation (SAC) a European site of nature conservation importance. Similarly, there are SAC's at the North Pennines Moors, Solway Firth, Walton Moss and Kielder-Butterburn all located between 4.6km to 12.2 km from the application site. Other internationally designated sites lie 6.8 km to the east (North Pennines Moors SPA) while another highly important European designation, the Upper Solway Flats and Marshes Special Protection Area (SPA) is situated 12.2 km to the west. The Upper Solway Flats and Marshes is also a Wetland of International Importance under the Ramsar Convention and is one of the key estuaries in the UK for wintering wildfowl.
- 5.203 In terms of nationally important designations, the River Eden & Its Tributaries Site of Special Scientific Interest (SSSI), the boundary of which closely coincides with the River Eden SAC, lies a similar distance away (0.4km) while the Walton Moss National Nature Reserve and 21 other SSSI's, including White Moss, Cotehill Pastures and Ponds, Whitberry Burn, Cumwhitton Moss, Cauldbeck Flow, Cairnbridge Sand Pit and Gelt Woods, are located between 1km and 14.5 km from the application site.
- 5.204 There are also 6 Nature Reserves, including the RSPB reserve at Geltsdale, located between 4.6km and 14km from the Airport.
- 5.205 Within Cumbria there are other "local" designations that are designated through the planning system: Regionally Important Geological Sites (RIGS) are identified for rock/fossil exposures that are of local importance while County Wildlife Sites (CWS) are identified for their biological interest. Most of the Carlisle Airport site has been designated as a County Wildlife site on account of its breeding bird populations.
- 5.206 Members will note from the consultation responses from Natural England, the Royal Society for the Protection of Birds, Cumbria Wildlife Trust and from comments made within the responses from the Environment Agency and Cumbria County Council that a key concern relates to the potential impact of the development upon important nature conservation interests.
- 5.207 That is unsurprising: the ES notes that both Natural England and the Environment Agency gave prior indication that an Appropriate Assessment (a Habitats Regulations Assessment) under legislation derived from the Habitats Directive [European legislation designed to ensure protection of European protected habitats and species] but transposed in domestic law within the Conservation (Natural Habitats &c) Regulations 1994 may be required. In identifying an appropriate study area within which to base the ecological impact assessment this was, in the words of the ES, *"to assist in determining the extent of any necessary Appropriate Assessment, required under the*

Conservation (Natural Habitats &c) Regulations”.

- 5.208 An Appropriate Assessment is required to be undertaken, under Regulation 48 of the foregoing Habitats Regulations of *“any plan or project within the District for which they are the competent authority, and which is likely to have a significant effect on a European Site either alone or in combination with other plans or projects”*. Carlisle City Council is the competent authority for the purposes of Habitats Regulations Assessment in this instance and, accordingly, is required to carry out that assessment prior to the determination of a proposal.
- 5.209 The applicants have, within the ES, sought to evaluate the potential impacts upon nature conservation and its ecological impact assessment is stated to have been prepared in line with guidance published by the Institute of Ecology and Environmental Management. The ES adopts a 15km distance from the site boundaries as the general study area as *“a reasonable limit for which to consider whether impacts associated with the proposed development at the Airport are likely to have an effect on features of nature conservation importance, and specifically, the qualifying features of statutory designated sites”*.
- 5.210 Although a Habitats Regulations Assessment is not the same as the Environmental Impact Assessment process, it is normally appropriate to use the information contained within an ES (or EIA as it is also known) which has been submitted by the applicants, when carrying out the Habitats Regulations Assessment.
- 5.211 The Regulations require that in carrying out the Assessment, the competent authority shall consult the appropriate nature conservation body (Natural England [NE] in this instance) and shall have regard to any representations made by that body. In practice, however, where Carlisle City Council has previously carried out such assessments, e.g. when dealing with planning applications for the proposed Tesco store adjacent to the River Caldew and for the Carlisle Flood Alleviation Scheme, both the Council and Natural England have “signed off” the assessment which is carried out using a “template” agreed with NE.
- 5.212 In this instance, however, it is readily apparent from the Natural England consultation response that it considers the level of baseline environmental information, supporting survey data in particular, that the applicants have furnished within the ES is inadequate to enable a robust assessment of the potential impacts on the European sites and other biodiversity interests. In such circumstances, which are also acknowledged in the Cumbria Wildlife Trust and RSPB consultation replies and within Cumbria County Council’s Committee Report and related recommendations to the City Council, it is not considered possible for the Council to ascertain with any degree of certainty that the proposal would not lead to an adverse impact on the integrity of the European Sites. Further discussions and subsequent correspondence have resulted in additional information being supplied but for the purposes of Habitats Regulations Assessment there are still some outstanding issues for the River Eden SAC and Upper Solway Flats and Marshes SPA. These

include: confirmation of UU agreement to the proposals to deal with foul and contaminated surface water drainage via the Waste Water Treatment Works at Irthington which the EA has already indicated is the most appropriate option; provision of the risk assessment following the results of intrusive ground investigations re contaminated land (to ensure that there is sufficient evidence to show no significant risk to the River Eden SAC) and; provision of the full background survey data/methodology report for the SPA bird species (to ensure that the interpretation of these results, as already presented, is fully supported by adequate and appropriate survey).

5.213 Despite the fact that their own ES had acknowledged the prior indication of the need for an Appropriate Assessment to be undertaken and the applicants have not, until recently, contested that requirement, they are now adopting a position where they dispute the need for such an Assessment. They contend that it is not warranted because, in their opinion, the ES provides adequate evidence that *“the proposed development is not likely to have any significant effect on any European site or on the features associated with the designation of such sites”*. In effect, they believe that, within the overall assessment process required under the Habitats Regulations, the initial screening stage (the "Assessment of Likely Significant Effect") demonstrates there would be no such adverse impact. In the absence of a likelihood of a significant effect, it is maintained, there is no need to undertake an Appropriate Assessment.

5.214 As competent authority it is incumbent upon Carlisle City Council to undertake the AA but, in view of the diametrically opposed view that the applicants have taken on the need for it, Counsel's Opinion has been sought. The advice of Counsel is that it is entirely proper for the City Council as the “competent authority” to have regard to Regulation 48 (1) of the 1994 Regulations, viz: *“before deciding to... give... permission...for a..plan or project to undertake an assessment of any plan or project which...is likely to have a significant effect on a European site (either alone or in combination with other plans or projects)...[to] make an appropriate assessment of the implications for the site in view of that site’s conservation objectives”*.

5.215 Counsel advises that the key question is, thus, whether the project- the proposed development- is likely to have a significant effect on a European Site or Sites. Following a judgement in the European Court of Justice (ECJ) it has been held that:

- Article 6(3) of the Habitats Directive does not presume that the project definitely has significant effects but follows from the mere probability that such an effect attaches to the project
- The requirement is that there be a probability or a risk of significant effects; in the light of the precautionary principle, such a risk exists if it cannot be excluded on the basis of objective information that the project will have significant effects on the site concerned
- In case of doubt as to the absence of significant effects such an assessment must be carried out.

5.216 Counsel was also asked to advise on the need for separate Assessments to

be undertaken in relation to the two distinct European designated sites that are considered to be potentially affected i.e. the River Eden SAC and the Upper Solway Flats and Marshes SPA. He has concluded that each must be considered separately and so an Appropriate Assessment is needed for each should likely significant effect be shown or insufficient information be available.

- 5.217 Whilst opposing the need for Appropriate Assessment, the applicants have also maintained that the permission could be granted subject to a condition that an Appropriate Assessment be carried out if necessary. Counsel's opinion is that such a condition would be unlawful and sees some parallels with a High Court judgement in 2001 where, in a case relating to an EIA (or ES), a condition was proposed by the determining planning authority that no development be undertaken until the applicants had carried out additional species/habitat surveys in accordance with details to be agreed with, amongst others, English Nature (now Natural England). The applicants were then to submit for approval appropriate mitigation measures prior to commencement of development. The High Court held that the Council, having decided that such surveys should be carried out, was not in a position to conclude that there were no significant nature conservation issues until they had the results of the surveys. The results of the surveys could have contained information that should therefore have been included in the ES which had to be considered before planning permission was granted.
- 5.218 Counsel concludes that, if on the facts and focusing on the additional impacts of the proposed development, the City Council is of the view that the risk of significant effects on each of the European Sites cannot be excluded, then following the *precautionary principle* identified in the European Court judgement, an Appropriate Assessment of each must be carried out before planning permission is granted and not subordinated in some way to a condition of planning permission.
- 5.219 In summary, it is a fundamental pre-requisite that before the City Council could consider whether to grant planning permission it is first necessary for a Habitats Regulations Assessment to be undertaken to demonstrate that there is not likely to be an adverse effect on the integrity of the European Protected Sites. Such Assessments necessitate analysis and consideration of detailed evidence-based, documented baseline information on the potential impacts upon relevant interest features. At the present time, reliable, comprehensive, authoritative and robustly sourced survey evidence to support the assumptions of likely impact made by the applicants is, however, simply not available. The Agents supplied on the 14 March 2008 some additional information. This has been sent to natural England and the Council's Consultant to evaluate the information. Until this has been concluded the Council cannot exclude the risk that there might be significant effects.
- 5.220 Planning Policy Statement 9: Biodiversity and Geological Conservation (PPS9), published in August 2005, sets out the Government's planning policies on the protection of biodiversity and geological conservation through the planning system. It reiterates that the Government's main objectives for planning are:

- to promote sustainable development by ensuring that biological and geological diversity are conserved and enhanced as an integral part of social, environmental and economic development, so that policies and decisions about the development and use of land integrate biodiversity and geological diversity with other considerations.
- to conserve, enhance and restore the diversity of England's wildlife and geology by sustaining, and where possible improving, the quality and extent of natural habitat and geological and geomorphological sites; the natural physical processes on which they depend; and the populations of naturally occurring species which they support.
- to contribute to rural renewal and urban renaissance by:
 - enhancing biodiversity in green spaces and among developments so that they are used by wildlife and valued by people, recognising that healthy functional eco-systems can contribute to a better quality of life and to people's sense of well-being; and
 - ensuring that developments take account of the role and value of biodiversity in supporting economic diversification and contributing to a high quality environment.

5.221 The PPS also acknowledges that *"the planning system has a significant part to play in meeting the Government's international commitments and domestic policies for habitats, species and ecosystems"*. In that regard, the most important sites for biodiversity are those identified through international conventions and European Directives although the PPS also affirms that Ramsar sites, as a matter of policy, should receive the same level of protection as designated SAC's and SPA's.

5.222 Sites of Special Scientific Interest may also be designated as sites of international importance and will be protected accordingly. Even where not, or where a SSSI includes features not covered by an international designation, they are still required to be given a high degree of protection under the planning system through appropriate policies in (development) plans. Where a proposed development on land within or outside a SSSI is likely to have an adverse effect on a SSSI (either individually or in combination with other developments) planning permission should not normally be granted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSI's. The PPS advocates that Local Planning Authorities should use conditions and/or planning obligations to mitigate the harmful aspects of the development and where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest.

5.223 In addition to the protection afforded to internationally and nationally important nature conservation sites within PPS9, it recognises the value of regional and local sites, which include RIGS sites and sites such as County Wildlife Sites. These are regarded as having a fundamental role to play in

meeting overall national biodiversity targets; contributing to the quality of life and well-being of the community; and in supporting research and education. It advocates that criteria-based policies should be established in local development documents against which proposals for any development on, or affecting, such sites will be judged and those policies should be distinguished from those applied to nationally important sites.

- 5.224 The latter is clearly important as almost all (155 hectares) of the existing Carlisle Airport site is a County Wildlife Site. As such, apart from evaluating the impacts of the proposals upon internationally important nature conservation interests beyond its boundaries (as is required by Policy E34 of the Structure Plan and Policies CP1 and LE2 of the emerging District Local Plan), the proposals also need to be tested against the provisions of Policy 35 of the adopted Structure Plan and Policies CP1 and LE4 of the Carlisle Local Plan 2001-2016 Revised Redeposit Draft. Those Policies all post-date the release of PPS9 and are entirely consistent with its' advice. Thus, regardless of the non-statutory status of County Wildlife Sites, the objectives of PPS9 *"to aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests"* are recognised to be wholly apposite and such sites are still expected to be safeguarded through the protection afforded by the planning system, in this case through Structure Plan Policy E35 and emerging Local Plan Policy LE4.
- 5.225 The Council is also required to comply with the provisions set out in Section 40 of the Natural Environment and Rural Communities Act 2006 which places a New Biodiversity Duty on all public bodies to *"have regard, as far as is consistent with the proper exercise of its functions, to the purpose of conserving biodiversity"*. As the freehold owner, the City Council has additional responsibilities beyond its role as local planning authority, in this regard.
- 5.226 However, the development as proposed would result in the habitat loss arising from the virtual wholesale decimation of Watchclose Woods, removal of extensive areas of hedgerow and hedgerow trees, loss of scrub, semi-improved grasslands and marshy grasslands with consequential associated species loss and, hence, biodiversity loss.
- 5.227 Whilst it is accepted that almost any development of the Airport could result in a loss of some habitat, the cumulative result of the information presented by the current proposals indicates that the proposed development will lead to a significant net loss of biodiversity with little evidence of minimisation, mitigation and enhancement opportunities having been fully explored. It is true that additional woodland planting is proposed close to the north-west perimeter of the Airport but it will take a number of years before habitat creation will occur. Similarly, extensive loss of several kms of hedgerow, mature trees, and areas of scrub, semi-improved grasslands and marshy grasslands which support a number of species, notably birdlife, will reduce the site's biodiversity qualities and these will not readily re-establish nor, as it stands with the proposals, be replaced through appropriate off-site mitigation.

- 5.228 Cumbria Wildlife Trust identified the nature conservation significance of Carlisle Airport leading to its survey by Carlisle Natural History Society/Tullie House Museum and citation as a County Wildlife Site in 1999, principally due to its importance to wading and breeding birds. The Trust strongly objects to the current proposals, not just because there is a substantial habitat loss likely to occur but also on the grounds that very limited mitigation is proposed. The Trust considers its position is supported by Policy 35 of the Structure Plan, which precludes development detrimental to nature conservation interests unless the harm caused to the value of those interests is outweighed by the need for the development, the loss of interests is minimised and, where practicable, mitigation is provided. District Local Plan Policy LE4 (of the Revised Redeposit Draft) adopts an identical policy stance.
- 5.229 Circular 06/05, issued by the ODPM, is the companion to and elaborates on the advice contained within PPS9. It sets out the wide range of legislative provisions at the international and national level that can impact on planning decisions affecting biodiversity and geological conservation issues. In addition to legislative protection afforded to designated areas, however, protection is also extended to particular species. Thus, PPS9 provides advice on the conservation of habitats and species outside designated sites and acknowledges that, apart from protections otherwise afforded to species by international or national legislation, *"the potential effects of development on habitats and species listed as priorities in the UK Biodiversity Action Plan (BAP) are capable of being a material considerations in....the making of planning decisions."*
- 5.230 PPS9 makes it apparent that local authorities should take steps to further the conservation of habitats and species of principal importance through their planning functions. The list of "principal importance" or priority species and habitats identified under the UK Biodiversity Action Plan includes several species for which there are records at or in the vicinity of Carlisle Airport such as bats, skylarks, brown hares, otters and great crested newts. The high level of statutory protection which is afforded to identified species through either European or international protection e.g. otters, bats and great crested newts are all European Protected Species (EPS) or national legislation e.g. reptiles and badgers are protected by UK legislation imposes clear obligations in planning policy terms. Species and habitat protection for any EPS presence within a development site is also complemented by the protection afforded to "priority" BAP species under Policy E35 of the Structure Plan and Policy LE2 of the emerging District Local Plan.
- 5.231 In addition, all wild birds are afforded protection under the Wildlife and Countryside Act 1981, including their nests and eggs. The Act also bestows protection upon certain animals, insects and plants: any reptile, butterflies or insects protected by Schedule 5 of the Act which have a presence within the application site are "protected species" where, in addition to intentionally killing, injuring or taking away any animal within the listed species is an offence, so too is it an offence to intentionally or recklessly damage or destroy or obstruct any access to any structure or place which any animal of a listed species uses for shelter or protection.

- 5.232 A particular difficulty faced by nature conservation agencies has been commenting upon the likelihood of such harm being caused to listed species: although the mix of habitats at the airport is likely to support a range of wildlife that may be affected by the development, regrettably, the applicants have not furnished any information within the ES on reptiles, butterflies and other invertebrates while other survey material, such as on over-wintering wildfowl, is either absent or is insufficient or is unsupported by documented methodology.
- 5.233 Members should be aware that in reporting this application to Cumbria County Council's Development and Regulation Committee in January, the Head of Transport and Spatial Planning advised that *"the development, as proposed, is considered contrary to national policy guidance in PPS9 and to the Policies E34, E35 and E39 of the Cumbria and Lake District Joint Structure Plan (adopted April 2006)"*. It added that *"an improved biodiversity protection, mitigation, compensation and enhancement package should be required before determination by the Local Planning authority"*.
- 5.234 The position since those views were expressed, and endorsed in the County Council's formal consultation response, has changed very little. Essential survey information is still outstanding and no real mitigation measures have been proposed to compensate for the degree of habitat loss that would occur. For example, Cumbria Wildlife Trust has identified from considering the proposals and analysing the County Wildlife Site designation documentation, that off-site mitigation in the form of habitat replacement in the form of wet grassland requires the applicants to provide a 240 hectare contiguous parcel of land, following the principle of 3x habitat loss. The identification of that required land area is based upon a measured consideration of the area used by breeding waders when the site was subject to a detailed bird survey in mid-June 1999 and was found to support 41 pairs of breeding waders. That area was plotted and extends to 80 hectares; in addition, the RSPB has been asked to identify the sort of densities of waders that are typically found on a good wader site, they have advised that a breeding pair of waders per 2 hectares is a good density. That corresponds almost exactly with the survey records from June 1999 at Carlisle Airport.
- 5.235 Good practice in replacement habitat creation indicates that the suggested replacement ratio of 3x the habitat loss is not unreasonable or excessive: it has been accepted as appropriate at several Public Inquiries while in other recent schemes habitat replacement on a 10:1 ration have been implemented elsewhere.
- 5.236 Given the fact that, in view of the damage to the County Wildlife Site as a whole, the Trust might have requested replacement of its entirety on a 3:1 ratio i.e. 3x the designated area of 155 hectares, totalling 465 hectares, the extent of mitigation sought by the Trust is actually quite modest. The Trust advises that the at required 240 hectares should be located within Carlisle District, if possible, but outwith the 13km safeguarding zone identified for the Airport which might cause conflict with the Bird Management Policy and thus restrict the management of the compensation site. A suitable area within the

Solway Estuary locale, i.e. within 25-30kms of the Airport, would provide, principally, a large area of wet grassland that would allow colonisation by the breeding wading bird species and other bird species such as skylark from the North Cumbrian population which will be displaced by the development, along with the likely range of raptors, brown hares, invertebrates for feeding bats and probably reptiles which the Airport grasslands would have supported. In addition to the grasslands, but part of the 240 hectares provided, it would be appropriate to include some degree of replacement woodland planting to compensate for the loss of Watchclose Woods and hedgerow management to displace the extensive lengths of hedgerows (circa 5 km) either being removed or degraded at the Airport site.

- 5.237 The applicants have indicated reluctance to accept that obligation, which would not be expected to be identified “up-front” in the sense of a site specified prior to the grant of any planning permission, but would be expected to be subject to a S106 Agreement. They are, it seems, prepared to accept some degree of mitigation is justified but challenge the basis on which it is calculated i.e. not the “multiple” but the land area being multiplied.
- 5.238 Again, however, this is a matter which Members would need to be certain would be satisfactorily achieved (through the mechanisms of a suitable S106 Agreement) before the release of any planning approval could be contemplated.
- 5.239 In summary, it is apparent that there are a number of outstanding, but highly critical, aspects of the proposals, in relation to nature conservation interests, that are fundamental to the overall acceptability of the development. These must be reconciled before the Council could, with any confidence, be satisfied that the development would have no unacceptable environmental effects or cumulative and seriously adverse biodiversity loss prejudicial to those interests and/or that appropriate mitigation, compensation and enhancement measures are in place or can be put in place.

Conclusion

- 5.240 There is considerable support from planning policy for the development of Carlisle Airport that provides for airport-related development. This extends from the Government’s Aviation White Paper: The Future of Air Transport (issued in December 2003), the Regional Spatial Strategy (draft approved in January 2006, EIP concluded in February 2007 and shortly expected to be formally adopted), the Regional Economic Strategy for the North-West (Sept 2004), Policy ST8 of the Cumbria & Lake District Joint Structure Plan (adopted April 2006) through to Policy DP3 of the Carlisle District Local Plan 2001-2016 (expected to be adopted later this year).
- 5.241 It is also apparent that many supporters of the application do so because they see benefits to the local economy, not just of the Carlisle area but North Cumbria, SW Scotland and the Borders, being derived through the establishment of a successful sub-regional airport. Other supporters welcome the possibility of the restoration of scheduled services and perhaps charter services.

- 5.242 Public perception of the application clearly varies. It ranges from those that believe the current proposals will secure the future of the Airport to those that consider that it will only to deliver the warehouse/distribution activities associated with Eddie Stobart Limited's haulage business re-locating from the urban area. Other commentators on the application fear that investment will occur in the Airport but that this would yield increased air freight activity linked to development of a major freight "hub" with little or no real prospect of scheduled passenger services.
- 5.243 All of the above present some risks and uncertainties to the Council in considering the application. It would have been preferable for the submission to have been more detailed in relation to the allocation of space, the design, internal layout and the location of facilities normally provided within functional airports and for some indication of likely future providers of air services. It would also have been beneficial if there had been a phasing programme that put the development of the runway and associated instrument landing and lighting systems, coupled with the Terminal, at the forefront of the development prior to the re-location of the ESL/WAD businesses from the city. However, none of these are available. Instead, the Council is having to rely on all of the development facets being provided and applying appropriate conditions to any approval that may be forthcoming.
- 5.244 The re-location of part of one of Europe's largest road haulage operators, from a very sustainable site situated on the urban edge close to the hub of the motorway and trunk road network in North Cumbria/South-west Scotland to an almost open countryside location does raise environment sustainability concerns. In this case, however, the Council has to see the re-location as enabling development, which is a material planning consideration, that may regenerate the Airport and bring economic and tourism benefits to the area.
- 5.245 The re-construction of the runway, the installation of an Instrument Landing System, Ground and Approach Lighting and better passenger and freight handling facilities are all supported by planning policy at every level from national strategic guidance to local planning policies. The Airport exists and the improvement in essential infrastructure to enable it to be developed is policy compliant. Any concerns regarding the numbers and times of flights that can be operated from it are capable of being regulated through suitable planning conditions. Likewise, some objectors perceived "hidden agendas" for increased runway length and larger aircraft are speculation: if any such future proposals arise, a new planning permission would be required and any arguments for or against such proposals would need to be fully considered.
- 5.246 The essential difficulty that Members face, however, concerns the quality and completeness of information to enable a fully informed judgement to be made on these proposals. At the time of writing foul drainage and potential contamination issues from spillage and de-icers remain outstanding. They are important in their own terms but are essential in enabling the potential effects on nature conservation to be evaluated, as risks to the local hydrology in a very delicate ecosystem are real and apparent. The recent amendment to the location of the storage lagoons to the vicinity of the Roman road has led

to English Heritage requiring a pre determination investigation. This matter is the subject of discussions between English Heritage and the Agent's archaeologist.

- 5.247 Progress is being made almost on a daily basis, in establishing effective environmental baseline information. Important information is, however, still missing and until it is provided, an Appropriate Assessment of the development's impacts on wider conservation interests, cannot be completed.
- 5.248 Consequently, at the time of writing this Report the Appropriate Assessment has not been completed and therefore the City Council is unable to approve the application. To do so would be unlawful. Members will be updated on the position at the Committee. If the Committee are minded to approve the application planning conditions and a Section 106 Agreement will be required.
- 5.249 Members should also be aware that, if ultimately "minded to approve" the proposals, the Council must first refer the application to GONW as a "Departure" from the Development Plan. Without the completed Appropriate Assessment the Council could not refer the application to the Secretary of State with a "minded to approve" recommendation.
- 5.250 If the Appropriate Assessment is completed and the Council wishes to approve the application contrary to the outcome of the Appropriate Assessment the Council will have to refer the application to the Secretary of State.

Departure From Development Plan

The proposal involves, in the opinion of the Council, a departure from the provisions of the Development Plan within which the site is allocated for other purposes.

6. Human Rights Act 1998

- 6.1 Several provisions of the above Act can have implications in relation to the consideration of planning proposals, the most notable being:
- Article 6** bestowing the "Right to a Fair Trial" is applicable to both applicants seeking to develop or use land or property and those whose interests may be affected by such proposals;
- Article 7** provides that there shall be "No Punishment Without Law" and may be applicable in respect of enforcement proceedings taken by the Authority to regularise any breach of planning control;
- Article 8** recognises the "Right To Respect for Private and Family Life";
- 6.2 **Article 1 of Protocol 1** relates to the "Protection of Property" and bestows the right for the peaceful enjoyment of possessions. This right, however,

does not impair the right to enforce the law if this is necessary;

- 6.3 In considering the proposals and the observations made by representations by the applicants and third parties, the provisions of the Act have been taken into account.

7. Recommendation

Reason For Including Report In Schedule B

- 7.1 At the time of writing further information is awaited in respect of:
- The predetermination evaluation of the effect of relocating the lagoons on the Roman road, Stanegate; and
 - Information to enable the Appropriate Assessment under the European Habitat Regulations to be completed.
- 7.2 Officers are currently liaising with the relevant specialist bodies with a view to receiving the outstanding information. Officers will be in a position to report to Members at the Committee and make the appropriate recommendation at that time.
-