

SCHEDULE A: Applications with Recommendation

10/1116

Item No: 01

Date of Committee: 15/07/2011

Appn Ref No:
10/1116

Applicant:
Stobart Air Limited

Parish:
Irthington

Date of Receipt:
16/12/2010

Agent:
URS/Scott Wilson

Ward:
Stanwix Rural

Location:

Carlisle Lake District Airport, Carlisle CA6 4NW

Proposal: Erection Of A Distribution Centre (Inclusive Of Air Freight And Road Haulage, And Including Integrated +3°C Chiller Chamber, +12°C Chiller Chamber, Workshop And Offices)(Use Classes B1 And B8), Gatehouse, Canteen/Welfare Facilities, Landscaping, New Access, Parking And Other Infrastructure Works (Such As Auxiliary Fire Station, Package Sewage Treatment Works, Fire Sprinkler System And Electrical Substation) And Raised And Re-Profiled Runway 07/25

REPORT

Case Officer: Angus Hutchinson

Brief Summary

Whilst the City Council in principle welcomes Airport related development, the proposed distribution centre appears, in the view of officers, to be primarily for road haulage (a relocation and potential expansion of the applicant's existing operation at Kingstown Industrial Estate), rather than to be airport-related. It is considered to be contrary to policy.

The application has been submitted on the basis that the proposed distribution centre would enable the Stobart Group to relocate from its existing sites at Kingstown Industrial Estate (albeit with the office premises for Stobart haulage and Stobart Rail at Parkhouse retained), provide a source of non-aviation rental income to stem the annual losses and help thereby to ensure the future viability of the Airport with a view to enabling commercial passenger flights and air freight to be handled at the Airport. The applicant has offered to secure the implementation of the proposed raising and re-profiling of the main runway 07/25 (and provision of taxiways and aprons) by a condition.

It is true that the tenant could currently seek to close the Airport if it is demonstrated that it is not capable of economic operation as a commercial airport. Even if permission were to be granted for the proposed development it has not, however, been

demonstrated that the income generated by the distribution centre would both cover current significant annual losses and pay for the substantial cost of the airport-related development. Further, specialist advice received by the Council casts significant doubt on the realistic potential for either air freight or passenger flights given the market, competition elsewhere, coupled with the relative shortness of the landing distance available of the runway and the lack of provision of an instrument landing system.

Officers are of the view that, upon analysis, the likely benefits of the proposal do not outweigh the harm.

The ES appears to be deficient in not having assessed how the additional passenger throughput will be managed (what additional building needed and the environmental consequences thereof). In law therefore permission could not be granted.

1. Recommendation

- 1.1 It is recommended that this application be refused.

2. Main Issues

- 2.1 Accordance of the application with the Development Plan;
- 2.2 Socio-Economic Impact;
- 2.3 Sustainability- Means of Travel;
- 2.4 Sustainability- Design;
- 2.5 Highway Network;
- 2.6 Noise and Vibration;
- 2.7 Air Quality and Odour;
- 2.8 Visual Impact;
- 2.9 Ecology and Nature Conservation;
- 2.10 Archaeology; and
- 2.11 Hazard Assessment.

In undertaking the assessment, the Council commissioned independent advice from Lloyd Bore regarding ecology, and specialist aviation advice from Alan Stratford Associates.

3. Application Details

The Site

- 3.1 Carlisle Airport lies approximately 8.5kms north-east of Carlisle and about 3.5kms west of Brampton and has a current operational area of approximately 176 hectares. The southern boundary of the Airport has a frontage onto the A689 that links the A69 west of Brampton to Junction 44 of the M6 at Kingstown on the northern fringe of Carlisle. The western, northern and eastern boundaries of the Airport front onto the minor roads serving the hamlet at Oldwall, and the villages of Laversdale and Irthington.
- 3.2 The Airport originally commenced use in 1941 as a wartime training base for pilots and was known as RAF Crosby-on-Eden. It currently comprises three

asphalt runway strips in varying states of repair, namely the principal instrument runway 07/25 (which is 1837 metres long); a small visual-only runway 01/19 (938 metres in length) which has a north-south axis but with no lighting; and 13/31 which is disused and orientated south-east to north-west. The associated linking taxiways, aprons and hard standings/dispersals vary in condition.

- 3.3 The Airport related structures consist of the control tower; a passenger terminal with three check-in desks and a cafe/bar (Cafe Stobart); a single storey administration building; a building used by Micro Light Training; four hangars of varying size (occupiers including Haughey Air, Carlisle Flight Training, Border Air Training and Northumbria Helicopters); a fuel farm; fire station; helipad; and three single storey buildings used by Solway Aviation Museum. In 2008 (application reference number 08/0131/FP) an application was submitted for Building Regulations' approval concerning the erection of an aircraft hangar shell. The hangar appears to now be in use but with 921.6 square metres of unoccupied office space on the first floor.
- 3.4 The Airport sits within a generally rolling and undulating agricultural landscape which is relatively open, with the only significant visual interest created by Watchclose Woods (at the western perimeter), relatively small farmsteads (such as Hurtleton), and industrial/commercial buildings occupied by ECM, E&N, Farrer (haulage), Laversdale Timber Co, Dundee Tyres Ltd, System Driver Training/System Group, and Frank Johnson (tractors) to the west of the Laversdale road (close to Watchclose Woods) and immediately opposite the northern site boundary.
- 3.5 The nearest settlements are the hamlets at Oldwall and Bleatarn, and the villages of Irthington and Laversdale that respectively lie about 0.2km, 1km, 0.5km and 0.6km to the north, north-west, north-east and north of the existing Airport perimeter. Irthington is identified as a Local Service Centre in the Local Plan and has approximately 70 households, St Kentigern's Church, the Village School, the Salutation Inn, a local shop, and a bus service. Laversdale is a smaller settlement of approximately 29 households.
- 3.6 The whole of the Airport is within the "Buffer Zone" of the Hadrian's Wall World Heritage Site and includes the Watch Close Roman Camp (a Scheduled Ancient Monument near the south-west boundary), and the remains of part of Stanegate Roman road. The course of Hadrian's Wall runs between the northern perimeter of the Airport and Oldwall. The associated Hadrian's Wall Path, which is a national trail, has interconnecting public rights of way running from Irthington, Laversdale, and Newtown Bank.
- 3.7 The Airport is a County Wildlife Site and Watchclose Woods is a non-statutory "local" wildlife site. The Airport is 0.4km to the west of the River Irthing which forms part of the River Eden Special Area of Conservation ("SAC") and the River Eden & Its Tributaries Site of Special Scientific Interest ("SSSI").

Background

- 3.8 The Airport has a full Civil Aviation Authority Public Use Licence but with Public

Use and flight training movements restricted to aircraft with a Maximum Take-off Weight of 12.5 tonnes. Under the terms of its Lease, the applicant/tenant cannot presently operate more than eight air traffic movements at the Airport between 23.00 and 06.00 hours. The Airport currently has an instrument aided approach on runway 07/25 using the available Non-Directional Beacon and Distance Measuring Equipment. However, the final approach is made on a visual basis. It does not have an instrument landing system ("ILS").

- 3.9 Stobart Air has 12 full time, and 7 part time, staff at the Airport as well as employing the services of 4 airfield engineers (1-2 days per week) and a cleaner (2 hours per day). There are a total of 6 full time staff and 3 part time staff employed by Border Air Training and Carlisle Flight Training, and 3-4 staff employed by the aircraft charter company VLL.
- 3.10 The records from the CAA show that since 2004 there has been decline in total aircraft movements at the Airport from 25,000 to 18,000 in 2010. The majority of movements were private light aircraft, flight training or helicopter movements including air ambulance. There were no passenger or cargo services.
- 3.11 In 2007 (reference number 07/1127) an application, accompanied by an Environmental Statement, was submitted for a replaced and realigned runway and related aprons and taxiways, a new air traffic control tower, Instrument Landing System and other navigational aids including approach lighting, and an extensive building that was proposed to be used for warehousing, hangarage and as a Terminal. The Development Control Committee resolved to grant conditional permission but the application was withdrawn in July 2008 when called in by the then Government Office for the North West.
- 3.12 A subsequent, scaled down, application (reference number 08/1052) was made in October 2008 for the erection of a freight storage and distribution facility (including chilled cross dock facility) with associated offices, gatehouse/office/ canteen/staff welfare facilities, new vehicular access, car and lorry parking, landscaping, new vehicular access, and other infrastructure works. The airport works were not included in the application. The applicant indicated that it intended only to repair/resurface rather than replace the existing main runway and to use an existing building as a passenger terminal; and to rely upon permitted development rights for these elements. The distribution centre was smaller than that proposed in 2007 but contained a larger element of office floor space. The application was approved by the Development Control Committee subject to the completion of a Section 106 Agreement to secure the renewal of the runway (to last for about 20 years) and the provision of passenger terminal facilities, the latter to be kept open for at least 10 years provided it was, in the opinion of the applicant, commercially viable to do so. This decision was later overturned in May 2010 by the Court of Appeal following a Judicial Review that held that found all aspects of the development, i.e. including the airport works, should have been the subject of an Environmental Impact Assessment. The Environmental Statement had dealt only with the likely significant effects on the environment of the Freight Distribution Centre proposed in the application. It had not addressed the environmental effects of the revised airport works.

The Proposal

- 3.13 The current application seeks Full Permission for the erection of a distribution centre (inclusive of air freight and road haulage, and including integrated +3°C chiller chamber, +12°C chiller chamber, workshop and offices)(Use Classes B1 And B8), gatehouse, canteen/welfare facilities, landscaping, new access, parking and other infrastructure works (such as auxiliary fire station, package sewage treatment works, fire sprinkler system and electrical substation), raised and re-profiled runway 07/25, and associated taxi ways and aprons.
- 3.14 The application primarily relates to approximately 28.6 ha in the south-eastern section of the Airport to the immediate north of the A689 and west of the road to Irthington.
- Freight Distribution Centre (FDC)
- 3.15 The submitted plans show the proposed distribution centre to measure 241 metres by 151 metres with an eaves height of 14.25 metres and a ridge height of 15.6 metres comprising the distribution centre (internal area of 28,940 square metres); a workshop (3,000 square metres); two chiller chambers (combined floor area of 4,756 square metres); a warehouse office on the ground and first floors (444 square metres); and an operations office also having a ground and first floor (184 square metres).
- 3.16 The proposed distribution centre is shown to be constructed with five bays, externally finished in grey profiled sheet cladding on the walls and the roof having shallow pitched panels with roof lights. The western elevation (facing the southernmost section of runway 01-19) is blank apart from a centralised means of escape door. The eastern elevation (facing the southernmost section of runway 13/31) has ten indented loading bays to serve the chiller chambers, two level access doors for the workshop, and two technical services blocks. The proposed northern elevation has ten level access doors of which six are to serve the distribution centre. The proposed southern elevation also has ten level access doors of which two would serve a chiller chamber.
- 3.17 Paragraph 3.3 of the Transport Assessment explains that the “*..Air Freight Distribution Centre will accommodate the Eddie Stobart Ltd warehouse operations currently located in Kingstown. The chilled cross docking facility will allow bulk perishable freight to be broken down and reloaded for onward delivery.*” The submitted Environmental Statement refers in Table 2.2 to 1,560 air traffic movements by freight aircraft i.e. the approximate equivalent of two aircraft landing and departing per day, by 2025. On the basis of 1) the applicants air traffic forecasts, 2) the typical payloads of the proposed cargo aircraft to operate (RJ146 and ATR42), and 3) the likely nature of the cargo (i.e. perishables and smaller items), ASA are of the view that air cargo would account for a maximum of only 5-10% of the centre's capacity by 2025. As will become apparent later in this report, ASA consider that the predicted market is neither operationally nor financially viable – that, even in an optimistic scenario, the total number of cargo ATMs would be unlikely to exceed 300-400 pa by 2025. Thus, by reference to the amount of floor space and the likely nature of its use, the distribution centre appears therefore likely to relate to a very great

extent to road haulage as opposed to air freight.

- Raised and Re-profiled Runway 07/25, Taxiways and Apron Layout

3.18 Officers have very recently been advised that the proposed runway works are to be constructed to a minimum Pavement Classification Number (PCN) of 31 in order to meet the standard required to accommodate the aircraft predicted to use the Airport, as set out in the submitted Environmental Statement (ES).

3.19 Paragraph 13.4 of the accompanying Non-Technical Summary states that some taxiway resurfacing will be included and, although not mentioned in Part 1 of the ES, this is pictorially represented in Figure 2.2 of Part 3. The proposed new apron layout shows 11 aircraft stands adjacent to the FDC of which four are suitable for all aircraft sizes up to and including Boeing 747 (i.e. "jumbo") types or similar, with the remainder appropriate for B737 size or similar. The applicant has explained that any surplus stands might be used for the storage of aircraft belonging to airlines and leasing companies that are not in use during the current economic climate.

- Gatehouse

3.20 The proposed Gatehouse building comprises two floors providing a total of 514 square metres of floor space i.e. 257 square metres per floor. The ground floor would consist of four hatches controlling inbound and outbound traffic with 195 square metres of an open plan office. The proposed first floor has w.c. facilities, a meeting room, "tea station", two partitioned offices, an open plan office, and a boardroom. It is proposed to be externally finished in "albatross" micro-rib cladding panels and grey framed "ribbon" windows for the walls, and Kingspan panels on a curvilinear roof. The height of the proposed roof varies from 6.5 metres to 10.5 metres.

- Canteen and Welfare Building

3.21 The proposed canteen and welfare building is single storey with an internal floor area of 192 square metres comprising a lounge/dining area, kitchen, w.c. and shower facilities, and a store. Externally it is shown to be constructed using "albatross" panels on the walls and Kingspan panels covering the roof. The proposed height of the curvilinear roof varies between 3.67 metres to 4.85 metres.

- Vehicular Access

3.22 Access to the proposed site is to be provided by a new spur road off a roundabout junction with the northern side of the A689. The proposed road, which would follow part of the south-eastern boundary of the site, provides access to a staff car park; the proposed gatehouse and FDC; trailer parking areas; the HGV wash/fuelling area; and the sprinkler tank and pump house.

3.23 The proposed roundabout will, amongst other things, involve the re-alignment of the A689, and the removal of a section of existing hedgerow and an electrical sub-station.

- Car Parking, Cycle Parking, and HGV Parking

3.24 The development proposes a 223 space car park (including nine disabled persons spaces and eight taxi bays) for staff, visitors and drivers associated with the FDC. The aforementioned car park also includes provision of a cycle shelter. The submitted plans also annotate a second car park with 110 spaces to serve air passengers to the east of the existing passenger terminal to the north of the site.

3.25 Parking for 41 no. HGV cab units and standing space for 99 trailer units is proposed within the “secure” hard standing areas adjacent to the north-western, south-eastern and southern facades of the FDC.

- Fire Station

3.26 The proposed fire station measures 16 m by 17 m with an eaves height of 5.45 m and ridge height of 7.2 m. Internally it comprises parking for two engines, w.c. facilities, a lecture and recreation room with kitchen facilities, plant room, store and watch room. Externally it is proposed to be constructed in “albatross” cladding.

- Foul Drainage Works, Sub-Stations and Surface Water Drainage

3.27 The originally submitted plans showed a proposed foul drainage treatment system serving the FDC, gatehouse, canteen and welfare building, fire station, and the HGV wash area/refuelling facility. Following comments from the Environment Agency and United Utilities, the applicant’s agent has explained that the package treatment plant remains his client’s preferred solution but further plans have been submitted showing connection to the Sewage Works at Irthington that are planned to be upgraded.

3.28 The intention is for the surface water drains to be connected to 2 balancing lagoons located either side of the proposed roundabout lying parallel with the A689. Interceptors will be installed to avoid contamination by oil and other material and attenuation will be provided to control the discharge rates from the lagoons to the receiving watercourse on the southern side of the A689.

3.29 The proposal includes an electricity sub-station, a back-up generator located to the south-west of the canteen/welfare facilities, a substation compound and a structure to protect the gas meters from the elements. An LPG store is proposed within the service yard to the FDC.

- Landscaping

3.30 The application is also accompanied by a landscaping scheme which, in relation to the boundaries of the site, involves woodland mix planting fronting the road to Laversdale; to the north-east of the proposed FDC; and the sections of road frontage onto the A689 to the east and west of the proposed new roundabout. The proposed woodland mix consists of Lime, Ash, Hazel, Silver Birch, Scots Pine and Oak trees.

- 3.31 The loss of sections of existing hedgerows will be mitigated by the planting of new hedging using Field Maple, Beech, Silver Birch, Hornbeam and Privet.
- 3.32 The proposed landscaping also includes the planting of Lime trees to line the access road; hedge planting with trees along the access road leading to the vehicle wash/fuel storage area; tree planting down to the yard areas to the south-east of the building and around the yard beyond the north-east gable.
- Security Fencing and Lighting
- 3.33 The intended means of enclosure involves the erection of 2.4m high paladin security fencing along the southern and western boundaries of the FDC; and 2.8m high welded mesh and barbed wire for the airside activities. The access road system will incorporate 10m high lighting columns with 150 watt light fixtures around the proposed new roundabout with the A689 but then reduce to 8m high columns with 100 watt lights for the internal road system. It is also proposed that the car park, HGV yard and circulation areas will be lit by building or column mounted lights.
- 3.34 The scheme considered under application 08/1052 involved the provision of 44,048 square metres of floor space (in total) of which 7,988 square metres related to offices. This compares to the current proposal which involves the provision of 37,711 square metres of floor space (in total) of which 823 square metres are for office purposes. It should also be noted that there is no reference to passenger terminal facilities (paragraph 6.46 refers to this later).
- 3.35 The proposal is accompanied by an Environmental Statement in respect of all that is described in the application as well as: a “Non-Technical” Summary of the Environmental Statement; a Planning Policy and Position Statement; a Design and Access Statement; a Transport Assessment and Travel Plan; a Flood Risk Assessment; two Economic Impact Appraisal Reports dating from 2008 and 2010 prepared by EKOS Ltd; and an assessment on Potential Odour Impacts by Air Quality Consultants Ltd. As part of the proposal the applicant has confirmed their willingness to pay £100,000 towards the provision and management of a habitat scheme.
- 3.36 In addition to the independent advice commissioned by the City Council from Lloyd Bore and Alan Stratford Associates, interested parties have submitted separate documentation including copies of a letter from the Chairman of the Stobart Group dated the 12th May 2009; the Stobart Group Annual Report 2010; a Notice of General Meeting dated the 26th April 2011; the CAA Licence for Carlisle Airport (30th May 2006); and a report prepared by York Aviation LLP consultants (June 2011).
- 3.37 The Environmental Statement, in paragraphs 2.18 to 2.20, explain that the Runway 07/25 is in a poor state of repair and, in its current condition, cannot satisfy the requirements of either commercial aviation operators or the CAA; the current level of use does not provide sufficient income to cover the maintenance and fixed cost operations of the Airport; the requirement to keep

the Airport open is recognised and included in the Lease; and even with the addition of commercial passengers the Airport would be left with a large financial deficit. It is therefore considered essential that the Airport realise alternative on-site income streams such as those that will be generated by commercial air freight operations and associated warehousing and distribution.

- 3.38 Section 2 of the Design and Access Statement states that *“these revised proposals reaffirm the Stobart Group’s commitment to consolidate its operations at the Airport, thereby establishing the commercially viable operation at the airport, which will ensure the future viability and sustainability of the Airport.”*
- 3.39 The application has thus been submitted on the basis that it would enable the Stobart Group to relocate from its existing sites at Kingstown Industrial Estate with the office premises for Stobart haulage and Stobart Rail at Parkhouse retained; enable the addition of commercial passenger flights and air freight to be handled at the Airport; and provide a source of non-aviation rental income to ensure the future viability of the Airport.
- 3.40 Generally property matters, including leases, are not usually relevant to the determination of a planning application but the applicant refers to its lease of the Airport so some brief background explanation may assist. As is well known, the City Council is the freehold owner of the Airport and granted (on the 31st May 2001) a 150 year lease of the Airport to Haughey Airports Ltd, a lease which is now held by the Stobart Group. The Airport is now under the management of Stobart Air Ltd as part of the Stobart Group. The applicant has drawn attention to that part of the Lease regarding keeping the Airport open. The Lease requires the Airport not to be used other than for aviation, or B1 – B8 and C1 Uses, or for agriculture but also specifies that a tenant (after the expiry of the tenth year of the Term) may close the Airport for airport operations if the tenant is able to demonstrate that it is not capable of economic operation as a commercial airport when managed by a reasonably competent operator.
- 3.41 The City Council’s attention has been drawn to a letter from the Chairman of Stobart Group Ltd dated the 12th May 2009 (see paragraph 3.36 above) which explains that the current (Kingstown) sites lead to inefficiencies as a result of operating from multiple locations; the current sites have inadequate storage capabilities (including height restrictions); are on short-term lease arrangements; and one of the Group’s most significant customers has requested that its operations are conducted from one consolidated warehouse facility. The letter goes on to say that:

“...the new facility at the Airport would provide ongoing savings as a result of more efficient working practices, high bay stacking, improved turnaround times and reduced labour and other costs, as well as providing the Northern hub...following the acquisition of Innovate (now Stobart Chilled) in July 2008, the Group would have the opportunity to incorporate both ambient and chilled storage in one location....

The Board also believes that the acquisition of Carlisle Airport, although not the primary purpose, offers the Group the opportunity to provide air freight solutions as well as the potential to develop passenger aviation.” (emphasis added)

- 3.42 The Stobart Group Annual Report and Accounts for 2010 states that “*the Group has signed a new nine year deal with Crown, which will have a new warehouse at Stobart’s Carlisle Lake District Airport site to act as distribution centre for the UK*” (page 20) and that “*Stobart will also develop the area as a business site, and plans to combine the Group’s seven locations currently dotted around Carlisle into a single, highly efficient facility. An important regional cross-docking warehouse will also serve Scotland.*” (page 25) The Annual Report and Accounts (2010) also indicate that Carlisle Lake District Airport has long been overdue for development as a valuable tourist route, and that plans are well advanced to link it to London Southend Airport.

4. Summary of Representations

- 4.1 At the time of preparing the report 1 petition regarding Solway Aviation Museum; correspondence from 7 individuals commenting on the proposal; 62 formal objections; and 67 letters/e-mails of support, have been received. The correspondence has been summarised below under its respective headings.
- 4.2 The petition, signed by 11 signatories, from Solway Aviation Society Limited and Solway Aviation Museum request that any permission should include a Section 106 Agreement safeguarding the Museum from any resultant development at the airport.
- 4.3 The main points raised are in respect of the comments received centre on the existing use of the site and the processing of the application.

Existing Use of Site

- Welcome airport development to promote passenger services and general aviation use
- Stobart Group have withdrawn a 30 year lease and offered a 5 year lease with a get out clause which the Solway Aviation Association are unhappy about
- Request a condition be included within any successful decision notice ensuring the integrity of the Solway Aviation Museum
- The proposed size of the scheme indicates that it would be impossible to be supported by air freight alone. What other uses are proposed?
- If Stobart is proposing to move their entire haulage network to the airport then it would be changing its use into an industrial estate which should not be endorsed
- Suggested number of flights that the airport could see in the future appears optimistic given the past levels of service and numbers of people using them

- There is not the population base to support a commercially viable passenger service from the airport

Application Procedure

- Request that the application is determined by the Planning Committee and not through Delegated Powers
- There was not robust discussion at previous Council Meetings
- Request that application is determined at a Public Inquiry
- Questions length of time for consultation period for Parish Council responses and third parties

4.4 The letters/e-mails of support centre on the following issues: economic benefits; improved transport links; environmental issues; existing use of site. These issues are summarised below:

Economic Benefits

- Development would have a positive impact on the local economy both in Cumbria and South West Scotland
- Development would create new employment opportunities and safeguard existing jobs
- Development would have the potential to attract new businesses into the area
- Airport is currently used frequently by customers and suppliers to neighbouring businesses, an airport is essential to economic sustainability and growth in the area
- Continued operation and development of the airport for dual use is required to sustain the costs of aviation operations at the airport
- Other airports have associated businesses running along side the airport
- The success of the application is essential to protect employment at the flying schools based at the airport
- Stobart Group is a Cumbria brand known throughout the World, it should be allowed to flourish and grow
- Stobart Group invests in Cumbria through sponsorship deals which may be lost if the Stobart Group relocates
- Essential to keep Stobart Group in Cumbria, if it were to relocate it would result in job losses and loss of spending revenue in the Cumbria economy as a whole

Improved Transportation Links

- The benefits of commercial passenger flights will impact positively on the business and tourist economies of the Cumbria and South West Scotland
- Good passenger transport links are a necessity for the preservation and creation of jobs in the area
- Should the airport development be unsuccessful, jobs may be lost and businesses forced to relocate to areas with better transport links
- The new transport link will help bring new investment from other businesses which would not normally come to Cumbria due to its lack of

accessibility

Environmental Issues

- Other UK airports have villages and nature reserves in close proximity to runways
- Methane gas is a greater pollutant than carbon emissions
- The proposed increase in the number of aircraft is not a valid reason for people to object to the proposal
- The proposed new access would ensure that heavy traffic would be kept to a minimum around surrounding villages

Existing Use Of Site

- The airport has been used as an Airfield since World War Two
- Aviation based businesses have no option to relocate if the airport is not allowed to develop
- The Aviation Museum, based at the airport, is a valuable tourism asset which should be protected
- If the proposal is refused the airport will gradually deteriorate until the cost of making it operational again will become prohibitive

- 4.5 The objections highlight the following issues: use of building; location; environmental impacts; visual impacts; odour; highway issues; noise impact; safety issues; Development Plan policies; economic impacts; application procedures, proposed passenger flights; airside works; and compensation issues. The main points raised have been summarised below.

Use of Building

- No indication as to how much of the building would be used for road haulage and air freight
- If the air traffic movements (ATMs) taken at face value then the proportion of air freight within the building would be minimal
- Stobart Group documents indicate that the seven Stobart locations across Carlisle would be relocated to the airport into a single highly efficient facility. This is at variance with the EKOS report which states that existing staff at Stobart Haulage and Stobart Rail would not relocate to the airport

Location

- Opposed to relocation of what is essentially a haulage business to a rural area
- The building should be located at a strategic site such as Kingmoor Park which is closer to Junction 44 of the M6
- Given the relatively small amount of cargo planes envisaged by year 2025, the large building appears to be more related to relocation of the Stobart Group HGV operations than airport use
- An airfreight business handling 2 cargo flights per day does not justify a building roughly the size of The Lanes shopping centre

- The size of the building could interfere with radar and radio communications which would might impact on the future use of the airport for aviation purposes
- Information contained within Stobart Group documents highlight that the building is unlikely to be used for air freight purposes

Environmental Impacts

- Little technical supporting information within Environmental Statement as to how or if the air quality has been measured within Irthington
- Request that the Council stand up for the ecology of Carlisle rather than the economy
- Increased traffic would impact on climate change, eco-systems and produce more CO2 emissions
- The size of the development would have a detrimental impact on biodiversity
- Increased air traffic movements between Southend and Carlisle will increase air quality pollution
- Relocation from Kingstown would result in increased road mileage
- Measures should be put in place in respect of monitoring air quality or noise pollution
- Same concessions should apply to Carlisle Airport as those imposed at Southend Airport

Visual Impacts

- Size of the building will have a negative impact on the Hadrian's Wall Path
- Increase in light pollution in the rural area and along the A689 due to the proposed operating hours of the building

Odour

- Distinct smell of aircraft odour below the existing flight path and concerned about the effect of the fumes on children's health
- Have not raised this issue with the airport direct as there appears no form of communication between residents and airport. Aware that there is an airport forum but unaware when or where this forum meets
- Concerned that the agent has dismissed the potential for odour and would expect increased aircraft movements over the village of Irthington to create increased aircraft odour

Highway Issues

- Increase in heavy goods vehicles using A689 and surrounding road network
- Insufficient infrastructure to support development
- Existing history of road accidents in the vicinity of the development
- The development could lead to possible transportation of nuclear waste fuel by road
- No restrictions on freight traffic through adjacent villages

- No assessment of the impact of traffic through Irthington as the village road connects the A689 with the A6071, key routes for traffic servicing the airport
- Travel Plan should adhere to nationally acceptable standards
- The Transport Assessment does not fully take into account the additional traffic along the A689 once the Carlisle Northern Development Route is operational
- Location of new roundabout will increase risk of road traffic accidents unless speed restrictions and high friction surfaces are used
- Location of new roundabout will increase risk of road traffic accidents unless speed restrictions and high friction surfaces are used
- Irthington Lane junction should be linked to the proposed roundabout on the A689

Noise Impact

- Increase in road traffic noise
- Increase in aircraft noise
- Increased air traffic movements between Southend and Carlisle will increase noise and pollution
- At present there is practically no night flying, therefore, any use of the airport at night would have a major impact on residents
- The Environmental Statement appears to concentrate on road noise; only makes passing mention to airside noise at Irthington school with the data provided more or less a straight crib from PPS24
- The ES does not appear to address the impact of night flights

Safety Issues

- Increased danger to residents in surrounding villages from aircraft accidents
- Proposals would permit the operation of larger aircraft than those which currently operate from the airport
- Studies indicate that cargo planes are up to 16 times more liable to have air accidents than passenger planes
- As the runway is not to be repositioned, all flights will be directly over Irthington and the three places that people congregate; the Church, public house and school
- Has a risk assessment been undertaken in respect of the 4,000 tonnes of LPG which the applicant proposes to store on site?
- The submitted drawings do not indicate a fence around the curtilage of the airport, only the Distribution Centre. Deer are regularly seen within the confines of the airport
- Large flocks of geese and swans in the fields surrounding the airport would increase the risk of air strikes
- The existing runways due to their length and uneven topography would not be acceptable to the CAA

Development Plan Policies

- Conflicts with national, regional and local plans by proposing to locate an industrial estate in a position of poor sustainability

- Contrary to Policies within the Carlisle District Local Plan, therefore, should be referred to relevant Government Office and a Public Inquiry should ensue

Economic Impacts

- Information contained in a letter to Stobart's Shareholders recommends the move to the airport would generate "ongoing savings" as a result of "reduced labour". However, information submitted with the application envisages major job creation and a new airport for Carlisle
- Questions if the proposal is enabling development as the commercial case for developing the airport appears weak
- Documents from the Stobart Group to shareholders appear to highlight how a value can be extracted from the site but they do not contain commitments to airside works
- A timetable of airside works should be secured by a Section 106 Agreement
- An industrial site in vicinity of Hadrian's Wall would have a detrimental impact on tourism
- Questions employment figures outlined in ES as they appear to be extravagant use of staff and lorries for amount of cargo flights envisaged
- Commercial case for developing the airport appears weak
- In the absence of any enabling mechanism for the airport there is a risk that only an industrial estate in an unsustainable location will be built

Application Procedures

- Submission of application prior to Christmas period limited the amount of time available in which to comment and gain more information
- No consultation undertaken between developers and local residents
- Questions what technical aviation expertise has been employed by the Council to provide an independent assessment of the aviation elevation of the application
- No evidence as to whether the applicant has received, or applied for, the necessary CAA approval for this development
- Concerns about the information contained within the Environmental Statement. In particular, airport related businesses, employment figures and type of aircraft which would use the airport as no PCN figure has been mentioned
- The Pavement Classification Number (PCN) must be known as this determines the cumulative effect and possibilities in the future of aircraft types that could possibly land at the airport
- Within the Local Plan there is a commitment to prepare a Masterplan as this has not been compiled there is no template against which to judge the application
- The same restrictions should be imposed as those imposed at Southend airport
- The application description is misleading as the runway is to be newly engineered runway not an upgraded runway
- The application should be referred to the Infrastructure Planning Commission

- The application outlines the willingness of the applicant to enter into a Section 106 Agreement in respect of airside works. This was the case in the previous application; however, during the intervening 14 month period between issuing of the decision and the subsequent quashing by the High Court, no programme of works was submitted by the applicant
- Appears that the applicant has not fully addressed the ambiguities within Stobart Group documents and the application, therefore until these have all been addressed it would be premature for the Council to consider the application
- Concerned that the viability of the airport and runway works remain unaddressed

Proposed Passenger Flights

- The promise of passenger flights to Southend does not warrant the building of what is obviously a business park
- Previous attempts to offer passenger flights have failed as they were not financially viable
- People are more liable to use direct flights from Newcastle Airport as opposed to commuting to Southend then onwards
- People wishing to travel to London are more likely to travel by rail as opposed to flying to Southend

Airside Works

- No mention of the PCN (Pavement Classification Number) within the Environmental Statement to give an indication of the weight of aircraft that the runway will be able to accommodate
- The runway must be re-orientated to avoid over flight and protect home from danger, noise, pollution and vibration
- The advice of the CAA should be sought prior to determining the application in order to ascertain if they will be granted to necessary licenses

Compensation Issues

- Part 1 of the Compensation Act 1973 allows payment of compensation where development proposals affect the value of properties through physical factors such as noise, pollution and vibration

5. Summary of Consultation Responses

Government Office for the North West: - no comments received during the consultation period;

British Horse Society: - no comments received during the consultation period;

Civil Aviation Authority: - no comments received during the consultation period;

Access Officer, Development Services: - there are a number of design issues concerning access and circulation space for the disabled within the proposed building;

TCCE - Econ Dev Unit - Business & Employment: - no comments received during the consultation period;

Ministry of Defence/Defence Estates: - no safeguarding objections to the proposal;

National Air Traffic Services: - no safeguarding objections to the proposal;

Northumberland County Council: - no comments received during the consultation period;

Northwest Regional Assembly: - no comments received during the consultation period;

Northwest Regional Development Agency: - proposal falls outside the scope of the Agency's notification setting out the types of development on which the Agency have asked to be consulted in their role as a statutory consultee. The Agency has; however, informally commented that it would, in principle, welcome the development and expansion of air services from Carlisle on the basis that this would bring potential economic and tourism benefits to the City and wider sub-region;

Dumfries and Galloway Regional Council: - no comments to make regarding the proposal;

Blennerhasset and Torpenhow Parish Council: - concerned as the Parish appears to lie under the flight path in particular concerned about night flights and height of aircraft. Would seek controls over the aforementioned concerns;

Brampton Parish Council: - support the application;

Hayton Parish Council: - no comments received during the consultation period;

Irthington Parish Council: - re-iterates support for the continued operation of Carlisle Airport in the hope that it can be made to thrive as a small, local, commercial airport. Provides further comments in respect of: planning policy; airside developments; air freight distribution centre; lighting and noise; traffic and road safety; other environmental concerns; employment; and general issues. In summary the comments are:

Planning Policy

- the developer has not demonstrated compliance with Policies DP3 and EC22
 - development is clearly a departure for the recently adopted Local Plan
- Airside Developments

- welcome the proposal to resurface the runaway to enable commercial services to resume
- disappointed that no developments to passenger handling facilities are proposed
- fear that the developer might renege on the improvements to the runway once the warehouse facility has been constructed
- should permission be forthcoming the current restrictions on night time should apply with similar commensurate restrictions on day time commercial movements
- no ground testing of aircraft engines
- planning obligation should be imposed to maintain the commercial status of the airport until at least 2030

Airfreight Distribution Centre

- large building out of keeping with the rural character of the area
- landscaping is inadequate to screen the building from public view
- use of building has been mis-described

Lighting and Noise

- lighting would be intrusive
- operation of the warehouse would be on a 24 hour basis with the associated noise unacceptably intrusive

Traffic and Road Safety

- Parish Council has previously sought improvements to the road junctions within the Parish. Increase in HGV and light vehicle movements associated with the development can only make a poor situation worse
- seek the repositioning of the proposed roundabout
- the haulage site is further from the motorway system than its current base. More suitable alternative sites on the Kingmoor Park development with better connectivity
- rural road system in the vicinity of the airport is not suitable for HGV traffic. Conditions should be imposed restricting HGVs from Irthington, Laversdale, Newby East and Newtown
- speed restrictions in aforementioned villages should be imposed
- no traffic volume projections for Newtown which is a serious omission as light vehicle traffic from Longtown will almost certainly pass through Newtown or Laversdale

Other Environmental Concerns

- concerns over deterioration of air quality from this development. An air quality monitor should be established before commencement with a plan to alleviate any adverse effects established
- Travel Plan appears to accept that there is no alternative other than car travel to the development. Public transport services should be provided and subsidised by the developer to ensure that public transport is first mode of travel for employees
- Non-Technical Summary states that there are few dwellings under the landing and take-off areas, which seems to dismiss the village of Irthington as negligible. Disagree with the Summary that there is no requirement to establish a Public Safety Zone

Employment

- during the processing of previous applications, the Stobart Group has repeatedly threatened to move their business from the County unless

granted the right to develop quickly. Makes no commercial sense to service their Carlisle business from Cheshire

- Stobart Group makes that claim that the development will safeguard the jobs of existing employees and will provide further employment opportunities. This statement appears to be contrary to documents published by the Chairman of the Stobart Group

General

- developer keen to present the development as providing a non-airport related revenue stream to subsidise the future passenger air operations yet do not provide details as to how this will be achieved
- alleges that the developer makes misleading statements with respect to community consultation.
- concerns about the future of the Solway Aviation Museum due to changes its tenancy agreement.

Scaleby Parish Council: - do not wish to make any representation on the proposal;

Stanwix Rural Parish Council: - objects to the proposal on the following grounds: concerns regarding consultation; air freight; passenger flights; other airside issues; non airport related activity; impact on local highways and highway safety; environmental and sustainability issues; climate change; hazard assessment; economic appraisal; and policy. In summary the comments are:

Concerns Regarding Consultation

- consultation process has been widely criticised with some residents who will be affected by the proposal omitted from neighbour notification mailings.
- Timing of the submission of the application has resulted in consultation deadlines unfeasibly constrained
- Lack of co-operation from the application regarding their representation at Public and Parish meetings
- current application constitutes a hybrid, combining elements of both predecessors, therefore, the relevant planning policies remain substantially unaltered and like its predecessors be treated as a 'Departures Application'

Proposed Airside Development

- the application proposes only re-surfacing the main runway and creation of hard standings close the proposed warehouse. No further enhancements are proposed to the airport's facilities and no Pavement Classification Number appears to be specified by the applicant. As the primary purpose of the application is for an Air Freight Distribution Centre it is informative to examine the applicants projections for freight and passenger air operations

Air Freight

- the magnitude of the proposed distribution centre is far greater than that required to handle the small predicted volume of freight flights. The proposals primary function i.e. the erection of an air freight distribution centre, albeit one with subsidiary road haulage function is fallacious

Passenger Flights

- query submitted data regarding passenger flights

Other Airside Issues

- evidenced by: very low volume of anticipated freight and passenger flights, even after 14 years of operation and market development; minimal level of airside investment and enhancement i.e. no more than the simple resurfacing of a runway; no reference to a specified PCN; and by the intrusive massing of the proposed warehouse building. The inescapable conclusion must be that the application, if permitted, will threaten, rather than enhance, the airport's development and future viability

Non Airport Related Activity

- the airport will derive little benefit from this development, which is massively out of scale with the existing airport infrastructure; and its future development may significantly be disenabled as a direct result of the distribution centre and its satellite buildings being located on the proposed site. It is also clear that the very small proportion, only 0.6% of air freight activity could be accommodated more sustainably
- as airside activity will account for 0.6% of the proposals daily operations, it can not be, seem realistically, as 'enabling development' that may regenerate the airport. The likelihood is that the proposal, if permitted, would actually disenable regeneration of the airport

Impact On Local Highways and Highway Safety

- the proposal would increase the pressure of traffic at all junction on the A689 between Junctions 44 of the M6 and the A689. This would, in turn, increase the risk of accidents with commensurate increase in the incidence of those having serious or fatal consequences
- the proposal, if permitted, would have significant negative impact upon the local highway network; would prejudice road safety; and could impose heavy financial burdens on the relevant highway authority, as a result of increasingly necessary intervention requirements. Even those members of the Parish Council who favour the development acknowledged residents concerns on traffic etc

Environmental and Sustainability Issues

- no meaningful sequential test or assessment of alternative sites is included within the application Environmental Impact Statement. Such an assessment should appear in the EIA
- increase in mileage and fuel is hardly commensurate with the demands of sustainable development
- increase in Co2 emissions
- opportunities for Travel Plan are negligible
- increase in noise and vibration from HGV traffic
- the proposal, if permitted, will create a major visual impact and will constitute a massive incongruity in an essentially rural landscape
- a detailed reversibility appraisal has not been included within the application
- comprehensive invertebrate assessment should be submitted

Climate Change

- Climate change should supersede all other material considerations

Hazard Assessment

- hazard assessment dwells extensively on possible aircraft accidents but fails to assess other risks to public safety e.g. form hazardous cargo, be it transported by air or HGV

- hazard assessment makes no mention of the storage of LPG and its hazardous potential
- in the interests of safeguarding public safety a comprehensive hazard assessment, including detailed contingency planning, must be approved prior to construction, if permitted, is commenced

Economic Appraisal

- query submitted data and other documents from the Stobart Group regarding economic viability

Policy

- the application, although differing in some respects from previous applications, remains substantially the same as its predecessors, therefore, it should be treated as a Departure
- conflicts with National Policy in respect of climate change;

RAF Spadeadam: - no comments received during the consultation period;

Ramblers Association: - no comments received during the consultation period;

Royal Society for the Protection of Birds: - maintain its objection on climate change grounds and due to insufficient information/analysis in the Environmental Statement, which the RSPB believe needs to be provided to enable the City Council to make an informed decision on this case. The RSPB also believe that the Appropriate Assessment needs to be updated;

Department Of Transport (Aviation Security): - no comments received during the consultation period;

Tynedale Council : - no comments received during the consultation period;

Cumbria Tourism: - strongly supports this application and considers that it is crucial to the economic regeneration of Cumbria and the visitor economy of both Carlisle and the wider sub-region;

Scottish Enterprise: - support the proposals as the potential for growth is likely to be of complementary benefit to South West Scotland and may support local initiative to diversify the economy. Note that the proposal are considered to be necessary to secure the long-term future viability of the airport and may provide the platform for future air passenger and freight service development that could be of benefit to the wider regional economy in the longer term;

Cumbria County Council - (Archaeological Services): - aware of comments made by English Heritage in respect of the Roman camp Scheduled Monument. An archaeological evaluation has been undertaken which indicates that outside of the Scheduled Monument no significant archaeological remains will be affected by the proposed development;

Cumbria Chamber Of Commerce And Industry: - no comments received during the consultation period;

Cumbria Constabulary - North Area Community Safety Unit (formerly Crime Prevention): - satisfied that a package of robust measures shall be implemented by the applicant, particularly in response to continuing offences committed against the road haulage industry. Security matters relating to airport activity are influenced by TRANSEC;

Cumbria County Council - Transport & Spatial Planning: - do not consider the proposal to be a Category One Application, therefore, the County Council will not be responding from a strategic planning perspective. Comments in respect of previous applications are still applicable to ensure that the developer enters into a Section 106 Agreement to secure: the continued improvements to airport infrastructure and that any future development is relation to the airport location; and the delivery of a Travel Plan and bus service to serve the development. The City Council should also undertake an assessment of the ecological impacts of the development and ensure that the proposed woodland belt on the southern boundary of the site is at least 15 metres wide;

Cumbria County Council (Ecology): - the RSPB response the ecological issues appear to have been inadequately dealt with. The RSPB response outlines that there is direct habitat loss of 23ha of County Wildlife Site. This loss would have to be fully compensated for to be in line with PPS9, SRSpS and RSS. In its Scoping Request, Cumbria County Council clearly identified the need for all these matter to be fully addressed in the Environmental Statement;

Cumbria Fire Service: - no comments received during the consultation period;

Cumbria Wildlife Trust: - objects to the application on the grounds of: lack of a complete season of wintering bird information and analysis of results; absence of information regarding proposed compensation/enhancement for loss of part of the Carlisle Airport County Wildlife Site; and climate change and sustainability;

Department for Transport (Highways Agency): - no comments received during the consultation period;

Environment Agency (N Area (+ Waste Disp)): - confirm that through discussions with agent and subsequent receipt of letter and of Drawing Number D133593/PL/076A received 21st June, illustrating the proposed connection to public sewer, the Environment Agency are now in a position to remove its original foul sewerage disposal objection subject to the imposition of conditions;

English Heritage - North West Region: - in relation to the impact on the setting, the aim is to protect the Outstanding Universal Value of the Hadrian's Wall World Heritage Site with the setting component of this Value being the ability to comprehend and appreciate Roman military planning and land use. Having considered the submitted material it is considered that the main built element, by virtue of its location and scale, seems unlikely to have an adverse impact on this Outstanding Universal Value.

Initial concerns were raised with regard to the potential impact of the drainage and resurfacing of the runway on the scheduled remains of Watchclose Roman camp, and the potential implications with regard to the option to connect to the public sewer.

In relation to the drainage and resurfacing of the runway no objections have subsequently been made on the basis that the maximum depth of excavation for the drainage is 300mm below the present ground level; the imposition of conditions requiring further approval by the Council of a final drainage design and resurfacing; and (given the discovery of a probable defensive feature outside the northern entrance to the camp) the results the evaluation work are placed in the public domain, through a short publication in a local archaeological journal.

English Heritage has also confirmed that they have no issues with the works shown on the main sewer although the rising main route crosses the line of the Stanegate Roman road because it is in an area where this is unlikely to be well preserved, and the Agent's recommendation for this work to be covered by an archaeological watching brief is considered to be acceptable. In terms of other archaeological impacts, works outside the airport site involve the use of existing sewer pipes with no excavation. As such, the only remaining potential concern is with reference to United Utilities intention to 'upgrade the Irthington works' details of which would need to be resolved;

Council for Protection of Rural England/Friends of the Lake District: - the proposal does not appear to have materially altered since the previous submissions in 2007 and 2008. The fundamental concerns raised are prematurity, the local environment, location, economic rationale, climate change and sustainability remain of relevance;

Friends of the Earth (Local Group Carlisle): - no comments received during the consultation period;

Cumbria County Council - (Highway Authority): - the applicant has now shown that the issues surrounding this application from a highways point of view can be mitigated by conditions. The original recommendation of refusal to this application can therefore be withdrawn;

Health and Safety Executive: - no comments received during the consultation period;

Hadrians Wall Heritage Limited: - support the proposed development and the economic benefits associated with it. The development should increase job opportunities, visitor access to the World Heritage Site and, in particular, retain a very major employer within the Carlisle district, which all weigh heavily in favour of the development;

Local Environment - Environmental Protection (former Comm Env Services- Env Quality): - assessed the proposal with regards to the likelihood of the proposal resulting in a statutory nuisance to neighbouring properties, including noise and light etc. The statutory nuisance legislation does not

include noise from aircraft or aircraft movements as this is enforced by the CAA; however, from the submitted information there are no objections to the proposal.

The design and location of the lighting should be such that it does not cause a nuisance, either directly or by glare to any neighbouring properties. Should any unforeseen contamination be encountered, the developer should contact the LPA before development continues. There are no concerns regarding air quality issues from the information provided;

Economic Development (former Economic & Community Development Services): - no comments received during the consultation period;

Natural England: facilities for dealing with foul drainage must ensure that there is no adverse impact on the water quality of the River Eden SAC and this must be clearly documented in the City Council's River Eden SAC Appropriate Assessment. The relationship between the development (including timescales), requirement for treatment and disposal of foul drainage, and the availability and capacity of the public sewer system and upgraded facility at Irthington should be considered in the Appropriate Assessment in relation to the water quality assessment. If a satisfactory conclusion can be reached to meet UU and EA concerns, and the outcome secured through the planning process, then this can be documented in the AA;

United Utilities: - in relation to the alternative drainage proposal which includes foul flow from the 'South-side', there seems to be potential way forward in developing a solution to allow foul drainage from both the North and South runway developments at Carlisle Airport (Irthington) entering the public sewer network. However the detailed design of the drainage scheme and confirmation of population equivalent loadings from the Airport will be the final determining factor in the feasibility of this new proposal. The sensible and appropriate approach to this matter is considered to be:

- if UU subsequently finds that connection to public sewer (with whatever design controls or additional measures agreed) is acceptable, this will allow foul waste to be treated (at Irthington);
- if UU finds it is unreasonable to connect to public sewer, despite incorporation of best and most feasible design measures, then the package plant will be the most reasonable option, and foul waste will similarly be treated (although this time, on site);
- in extremis, in the event that the EA and UU are unable to approve a foul drainage design (as submitted to them via the Council as a condition of planning permission) the scheme will not go ahead until another option is accepted.

The planned up-grades to Irthington WwTW will not be complete until May 2013. Therefore United Utilities will not be able to accept the full foul flows, until completion of the Irthington WwTW upgrades. If additional foul flows are expected from the development before this date, temporary treatment on site may be necessary until the flows can be transferred.

6. Officer's Report

Assessment

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 6.2 As a result of the recent Cala Homes litigation, the Regional Spatial Strategy (RSS) remains in force and part of the development plan unless and until the Localism Bill is enacted. Given the stage of the Localism Bill (and the lack of certainty as to what its ultimate content will be) it is inappropriate to give weight to the government's intention to revoke the RSS; and this is in accord with the Court of Appeal's judgment in June 2011. For the purposes of the determination of this application, therefore, the development plan comprises the North West of England Plan (Regional Spatial Strategy to 2021); the "saved policies" of the Cumbria and Lake District Joint Structure Plan 2001-2016; and the Carlisle District Local Plan 2001-2016.
- 6.3 Other material considerations include PPS1 "Securing Sustainable Development"; PPS4 "Planning for Sustainable Economic Growth"; PPS7 "Sustainable Development in Rural Areas"; PPS9 "Biodiversity and Geological Conservation"; PPG13 "Transport"; PPG16 "Archaeology and Planning"; PPS23 "Planning and Pollution Control"; PPG24 "Planning and Noise"; Circular 11/95 "The Use of Conditions in Planning Permissions"; and Circular 05/2005 "Planning Obligations".
- 6.4 In addition, an important document is the White Paper "The Future of Air Transport" (2003). The White Paper notes that Carlisle has had commercial services in the past, that (as at 2003) plans had 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; 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. 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."*
- 6.5 Members also need to have regard to the White Paper "The Future of Transport – a Network for 2030" (2004); the Cumbria County Council Local Transport Plan 2006-2011 and "Travel Plans and the Planning Process in Cumbria: Guidance for Developers" (March 2011); and the economic policy background such as the "Future North West: Our Shared Priorities" and the Cumbria Economic Strategy 2009-2019.
- 6.6 The next stage of the report follows the order below.
- Accordance of the application with the Development Plan;
 - Socio-Economic Impact;
 - Sustainability – Means of Travel;

- Sustainability - Design;
- Highway Network;
- Noise and Vibration;
- Air Quality;
- Landscape and Visual Impacts;
- Ecology and Nature Conservation;
- Archaeology; and
- Hazard Assessment.

1) Whether the proposal is in accordance with the Development Plan

- 6.7 This is relevant for two purposes: first, as to how the application is advertised in accordance with the Town and Country Planning (Development Management) Procedure Order 2010, where there is an Environmental Impact Assessment application accompanied by an environmental statement which “does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated”; secondly, as noted in paragraph 6.1 above, for the purposes of section 38(6) of the 2004 Act.
- 6.8 As regards the Regional Strategy, Policy RDF1 is identified as the cornerstone of the Regional Spatial Strategy. It sets out the spatial priorities for the location of development within the North-West. It identifies 4 priorities, with primary emphasis being placed upon the regional centres of the cities of Manchester and Liverpool. The next highest order of priority is the inner areas surrounding these regional centres, areas in need of regeneration and Housing Market Renewal Areas within those being specifically targeted. Third priority is accorded to the towns/cities in the 3 “city-regions” of Manchester, Liverpool and Central Lancashire. Fourth priority is identified as the towns and cities (outside of the city regions) of Carlisle and Lancaster with investment also encouraged in Barrow, Workington and Whitehaven to address regeneration and worklessness in the Furness Peninsula and West Cumbria. Carlisle is therefore in the fourth category. In the latter two categories of priority, development is expected to be focussed *“in and around the centres of the towns and cities”*. The Policy does, however, accept that *“development elsewhere may be acceptable if it satisfies other policies notably Policies DP1 to 9”*. In that regard, the supporting text advises that emphasis should be placed on regeneration.
- 6.9 Policy DP1 sets out the key “Spatial Principles” that drive the overall Strategy, with Policies DP2-9 elaborating on each of these which are, thematically:
- Promoting sustainable communities (DP2)
 - Promoting sustainable economic development (DP3)
 - Making the best use of existing resources and infrastructure (DP4)
 - Managing travel demand, reducing the need to travel and increasing accessibility (DP5)
 - Marrying opportunity and need (DP6)
 - Promoting environmental quality (DP7)
 - Mainstreaming rural issues (DP8)
 - Reducing emissions and adapting to climate change (DP9).

- 6.10 Although these are not set out in order of priority, Policies DP2-9 are to be read together, as the spatial principles underlying the Strategy, to help to “*ensure an effective cascade of policy from regional to sub-regional and local levels, promoting sustainability and subsidiarity*”.
- 6.11 Policy DP4 observes that priority should be given to development in locations consistent with the regional and sub-regional spatial frameworks set out later in the Plan, notably Policy RDF1, and the sub-regional policies within later Chapters (Chapter 13: Cumbria and North Lancashire being relevant to this application). The policy (DP4) expects development to be located in accord with the following sequential approach:
- Re-use of existing buildings (including conversions) within settlements and previously developed land within settlements.
 - Other suitable infill land within settlements where compatible with other policies of the RSS.
 - Development of other land where this is well-located in relation to housing, jobs, other services and infrastructure and which complies with other principles in Policies DP1-9.
- 6.12 In similar terms, Policy DP5 recognises that:
- Development should be located so as to reduce the need to travel, especially by car, and that a shift to more sustainable modes of transport for both people and freight should be secured.
 - Safe and sustainable access for all, particularly by public transport, between homes, employment and a range of services and facilities should be promoted, and should influence locational choices and investment decisions.
 - Major growth should, as far as possible, be located in urban areas where strategic networks connect and public transport is well provided.
 - All new development should be genuinely accessible by public transport, walking and cycling and priority should be given to locations where such access is available.
 - Within rural areas, accessibility by public transport should also be a key consideration in providing services and locating new development, emphasising the role of Key Service Centres (in Carlisle district these are Brampton and Longtown)._
- 6.13 The supporting text to DP5 notes that the principle of managing demand, reducing the need to travel and increasing accessibility has influenced, amongst other matters, the locational criteria for regionally significant economic development with accessibility by public transport highlighted as a key consideration under Policy W2.
- 6.14 The Regional Spatial Strategy's Policy W2: “Locations for Regionally Significant Development” is intended to ensure that, if the vision and objectives of The Northern Way Growth Strategy, The Regional Economic Strategy and the RSS are to be achieved, there is a ready supply of land for employment use that is of sufficient quality and quantity to support economic growth. The Policy

provides that regionally significant economic development will be located close to sustainable transport nodes within the urban areas of Manchester, Liverpool and Central Lancashire City Regions and Lancaster, Carlisle, Barrow and Workington and Whitehaven. Sites for such development are to be identified in (future) Local Development Documents having regard to the priorities set out in Policy RDF1, the spatial principles under Policies DP1-9 and the relevant sub-regional policies. Such sites are expected to be:

- capable of development within the Plan period
- highly accessible, especially by adequate public transport services, walking and cycling
- well-related to areas of high levels of worklessness and/or areas in need of regeneration
- well-related to neighbouring uses, particularly in terms of access, traffic generation, noise and pollution.

The Policy notes that such sites should not be used for development that could equally well be accommodated elsewhere and should not be developed in a piecemeal manner.

Sites for regionally significant logistics and high-volume manufacturing should be well connected to the primary freight transport networks. The A689 is identified in the Appendices to the RSS as part of the Primary Route Network and as a Route of Regional Importance.

- 6.15 When 4NW were consulted with regard to the previous application (08/1052) it took the view that Policy W2 of the RSS did not apply to the distribution centre proposal because W2 referring to sites identified as Regionally Significant in Local Development Frameworks. The application site has not been allocated in an LDF or Local Plan as being a regional site; within Carlisle District only Kingmoor Park has been identified in adopted Policy documents as a "Regional Investment Site".
- 6.16 The Regional Spatial Strategy includes a specific policy on "Airports" (Policy RT5) which provides general advice that *"plans and strategies should support the economic activity generated and sustained by the Region's airports, in particular the importance of Manchester Airport as a key economic driver for the North of England and Liverpool John Lennon Airport for the Liverpool City Region"*. The policy, in relation to Carlisle Airport, notes that *"proposals for development should be considered through the local planning process"* and that, *"if proposals exceed 20,000 air transport movements annually by 2030, the airport should consider developing an Airport Masterplan"*.

Airport boundaries, as existing or as proposed, should be shown in Local Development Documents. Development that would impede the operational requirements of an airport should not be permitted within this boundary

- 6.17 Policy RT5 further advises that, in formulating plans and strategies, account should be taken of the contribution general aviation makes to the regional and local economies, and the role that smaller airfields have in providing for both business and leisure. It observes that, as demand for commercial air transport

grows, general aviation users may find that access to the larger airports becomes increasingly restricted and hence they are forced to look to smaller airfields to provide facilities.

- 6.18 The supporting text to Policy RT5 acknowledges that airports generate employment, attract businesses to the area, open up markets and encourage tourism and visitors. It reiterates the view expressed in the Government White Paper: The Future of Air Transport that *"building of local supply chain and capacity for the aviation industry could bring important benefits to the economies of regions"* but cautions that *"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."*
- 6.19 The Regional Spatial Strategy's Policy RT7: Freight Transport notes that road haulage accounts for the majority of goods moved in the North West, and will continue to be the dominant mode in the foreseeable future. It advocates the preparation of plans and strategies that take account of the aims and objectives of the Regional Freight Strategy, the development of sub-regional freight strategies and close working between local authorities, distribution companies, their customers, and with rail, port and inland waterway operators, Network Rail, the freight transport industry and business to capitalise on the opportunities available in the North West for increasing the proportion of freight moved by short-sea, coastal shipping and inland waterways.
- It also encourages local authorities to 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", having particular regard to minimise and mitigate environmental impacts (including night noise).
- 6.20 The RSS provides specific policy guidance in relation to the sub-regional areas of the North West, the latter including the Cumbria and North Lancashire Sub-Region. Of its 4 Policies relating to that sub-region, Policies CNL1: Overall Spatial Policy for Cumbria and CNL2: Sub-Area Development Priorities for Cumbria are relevant to the application. Within the former, plans and strategies should be directed at 10 criteria which, in relation to this application, are to focus major developments within the City of Carlisle (in line with Policy RDF1 and the spatial principles in Policies DP1-9); provide a portfolio of employment sites in accord with Policies RDF1 and W2; develop the role of Carlisle as a regional public transport gateway to the region in line with Policy RT1 and harness its potential for economic growth in sustainable ways; and give priority to improving access to employment, services, education/training facilities on foot and by cycle, and by public transport.
- 6.21 Policy CNL2 refines the aspirations and objectives of Policy CNL1 in relation to the county's sub-areas. It requires plans and strategies for the sub-areas to accord with Policy CLN1 and, in relation to this part of the county, that they should focus on supporting sustainable growth in Carlisle, building on Carlisle city's significant potential to attract sustainable development to Cumbria; enhance the city's role as the sub-regional centre for business, shopping, leisure, culture and tourism, serving Cumbria and the adjoining parts of Scotland and North-East England; develop its higher education function

through the establishment of the new University of Cumbria to help attract investment in the knowledge-based economy; and ensure development is compatible with the conservation and enhancement of the historic city centre.

6.22 Thus, in summary, the RSS:

- Seeks sustainable economic development, in particular the location of development so as to enable a reduction in the need to travel, and seeks to focus development in and around the centre of Carlisle.
- Seeks to locate regionally significant economic development close to sustainable transport nodes in the urban area.
- Seeks a shift to more sustainable modes of transport for freight
- Supports development of Carlisle airport and economic activity generated by airports.
- Sites for regionally significant logistics development should be well connected to the primary freight transport networks.

6.23 The airport-related development would clearly accord with the RSS. Regionally significant economic development should be located in the urban area near sustainable transport nodes. Such locations may assist a shift to more sustainable modes of transport for freight. The Airport has not been identified as a site for regionally significant logistics and there appears no need for the logistics/road freight development to be at the Airport. Although the logistics development could be made to be well connected to the primary freight transport network the thrust of the RSS appears to direct the development to the urban area, where a shift to more sustainable modes of transport may be achieved, and be well connected to the primary freight transport network.

6.24 Policy ST5 of the Cumbria and Lake District Joint Structure Plan 2001-2016 expects new development to be focussed on the "key service centres" with major development being focussed on Carlisle to foster its regional role. The other key service centres in this area, Brampton and Longtown, are identified as suitable for "moderate" development appropriate to the scale of the settlements. In this context Policy EM13 of the Structure Plan (2001-2016) requires that an adequate supply of employment land is available, for a variety of business uses, in the most appropriate locations. The Policy specifies 4 employment land market sectors within the administrative area of the City of Carlisle, divided into 3 time periods between 2001-2016, including a Regional Investment Site of 50 hectares at Kingmoor, a Strategic Employment Site of 30 hectares, 45 hectares for local employment sites and 25 hectares for business/science park; in addition within North Cumbria a Strategic Employment Site at Carlisle Airport is identified.

6.25 Thus, the Saved Policies of the Structure Plan 2001-2016 allocate a Strategic Employment Site at Carlisle Airport and the permitted uses include B8 (storage and distribution). The development accords with these policies.

6.26 Under the more recently adopted Carlisle District Local Plan 2001-2016 Policies DP1: Sustainable Development Locations, DP3: Carlisle Airport, and EC22: Employment and Commercial Growth Land Allocations are of direct relevance.

- 6.27 Policy DP1 requires all proposals for development to be assessed against their ability to promote sustainable development. Proposals will be considered favourably within the locations identified in the policy, provided they are in scale with the location and consistent with other policies of the Local Plan. The locations identified are prioritised as the urban area (City of Carlisle), the Key Service Centres of Brampton and Longtown, and the 20 Local Service Centres which include Dalston, Wetheral, Irthington and Houghton. Outside those locations, development is required to be assessed against the need to be in the location specified/proposed. Therefore, this is a very important policy.
- 6.28 Policy DP3 specifically considers the role of Carlisle Airport and the opportunity it offers to enhance the local economy. Proposals for development will be supported where they are related to airport activities, in scale with the existing infrastructure and minimise any adverse impact on the surrounding environment. The Policy accepts that larger-scale development 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 and heritage interests, the existing highway network and road safety. The Policy notes the allocation of the Strategic Employment Site under related Policy EC22. Policies DP3 and EC22 are also important policies.
- 6.29 Under Policy EC22, a total of 77 hectares of land is allocated as employment land which is disaggregated between the urban and rural areas of the District. However, with due regard to Policy DP1, the bulk of provision is made within the urban area of Carlisle. Of the rural allocation, 21.15 hectares is identified for a Strategic Employment Site at Carlisle Airport that broadly reflects the extent of land subject to a previous unimplemented outline planning permission in 1989 (reference number 89/0898), now lapsed, for the provision of small industrial units, flying training facilities, small business park, and a new airport terminal complex.
- 6.30 Although EC22 is broadly worded, paragraph 4.88 of the reasoned justification (the reasoned justification by law forms part of the Local Plan) for Policy EC22 provides as follows:

“4.88 The 21.06 hectares of land allocated for development at Carlisle Airport were previously the subject of planning permission although this has now expired. The airport has potential as a strategic site for inward investment and would therefore be suitable for industrial or commercial development including development with a need to be located at the airport. Regional Planning Guidance, the Structure Plan and the Aviation White Paper recognise the value of 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 businesses in the 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. A Masterplan is being prepared for the long-term airport development.”

There are 4 categories of appropriate development, therefore:

- inward investment including industrial or commercial development with a need to be located at the airport;
- airport related development in providing business and light aviation facilities;
- airport or transport related with a requirement to be located at the airport;
- Development which meets the needs of local businesses, particularly hauliers, in the Brampton area.

- 6.31 From this, it is officers' view that the FDC does not fall within any of the four categories specified under Policy EC22 of the Local Plan: it is not inward investment (Stobart are already located in Carlisle); the FDC relates primarily to road haulage as opposed to air freight or airport-related development and the road haulage does not have a need to be located at the Airport; and it is not a local business in the Brampton area. It is not enough, therefore, merely to be industrial or commercial development.
- 6.32 It is also of note, moreover, that whilst 21.15 hectares is identified for a Strategic Employment Site at Carlisle Airport under Policy EC22, the extent of the proposed development (excluding the car park to the east of the existing passenger terminal) is approximately 28.6 hectares.
- 6.33 The applicant has contended that the proposal is "policy compliant" because the accompanying text to Policy EC22 gives no direction on what scale of inward investment is required; the need for inward investment is only identified in the supplementary text and therefore should be given limited weight; inward investment is detailed within the Economic Impact Appraisal; and the registered address of the Stobart Group is in Appleton Thorn.
- 6.34 These arguments are not accepted by Officers. Although the proposed runway works etc are clearly supported by policy, the distribution centre is not.
- 6.35 In officers' view, the development as a whole does not accord with the development plan as a whole (which, as previously stated, includes the RSS, the saved policies of the Structure Plan and the Local Plan). Accordingly, the application has been formally advertised as a "Departure" from the Development Plan.

2) Socio-economic impact

- 6.36 In Annex B of PPG13, the role of Aviation is considered and recognition is given to the potential for small airports and airfields to serve business, recreational, training and emergency services needs. Local Planning Authorities are required, when formulating plan policies and proposals, to take account of the economic, environmental and social impacts of general aviation on local and regional economies.
- 6.37 The Regional Spatial Strategy includes a specific policy on "Airports" (Policy RT5) which provides general advice that *"plans and strategies should support*

the economic activity generated and sustained by the Region's airports, in particular the importance of Manchester Airport as a key economic driver for the North of England and Liverpool John Lennon Airport for the Liverpool City Region". The policy, in relation to Carlisle Airport, notes that "proposals for development should be considered through the local planning process" and that, "if proposals exceed 20,000 air transport movements annually by 2030, the airport should consider developing an Airport Masterplan".

- 6.38 Policy RT5 further advises that, in formulating plans and strategies, account should be taken of the contribution general aviation makes to the regional and local economies, and the role that smaller airfields have in providing for both business and leisure. It observes that, as demand for commercial air transport grows, general aviation users may find that access to the larger airports becomes increasingly restricted and hence they are forced to look to smaller airfields to provide facilities.

- 6.39 The Regional Spatial Strategy's Policy RT7: Freight Transport notes that road haulage accounts for the majority of goods moved in the North West, and will continue to be the dominant mode in the foreseeable future. It advocates the preparation of plans and strategies that take account of the aims and objectives of the Regional Freight Strategy, the development of sub-regional freight strategies and close working between local authorities, distribution companies, their customers, and with rail, port and inland waterway operators, Network Rail, the freight transport industry and business to capitalise on the opportunities available in the North West for increasing the proportion of freight moved by short-sea, coastal shipping and inland waterways.

- 6.40 Policy RT7 also encourages local authorities to 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", having particular regard to minimising and mitigating any environmental impacts.

- 6.41 At a more local level the Cumbria Economic Strategy (2009-2019) recognises Carlisle Airport as offering great potential as an economic driver. The LTP 2006-2011 also explains that services from Carlisle Airport would assist economic growth in the areas within its potential catchment, and in particular could improve access for inbound tourists to the Lake District and South West Scotland, as well as providing opportunities for travel throughout the UK and abroad.

- 6.42 ASA has explained that in addition to reduced demand due to economic recession, all smaller UK regional airports are facing increased costs, particularly from Air Passenger Duty, the UK's entry into the EU's Emissions Trading Scheme (ETS) and the lack of peak time slots at the main London airports. Plymouth Airport, which currently handles 100,000 passengers annually, is currently operating at an average loss of some £8.00 per passenger and will apparently close later this year. Blackpool Airport is also allegedly under threat and has introduced a levy of £10.00 per passenger for its Airport Development Fund. Newquay Airport is currently subsidised by Cornwall County Council through a grant of £3.4 million – although this enables the

airport to claim over £20m in EU grants and loans. Based on throughput, this equates to a subsidy by the Council of some £10.62 per passenger.

- 6.43 Although Carlisle Airport does not currently have commercial services, it did operate a number of scheduled and charter passenger services between 1967-1987, including Dan-Air seasonal charters to the Isle of Man (1967-1983), scheduled services by Air Ecosse and Euroair (1982-1987), and a route between Dundee and Heathrow using Carlisle as a transit stop. Traffic volumes were, however, comparatively low e.g. 14,000 passengers in 1986. Despite a link into London's largest airport, the Carlisle-Heathrow service was not financially viable.
- 6.44 ASA has identified the inherent problems with Carlisle Airport as being the limited runway length/landing distance, absence of an Instrument Landing System (ILS), limited capacity of the terminal, and a relatively small catchment area.
- 6.45 Under the current proposal the Airport operator proposes to continue to use the existing navigational aids (NDB/DME) and note that a GNSS approach may be established in the future although this is not used for standard operations at UK regional airports. Given the recent increase in approach and landing related accidents, ASA has expressed their surprise that the applicant has not indicated an intention to purchase and install ILS. This is because the absence of an ILS will restrict operations in low visibility conditions, and most commercial airlines regard these as essential for regular scheduled service operations in terms of perceived safety and the disruptive impact of diversions. It is recognised that an ILS may give rise to potential conflict with RAF Spadeadam traffic but that a possible solution has been proposed in which the military is given priority over civil traffic referred to as the "Spadeadam Box".
- 6.46 ASA has noted that the current application does not include any development of the current terminal building, and that the size of the terminal footprint cannot be increased without planning permission. In this context, it is considered unlikely that the terminal could cope with a passenger throughput of 50,000 – 100,000 per annum during peak periods let alone handle the projected number of passengers at 2025 of up to 200,000 per annum. On this basis the ES appears to be deficient in not having assessed how the additional passenger throughput will be managed (what additional building needed and the environmental consequences thereof). In law therefore permission could not be granted.
- 6.47 The EKOS Report (2008) acknowledges that the catchment area for Carlisle is small in comparison to other UK regional airports with an immediate catchment area of 160,000 (within 30 minutes drive time) and a core catchment of 500,000 where Carlisle is the nearest airport. The Report (2008) also highlighted that Carlisle Airport faces competition from Manchester, Newcastle and Glasgow as well as other airports such as Liverpool, Teeside, Edinburgh and Blackpool. ASA has highlighted that based on a CAA survey in 2009, 290,000 passengers using scheduled services from Manchester Airport and 112,000 passengers from Newcastle had an origin/ destination in Cumbria.

6.48 When looking at the socio-economic impacts of the current proposal in this backdrop the two principal considerations relate to: i) the economic and employment benefits; and ii) the opportunity to re-develop the existing sites at Kingstown Industrial Estate occupied by the Stobart Group.

i) Economic and employment benefits

6.49 Airports can be seen to serve two main inter-related functions, namely as a transport node; and the consequent interactions with the regional economy.

6.50 When looking at an airport's role as a transport node there are largely three markets of passengers/freight that can be distinguished:

- Persons or freight from the region served by the airport that needs to be transported elsewhere;
- Persons or freight from elsewhere that needs to be transported to the region served by the airport; and
- The transfer of passengers or freight whose origin and destination do not coincide with region served by the airport.

6.51 The second function of an airport concerns the role it plays in the regional economy. The economic significance is apparent in the employment created in the transport sector; the temporary effects during the period of construction; the employment generated by maintaining the facility such as handling the aircraft, passengers, and freight; and the potential attraction of a symbol (such as an airport) on firms considering a new location. In order for the second function to be realised, the first role as a transport node has to be fulfilled.

6.52 The current application is advanced on the basis that the existing level of aviation income (from fuel, landings and rent from hangars) and non-aeronautical income (limited to agricultural tenancies and rents from flying school offices) is not sufficient to cover the maintenance and fixed cost operations of the Airport. The EKOS Report (2008) highlights that in the financial year to the end of February 2008 there were losses of just under £1.4m. It is therefore necessary for the Airport realise alternative on-site income streams such as from the proposed FDC.

6.53 The EKOS Report (2010) states that the potential economic benefits also relate to the FDC creating some 121 FTEs (Full Time Equivalent) jobs (including new HGV drivers); 35 FTEs relating to scheduled air services; and safeguard the existing Airport related jobs. It is estimated that in the process this will deliver an estimated £7.35m of new Gross Value Added annually to the Cumbrian economy of which £5.7m relates to the FDC and £1.65m from the introduction of scheduled flights. The construction spend is estimated to generate 94 construction jobs.

6.54 The applicant has explained the basis for the potential economic benefits on the grounds that by 2025 the total number of air traffic movements will have increased to 27,635 with the noticeable provision of a total of 3,650 landings and departures of scheduled passenger services and a total of 1,560 landings and departures of cargo flights. The estimated maximum number of

passengers passing through the Airport is in the region of 200,000 per year by 2025 with the air freight predominantly comprising perishable goods such as cut flowers.

- 6.55 The applicant's agent has recently confirmed in three letters that the Airport is currently operating at a loss of £1.2m per year; the proposed FDC will generate an income of around £2m per year; the proposed investment will be £15m (inclusive of the runway works) which at a rate of 5% would equate to interest only payments of £750,000 per year; this would result in the Airport operating at a surplus of £50,000 and thereby make the Airport profitable; a draft construction programme indicates the applicant's intention to commence runway works in January 2012 and complete these works in April 2012; and an ILS is not an essential element of the development.
- 6.56 On the matter of viability, the EKOS Report (2008) provided an analysis of the market potential associated with Carlisle Airport using publicly available data, a review of previous studies, and discussions with Carlisle Airport management. EKOS (2008) concluded that the overall underlying demand for air services to/from Carlisle is unlikely to be particularly high although there would be significant demand for a London service. EKOS also speculated on other potential passenger services including Belfast, Inverness, Cardiff, Bristol, Exeter, Southampton and Dublin. In the case of cargo, EKOS considered it unlikely that significant cargo volumes can be generated although there may be niche opportunities and some potential for multi-modal integration with Stobart warehouses.
- 6.57 The Stobart Group has purchased London Southend Airport with a new airport railway station close to opening providing fast and frequent train services to Stratford and London's Liverpool Street Station in approximately 50 minutes. As such, the applicant believes that a London Southend – Carlisle Lake District Airport service will be provided and that this will readily develop into a twice daily service in each direction. The applicant envisages that this service route, and the benefits it will bring, will be introduced within 3 to 4 years of the grant of planning permission. Following the Stobart Group purchasing a stake in Aer Arann, the applicant also identifies other potential routes to Belfast, Dublin, Inverness, Cardiff, Bristol, Exeter, Southampton, Isle of Man, and international destinations such as Amsterdam and Paris which might use London Southend Airport as a connection.
- 6.58 When advancing their case on this matter the applicant explains that the City Council need to appreciate that it is very difficult to define what service routes will be realised because operators are unwilling to commit to airports until infrastructure is in place; as a result it is not possible to identify what subsidies might be required.
- 6.59 The Chief Executive of Aer Arann has written to Stobart Air Ltd confirming that they are *"looking at the opportunities to operate service from London Southend Airport to Carlisle Lake District Airport as being a sustainable possibility in order to service the Cumbrian and Lake District region."* [These proposals do not appear as well advanced as suggested in paragraph 3.42]

- 6.60 ASA are critical of the alleged economic and employment benefits from the proposal for a number of reasons.
- 6.61 At a general level, it is understood that no large scale surveys have been undertaken by the Stobart Group although several organisations were interviewed by EKOS in 2008. The applicant has not provided a detailed financial appraisal based on an analysis of current revenues and expenditure in the light of current operating losses; and future commercial operations inclusive of subsidies, additional revenues, and operating and capital costs. There are also concerns over the application of the data with regard to passengers and use of the chilled docking station by air freight. In the case of passengers ASA consider the figures to be an over-estimate simply because the available seat capacity for the stated aircraft types (Jetstream 41 and DHC-8Q400) is some 25% less than the predicted average passenger load per flight. ASA believe that the extent of use of the chilled docking station by air freight would be comparatively small. In 2010, Humberside Airport opened a similar perishables facility at a cost of £1.6m that employs six staff although there is only one scheduled service per week by Icelandair using the facility. It is clear that there would be insufficient demand from perishable air freight for a facility at Carlisle Airport that would generate 54 warehouse staff, 15 loading staff and 36 HGV drivers, particularly in view of the limited size of cargo aircraft that could use the Airport e.g. the Icelandair flights by B757-200 aircraft currently using Humberside Airport would not be possible at Carlisle due to its limited runway length.
- 6.62 For passengers, ASA consider the most promising route for a scheduled passenger service in terms of viability is likely to be a London Southend service although further assessment should be carried out, and it is unclear as to the extent to which a possible new air service from London Southend Airport might be used by tourists to the Lake District. It is also likely that the Airport and/or airline(s) would need to be subsidised at least in the short-term. ASA are of the view that the size of markets for routes to Dublin, the Isle of Man, Belfast or other destinations would be very limited and would not be commercially viable in the medium to long term. Dependent on the subsidies and types of aircraft, a total passenger throughput could be between 50,000 to 100,000 per annum.
- 6.63 When looking at freight, ASA consider that freight operations would be limited to certain aircraft types such as freighter or combined passenger/freight versions of BAe 146, ATP, ATR 72 or HS 748. The payload and range would therefore be low and there would be little or no hubbing operations. ASA can see that theoretically a limited number of movements (probably at most 2-3 per day) might be commercially viable, particularly for perishables such as fish and fruit; however given the Airport's limited runway length there are severe constraints on the size of cargo aircraft used which would largely prohibit flights from the main sources of such items (e.g. Africa, Iceland and Norway). In general ASA consider that it is operationally and financially preferable for such cargo to be flown direct to the main airport hubs and be distributed by road. There may be some ad hoc cargo activity but this tends to be very limited as usually traffic loads need to be reciprocated i.e. delivery of inbound cargo and pick-up of outbound cargo. ASA consider that, even in an optimistic case, total cargo movements would be unlikely to exceed 300-400 per annum by 2025.

6.64 In the absence of details of the likely costs of the runway works the City Council was obliged to take its own advice although this information was subsequently received as detailed in paragraph 6.55 above. The City Council has been advised that the runway resurfacing and delineation works are likely to cost in the region of £11.8 million, and the costs of the new apron at least £6.0 million. The figure of £11.8 million is very significantly different from the figure provided in confidence to the City Council by the applicant as forming part of the £15 million referred to in paragraph 6.55. In ASA's view, even with an optimistic case of 100,000 passengers per annum and cargo throughput of 2,000 tonnes pa (which might be attained in 10-12 years), the total revenue generated would be in the region of £2.0 – 2.5 million pa – which would not cover the additional operating costs (say £1.5-1.8 million pa), repayment of the capital costs and interest (say £1.6-1.8 million pa) and fails to provide any contribution towards the current operating deficit. Comments on the apparent discrepancy in the figures are awaited from the applicant.

6.65 A separate report prepared by York Aviation LLP (commissioned by a local resident) reaches the following conclusions.

- They do not believe there is a current market for air freight at Carlisle Airport. To the extent that a market exists, independent of the ability of the Stobart Group to create a hub based on the FDC, such freight could easily be handled through one of the existing buildings on the site. No new facilities would be required.
- The applicant may have misunderstood the market, in particular the nature of the perishables market. Most of the perishable goods imported by air to the UK arrive in the South East of England. This is because the largest markets for such products, particularly flowers are located in this area and such goods are typically carried in the belly-holds of large passenger aircraft operating from outside of Europe. There are very few perishable products that arrive by air from destinations which could be served from the runway length at Carlisle, with the vast majority being to and from Africa and South America. It is difficult to anticipate any other forms of freight which could be generated on a large scale by the Cumbrian market.
- The infrastructure proposed does not lend itself to air freight operations due to the restricted runway length and lack of facilities to make the operation reliable, such as an Instrument Landing System (ILS) and the provision of only temporary lighting on part of the new development which is not conducive with air freight because it is dominated by night time activity.
- On the face of a rational analysis of the market, the scale of air freight operation set out in the ES does not appear likely to arise based on the local need for air freight and in a manner which would deliver local benefits.

- They do not believe that the level of air freight activity projected will arise in normal market circumstances, yet the level of facilities being provided suggest potential for a significantly larger market opportunity than is considered to exist. No evidence has been submitted as to how such a larger market opportunity could be realised nor in any event have its effects been assessed in the ES, for example the largest apron stands are 58m by 70m which are large enough to handle wide bodied aircraft but this is inconsistent with the capability of the Airport's runway.
- The scale of the FDC required to service the projected air freight traffic would need to be minimal in size. York Aviation LLP estimates that only 330 square metres of the proposed facility [i.e. 1%] would be used for air freight if delivered at the maximum forecasted level. In these terms it is difficult to classify the facility as having an airport related purpose, other than on the margin.
- The passenger forecasts appear to be overstated and the opportunities, given the infrastructure available, would appear to be limited based on the underlying market in the region. Of the top 25 highest demand destinations from Cumbria, the majority could not operate from the runway. Of the routes which could be served, there is unlikely to be the critical mass, even by 2025 and allowing for market stimulation, on many routes to make them viable for airline operators, for example in 2009 there were only 9,000 air passengers travelling to Belfast from the region which would be unlikely to make a scheduled service to this destination sustainable.
- A Carlisle Airport to London Southend Airport service would struggle to be sustainable because the journey time from central Carlisle to central London would be too long – York Aviation LLP estimate that the journey time is 3 hours 43 minutes to get from Carlisle to Leicester Square by train compared to 3 hours 45 minutes to fly from Carlisle and then get a train from London Southend.
- Based on the levels set out in the Environmental Statement, air freight activity supplemented by a low level of passenger activity is unlikely to sustain viable airport operations.
- In the event that the runway is refurbished, the CAA would need to check the capability of the airfield and may require additional RESAs (i.e. Runway End Safety Areas that would allow for landing short, or overshooting the runway in an accident) to be provided which might further restrict the runway length available. This could have further consequences for the ability of the Airport to attract any commercial traffic.
- It is alleged that the lack of facilities such as ILS only serves to suggest that the operator is not serious about attracting air services, potentially suggesting that they know the market does not exist for freight or large

scale passenger services at Carlisle. The reliability provided by such equipment is often a pre-requisite for commercial air services.

- Refurbishment of the runway will not, of itself, serve to extend the market potential of the Airport as there are no proposals to overcome the inherent runway length restrictions currently in force. Improving the runway PCN will, on its own, deliver little benefit in terms of the type and range of aircraft which can use the Airport whilst the runway length restrictions remain in place.
- The EKOS Report (2010) appears to have significantly overstated the multiplier effects of employment through the use of the Scottish National Multiplier – within the Airports Council International framework for economic impact analysis it is estimated that the more likely multiplier at a regional level is only 1.5 as opposed to 2.4 used by EKOS.

6.66 When assessing this issue in the light of the available information it is concluded that no convincing evidence, that includes a breakdown of all costs, has been presented by the applicant regarding the effectiveness of the proposed FDC in enabling development in the light of the disputed costs regarding the runway works. No convincing evidence has been given showing that the forecast passenger flights and air freight movements are either realistic or achievable. The figures given by the applicant lack detailed supporting evidence and analysis. No evidence in the form of extensive market research nor a business/master plan has been presented to substantiate these claims. Thus even if the Council were to impose a condition requiring the runway works to be carried out in advancement of commencement of the proposed FDC, there is no guarantee that flights will actually take place, nor that further building to raise sufficient revenue will not be required.

6.67 Based on the work of ASA, the aviation benefits appear over-optimistic.

6.68 The lack of supporting evidence is a surprising omission. It would be inappropriate to allow a development on the basis of enabling development, if there is little realistic prospect of the runway being used as proposed. As such the asserted benefits, should in the view of officers, be given little weight.

ii) Redevelopment of existing premises

6.69 The new FDC will bring together the Stobart Group's road freight distribution and warehousing facilities at Kingstown Industrial Estate broken down into different Titles: 1) Sites 85, 90 and 90a; 2) Site 91; 3) Sites 100 and 101; 4) Site 102; 5) Site 76; 6) Site 83; and 7) Site 63 on Millbrook Road. This equates to approximately 25,000 square metres in floor space of which 23,842 square metres relate to warehousing; 1020 square metres are offices; and just over 80 square metres are a canteen. This compares to the current proposal involving the provision of a general warehouse/storage area of 28,940 square metres; two chiller chambers measuring a total of 4,756 square metres; a workshop (3,000 square metres); 823 square metres of offices; and a welfare building with an internal floor area of 192 square metres. In effect the proposal involves the provision of additional space for general storage, the chiller

chambers, workshop and canteen with a reduction in office floor space (the latter remains at Parkhouse).

- 6.70 In relation to the existing premises, paragraphs 2.22 of the ES and 1.2 of the Planning Policy Position Statement explain that the existing buildings are now more than 25 years old and approaching the end of their economic life; some of the buildings are in need of substantial refurbishment to satisfy the Stobart Group's and customers' quality standards, in particular customers now insist on more sophisticated fire protection measures (typically sprinklers) than those installed at Kingstown; and the relocation will enable its existing sites to be redeveloped and would remove HGVs from the main highways leading to the centre of Carlisle.
- 6.71 When considering alternatives to the current proposal, the ES states in paragraph 2.81 that it might be possible to relocate to another Stobart Group site, probably in Cheshire. This would, however, lead to the loss of wages and local spend, local purchasing and sponsorship that totals some £50m per year.
- 6.72 When assessing this situation Members will be aware that the Kingstown Industrial Estate is allocated for employment purposes and will have a direct access onto the Carlisle Northern Development Route which is due for completion in 2012. Six of the units occupied by the Stobart Group are currently being advertised for lease or sale with the particulars describing them as *"high quality units...located less than a mile from Junction 44 of the M6... (and) adjacent to the Carlisle Northern Development Route and the proposed £multi-million Kingmoor Park Hub development."*
- 6.73 It is also apparent that an assessment of Carlisle's employment land supply shows there to be an oversupply of land in B1, B2 and B8 uses. The Carlisle Employment Sites Study confirms that as of June 2010 there was 68.83ha of land allocated and available for employment purposes. In addition to this figure 20ha of land at Brunthill has also been allocated in line with Policy EC22 of the Local Plan 2001-2016. This brings the total supply of allocated employment land to 88.83ha.
- 6.74 How the supply relates to future trends in employment land requirements has been forecasted using two different scenarios: a baseline scenario and an aspirational scenario.
- Baseline scenario – factors in the potential impacts of the current recession to forecast how Carlisle may be affected in terms of employment change by sector up to and including 2026.
 - Aspirational scenario – factors in growth in a number of key sectors in the long term. The underpinning assumption is that over the two periods 2010-2015 and 2016-2026, Carlisle matches growth of either the North West or the UK.
- 6.75 The baseline scenario predicts the future land requirement to only be 0.7ha to 2026 whilst the aspirational scenario predicts a requirement of 13ha.

6.76 Kingmoor Park (including Brunthill) and Kingstown Industrial Estate are the two highest scoring sites qualitatively. Under Policy EM13 of the Structure Plan 2001-2016, Kingmoor Park is designated a Regional Investment Site. As such there is allocated employment land that is available closer to the motorway network than the Airport. This is also at a time when no argument has been advanced that there is an essential need for the road haulage to be located at the Airport that could not either be addressed by the redevelopment of existing sites or available land within the immediate vicinity.

6.77 Whilst PPS4 and recent Government statements promote economic development, the deliverability of the asserted airport related benefits of this proposal are open to serious doubt and there appear to be clear opportunities for the FDC to be more appropriately located elsewhere.

3) To what extent is the proposal consistent with PPG 13 with regard to the integration of sustainable development and the need to reduce the length and number of motorised journeys and encourage alternative means of travel

6.78 The delivery of sustainable development lies at the heart of Government planning policy with overarching policies set out in PPS1. Paragraph 3 of PPS1 stating that *“sustainable development is the core principle underpinning planning”*. Paragraph 13 (ii) goes on to say that development plans need to have policies which reduce energy use, reduce emissions (for example by encouraging patterns of development which reduce the need to travel by private car, or reduce the impact of moving freight), promote the development of renewable energy, and take climate change impacts into account in the location and design of development. Paragraph 42 of the Supplement to PPS1 explains that development needs to create and secure opportunities for sustainable transport including through: the preparation of travel plans; providing for safe and attractive walking and cycling opportunities; and an approach to the provision and management of car parking. This is in the context of the Climate Change Act 2008 stipulating a legally binding target of at least an 80 percent reduction in greenhouse emissions by 2050 and of at least a 34 percent reduction by 2020 using 1990 as a baseline.

6.79 These policies and associated objectives are reflected in other PPSs/PPGs, including PPG13 and PPS23.

6.80 In order to deliver the objectives of PPG13, paragraph 6 explains that major generators of travel demand need to be focused near to major transport interchanges. However, recognising that airports have become major transport interchanges and traffic generators that attract a range of related and non-related development, PPG13 also advises that LPAs should, when preparing development plans and in determining planning applications, consider the extent to which development is related to the operation of the airport and is sustainable given the prevailing and planned levels of public transport. It goes on to emphasise that *“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”*.

- 6.81 PPG13 notes that related development appropriate to airports includes *“transport interchanges, administrative offices, short and long-stay car parking”*. Less directly related development is also outlined and *“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”* while non-related development (which is not defined but presumable means everything not covered by the other definitions) *“should be assessed against relevant policy elsewhere in planning guidance”*..
- 6.82 In considering matters of sustainability it is also relevant to take into account the Government’s objectives in respect of existing aviation infrastructure. The White Paper “The Future of Air Transport” (2003) makes it clear that the starting point is to make best use of existing capacity with growth at regional airports to be encouraged. However, this does not give carte-blanche for development at regional airports; it is necessary to make a critical judgement based on the circumstances of each case. Indeed this is implicit from the White Paper (2003) which, in the Foreword, advocates *“taking a measured and balanced view”*; and explicit with regard to Carlisle Airport with its encouragement for the operator to *“bring forward proposals for the development of the airport, to be considered through the normal regional and local planning process.”*
- 6.83 “The Future of Transport – A Network for 2030” White Paper highlights that the promotion of sustainable transport is fundamental to reducing air pollution and road congestion; and that travel plans could reduce commuter car driving by 10-30% at the local level.
- 6.84 Policy DP1 of the RSS sets out the key “Spatial Principles” that drive the overall Strategy, with Policies DP2-9 elaborating on each of these which are, thematically:
- Promoting sustainable communities (DP2)
 - Promoting sustainable economic development (DP3)
 - Making the best use of existing resources and infrastructure (DP4)
 - Managing travel demand, reducing the need to travel and increasing accessibility (DP5)
 - Marrying opportunity and need (DP6)
 - Promoting environmental quality (DP7)
 - Mainstreaming rural issues (DP8)
 - Reducing emissions and adapting to climate change (DP9).
- 6.85 On the matter of managing travel demand, Policy DP5 recognises that:
- development should be located so as to reduce the need to travel, especially by car, and that a shift to more sustainable modes of transport for both people and freight should be secured
 - safe and sustainable access for all, particularly by public transport, between homes, employment and a range of services and facilities should

- be promoted and should influence locational choices and investment decisions
 - major growth should, as far as possible, be located in urban areas where strategic networks connect and public transport is well provided
 - all new development should be genuinely accessible by public transport, walking and cycling and priority should be given to locations where such access is available
 - within rural areas, accessibility by public transport should also be a key consideration in providing services and locating new development emphasising the role of Key Service Centres.
- 6.86 The supporting text to DP5 notes that the principle of managing demand, reducing the need to travel and increasing accessibility has influenced, amongst other matters, the locational criteria for regionally significant economic development with accessibility by public transport.
- 6.87 Policy W3 of the RSS requires the site to comply with the spatial development principles outlined in policies DP 1-9 and office development to be, as far as possible, focused in the regional centres, in or adjacent to town/city centres listed in RDF1 and in Key Service Centres, consistent with RDF2 and the sequential approach in PPS6.
- 6.88 The Local Transport Plan 2006-2011 identifies, amongst other things, the need to improve accessibility by reducing the need to travel by guiding development to Key Service Centres that are accessible by public transport, on foot and by cycle. Policy T5 of the LTP explains that priority will be given to surface transport measures that support the development of the Airport where necessary. Policy RT5, on freight traffic, states that the County Council will encourage the movement of goods by rail and sea wherever possible through travel plans and freight quality partnerships and to reduce the amount of freight on the road network. Policy LD5 requires all proposals for commercial development to be or be made accessible by public transport, walking and cycling.
- 6.89 Policy T31 of the Structure Plan requires travel plans for certain types of development. In "Travel Plans and the Planning Process in Cumbria: Guidance for Developers" (March 2011) the County Council stipulate that a travel plan should have a minimum 10% target for reducing private vehicle trips, and that as part of a travel plan there should be a guaranteed travel plan contribution paid upfront but repaid dependent upon whether the modal shift targets are met.
- 6.90 The Travel Plan (TP) accompanying the current application highlights that such plans are prepared to minimise the negative impact of travel and transport on the environment by reducing congestion, enhancing accessibility by non-car modes, and improving air quality. The TP highlights that the A689 is used by three bus operators running limited daily services between Carlisle and Hallbankgate, Brampton, Nenthead and Newcastle but the nearest bus stop to the Airport is over 400m away in Ruleholme. Travel to the Airport by bus is not currently considered to be a viable option because of the limited service and lack of stops.

- 6.91 In response to the problems of access, the TP puts forward six measures: staff travel awareness; establish a staff travel database; introduce a staff car sharing scheme; provide travel information; and establish an airport passenger shuttle bus. In the case of the staff car sharing scheme, the incentive created is by having 10% of the best car parking bays reserved as car share spaces. A sheltered and secure cycle storage facility will be provided as part of the proposal to encourage staff to cycle should future strategies permit cycling as a travel option. The TP also includes a shuttle bus for passengers linking the Airport with the City Centre that will be reviewed on a three monthly basis to establish viability based on a threshold of an average patronage of five per journey. As part of the TP, the applicant has indicated that the operational issues of maintaining an environment-friendly fleet will be considered including: the regular servicing of vehicles; the purchasing of replacement vehicles with good environmental ratings; and consideration of conversion to low emission fuels. This is reiterated in a letter from the applicant's agent dated the 22nd June 2011, which explains that the Stobart Group is very committed towards minimising its road haulage emissions through better fleet utilisation, more efficient driving practices, using alternatives to road transport, and the development of cross-dock facilities.
- 6.92 Sections 9 and 10, and Figure 2 indicate that the TP will be monitored and reviewed annually through staff surveys; the results of the analysis will be forwarded to the County Council; the information used to set new targets and measures to be implemented; and keeping employees aware of the situation through the use of notice boards, welcome packs and a newsletter.
- 6.93 The TP points out that Government estimates suggest that a 20% reduction in car travel is possible in areas with good public transport provision but, given the site, a revised total target of 10% is set in the agent's letter dated the 22nd June 2011.
- 6.94 When assessing this element of the proposal it is recognised that Cumbria and the Scottish Borders air passengers have to use airports outside the region. The LTP (page 31) explains that Cumbria is more remote from access to air services than any other part of the UK with a comparable population. There is an opportunity for air passengers to utilise Carlisle Airport, and thus reduce the number of long distance journeys currently made, mainly by car. The significance of this issue is, however, dependent upon whether there is a reasonable prospect of the forecasted air movements to be realised.
- 6.95 Section 4.4 of the ASA Report (May 2011) explains that the scope for mitigation measures is limited because of such factors as: the use of HGVs to distribute freight; heavy reliance on shift working; air passengers arriving and departing; the Airport's isolated location; and poor public transport.
- 6.96 The current proposal is regarded as a relatively major generator of travel demand. The TP confirms that up to 328 members of staff will be based at the development site. A letter from the agent dated the 14th March 2011 explains that this is based on the use of the FDC by 121 Stobart Group staff relocated from the Kingstown Industrial Estate sites and the creation of 69 new jobs (of

which 15 relate to the handling of air freight); and the relocation of 102 HGV drivers and creation of 36 new HGV driver posts.

- 6.97 The proposed FDC is intended to be a 24 hour operation 7 days per week, throughout the year with employees having a 3-shift work pattern with changeovers at 06.00, 14.00 and 22.00 hours, although office staff will be present from 08.00 to 17.00 hours. Figure 12 of the Transport Assessment (TA) confirms that for 2012 the expected number of car movements is 328 “in” and 328 “out”. Based on the proposed number of car parking spaces, it is possible that there could be a shortfall of approximately 20 spaces during the change in shifts at 13.00 hours depending on how this is managed. Furthermore Figure 17 of the TA indicates that by 2025 the equivalent “in” and “out” number of car movements rises to 408 per day. This shows the vital need for an effective Travel Plan to be in place.
- 6.98 Carlisle Airport is not directly served by a bus service, and is remote from rail links. In no sense can it be regarded as being a major transport interchange, nor is it near such an interchange. When considering the suggested measures in the TP the proposed shuttle bus for air passengers does not appear to be a permanent commitment and it does not include any travel plan contribution should the development exceed the thresholds. As a consequence, it cannot be attributed much weight. By far the most convenient means of travelling to and from the Airport will remain to be the car as evident by Figures 12 and 17 of the TA and the relatively substantial amount of proposed car parking.
- 6.99 In addition, the ASA Report recognises that much of the impact of the development on the road network will be from HGV traffic which will be unaffected by the Travel Plan mitigation measures although a Designated Advisory HGV route is proposed, to seek to ensure that all HGV traffic between the M6 and the FDC uses Junction 44 of the M6 and the A689.
- 6.100 It is acknowledged that there could be inward investment at the Airport involving uses that fall within Classes B1-B8 that would be acceptable under Policy EC22 of the Local Plan but otherwise it is not a sustainable location.
- 6.101 In overall terms, against the background that the proposal is considered to be contrary to Policy EC22, it is also considered not to be sustainable in terms of being located at or near a transport interchange and does not bring forward measures that satisfactorily address the need to reduce the length and number of motorised journeys.
- 6.102 As will be apparent from paragraphs 6.73 – 6.76 in the report, there are alternative sites available within the settlement boundary of Carlisle with closer connections to the M6.

3) Sustainability of Design

- 6.103 Paragraph 22 of PPS1, on the prudent use of natural resources, explains that local authorities should promote resource - and energy-efficient buildings. Paragraphs 8 and 30 of the Supplement to PPS1 highlights that the planning system needs to support the delivery of the timetable for reducing carbon

emissions from domestic and non-domestic buildings. Paragraph 10 of the Supplement also goes on to say that the provision for new development, its spatial distribution, location and design should be planned to limit carbon dioxide emissions; and make good use of opportunities for decentralised and renewable or low carbon energy. Planning authorities should expect new development to comply with policies for decentralised energy supply and for sustainable buildings unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable (paragraph 42).

6.104 Policy CP9 of the Local Plan states that development proposals should take into account the need for energy conservation and efficiency in their design, layout and choice of materials. Paragraph 3.48 accompanying Policy CP9 explains that applicants should be able to demonstrate how they have attempted to minimise energy use and heat loss through careful and imaginative design, location and construction techniques.

6.105 Section 6.01 of the submitted Design and Access (D&A) Statement states that:

“....the best practicable technologies suited to the proposed development and its local context are considered to be tri-generation energy harnessing and rainwater collection systems. The introduction of such technologies is still at the inception stage and they are yet to be fully integrated into the design. They are however considered appropriate to the overall design and operation of the proposed development (and) will be taken forward in consultation with appropriate parties.

....the development proposals will incorporate further sustainability features designed to minimise the impact of the development. It is possible to install energy saving technologies and techniques across the onsite buildings, reducing the carbon footprint of the proposed development during operation. Throughout construction, we will seek to source local materials; supporting local businesses, minimising transportation miles and generating local jobs. Furthermore, during development construction wastes will be reused onsite wherever practicable; lessening the requirement for landfill and natural resources.”

6.106 Section 6.01 of the D&A Statement also confirms that the development will incorporate sustainable drainage techniques *where appropriate*; roof and hardstanding areas will drain directly to the stormwater attenuation lagoons; and opportunities for other sustainable measures *will be explored* during detailed design.

6.107 When considering this issue it is recognised that the EU Emissions Trading Scheme provides a mechanism for addressing greenhouse gas emissions from aircraft. Policy initiatives such as Sustainable Aviation also support a reduction in emissions from aircraft. However, no assessment is made in the D& A Statement with regard to either carbon from construction or use of the buildings/airport infrastructure. Furthermore the measures are vague and there is no explanation why other measures are neither feasible nor viable. This aside, in a letter dated the 22nd June, the agent has confirmed that “*the*

applicant aims to achieve a “good” BREEAM rating”. On this basis it is considered that this matter can be addressed by the imposition of a relevant condition.

4) Highway Network

6.108 In relation to traffic, and the information contained in the ES and Transport Assessment, ASA initially raised a series of concerns such as the relevant section of the ES not including the B6264 (Old Brampton Road) west of Linstock although this is likely to form the most direct route from the centre of Carlisle; the assessment is unclear with regard to traffic predictions that take account of the Carlisle Northern Development Route inclusive of Junction 44 of the M6; and the time periods used for background analysis were 08.00 to 09.00 hours for the AM peak, and 17.00 to 18.00 for the PM peak, however these are not the peak hours for traffic generated by the development.

6.109 ASA have also pointed out that the submitted TA identifies “...an accident cluster at the A689/Houghton Road North staggered T-junction.” This is on the main route for HGVs between the FDC and the M6, however the significance of this is not addressed in either the TA or the ES. A letter from the agent dated the 11th February 2011, states:

“One accident cluster is evident at the A689/Houghton Road North staggered T-junction and this has been further analysed. There were 6 recorded accidents at this staggered T-junction during the period 1st January 2005-31st December 2009. Of the six recorded accidents none involved HGVs (>7.5t), however two of the recorded accidents involved light goods vehicles (<3.5t).”

However, section 2.23 of the Transport Assessment states:

“Analysis of accident location shows that there is an accident cluster at the A689/Houghton Road North staggered T-junction. Of the total recorded accidents, 4 involved Heavy Goods Vehicles (HGVs).”

6.110 In response to these comments, the agent has explained that: the study area network is relatively large and the nature of traffic on the A689 is known to comprise a high level of longer distance traffic; modelled flows with the Carlisle Northern Relief Route for the A689 between Junction 44 of the M6 and the Linstock roundabout forecasted a 30% drop in flow; the AM and PM peak hours have been assessed because this represents the network peak flow; there is no discrepancy between the TA and the agent's letter dated the 8th February 2011 because the reference in the TA relates to 4 accidents involving HGV's and covers the whole of the study area as opposed to just the A689/Houghton Road junction.

6.111 In conclusion, ASA accept that the underlying background traffic volumes reported are relatively low, and there does appear to be spare capacity on routes within the study area. This would suggest that the development traffic can be accommodated, and the implications could be minimal. The applicant has subsequently addressed any concerns raised with regard to the ES.

5) The extent to which the proposal is consistent with national planning policy contained in PPG24 “Planning and Noise” regarding the potential impact of noise and vibration

i) Aircraft

- 6.112 PPG24 sets out guidance on dealing with proposals for development generating noise. Annex 1 of PPG24 defines 4 levels of noise exposure categories (NECs) for dwellings. These range from NEC A, where noise need not be considered a determining factor in granting planning permission, to NEC D where planning permission should normally be refused. At Table 2 the guidance is that air traffic noise in daytime 57dB LAeq16hr relates to the onset of low community annoyance. This is an average figure, and is not to be taken to mean that people outside that threshold will not be annoyed by noise. Higher up the scale 63 dB LAeq 16hr equates to moderate annoyance; and 69 dB LAeq 16hr to high community annoyance. At night, defined in PPG24 as 23.00 to 07.00, noise is evaluated in a different way using different units, such as the single event level (SEL) unit. For the assessment of night time aircraft noise it is generally, but not universally, accepted that outdoor noise levels below 90 dB(A) SEL are unlikely to increase overall rates of sleep disturbance.
- 6.113 The PPG24 noise guidance in Annex 1 nominally relates to the development of new housing in an existing noise environment, rather than to existing housing being affected by changes in the noise environment as is the case in the context of this application. Nevertheless, it is considered that the thresholds set out in PPG24 offer a reasonable way forward in assessing any impact. Reference has been made to World Health Organisation noise guidelines, however current national policy is set out in PPG24. It is appreciated that the relationship between noise and annoyance is recognised to be subjective, varying between individuals and locations.
- 6.114 The applicant has suggested the imposition of a condition that would restrict the number and type of aircraft landing to control the level of operations at the Airport. The submitted Transport Assessment acknowledges in paragraph 2.6 that Carlisle Airport is not particularly busy and handles a limited range of aircraft types such as private air taxis, the local flying club, occasional helicopter movements and military jets stops for refuelling. Aircraft noise is not currently considered to be a significant feature of the local noise environment. Thus any measures would be offset by the increase in air movements and noise from the FDC.
- 6.115 In relation to the submitted ES, the ASA Report raises concerns because:
- The methodology and criteria used for airborne aircraft traffic noise are standard for fixed wing aircraft. However, people’s tolerance to noise from rotary aircraft (e.g. helicopters) has been shown to be far lower (by up to 15dB) than that for fixed wing aircraft. As such, it would have been

more accurate to assess the impact of helicopter noise separately to that of fixed wing aircraft and against different criteria.

- The airborne aircraft noise predictions have been undertaken on the basis of a 90% westerly and 10% easterly modal split. A typical average modal split for a UK airport is nearer 70% westerly and 30% easterly. From the information provided, it is difficult to see why a 90%/10% modal split has been used, and no investigation has been carried out regarding the effect of changing wind conditions.
- The overall number of aircraft and helicopter movements is relatively low and, as such, it is possible that alternative methods of assessment are preferable than the standard 16-hour Leq used in noise impact assessment at most UK airports. For these activities a relative assessment method, such as that outlined in BS4142:1997, is a far more appropriate tool in establishing the noise impact, where events over a one-hour period during the day or a 5 minute period during the night are compared with underlying ambient noise climate.

6.116 In response, Scott Wilson has stated that no agreement on a helicopter noise differential has been settled; and the 90%/10% modal split was advised by the Airport as the typical split of air traffic movements on the main runway.

6.117 On this matter it is recognised that an increase in air movements will lead to a loss of amenity. However, and irrespective of the above, it is the case that ASA have concluded that fixed wing aircraft and helicopter noise is likely to be below a level representative of the onset of annoyance.

ii) Ground and Freight Handling Operations

6.118 ASA have highlighted that the use of a 16 hour average noise level for ground operations contained in the ES underestimates the noise impact. Activities such as the operation of auxiliary power units, ground power units and engine maintenance runs on high power can produce high noise levels for a short period of time. Furthermore, the use of 60dB LAeq T at 152 metres taken from a different airport for operations at Carlisle overestimates the noise impact. ASA consider that the noise impact would be more accurately equated using a relative assessment method, where events over a one hour period during the day or a 5 minute period during the night are compared with the underlying ambient noise climate.

6.119 On the basis of the background noise survey data, ASA consider it possible that ground operations surrounding the Airport would be occasionally noticeable during the day and evening. ASA recommend that a detailed relative assessment of individual ground running operations should be undertaken in order that the impact can be reviewed fully.

6.120 In relation to the FDC, the ES refers to a topographical variation of approximately 8 metres between the finished floor level and the existing ground level to the east and north; and that this topographical variation provides “significant screening” to noise sensitive receptors. ASA confirm that there is

a variation of around 8 metres between the centre of the site and the nearest properties to the east and north-east of the site. However, this variation is a gradual incline and as such would not provide any realistic topographical screening. To achieve significant screening of the order of 10dB or more, such a variation in height would have to occur rapidly near to either the source or receiver. Furthermore, it needs to be clarified that working practices and machinery are such that machine driven flaps at the docking stations are to be used.

6.121 In response to the comments by ASA, the applicant's agent has explained that: a thorough assessment of the risk of ground noise impact was made using a reference noise level 60dB LA eq T which would lead to an overestimation of noise impact; no significant ground noise impacts were predicted because of the considerable separation between the aprons and local noise sensitive receptors; a 10 dB screening attenuation was adopted because the proposed FDC is to be built into the local topography such that the noise producing activities will be hidden from direct view; the noise impact assessment for the FDC was assessed at night time when background noise levels were lowest; that assessment found that during this most critical time the proposal could operate without causing an unacceptable degree of disturbance; and the intention is to use hydraulic and fully automated driven flaps to ensure that the HGV docking operations do not exceed the reference noise level of 80 dB LAmax.

6.122 In conclusion, it is considered that the likelihood of the noise being noticeable outdoors during the evening and night-time is high, however none of the presented activity noise levels are likely to cause sleep disturbance when in operation. No objections have been raised by the City Council's Environmental Quality Section. The changes in topography and use of machine driven flaps at the docking stations can be the subject of a relevant condition(s).

iii) Road Traffic

6.123 The submitted Transport Assessment refers to the level of traffic generated by the current use of the Airport as being "minimal". Whilst there will be limited occupation of the offices outside of "typical" work times i.e. circa 0800-1700 hours, the proposed FDC is intended to be a 24 hour operation 7 days per week, throughout the year with employees having a 3-shift work pattern with changeovers at 06.00, 14.00 and 22.00 hours. The Airport will operate between 06.00 to 23.00 hours with staff working in two shifts i.e. 04.00 – 13.30 and 13.30 – 23.00 hours. The aviation side of the Airport will occur between 09.00 – 1930 hours (Figures 12 and 17 of the TA, and paragraphs 5.13 and 5.14 of the ES).

6.124 Based on the forecasted growth in traffic movements, the submitted ES concludes, as summarised in Table 5.26, that the effects during construction, and operation at 2012 and 2025 range from being "negligible" to "negligible adverse".

- 6.125 On this issue ASA consider that there is nothing within the ES to question the accuracy of the road traffic noise predictions and assessment. ASA conclude that the noise impact from road traffic under such conditions would be negligible.

iv) Construction

- 6.126 ASA consider that construction noise may be noticeable but it is regarded as within appropriate noise limits. In both these instances mitigation measures can usually be employed to reduce noise and light impact. As such, concerns relating to construction noise and the hours of construction may be addressed through a Construction Management Plan.

6) The extent to which the proposal is consistent with national planning policy contained in PPS23 “Planning and Pollution Control” regarding the potential impact of air quality and smell

- 6.127 Paragraph 6 of PPS23 explains that the “precautionary principle” should be invoked when: there is good reason to believe that harmful effects may occur to human, animal or plant health, or to the environment; and the level of scientific uncertainty about the consequences or likelihood of the risk is such that best available scientific evidence cannot assess the risk with sufficient confidence to inform decision-making. Paragraph 8 goes on to highlight that any consideration of the quality of land, air or water and potential impacts arising from development is capable of being a material planning consideration. Paragraph 10 differentiates between planning and pollution control, with the planning system controlling the development and use of land in the public interest.

“It plays an important role in determining the location of development which may give rise to pollution, either directly or from traffic generated, and in ensuring that other developments are, as far as possible, not affected by major existing, or potential sources of pollution. The planning system should focus on whether the development itself is an acceptable use of the land, and the impacts of those uses, rather than the control of processes or emissions themselves.”

- 6.128 The two pollutants of greatest concern in respect of aircraft and motor vehicles are generally NO₂ (nitrogen dioxide) and PM₁₀ (airborne particulate matter less than 10 micrometres in aerodynamic diameter). Aircraft are also the source of odours from burnt and unburnt hydrocarbons from aviation fuel. The submitted ES sets out impacts with regard to national Air Quality Strategy objectives and the assessment focuses on dust (during construction only), NO₂, PM₁₀, PM_{2.5} and NO_x (nitrogen oxide) deposition from vegetation.
- 6.129 In terms of the effect on air quality and dust, the ES observes that existing conditions within the study area (an 8km radius from the site) are generally good but instances of the health objectives in relation to air quality being exceeded have been recorded alongside the A7 south of J44 of the M6 (i.e. on Kingstown Road) leading to declaration of an Air Quality Management Area (AQMA). Construction works have the potential to create dust and it will

therefore be necessary to apply a package of mitigation measures to minimise dust emissions but any effects will be temporary and short-lived. Overall the potential effects during the construction phase are classified as “minor adverse”.

- 6.130 The ES states that, in terms of operational impact on local air quality arising from the development, the changed road traffic flows will have impacts ranging from negligible benefits to minor adverse effects. The benefits will be to reduce traffic on the AQMA through the re-location of Eddie Stobart Group with minor adverse effects being experienced on the roads leading to the Airport. It adds that there will be no significant effect to minor adverse effect on ecosystems and that, while traffic sources may impact on greenhouse gas emissions, it is not possible to assess the significance of the local changes that will take place in the national context.
- 6.131 ASA consider the approach of identifying sensitive locations for pollution sources to be reasonable, although Figure 7.1 of the ES does not include receptors for some of the communities near the Airport such as Irthington and Newtown, and there is the likelihood of slight adverse impacts at one “receptor” as a consequence of considering uncertainty in modelling predictions. ASA go on to say that although inclusion of receptors in these locations would be unlikely to change the conclusions of the assessment, it would assist in understanding the likely magnitude of all potential impacts in all relevant areas. ASA query whether a qualitative assessment of the potential impacts of the proposed development on greenhouse gas emissions is considered appropriate.
- 6.132 Overall, the ASA review has found that the methods used in the ES for assessment of air pollution impacts from construction, road traffic and airport sources are appropriate. The key conclusions are that potential effects during the construction phase are judged “negligible adverse” and that operational effects are judged to have no significant effect on human health or on vegetation and ecosystems. Adequate mitigation of construction dust would need to be dealt with by condition.
- 6.133 In response to criticism from ASA over the lack of any assessment with regard to odour impacts, the applicant commissioned a report from Air Quality Consultants Ltd. The subsequent report (June 2011) draws on research that suggests the odours are not directly associated with aviation kerosene itself, but a product of incomplete combustion. The greatest potential for odorous emissions is thus ground level emissions when the aircraft are on-stand with engines running, and during taxiing to and from the main runway. Air Quality Consultants Ltd conclude that it is highly unlikely the proposed development would cause any significant odour effects to occur because: the change in the number of air traffic movements is small; the prevailing wind will carry any emissions away from the closest properties to the south of the FDC for the majority of the time; residential properties in the prevailing downward direction are at least 0.5km away from the Airport operations; and evidence from other regional airports suggests that the number of odour complaints received is very low.

- 6.134 On the basis of the foregoing, and with due acknowledgment to the precautionary approach contained in PPS23, it is considered that any effects associated with odour are likely to be within acceptable limits.

7) Landscape and Visual Impacts

- 6.135 A distinction is drawn between landscape impacts that relate to the characteristics of the landscape, and visual impacts on receptor points (houses and rights of way etc) effects that relate to individual views within that landscape.
- 6.136 Paragraphs 13(iv) and 34 of PPS1 explain that design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions should not be accepted.
- 6.137 As already identified, the proposal is set within the Buffer Zone of the Hadrian's Wall World Heritage Site. The policies of particular relevance are therefore E34 and E37 of the Structure Plan; and CP1, DP10, and LE7 of the Local Plan. Having assessed the submitted material, English Heritage consider that the main built element, by virtue of its location and scale, will be unlikely to have an adverse impact on the ability to comprehend and appreciate Roman military planning and land use in relation to Hadrian's Wall. Due recognition also needs to be made of the fact that under Policy EC22 of the Local Plan 21.15 hectares is identified for a Strategic Employment Site at Carlisle Airport. Although the extent of the proposed development (excluding the car park to the east of the existing passenger terminal) is approximately 28.6 hectares of which over 22 hectares relates to grassland, the application site lies within an area designated in the local plan for development and cannot be regarded as countryside. Policy DP3, that specifically considers the role of Carlisle Airport and the opportunity it offers to enhance the local economy, states that proposals for development will be supported where they are related to airport activities, in scale with the existing infrastructure and minimise any adverse impact on the surrounding environment.
- 6.138 The submitted ES considers that by 2025 the proposed tree planting will have significantly reduced the adverse visual effects from the majority of viewpoints. However, the proposal will have a moderate/minor adverse effect on the landscape character with regard to the Buffer Zone of the Hadrian's Wall World Heritage Site; a moderate/minor adverse effect on visual amenity from the east (Netherfield and Irthington road); a moderate adverse effect on visual amenity for views from the south-east (Military Cottages); a moderate minor adverse effect on visual amenity for users of Hadrian's Wall National Trail from Oldwall to Chapel Field. Whilst no residential properties are assessed as being directly affected by the proposed lighting, the ES recognises that the section of the A689 adjacent to the proposed development is unlit, and this will result in an increase in ambient light levels to the wider area. The ES considers that the impact of the increased lighting levels locally will be restricted to users of the public rights of way.

- 6.139 When assessing the impacts on the landscape character of the area and visual amenity it is appreciated that the proposed FDC is to be built into the ground. However, it still represents a large-scale development that will have a noticeable visual presence detached from the existing buildings at the Airport. Irrespective of the imposition of a condition, the required external lighting would compound matters.
- 6.140 It is appreciated that development is envisaged at the Airport. In the context of the conclusions reached in the ES, it is considered that despite the proposed landscaping, the FDC and associated structures and parking would be prominent and visually intrusive features in such an exposed and highly visible location, and that this proposal causes harm over other potential development. This is a matter that weighs against the proposal.

8) The extent to which the proposal is consistent with policies set out in PPS9 “Biodiversity and Geological Conservation”

- 6.141 The key issues in this case relate to the possible impacts of the proposal on significant nature conservation interests “off-site” together with the “on-site” effects upon features and habitats, including protected species. Although the application site does not lie within the major international or nationally designated areas such as the Upper Solway Flats and Marshes Special Protection Area, the River Eden Special Area of Conservation or either the Whitemoss SSSI or the River Eden & its Tributaries SSSI, it is in close proximity to the River Eden SAC/SSSI and is directly affected by the Airport’s non-statutory status as a County Wildlife Site. In addition, birds (pink-footed geese and whooper swans) considered to be part of the Upper Solway Flats and Marshes SPA populations are known to use land around the application site; therefore, SPA interest features could also potentially be impacted by the proposed development.
- 6.142 In this context the Council has appointed an ecological consultancy (Lloyd Bore) to advise and undertake the relevant Appropriate Assessments with regard to the River Eden SAC and the Upper Solway Flats and Marshes SPA. Lloyd Bore also provided advice to the Council on general nature conservation issues concerned with the proposals, including impacts on protected species. Natural England, the Cumbria Wildlife Trust and Royal Society for the Protection of Birds have also both been informed of the application and invited to comment.
- 6.143 Lloyd Bore has completed the Upper Solway Flats and Marshes SPA Appropriate Assessment and it has been “signed off” by Natural England. The Assessment examined in detail the potential impacts of the proposed development during both construction and operation on the SPA interest features (pink-footed geese and whooper swans), such as potential impacts of bird-strike and disturbance. The Assessment concludes that *“whilst there are still some shortcomings in the information and evidence base provided with the 2010 application, sufficient information has been provided by the applicant for the purposes of this assessment to show that the proposed development will not have an adverse effect on the integrity of the Upper Solway Flats and Marshes SPA. However, to be certain of no future adverse impacts on the*

integrity of Upper Solway Flats and Marshes SPA, several issues need to be conditioned in any planning permission that may be granted.”

- 6.144 The River Eden SAC Appropriate Assessment, following the receipt of revised plans concerning the proposed means of foul drainage, is being completed and has yet to be signed off by Natural England. The Assessment examines in detail the potential impacts of the proposed development during both construction and operation on the SAC interest features, such as potential impacts of pollution on water quality and of disturbance on otters. The draft Assessment concludes that *“sufficient information has been provided by the applicant for the purposes of this assessment to show that there are not likely to be any major barriers to ensuring that the proposed development will not have an adverse effect on the integrity of the River Eden SAC. However, to be certain of no adverse impacts on the integrity of the River Eden SAC, a number of issues regarding potential impacts on the River Eden will need to be conditioned in any planning permission that may be granted”*.

Members will be updated on progress during the Meeting.

- 6.145 In relation to the impacts on the County Wildlife Site, designated for its breeding bird populations, the key concern is the development of the existing grassland resulting in habitat clearance and permanent loss. Policy E35 of the Structure Plan seeks to protect those areas and features of nature conservation importance other than those of national and international conservation importance e.g. County Wildlife Sites, UK Biodiversity Action Plan Priority Habitats that occur in Cumbria and Species of Conservation Importance in the North West Region that occur in Cumbria. Policy E35 clearly states that development that is detrimental to these interests is not permitted *“unless the harm caused to the value of those interests is outweighed by the need for the development”*. It adds that the *“loss of interests should be minimised in any development and where practicable mitigation should be provided”*. This stance is reiterated in Policy LE3 of the Local Plan 2001-2016.
- 6.146 The applicant’s agent, in the light of the information accompanying the ES, is of the opinion that the loss of area to the County Wildlife Site does not need to be compensated for. However, in the context of the comments from Cumbria Wildlife Trust and RSPB, the applicant has agreed to make a payment of £100,000 in order to enable the undertaking of a habitat scheme as per the previous proposal (application number 08/1052).
- 6.147 In relation to the potential effect of the development on European Protected Species, principally Great Crested Newts and Bats, as well as other wildlife interest, Lloyd Bore has concluded that: based on the information that has been provided by the applicant and on responses received by Natural England and other consultees, it is considered possible that the proposed development may impact on populations of the following protected species:
- Bats
 - Great crested newts
 - Breeding/wintering birds (and the CWS)

- Badgers
- Otters

On the basis of the information supplied to date and according to advice received by Natural England and others, several recommendations have been made and issues regarding protected species have been suggested for conditioning in any planning permission granted and in a Section 106 Agreement. Providing that the recommendations are followed and the issues as outlined in this report are adequately conditioned in any planning permission that may be granted, it is considered that it can be concluded that the proposed development is unlikely to significantly impact on populations of protected species and other wildlife.

9) Archaeology

- 6.148 The Ancient Monuments and Archaeological Areas Act 1979 is the basis for the protection of nationally important archaeological sites. Further guidance is contained in PPG15 and this is reflected in the policies of the Development Plan.
- 6.149 In relation to this application, English Heritage initially raised concerns with regard to the potential impact of the drainage and resurfacing of the runway on the scheduled remains of Watchclose Roman camp, and the potential implications with regard to the option to connect to the public sewer.
- 6.150 In relation to the former, English Heritage has subsequently confirmed in an e-mail sent on the 9th June 2011 that they have no objections on the basis that the maximum depth of excavation for the drainage is 300mm below the present ground level; the imposition of conditions requiring further approval by the Council of a final drainage design and resurfacing; and (given the discovery of a probable defensive feature outside the northern entrance to the camp) the results the evaluation work are placed in the public domain, through a short publication in a local archaeological journal.
- 6.151 In the case of the latter, English Heritage has confirmed that they have no issues with the works shown on the main sewer although the rising main route crosses the line of the Stanegate Roman road because it is in an area where this is unlikely to be well preserved, and the Agent's recommendation for this work to be covered by an archaeological watching brief is considered to be acceptable. In terms of other archaeological impacts, works outside the airport site involve the use of existing sewer pipes with no excavation. As such, the only remaining potential concern is with reference to United Utilities intention to 'upgrade to Irthington works' details of which would need to be resolved.

10) Hazard Assessment

- 6.152 The application of "Public Safety Zones" (PSZ) criteria is of some assistance to assessment of risk in this case. DfT Circular 1/2002 "Control of Development in Public Safety Zones" indicates that:

- PSZ policy is based predominantly on individual risk;
- PSZs are to be based on 1 in 100,000 risk contours, and within those zones there shall be no increase in the number of people living, working or congregating, and the number of people should be reduced over time as circumstances permit;
- People living within the 1 in 10,000 risk contours should have their residences bought by the airport operator and move.

6.153 Based on the foregoing there is a general presumption against new development within a risk contour of 1 in 100,000; but there is no reference in the guidance to any restrictions to development outside that contour.

6.154 An alternative approach to risk assessment is that of the HSE based on tolerability of risk divided into the following categories:

- Unacceptable – risks regarded as unacceptable whatever their benefits, except in extraordinary circumstances such as war i.e. more than 1 in 10,000 per year;
- Tolerable – risks that are kept as low as reasonably practicable, and tolerated to secure benefits i.e. between 1 in 10,000 and 1 in 1 million per year;
- Broadly acceptable – risks that most people regard as insignificant i.e. less than 1 in 1 million per year.

6.155 The applicant's baseline assessment of third party risk, set out in the ES, shows an increase in the size of the individual risk contours. For the baseline operations, it is estimated that the 1 in 100,000 per annum risk contour lies entirely within the Airport boundary. The 1 in a million per annum contour extends beyond the Airport boundary to include a haulage building to the south-west and the majority of Irthington to the north-east. Based on the anticipated growth to 2025, the risk contours increase in size such that the 1 in a million per annum risk contour would increase in length and width and cut through a building on the A689 at Watch Cross, include another building slightly to the north at Watchclose, and include almost all of the village of Irthington. These risks are potentially significant at these locations because the individual risks there would exceed the level 1 in a million per annum below which HSE would consider the risk to be "broadly acceptable" and *"are typical of the risks from activities that people are prepared to tolerate to secure benefits..."* Such risks represent detrimental impacts to be weighed against any benefits arising from the proposed development.

6.156 On this basis ASA have concluded that the risks encountered at Carlisle might be regarded as relatively modest i.e. below the level of 1 in 100,000 per annum, though not below the level of 1 in a million per annum at which they would generally be regarded as acceptable. ASA consider the level of risk that would arise from the proposal is not unusual in comparison to that encountered at other UK airports.

6.157 The estimated risk is also dependent upon the numbers of future movements of different aircraft types. Historical accident data indicates that different types of

aircraft operation have different crash rates, for example freight operations have had higher crash rates per movement than civil passenger operations and executive jet aircraft typically have higher rates than commercial civil airliners. ASA consider the model used tends to overstate rather than underestimate risks for any given operations. Any concerns over growth above the level envisaged in the ES can be addressed by the imposition of a planning condition.

- 6.158 The ES recognises that there is potentially a risk of bird strike due to the presence of numbers of birds, including pink-footed geese, in the vicinity of the Airport. The CAA is responsible for ensuring that an airport has an appropriate bird management policy as part of its safety management systems as a condition of its licence. ASA realise that technically the risk of bird strike will increase as a result of higher traffic levels, but also consider that the Airport would still be able to apply the necessary preventative measures in order to meet CAA requirements.
- 6.159 In overall terms, ASA have confirmed that it is strictly the responsibility of the airport operator to ensure that safe operations are carried out in accordance with the conditions of the CAA Public Use Licence that the Airport possesses, or any variation to that which CAA authorises. Whilst there is a Carlisle Airport Safeguarding Map lodged with the City Council, this is to indicate where proposed development in the vicinity of the Airport should be subject of consultation with the airport operator. It does not, however, place any responsibility on the Council for aviation safety either within or outside of the Airport boundary. Similarly, although Public Safety Zones are in place at airports where the number of ATMs (Air Traffic Movements) by commercial aircraft is in excess of 30,000 ATMs per annum (when a statutory PSZ is required) this does not apply to Carlisle Airport. ASA point out that the level of future ATMs at Carlisle Airport will be significantly less than the 30,000 ATMs “trigger point” when a statutory PSZ is required but observe that it is *“nevertheless good practice to prepare a safety risk assessment for aviation-related planning applications”*.
- 6.160 Questions have been raised by interested parties concerning the safety benefit that might be gained from re-orientation of the main 25/07 runway. In order to justify not undertaking the re-orientation of the runway, the operator of the Airport would need to show that the costs associated with the runway re-orientation would be disproportionate to the risk reduction benefits that would be gained from it. It is to be expected that construction of a new, re-aligned runway would be more costly than resurfacing of the current runway and there may therefore be an argument that those additional costs would not be justified by the risk reduction benefit provided. ASA recommend that the ES should contain evidence that demonstrates whether a re-orientated runway would be disproportionately expensive and would not provide sufficient benefits to justify those costs.
- 6.161 In conclusion, it is considered that that there is no sound basis, in terms of bird strike risk or any other hazard risk, to resist the current proposal. The ASA recommendation concerning the option of re-orientating the runway should be

viewed in this context. Overall, the risks associated with the proposal are considered to be within acceptable limits.

Other matters

- 6.162 The previous decisions reached by the Committee with regard to application reference numbers 07/1127 and 08/1052 are considered to be relevant but not determinative when assessing the current proposal. Clearly the present application needs to be assessed in the light of current information specific to the proposal.
- 6.163 Objectors have highlighted that emissions from aircraft are an important contributor to climate change and global warming, and that such growth should not be encouraged. Paragraphs 3.35 to 3.43 of The White Paper “The Future of Air Transport” (2003) recognise that there is a debate about this issue, acknowledges the growing contribution of air transport to climate change, and outlines a number of avenues the Government is following to tackle the problem. In effect, it is considered that such concerns can only be addressed through a review and changes in Government policy that are beyond the remit of the assessment of this application.
- 6.164 Solway Aviation Museum has requested that any permission should include a Section 106 Agreement safeguarding the Museum. These concerns are noted but are considered not to fall within the ambit of this application.

Conclusion

- 6.165 The proposed distribution centre and associated development is not considered to be inward investment, relates primarily to road haulage that does not have a need to be located at the Airport, and does not involve a local business in the Brampton area. The proposal is therefore contrary to Policy EC22 of the Carlisle District Local Plan 2001-2016. No convincing evidence has been presented regarding the effectiveness of the proposed distribution centre as enabling development, with the forecasted flights for passengers and freight considered not to be realistic. The Airport related development is supported.
- 6.166 In overall terms, and against the background that the proposal is considered to be contrary to Policy EC22, it is also not sustainable in terms of being located at or near a transport interchange and does not bring forward measures that satisfactorily address the need to reduce the length and number of motorised journeys. The proposed freight distribution centre is a major generator of travel demand. Carlisle Airport cannot be regarded as being a major transport interchange, nor is it near such an interchange. Despite the contents of the submitted Travel Plan, by far the most convenient means of travelling to and from the Airport will remain the car. This is at a time when no convincing argument has been advanced that there is an essential need for the road haulage use to be located at the Airport that could not be addressed by the redevelopment of existing and available allocated sites in an identified sustainable development location. It is therefore considered that the proposal

would not meet sustainability objectives in terms of being located at or near a transport interchange and address the need to reduce the length and number of motorised journeys contrary to paragraph 42 of the Supplement to PPS1, paragraph 6 of PPG13, Policies DP5 and RT5 of the North West of England Plan Regional Spatial Strategy to 2021, the underlying objectives of Policy T31 of the Cumbria and Lake District Joint Structure Plan 2001-2016, Policy RT5 of the Local Transport Plan, and Policy DP1 of the Carlisle District Local Plan 2001-2016.

- 6.167 The Airport sits within a generally rolling and undulating landscape that is relatively open with a southern frontage onto the A689 and the Hadrian's Wall Path national trail with interconnecting public rights of way to the north and east. In such a highly visible location the proposed distribution centre and associated structures and lighting would have an adverse effect on the landscape character and an adverse effect on visual amenity from the east, south-east, along the Hadrian's Wall Path from Oldwall to Chapel Field, and the A689. The proposal is therefore considered contrary to Policies E34 and E37 of the Cumbria and Lake District Joint Structure Plan 2001-2016, and Policies DP3 and CP1 of the Carlisle District Local Plan 2001-2016.
- 6.168 In this particular case, having weighed up the arguments for and against the proposal, it is concluded that the proposal is in conflict with the development plan and that the conflict with sustainability objectives and the harmful impact caused, is not outweighed by the unsubstantiated socio-economic benefits.
- 6.169 The ES appears to be deficient in not having assessed how the additional passenger throughput will be managed (what additional building needed and the environmental consequences thereof). In law therefore permission could not be granted.

7. Planning History

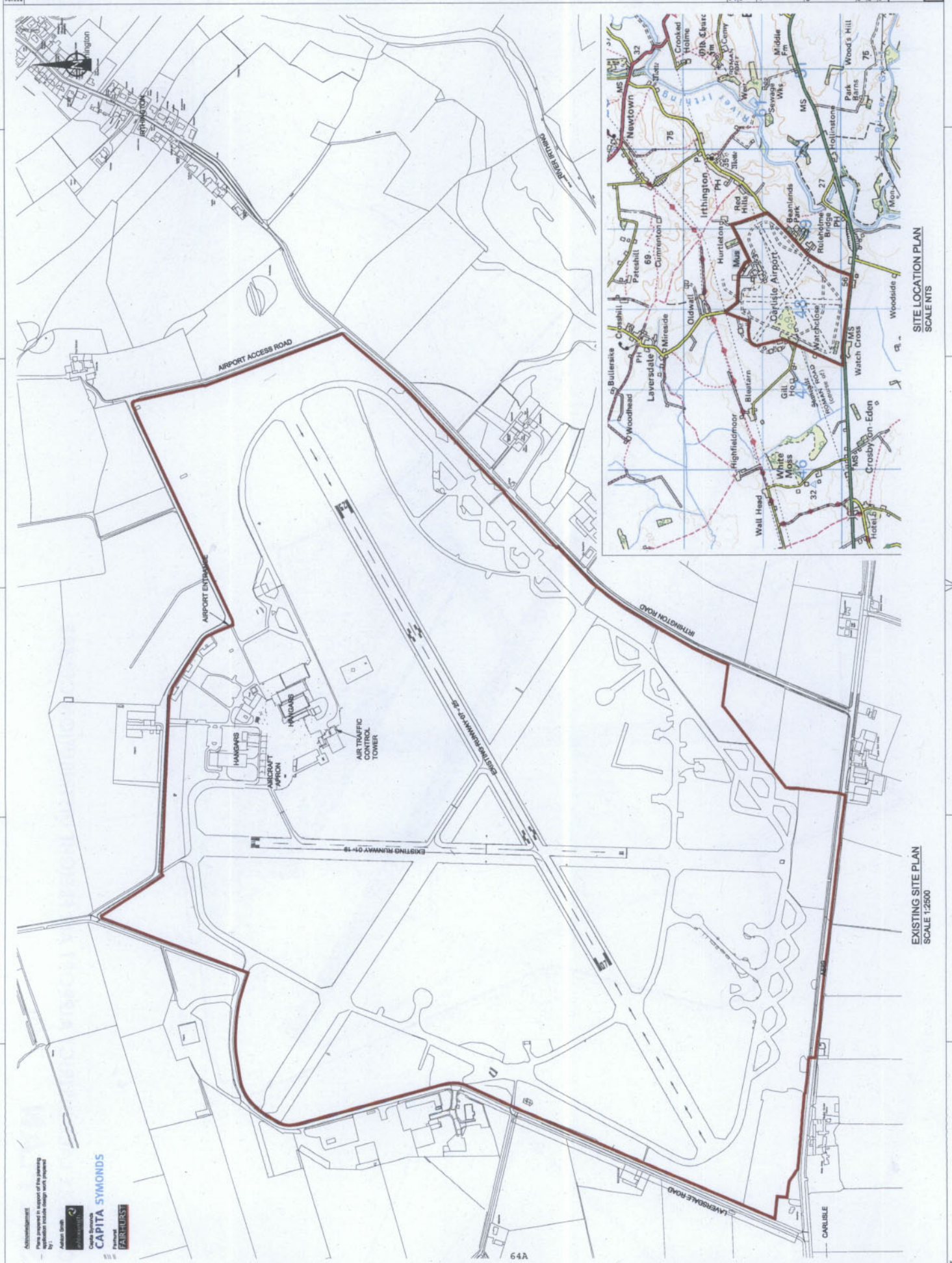
- 7.1 An application, reference number BA 2040, by Carlisle Corporation for planning permission to create a civil airport was made to Cumberland County Council in January 1959. Following an Appeal, against that authority's failure to give a decision within the statutory period the Minister of Housing and Local Government allowed the Appeal and granted planning permission subject to one condition that the siting, design and external appearance of any buildings, and the location and design of any accesses, and the extension or alteration of any existing buildings shall be as may be agreed with the Local Planning Authority.
- 7.2 In 1989, under application number 89/0898, outline planning permission was granted for the provision of small industrial units, flying training facilities, small business park, and a new airport terminal complex.
- 7.3 Also in 1989, planning application number 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.

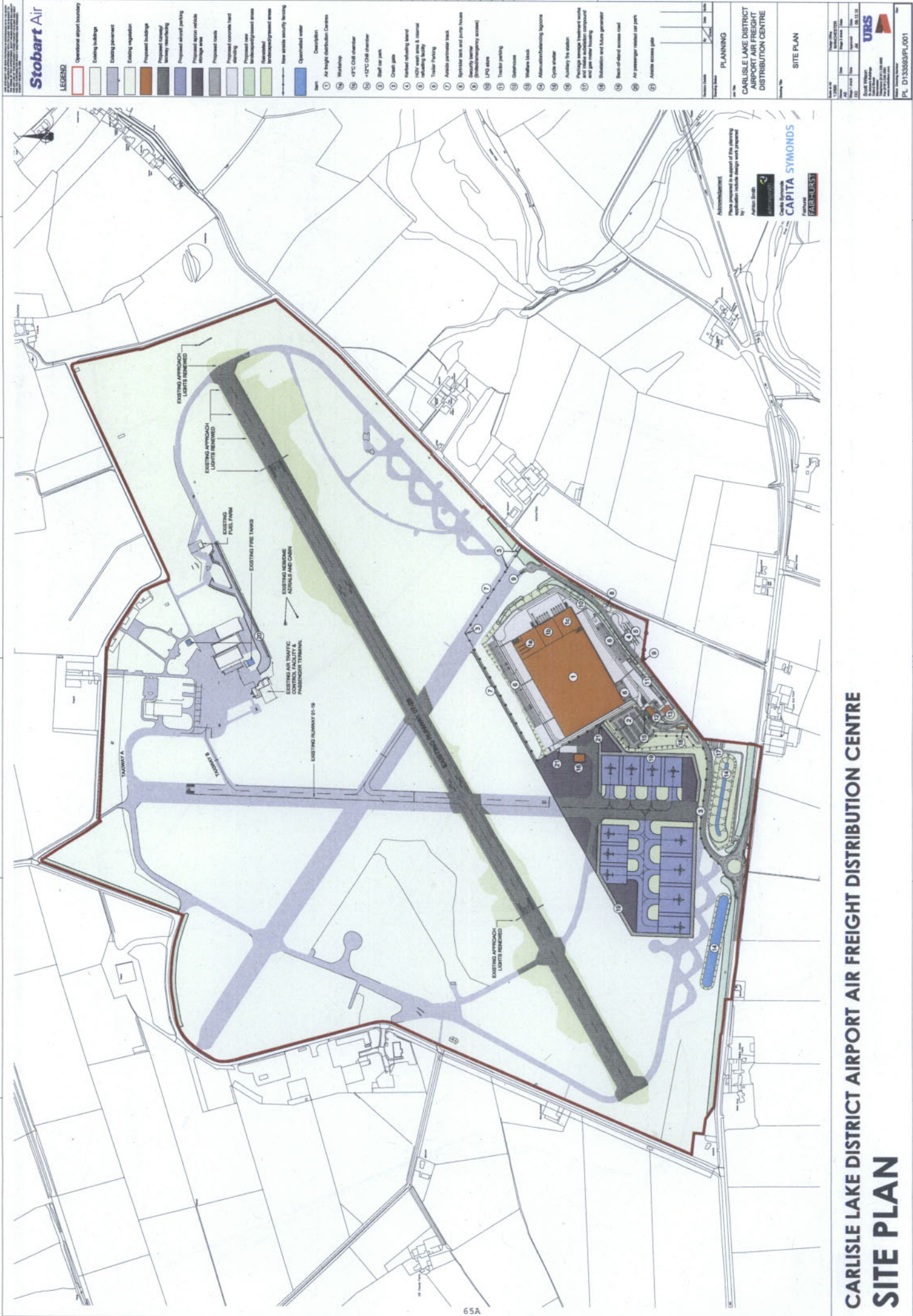
- 7.4 In 1994, full planning permission was granted for the erection of a hanger to house and maintain police support aircraft and for the temporary siting of 3 no. Portacabins for use as office and stores.
- 7.5 In 2001, under application numbers 01/1122 and 01/1123, full planning permission was granted for the erection of a new hangar to house aircraft; and an extension to the existing fire station, adding 3 no. 6m bays, to house further fire vehicles.*
- 7.6 In 2007, application number 07/1127, full permission was sought for a replaced and realigned runway and related aprons and taxiways, a new air traffic control tower, Instrument Landing System and other navigational aids including approach lighting, and an extensive building that was proposed to be used for warehousing, hangarage and as a Terminal. The Development Control Committee resolved to grant conditional permission but the application was withdrawn in July 2008 when called in by the then Government Office for the North West.
- 7.7 In 2008, application number 08/1052, full permission was sought for the erection of a freight storage and distribution facility (including chilled cross dock facility) with associated offices, gatehouse/office/ canteen/staff welfare facilities, new vehicular access, car and lorry parking, landscaping, new vehicular access, and other infrastructure works. The applicant indicated that it intended only to repair/resurface rather than replace the existing main runway and to use an existing building as a passenger terminal; and to rely upon permitted development rights for these elements. The application was approved by the Development Control Committee subject to the completion of a Section 106 Agreement to secure the renewal of the runway (to last for about 20 years) and the provision of passenger terminal facilities, the latter to be kept open for at least 10 years provided it was, in the opinion of the applicant, commercially viable to do so. This decision was later overturned in May 2010 by the Court of Appeal following a Judicial Review that found all aspects of the development, i.e. including the airport works as opposed to just the freight distribution centre, should have been the subject of an Environmental Impact Assessment

8. Recommendation: Refuse Permission

1. **Reason:** The proposed distribution centre and associated development is not considered to be inward investment, relates primarily to road haulage that does not have a need to be located at the Airport, and does not involve a local business in the Brampton area. The proposal is therefore contrary to Policy EC22 of the Carlisle District Local Plan 2001-2016. No convincing evidence has been presented regarding the effectiveness of the proposed distribution centre as enabling development, with the forecasted flights for passengers and freight considered not to be realistic. It is considered that the conflict with the Development Plan is not outweighed by the unsubstantiated socio-economic benefits.

2. **Reason:** The proposed freight distribution centre is a major generator of travel demand. Carlisle Airport cannot be regarded as being a major transport interchange, nor is it near such an interchange. Despite the contents of the submitted Travel Plan, by far the most convenient means of travelling to and from the Airport will remain the car. This is at a time when no convincing argument has been advanced that there is an essential need for the road haulage use to be located at the Airport that could not be addressed by the redevelopment of existing and available allocated sites in an identified sustainable development location. It is therefore considered that the proposal would not meet sustainability objectives in terms of being located at or near a transport interchange and address the need to reduce the length and number of motorised journeys contrary to paragraph 42 of the Supplement to PPS1, paragraph 6 of PPG13, Policies DP5 and RT5 of the North West of England Plan Regional Spatial Strategy to 2021, the underlying objectives of Policy T31 of the Cumbria and Lake District Joint Structure Plan 2001-2016, Policy RT5 of the Local Transport Plan, and Policy DP1 of the Carlisle District Local Plan 2001-2016.
3. **Reason:** The Airport sits within a generally rolling and undulating landscape that is relatively open with a southern frontage onto the A689 and the Hadrian's Wall Path national trail with interconnecting public rights of way to the north and east. In such a highly visible location the proposed distribution centre and associated structures and lighting would have an adverse effect on the landscape character and an adverse effect on visual amenity from the east, south-east, along the Hadrian's Wall Path from Oldwall to Chapel Field, and the A689. The proposal is therefore considered contrary to Policies E34 and E37 of the Cumbria and Lake District Joint Structure Plan 2001-2016, and Policies DP3 and CP1 of the Carlisle District Local Plan 2001-2016.
-





CARLISLE LAKE DISTRICT AIRPORT AIR FREIGHT DISTRIBUTION CENTRE

SITE PLAN

Stobart Air

- LEGEND**
- Operational airport boundary
 - Existing buildings
 - Existing pavement
 - Existing vegetation
 - Proposed buildings
 - Proposed landscape
 - Proposed parking
 - Proposed access roads
 - Proposed drainage
 - Proposed security fencing
 - Proposed security gates
 - Proposed security barriers
 - Proposed security lighting
 - Proposed security cameras
 - Proposed security gates
 - Proposed security barriers
 - Proposed security lighting
 - Proposed security cameras

- Item**
- 1 Air freight distribution centre
 - 2 Warehouse
 - 3 47°C Cold storage
 - 4 15°C Cold storage
 - 5 15°C Cold storage
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PLANNING

Carlisle Lake District Airport Air Freight Distribution Centre

SITE PLAN

Scale: 1:1000

North arrow

Legend

Stobart Air

URS

PL D133603PL001

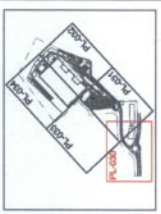


CARLISLE LAKE DISTRICT AIRPORT AIR FREIGHT DISTRIBUTION CENTRE DEVELOPMENT PLAN

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Stobart Air

KEY PLAN:



Revision	Drawn	By	Date	Scale
1				
2				
3				
4				
5				

PLANNING

Job Title
**CARLISLE LAKE DISTRICT
 AIRPORT AIR FREIGHT
 DISTRIBUTION CENTRE**

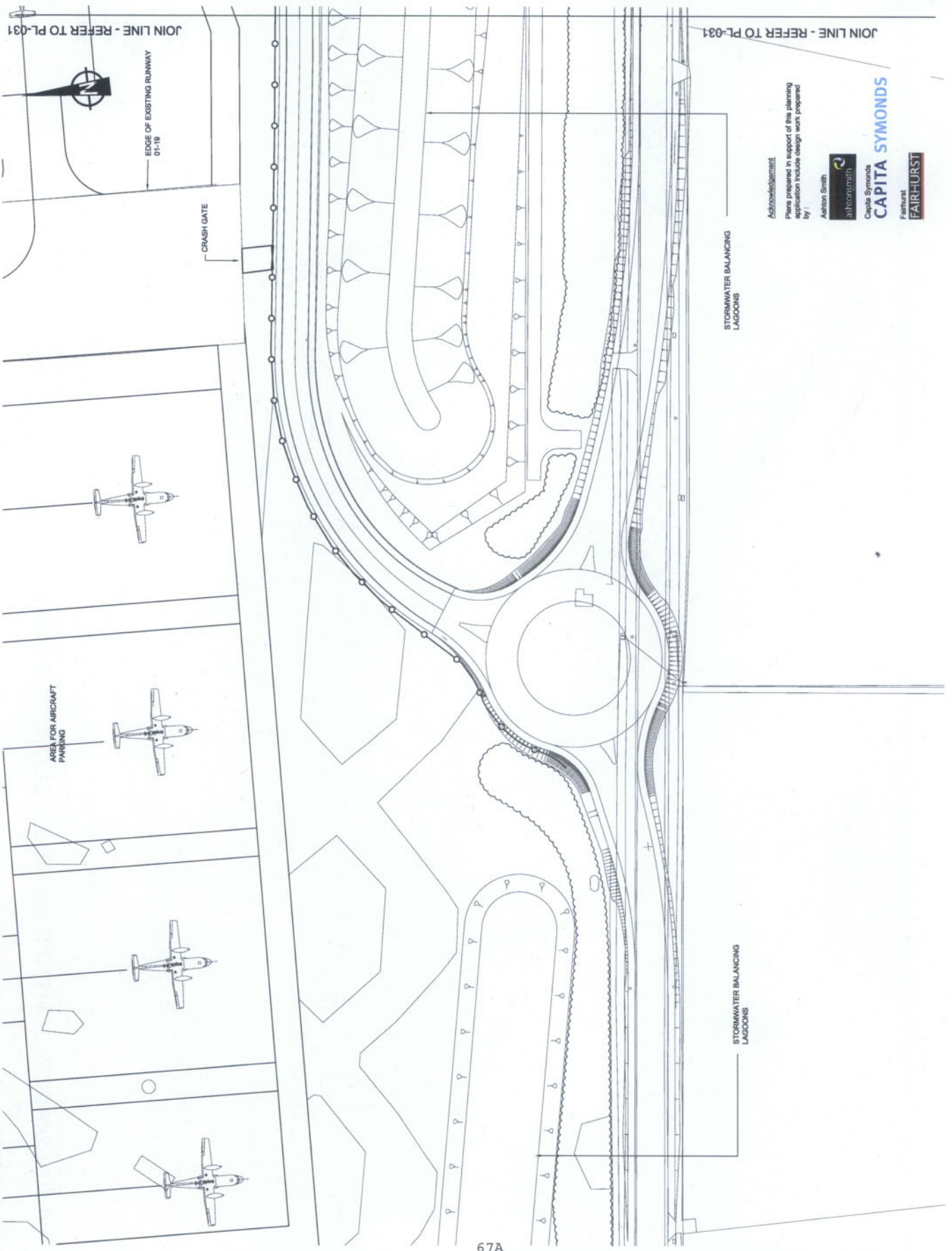
Drawn By
**DETAILED SITE PLAN
 SHEET 1 OF 5**

Scale at A1	Design Office	MANCHESTER
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1:500	Check	MANCHESTER
1:500	Stage 1 Check	MANCHESTER
1:500	Stage 2 Check	MANCHESTER
1:500	Approved	MANCHESTER
1:500	DO	MANCHESTER
1:500	08.12.10	MANCHESTER



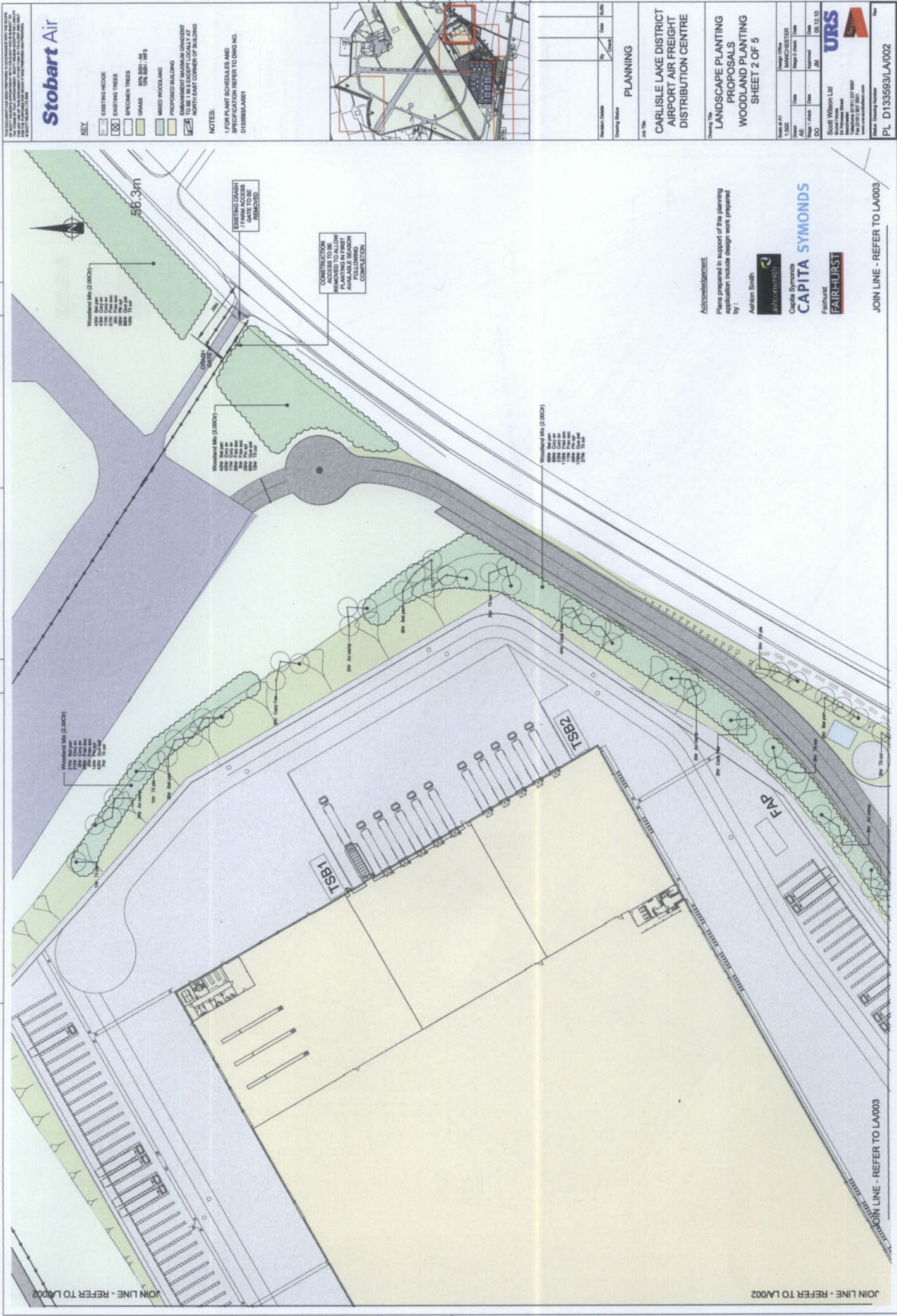
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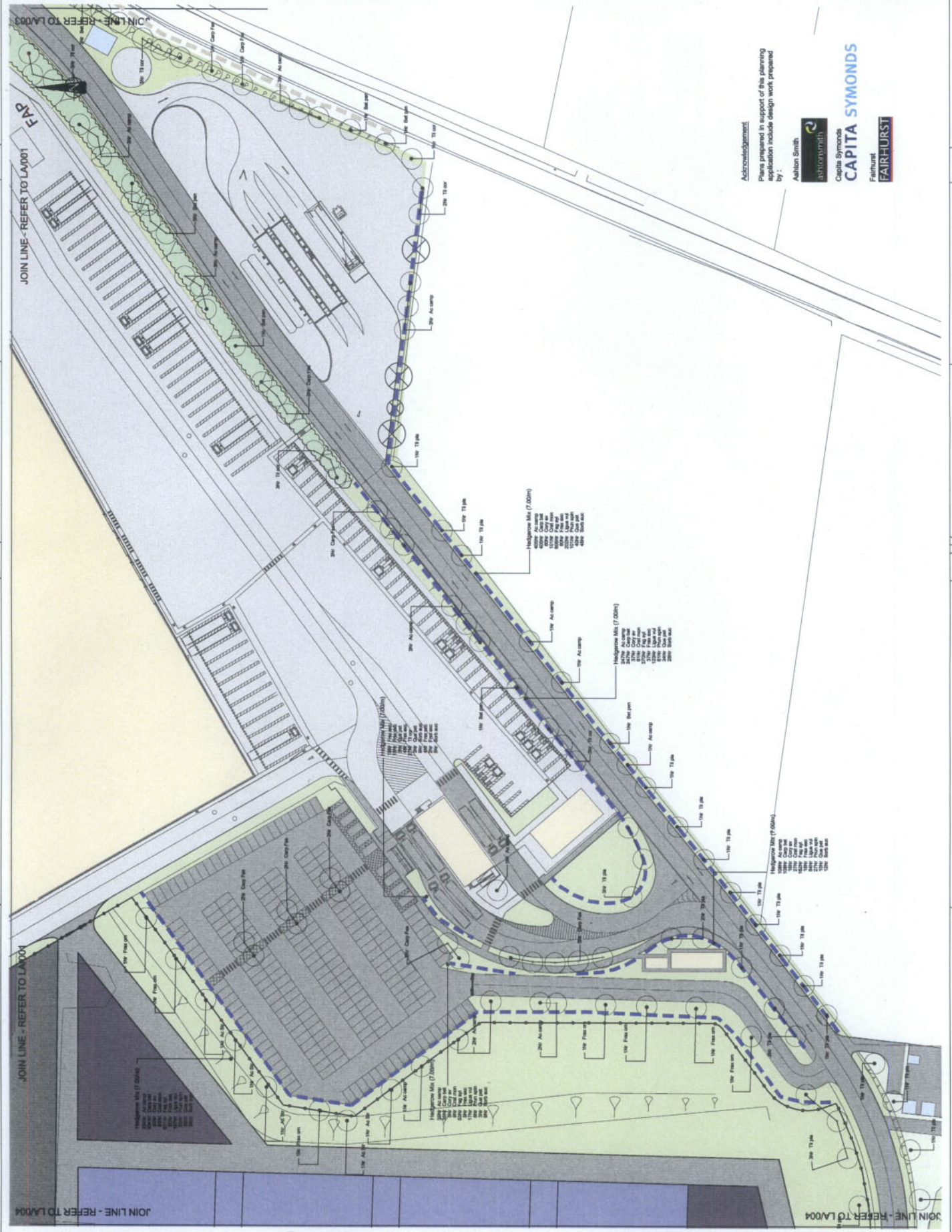
PL D133563/PLU030



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 Plans prepared in support of this planning application include design work prepared by:

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Acknowledgement

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PLANNING

Revision Details	By	Date	Initials
	Checked		

**CARLISLE LAKE DISTRICT
AIRPORT AIR FREIGHT
DISTRIBUTION CENTRE**

LANDSCAPE PLANTING
PROPOSALS
WOODLAND PLANTING
SHEET 3 OF 5

Scale at A1	Design Office		
1:500	MANCHESTER		
Drawn AE	Date	Stage 2 check	Date
Single 1 check	Date	Approved	Date
DO		JM	09.12.10

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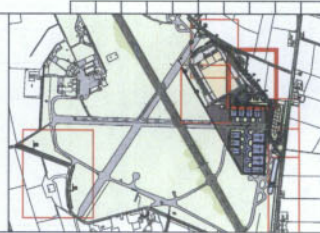
Stobart Air

KEY

- | | |
|---|--|
|  | EXISTING TREES |
|  | EXISTING HEDGE |
|  | SPECIMEN TREES |
|  | GRASS |
| | 90% BSH - A4
10% BSH - WFS |
|  | HEDGE |
|  | MIXED WOODLAND |
|  | PROPOSED BUILDING |
|  | ELEVATION MAXIMUM GRADIENT
TO BE 1 IN 3 |

NOTES:

1.FOR PLANT SCHEDULES AND
SPECIFICATION REFER TO DWG NO.
D133583JLA/001



Stobart Air

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KEY

- SPECIMEN TREES
- GRASS
- HEDGE
- MIXED WOODLAND
- PROPOSED BUILDING
- PROPOSED MAXIMUM GRADIENT
- 100M 1:10

NOTES

1. FOR PLANT SCHEDULES AND
2. FOR GRADIENTS REFER TO DWG NO.
D133593/LA/001

PLANNING

Carlisle Lake District
Airport Air Freight
Distribution Centre

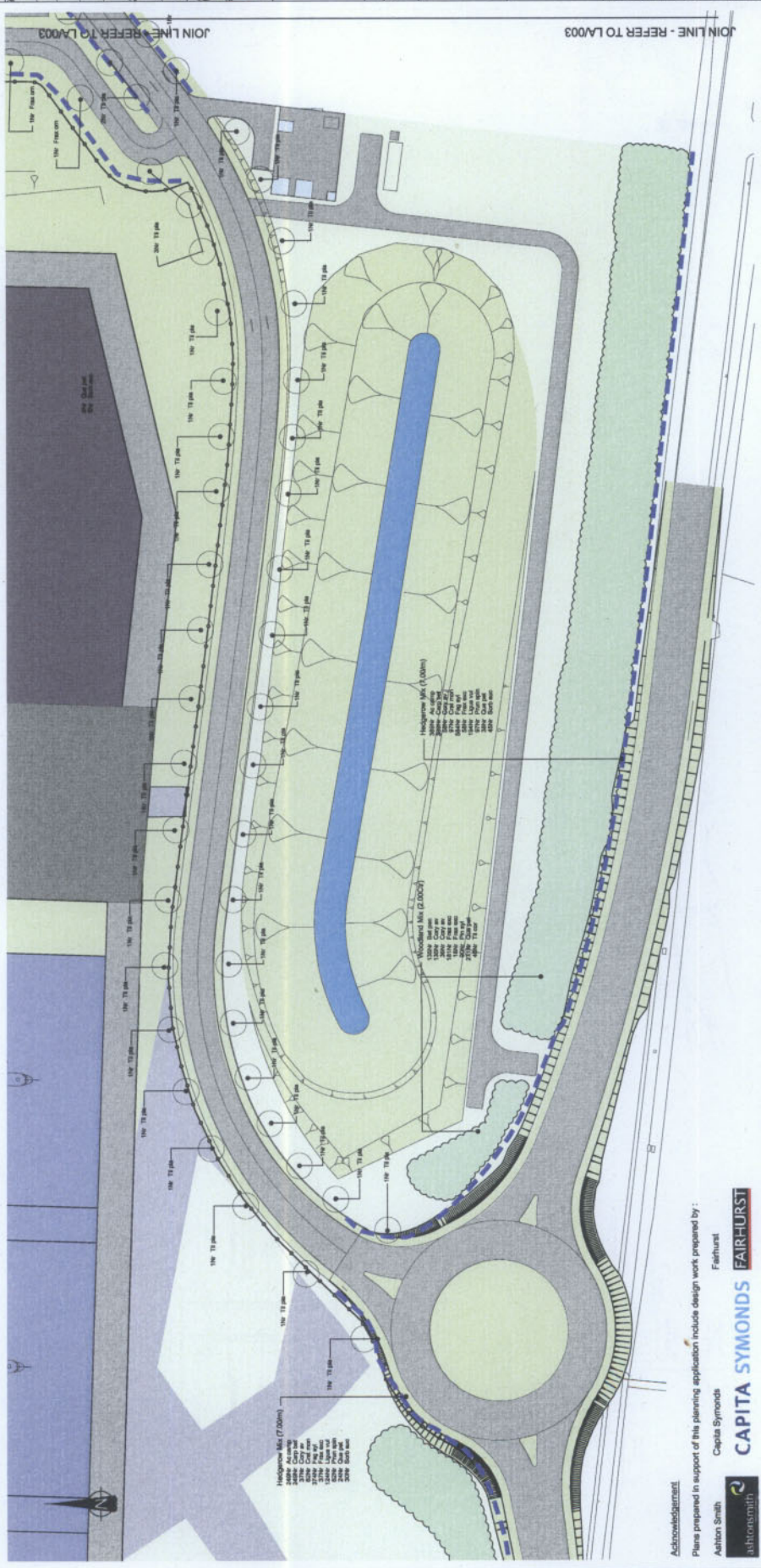
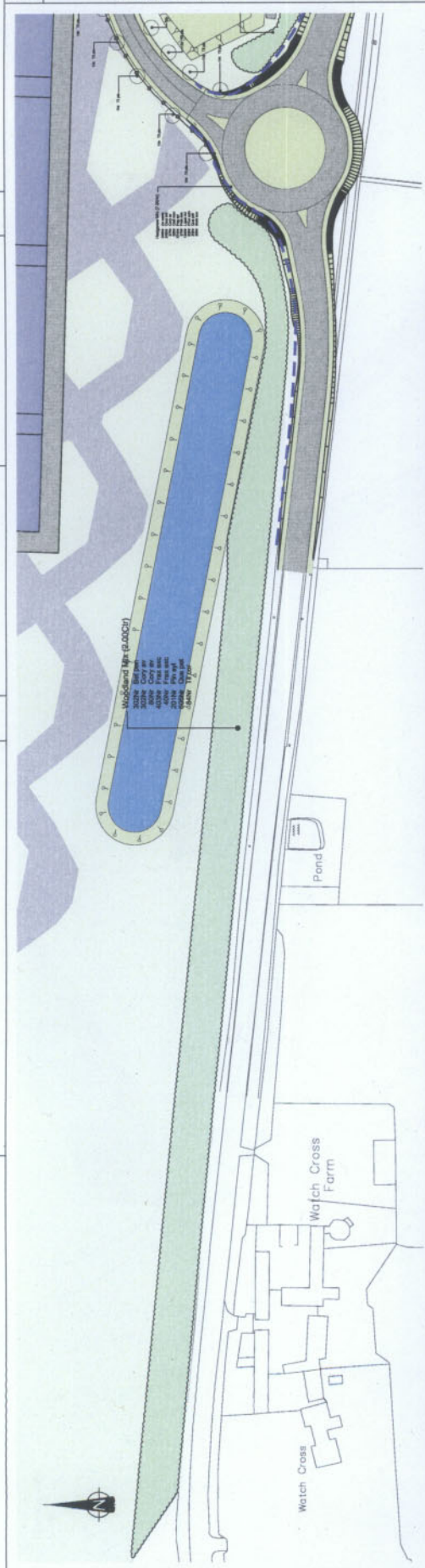
LANDSCAPE PLANTING
PROPOSALS
WOODLAND PLANTING
SHEET 4 OF 5

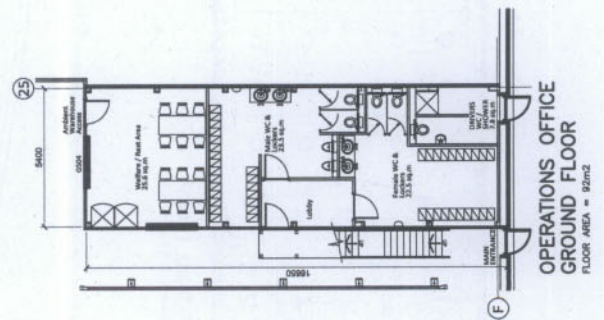
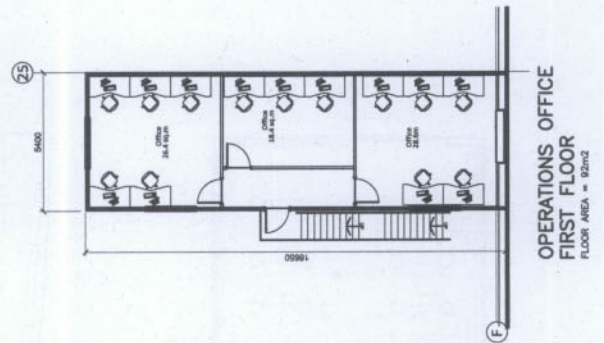
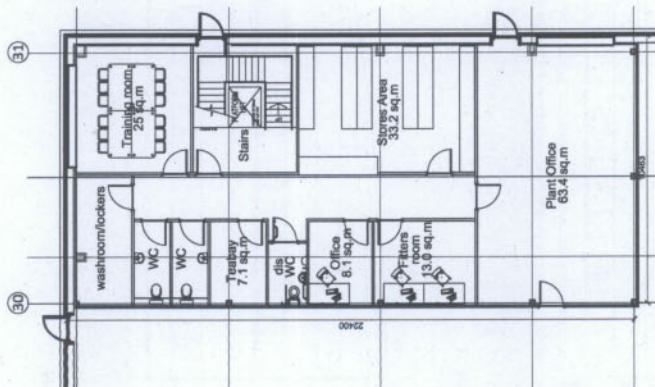
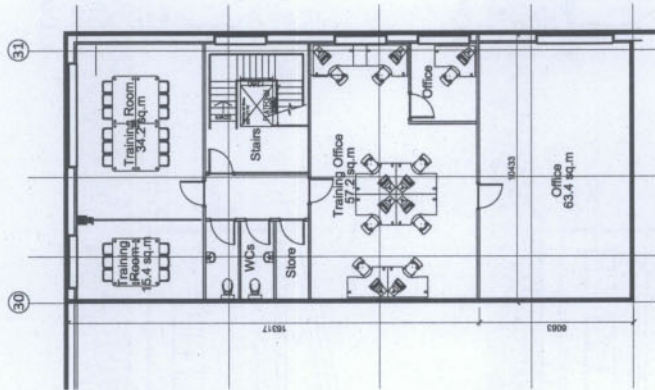
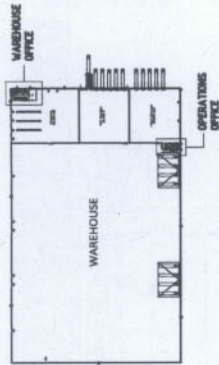
Drawn by	Checked by	Scale	Date
AD BROWN	MANCHESTER	1:1000	10.12.10
AE	Stage 2 Plans	Drawn	
DO	Stage 1 Plans	Drawn	
DO	Approved	Drawn	

URS

Scott Wilson Ltd
100 Victoria Road
Barnsley S70 2BA
Tel: 0114 207 0007
Fax: 0114 207 2001

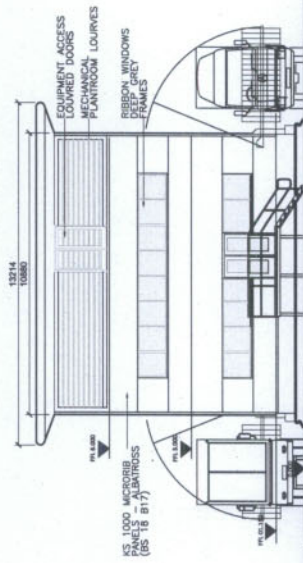
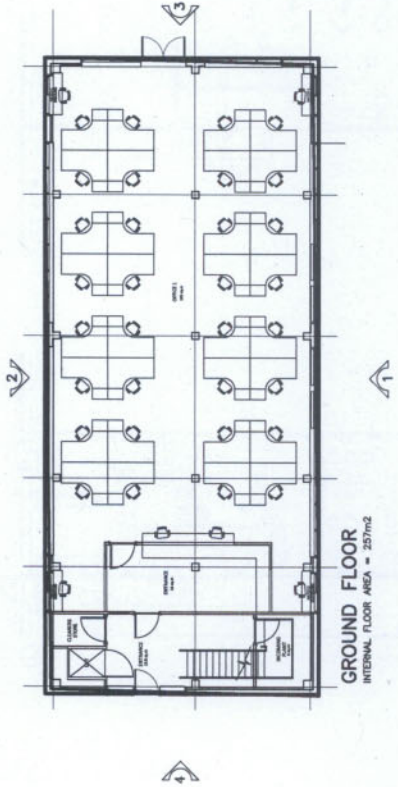
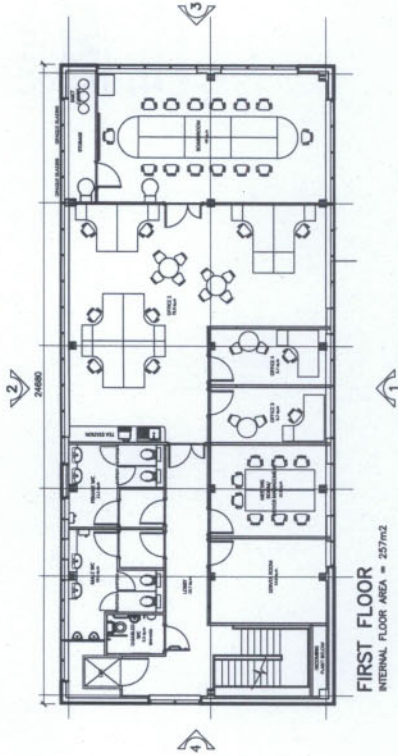
Project: Stobart Air
Drawing: Landscape
PL D133593/LA/004



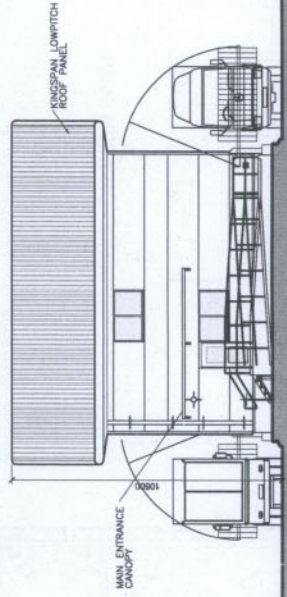


Revision Details	By	Date	Scale
Drawing Status	Rev	1	1:500
PLANNING			
CARLISLE LAKE DISTRICT AIRPORT AIR FREIGHT DISTRIBUTION CENTRE			
AIR FREIGHT DISTRIBUTION CENTRE WAREHOUSE OFFICE & OPERATIONS OFFICE PLANS			
Client	Project	Drawn	Checked
URS	WILKINSON	WILKINSON	WILKINSON
Stage 1: Initial	Stage 2: Main	Stage 3: Detail	Stage 4: Final
WILKINSON	WILKINSON	WILKINSON	WILKINSON
15.12.2010	15.12.2010	15.12.2010	15.12.2010
Scott Wilson Ltd 151 Farnham Road Farnham, Surrey GU14 7AB Tel: 01253 377 887 Fax: 01253 377 887 Email: info@scottwilson.co.uk			
Drawing Number D133593JA/1004			

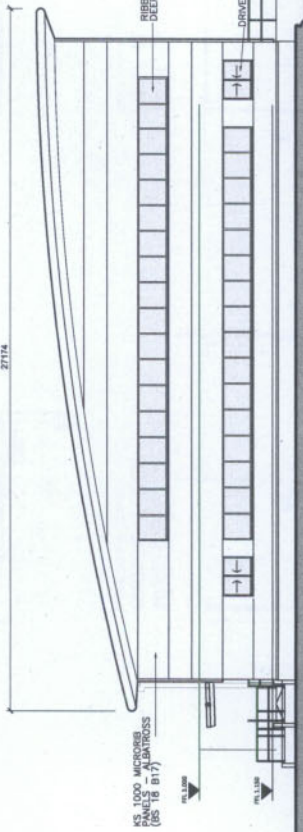
Acknowledgements
Plans prepared in support of this planning application have been prepared by:
Author: Smith
ashonm
Capita Symonds
CAPITA SYMONDS
Fairhurst
FAIRHURST



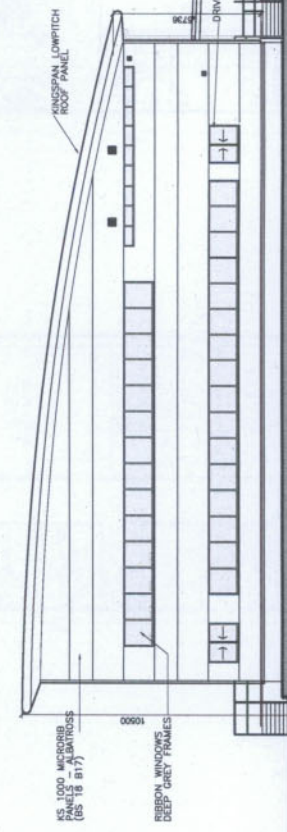
ELEVATION 3



ELEVATION 4



ELEVATION 1



ELEVATION 2

Revision	Drawn	By	Date
1	VP	VP	10/12/2010

PLANNING
CARLISLE LAKE
DISTRICT AIRPORT
AIR FREIGHT
DISTRIBUTION CENTRE

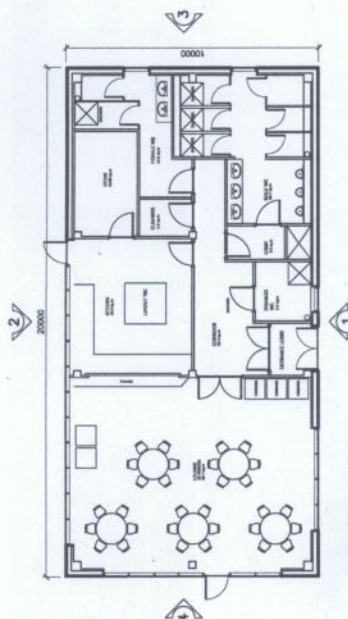
**GATEHOUSE PLANS
& ELEVATIONS**

URS
Scott Wilson Ltd
Bristol House
100 Victoria Road
Bristol, Avon, BS1 6QJ
Tel: 0117 933 3300
Fax: 0117 933 3301
www.urs.co.uk

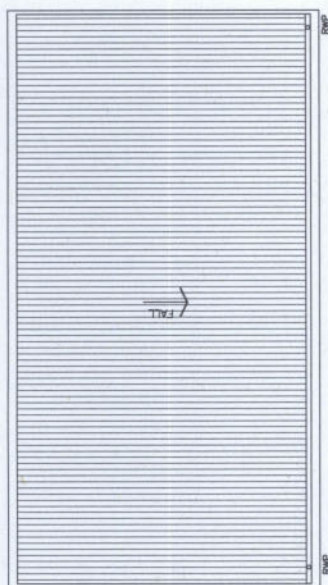
Capita Symonds
Fairhurst
D133593/A/1005

Capita Symonds
Fairhurst
D133593/A/1005

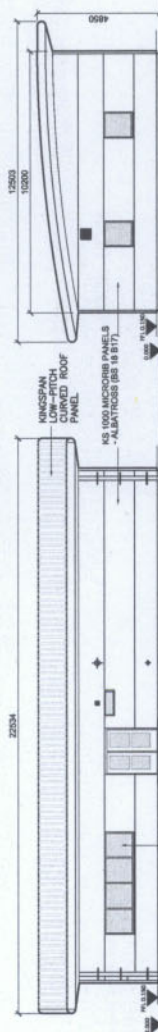
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Fairhurst
D133593/A/1005



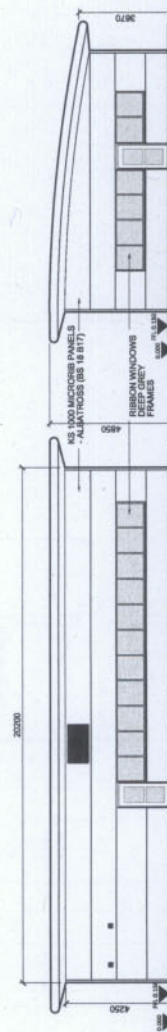
GROUND FLOOR
INTERNAL FLOOR AREA = 192m²



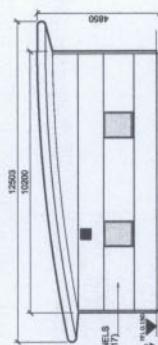
ROOF PLAN



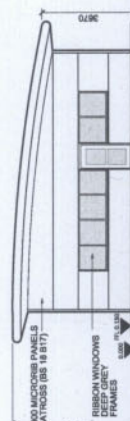
ELEVATION 1



ELEVATION 2



ELEVATION 3



ELEVATION 4

			By	Date	Status
Inventory Details					
Traveling Status					

**CARLISLE LAKE
DISTRICT AIRPORT
AIR FREIGHT
DISTRIBUTION CENTRE**

WELFARE
PLANS & ELEVATIONS[illegible]

URS

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www.urs-scottwilson.com

Ordering Number
D133593/A/1006



① FUEL ISLAND



② ABOVE GROUND FUEL TANKS



③ SPRINGLER TANK AND PUMP ROOM



④ VEHICLE WASH AND PLANT ROOM



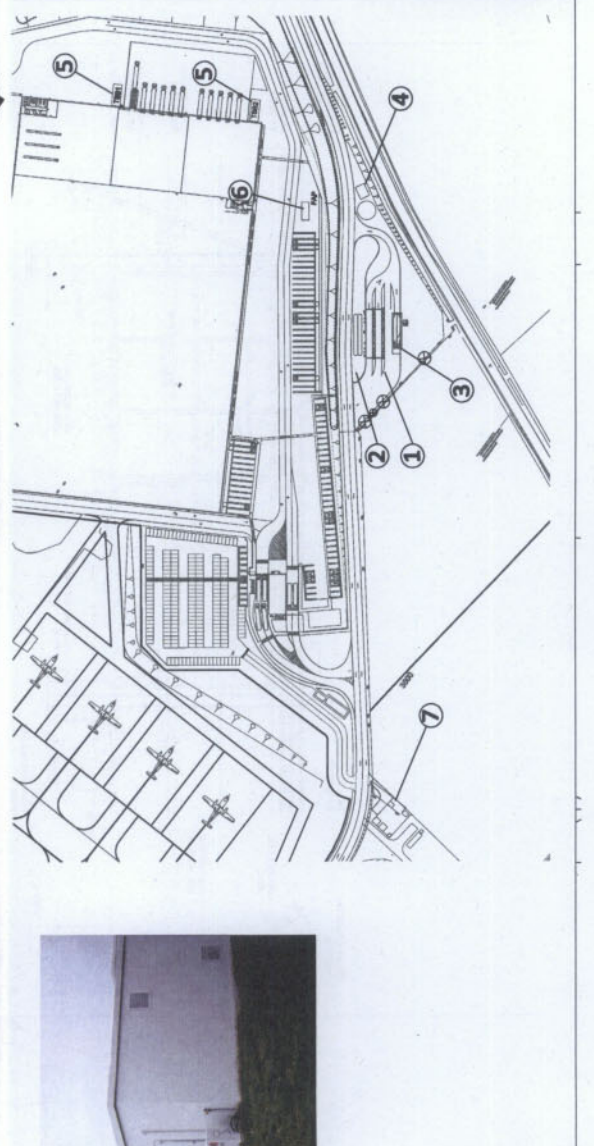
⑤ SUBSTATION



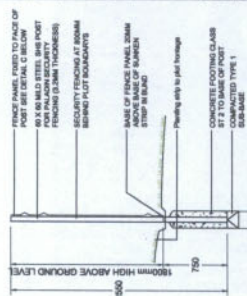
⑥ LNG TANK



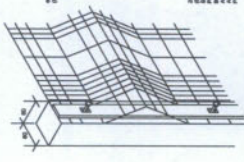
⑦ TYPICAL PLANT & EQUIPMENT IMAGES



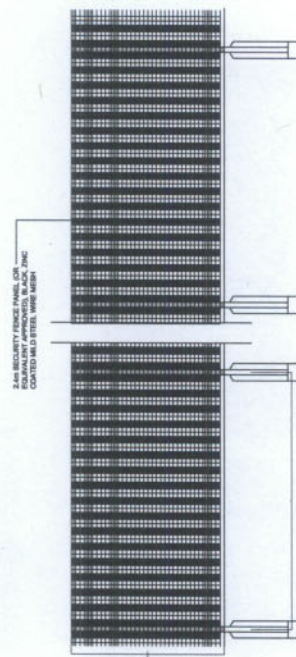
Revision	Number	Description	By	Date	Scale
1	1	PLANNING			
2	2	CARLISLE LAKE DISTRICT AIRPORT AIR FREIGHT DISTRIBUTION CENTRE			
3	3	TYPICAL PLANT & EQUIPMENT IMAGES			
4	4	MANCHESTER			
5	5	MANCHESTER			
6	6	MANCHESTER			
7	7	MANCHESTER			
8	8	MANCHESTER			
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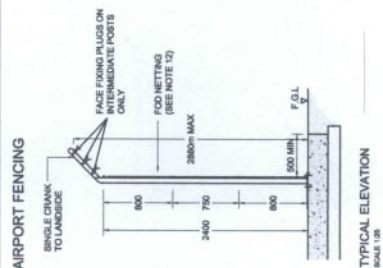
TAIL OF POST
E 1.25
DISTRIBUTION CENTRE FENCING



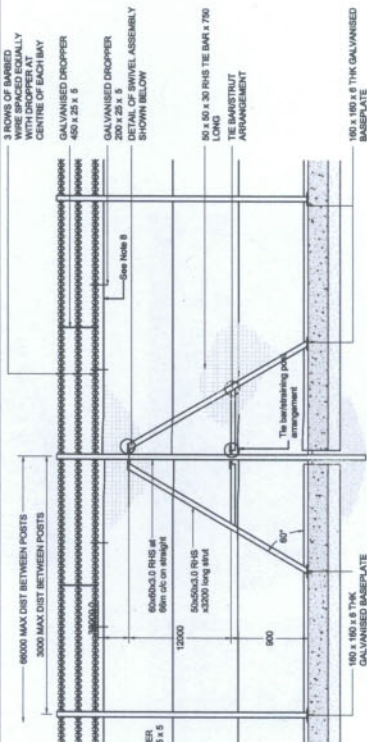
DISTRIBUTION CENTRE FENCING



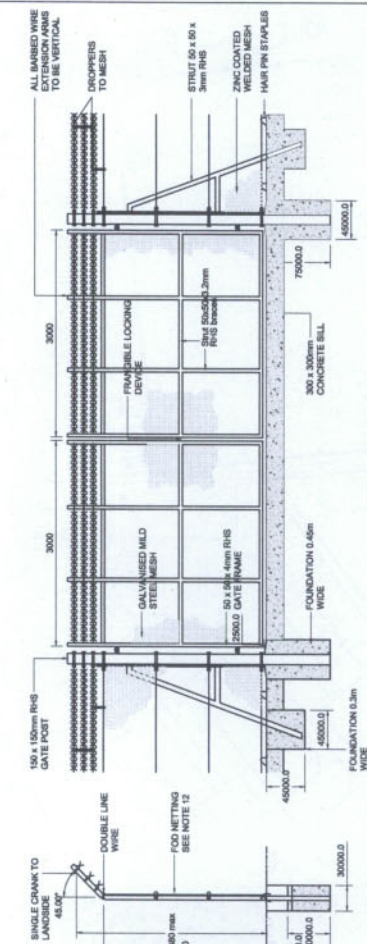
TYPICAL ELEVATION ———



AIRPORT FENCING

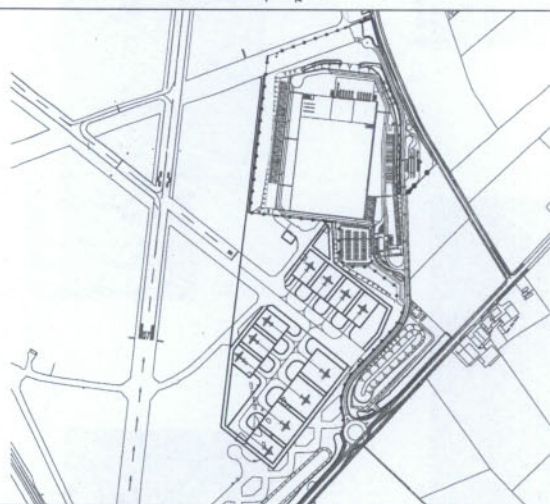


VG



TYPICAL CRASH GATE
SCALE 1/25

SECTION 1-1
SCALE 1:25



KEYPLAN : NTS (SEE DRG PL_060)

This document has been prepared in accordance with the scope of work set out in the contract and is subject to the terms of the contract. It is not to be used for any other purpose without the written consent of URS Scott Wilson 2011

Key



Existing sewerage



UU owned pumping station



Proposed foul drainage



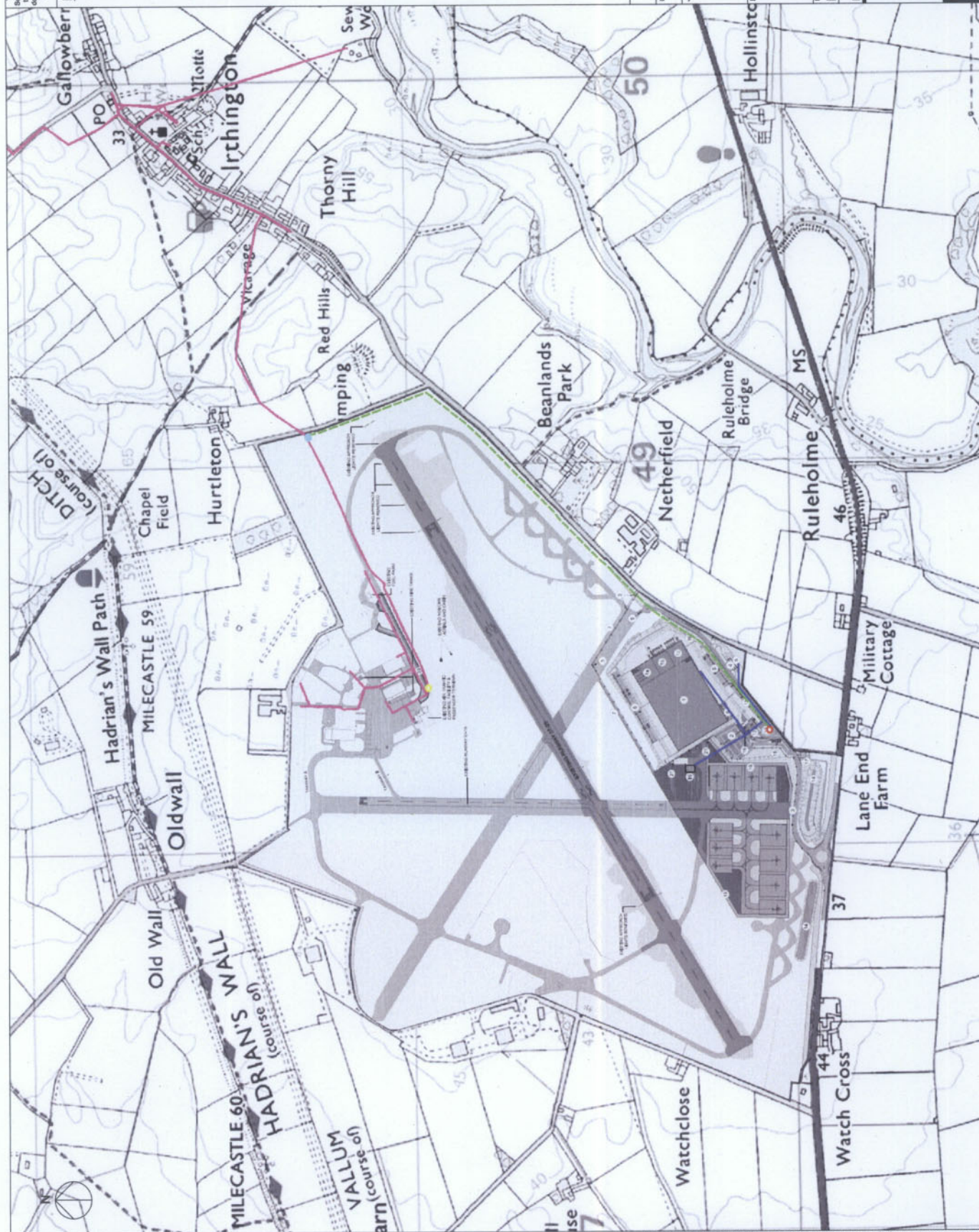
Foul drainage pumping station



Indicative route of rising main



New discharge chamber. Details of pumping arrangement to be agreed with UU at detail design stage.



Revision Details

By Check Date

PLANNING

Carlisle Lake District Airport Distribution Centre

PROPOSED CONNECTION TO PUBLIC SEWER

Drawing Title

Scale of A3

NTS

RB

MS

App

Date

JUN 2011

URS

URS Scott Wilson

Weston

Leeds

LS1 1BA

Telephone (0113) 204 5000

Fax (0113) 204 5001

D133593/PL/076

A