

Development Control Committee Main Schedule

Schedule of Applications for
Planning Permission

PART 2

19th December 2008

SCHEDULE A: Applications with Recommendation

08/1052

Item No: Date of Committee: 19/12/2008

Appn Ref No:
08/1052

Applicant:
Stobart Air Ltd

Parish:
Irthington

Date of Receipt:
14/10/2008

Agent:
Scott Wilson Ltd

Ward:
Stanwix Rural

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

Grid Reference:
348000 561000

Proposal: Erection Of A Freight Storage And Distribution Facility Including Chilled Cross Dock Facility (Use Class B8) With Associated Offices (Use Class B1), Gatehouse/Office/ Canteen/Staff Welfare Facilities, Landscaping, New Vehicular Access, Car And Lorry Parking And Other Infrastructure Works.

Amendment:

REPORT

Case Officer: Alan Taylor

Reason for Determination by Committee:

This application has been included in the Schedule as it is of major local significance, raises considerable Planning Policy issues and has attracted a large number of representations and associated requests for "Rights To Speak".

1. Constraints and Planning Policies

Ancient Monument

Site Of Nature Conservation Significance
Airport Safeguarding Area

Contaminated Land

RSS Pol RDF 1 - Spatial Priorities

RSS Pol DP 1 - Spatial Principles

RSS Pol DP 2 - Promote Sustainable Communities

RSS Pol DP 3 - Promote Sustainable Economic Development

RSS Pol DP 4 - Make Best Use Exstg.Resources&Infrastructure

RSS Pol DP 5 - Manage Travel Demand. Reduce Need to Travel

RSS Pol DP 6 - Marry Opportunity and Need

RSS Pol DP 7 - Promote Environmental Quality

RSS Pol DP 8 - Mainstreaming Rural Issues

RSS Pol DP 9 - Reduce Emissions & Adapt to Climate Change

RSS Pol RT 5 - Airports

RSS Pol RT 7 - Freight Transport

RSS Pol W 3 - Supply of Employment Land

RSS Pol W 2 - Locations Reg.Significant Economic Development

RSS Pol CNL 1 - Overall Spatial Policy for Cumbria

RSS Pol CNL 2 - Sub-area Development Priorities for Cumbria

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

Joint Str. Plan Pol EM13: Employment land provision

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

Joint St. Plan Pol E37: Landscape character

Joint St. Plan Pol E38: Historic environment

Joint St. Plan Pol T30: Transport Assessments

Joint St. Plan Pol T31: Travel Plans

Local Plan Pol DP3 - Carlisle Airport

Local Plan Pol EC22 - Employment & Commercial Growth Land Al

2. Summary of Consultation Responses

Allerdale Borough Council: the Council fully supports the principles of this development. The Council is particularly keen for such development to support the

long-term viability of Carlisle Airport, which in turn will help support the economic development of the sub-region. This is a key opportunity, likely to benefit the whole of north and west Cumbria in particular, safeguarding jobs and supporting the local economy;

British Horse Society: consultation returned undelivered;

Civil Aviation Authority: no comment other than to confirm that, under license conditions, changes in the physical characteristics of the aerodrome, including the erection of new buildings and alterations to existing buildings or to visual aids shall not be made without the prior approval of the CAA. This is a matter for discussion between the license holder and the CAA and is a quite different process from the Town and Country Planning procedures.

The application for planning permission and the request for CAA approval are not inter- dependent and are made separately at the times chosen by the applicant;

Community Services - Drainage Engineer: no comments received;

Council for Protection of Rural England/Friends of the Lake District: awaited;

Cumbria Chamber Of Commerce And Industry: awaited;

Cumbria County Council - (Archaeological Services): the archaeologically sensitive areas that were affected by the original application on the site are avoided because of the reduced scope of this proposal. Furthermore, the area of the prop[osed development has been archaeologically evaluated and the results indicate that no significant remains will be disturbed. There are, therefore, no recommendations or comments to make on the proposals;

Cumbria Constabulary - Crime Prevention: the application has been considered from a Community Safety and Architectural Liaison viewpoint. It is encouraging to note the comments in the Design and Access Statement (Section 3.08 - Security), following the police response to the previous application (Reference 07/1127). Cumbria Constabulary is satisfied that a package of robust measures shall be implemented by the applicant, particularly in response to continuing offences being committed against the road haulage industry. Any security matters relating to airport activity shall be influenced by TRANSEC. The Constabulary look forward to further involvement with this project, in the event of the application being approved;

Cumbria County Council- Head of Economic Development: I acknowledge that the County Council has been formally consulted on this proposal as a Category 1 Planning Application, but in view of the potential importance that this development could have on the economy of Cumbria, I wish to add my support separately, as Head of the Economic Development Unit.

The Economic Impact Appraisal makes it quite clear that the proposed freight storage and distribution facility is crucial in providing cross subsidy for the aviation operations and hence the long term sustainability of the airport. Evidence throughout the country demonstrates that small regional airports are not viable without income generated from non aeronautical activities.

The contribution that an operational airport can make towards strengthening this remote region's economy is recognised in numerous national, regional and local economic development strategies. Enhanced connectivity can increase business productivity and competitiveness, improve the attractiveness of the region for inward investment, help reach new markets, reduce perceptions of isolation, support the development of Britain's Energy Coast and stimulate an increase in high value tourists. It can also assist the plans for Carlisle Renaissance and the City's proposals for a housing growth point.

Equally the marked underperformance of the Cumbrian economy between the mid 1990's and 2002 and the need for transformational activity to help drive up the County's Gross Value Added is well documented. The airport can be the driver of a step change in the area's economic growth and offers an opportunity to stimulate GVA through improved connectivity with the rest of the UK.

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

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

I believe the proposed development at Carlisle Airport has the potential to positively transform Cumbria's image and dispel its popular perception as a peripheral business location. I would urge you therefore to give due consideration to the above economic arguments in determining the application. I should make clear that these are officer views based on existing plans and policies which recognise the economic importance of the development of the airport to Carlisle and Cumbria. As a consultee on strategic planning applications the County Council, through its Development Control and Regulation Committee, will consider the application taking into account all material planning factors and the Committee's views will be submitted to you in due course;

Cumbria County Council - (Highway Authority): comments included in response as Strategic Planning Authority;

Cumbria County Council (Strategic Planning Authority) Wind Energy Consultations: comments on landscape issues addressed within response as Strategic Planning Authority (see below);

Cumbria County Council - Transport & Spatial Planning: the application was considered by the Development & Regulation Committee of the County Council on 25th November when it was resolved that "No Objection" be raised subject to the City Council having regard to the matters set out in the Committee Report and ensuring that the developer:

- Provides a S106 planning agreement to secure the planned improvement to the airport infrastructure and ensure that future development is related to the airport location;
- Modifies the proposals in order to allow for the proposed freight facility to be accessed from the runway;
- Enters into a S106 planning agreement to secure delivery of the actions in the Travel Plan and a bus service to serve the development upon occupation; and that the City Council:-
- Undertakes an assessment of the ecological impacts of the development and seeks an appropriate biodiversity protection, mitigation, compensation and enhancement package;
- Establishes from the developer that the width of the proposed woodland belt on the southern boundary of the site is at least 15m wide;

Cumbria Fire Service: no comments on this application but any building, when occupied, will become subject to the requirements of the Regulatory Reform (Fire Safety) Order 2005;

Cumbria Tourism: All of the previously stated arguments [see Cumbria Tourism's 30 October 2007 response] remain valid – indeed in the current economic climate, the need for economic regeneration in Cumbria is now even more pronounced and the economic imperative more urgent.

A year on and Cumbria still has no prospect of international airport services, which is a serious disadvantage and detracts from the County's image in today's global market place. The planned development of Carlisle Airport has the potential to improve connectivity and significantly enhance Cumbria's reputation as an accessible destination for both tourism and inward investment. Cumbria Tourism recognises the need for development to support the viability of passenger and freight air services.

The airport is a major plank in the Cumbria Economic Plan and is recognised as a key opportunity to help address the county's poor connectivity with regional, national and international markets, the goal being to *"enhance the connectivity between all areas of the county, the UK and the rest of the world, to support economic growth and encourage inward investment"*.

The recently commissioned and independent report - "Economic Impact Appraisal for Carlisle Airport" [EKOS for Cumbria Vision, October 2008] presents the most contemporary perspective and crucially, demonstrates the strategic fit for the development of Carlisle Airport; *"the report reviews a wide range of national, regional, sub-regional and local policy and strategic frameworks aimed at identifying the extent to which the development proposal is supported by and is supportive of their aims and objectives and contributes to their achievement...the Stobart proposal fits these policy requirements and provisions"*.

Specifically in relation to tourism opportunities, the report highlights the airport as an under-developed resource that has the potential to stimulate further economic growth and regeneration, including *“the potential to grow the number of high value tourists from London/ SE and Europe”*.

- ◆ “Making the Dream a Reality”, the Tourism Strategy for 2008-2018: has a vision to establish Cumbria as the number one rural destination in the UK. *“Destinations all over Europe are easily and cheaply reached on low cost flights...meanwhile in the UK, the renaissance of our cities has seen a huge growth in the popularity of city breaks and rural destinations from North Wales to the Peak District are promoting themselves as the ideal get-away”*. Cumbria must be able to compete with these European and UK destinations and the airport will play a major role in making this possible. Similarly, much of the county’s tourism development potential lies beyond the Lake District National Park boundaries, offering significant economic opportunities for many areas, including the Solway, Borders, Hadrian’s Wall and North Pennines etc, which would benefit from easier access by air.
- ◆ International Visitor Survey, 2007: more than 2/5 of overseas visitors used a hired vehicle for some or all, of their journey to Cumbria, once in the UK. Those arriving by air flew into airports throughout the UK but the majority arrived into London Heathrow [46%] or Manchester [25%] – better links from these airports to Cumbria by air [via Carlisle airport] could help to reduce the dependence on the car as the primary mode of travel to Cumbria.
- ◆ Cumbria Visitor Survey, 2006: shows overseas visitor numbers to Cumbria fairly static at 9%, i.e. approximately one in ten. This figure has risen only slightly since 1996, when the figure was 8%. Significantly, those arriving from overseas were more likely to be “day visitors” staying outside Cumbria; there is the potential to increase the number of both overseas visitor numbers and the likelihood of more staying visitors to Cumbria if it was easier for overseas visitors to reach the county by air.
- ◆ 2012 Olympics: spreading the benefits to the regions – the airport would significantly increase Cumbria’s chances of attracting more overseas visitors to the UK on the back of the games. The Northwest Development Agency [2012 Legacy Framework] has recognised that *“the 2012 Games offer an ideal opportunity to capitalise on the region’s undoubted tourism strengths and present the Northwest and its assets to an international audience”*. However, for this aspiration to be realised, there needs to be improvements to the transport infrastructure. The Regional Tourism Strategy therefore sets out priority actions, including “Easy Access – making it easy for visitors to get to and travel around the region”.
- ◆ Competition / Lost Opportunity for Cumbria?: one only has to look at the impact Robin Hood Airport has had since it opened 3 years ago on former RAF Finningley site, serving Doncaster / Sheffield area with wider catchment of Yorkshire, Nottinghamshire and Lincolnshire. Currently handling 1 million passengers p.a. flying to/from 40 different destinations, it has had a significant impact on the local economy. Ryanair was recently quoted as having helped

to bring £17.6m of visitor spend to the area last year via Robin Hood airport. Meanwhile, Durham Tees Valley Airport [Darlington] handles 700k passengers p.a. to/from 20 destinations and markets itself as the Gateway to North East England, with regular flights to and from London Heathrow. Their target is to handle 3m passengers by 2015. Liverpool John Lennon Airport currently handles 5.52 million passengers p.a. and is promoting the airport as the “official Capital of Culture Airport” and a gateway for the leisure traveller. Cumbria urgently needs to keep pace with these competing destinations and there is a finite window of opportunity to capitalise on the potential offered by the Carlisle Airport development.

Cumbria Tourism strongly supports this application and reiterates its earlier view that it is crucial to the economic regeneration of Cumbria and the visitor economy of Carlisle and the wider sub-region;

Cumbria Wildlife Trust: Cumbria Wildlife Trust objects to this application on the basis that it will permanently destroy 11ha of the Carlisle Airport County Wildlife Site. The applicant’s documents indicate that they are not providing mitigation for the loss of this area of County Wildlife Site because they do not consider that the ecological integrity of the site will be damaged. Cumbria Wildlife Trust considers that the ecological integrity of the site will be damaged due to the loss of the 11 hectares of grassland and with no mitigation offered by the developer, The Trust has no choice but to object to the application.

The wildlife interest of the County Wildlife Site is its support of a population of breeding waders. The applicant argues that there are no important breeding bird territories in the area where the development is to be built so therefore there will be no impact on the value of the County Wildlife Site. Bird territories are not rigidly fixed and the fact that there were no wader territories identified in the 2006 survey does not mean that wading birds have not nested in this area before or will not do so in the future. It is the size of the Carlisle Airport County Wildlife Site which makes it viable for the bird populations found on the site. The loss of 11 hectares of grassland will reduce this flexibility and therefore the viability of the site.

Policy Context

Planning Policy Statement 1: Delivering Sustainable Development/ Planning Policy Statement 1 Supplement Planning and Climate Change:

The Trust does not consider that the proposed development would contribute to sustainable development, protecting and enhancing the natural environment so is therefore contrary to this Planning Policy Supplement.

PPS9 Key Principle (vi) indicates that if significant harm to biodiversity interests cannot be avoided by locating to an alternative site, then adequate mitigation should be put in place before planning permission is granted. If significant harm cannot be mitigated, appropriate compensation should be sought. If significant harm cannot be prevented, mitigated against, or compensated for, then planning permission should be refused. Significant harm to the integrity of the biodiversity interests will take place if this development goes ahead. The developer has indicated that they are not going to put any mitigation in place. The lack of understanding by the developer of the sensitivity of the site is highlighted when it is argued in Appendix 8G that they

have no duty to mitigate for the loss of habitat for birds.

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

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

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

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

This development will harm the integrity of the biodiversity resource as judged by key nature conservation principles. The biodiversity resource of the application area will be damaged by the development rather than enhanced as there is little mitigation proposed by the developers.

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

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

Carlisle Airport was designated as a County Wildlife Site in 1999, for the numbers and species of birds which use the grassland of the airport for breeding, feeding and loafing. The proposed development will reduce the amount of grassland that can be used by the birds. The proposed development is damaging to the Carlisle Airport County Wildlife Site. There are no actions proposed in the Environmental Statement to mitigate for the loss proposed in the environmental statement, therefore the application is contrary to Policy LE4.

Cumbria Wildlife Trust considers the nature of the proposed development means that it is a departure from National Planning Policy and should therefore be called in for all the same reasons that were given in paragraph 4 of the letter from The Secretary of State dated 18th June which called in application 07/1127;

Department for Transport (Highways Agency): A review has now been completed by the call-off consultants appointed by the Agency, which has examined the methodology, details and conclusions of the Transport Assessment, which accompanied application reference 08/1052.

The main conclusions of this review are as follows:

- ◆ The current application is a scaled back version of the original application, with the removal of the commercial flight elements and airport upgrades from the Masterplan.
- Broadly the impacts differ very little from the original application, as the first Transport Assessment did not include potential figures for increased commercial passengers. The removal of airport employees decreased the trip figures slightly when compared against the newly proposed chilled cross-dock facility.
- A growth value of 25% has been factored into the future traffic projections, which presents a robust scenario. Any future increases above this level are likely to trigger the need for new facilities and a revised assessment.
- *A robust implementation programme of the recommendations put forward in the Scott Wilson framework travel plan will be important to develop demand management controls from day one.*

Parking provision at the site has been demonstrated to be considerably lower than the guidelines for Cumbria. This will indeed have a positive demand management effect on the number of vehicles accessing the development site.

The Agency would refer you once more to the details of the reply in the response letter on application 07/1127 and dated 18th January 2008. In particular, the refinement and development of a proposals package for managing travel demand is felt to be paramount. This reflects the reality that the current proposals could most probably represent just one phase of development at this location as further building phases may be rolled out in future years.

Therefore, the Agency would not wish to raise any objection in principle to the proposals currently submitted for planning permission covered by planning reference 08/1052;

Department Of Transport (Aviation Security): no comments received;

Development Services Planning & Housing Services - Access Officer: the Supplementary Design and Access Statement has been reviewed and the following points are noted-

Section 4.00 Access comments on the accessibility of the premises in general and gives detail of the lifts, stairs, level entrances and disabled WCs.

Having checked the plans which have been submitted with this application, the information within the Supplementary Design and Access Statement is satisfactory.

However, appropriate provision should be provided regarding:

- Furniture within reception areas
- Reception counters
- Lighting (fixtures and also consideration of glare/shadows from windows)
- Induction loops at receptions and meeting rooms
- Signage

Policy CP15 of the Carlisle District Local Plan 2001-2016 should be complied with as well as Approved Document M. Applicants should be aware of their duties within the DDA;

Development Services Planning & Housing Services - Conservation Section: no comments received;

Development Services Planning & Housing Services - Local Plans: subsumed within Committee Report;

Development Services Planning & Housing Services - Local Plans (Trees):

Although there are trees and hedges on the site and the Applicant/Agent has stated as much on the application form, no tree and hedgerow survey has been submitted as part of the application documentation. A survey was submitted with the previous application 07/1127 and whilst the majority of this may be relevant to this application the information should be supplied.

The freight distribution/warehouse building will have a significant visual impact on the area. It will be clearly visible and will be a visual intrusion in the landscape and detract from the generally rural feel of the location.

The proposed landscaping for the area around the freight distribution/warehousing and access remains very weak and it is disappointing that the Applicant and their Agent has not addressed this issue following on from the earlier application.

The small blocks of woodland mix and the single row of trees along the eastern elevation and a double row along the southern elevation as proposed around this large structure would do nothing to soften its appearance or help integrate it into the landscape. The Applicant and their Agent may wish to consider greening of the building itself as a means to lessen the visual impact that such a large structure will have. Inclusion of a green roof and walls would help.

Whilst the further reduction in car parking spaces is most welcome there is still no landscaping within the car parking area. Again this is an area that would benefit from tree planting and would help provide screening and softening of the freight distribution/ warehouse building;

Development Services Planning & Housing Services - Urban Designer: no comments received;

Dumfries & Galloway Regional Council: has no comments to make on this application;

Economic & Community Development Services: no comments received;

Environment Agency (N Area (+ Waste Disp)): The Environment Agency has considered the proposal and wishes to comment as follows:

Environment Planning

Surface water from the site is to drain to a stormwater balancing lagoon, with the discharge to controlled waters limited to green field run-off rates. Oil interceptors are to be located prior to the stormwater lagoon. We suggest that the interceptors have a lock off facility in order to contain any spillages within the drainage system prior to the stormwater lagoon. It may also be more beneficial to have separate interceptors on different sections of the drainage system rather than an overall interceptor prior to the stormwater lagoon.

Areas draining to the surface water system include roads, vehicle parking and the freight distribution areas. Provided the discharge from the stormwater lagoon comprises clean uncontaminated surface water, no Water Resources Act 1991 Discharge Consent is required.

Foul drainage from the site should be discharged to the foul sewer. This should include all domestic sewage and trade effluent arising, including drainage from vehicle washing areas. Vehicle washing should be restricted to designated areas.

The discharge to the foul sewer is to be made via a pumping station and rising main. In order to mitigate against failure of the pumping station, it is proposed that a standby pump will be provided served by an external generator. Adequate tanker access should also be provided.

The proposed mitigation measures appear to be generally satisfactory. However, the following recommendations are made:

- interceptors should be located on individual sections of the drainage system
- interceptors should have lock off facilities
- adequate tanker access should be provided for the pumping station.

Development Control

The Agency has been involved in pre-application discussions with the applicants consulting engineers in the provision of information pertaining to the production of the Flood Risk Assessment (FRA) which is a component of the Environmental Statement (ES).

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

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

However, according to the Agency's Flood Risk Standing Advice planning authorities are advised to consult on FRA's for planning applications for operational

development of 1 hectare or greater.

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

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

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

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

The FRA adequately demonstrates at this stage that it should be possible to manage surface water run-off on a source, and site level basis, for the separate sub catchments within the site which contain the development areas, without exacerbating flood risk elsewhere. Additionally, the use of Sustainable Urban Drainage Systems (SUDS) techniques should improve the quality and reduce the quantity of surface water leaving the site that will be generated by the proposed development.

The Agency therefore have no flood risk objections in principle to the development as proposed, providing the recommendations made in the FRA are taken forward into further detailed design work.

Therefore, we would request the inclusion of the following condition on any permission granted.

Condition:

No development approved by this permission shall be commenced until a detailed scheme for the provision of surface water drainage works has been approved by the Local Planning Authority. Such a scheme shall be in accordance with the Environment Agency's Greenfield Run-off Criteria- A Specification Summary For Developers and shall be implemented before the construction of impermeable surfaces draining to this system, unless otherwise agreed in writing by the Local Planning Authority.

Reason:

To prevent the increased risk of flooding and to protect receiving waters by ensuring the provision of a satisfactory means of surface water disposal.

Any works involved in the refurbishment or construction of a new surface water outfall structure that will temporarily, or otherwise affect the flow of water in a watercourse, will require the prior written consent of the Agency under the terms of the Land Drainage Act 1991.

Recreation & Biodiversity

This proposal is relevant to the River Eden SAC (& River Eden & tributaries SSSI) mainly due to run-off/drainage issues and also sewage/trade effluents.

Thus there is a need for the planning authority to assess any significant effect on the SAC.

Contaminated Land

The Environment Statement Volume One, Section 12 - Ground Contamination.

In the absence of an explanation detailing the reasoning for the location of the sample points and boreholes it is difficult to assess whether the ground investigation results are representative of the whole site. Therefore we cannot comment on the adequacy of the ground investigation. A comprehensive justification for the sampling strategy is required.

The mitigation measures in table 12.10 /11/12 do not address the concerns of risk assessment for land contamination, but merely instruct on what measures to apply in certain circumstances if issues arise.

The DEFRA document CLR11 outlines a framework for management of contamination in a phased manner. This table does not accommodate the requirements of CLR11 because it supports the need for action as and when issues arise, as opposed to strategically planning remedial requirements based on representative site investigation and risk assessment. The mitigation measures outlined in the table would be acceptable in themselves as a “catch all”, but what is lacking is a definitive trigger level for when the measures are supposed to be actioned.

There is reference to baseline conditions from section 12.26. Baseline conditions are not relevant to contaminated land assessment under planning or part 2A legislation. Baseline conditions may be required for other permitting purposes or leasehold and liability agreements. The description under the title “baseline” will be reviewed as ground investigation results.

12.35 – There is reference to the boulder clay as having a high leaching potential. This is not true and the paragraph should be revised accordingly.

12.89 –Guidelines other than UK guidelines should not be used for risk assessment, but are acceptable for reference only.

12.92 – The Environmental Quality Standards values are hardness dependent and depending on the analyte, the criteria for pass or failure is determined by statistical representation of data. In the absence of a solid set of data representative of ground conditions under differing seasonal variation, the use of maximum values provides a degree of conservatism, but still shows exceedences of the generic threshold values.

The site walkover report (1st August 2007) appears to be missing

12.68 - The analysis of the WA Development (2007) and Geo-environmental Risk Solutions Report –April 2008 are included in appendix 12 D, but reports outlining the findings of the results are missing.

12.97 – In the absence of a quantitative risk assessment to derive acceptable threshold values for TPH, a level of 10ug/l should be used for qualitative comparison. The volatility of TPH is not a real issue for assessment to Controlled Waters, but solubility is relevant.

12.111 – The few samples taken are not likely to represent groundwater quality over a longer period. Seasonal variation over a 12 month period from sample points that reflect Greenfield site conditions up-hydraulic gradient of a specific targeted aquifer should be the only data representing baseline conditions. Such data can then be used for qualitative risk assessment, rather than generic screening criteria. If Zinc (Zn) and Copper (Cu) for example are naturally elevated in groundwater, this form of extended monitoring will be required to prove natural geochemistry.

12.130 – Mitigation measures can only be assessed following a full ground investigation that reflects conditions on site. The fact that Cu, Zn and hydrocarbons in the form of PAHs and diesel were found in groundwater is a concern.

12.132 –This section suggests further intrusive investigation in soft landscaping areas only. This is not acceptable. Further site investigation will be required wherever necessary in targeted areas identified by the desk study and conceptual site model, in order to supplement the limited ground investigation undertaken to date, whatever the end-use.

There may be some value in discussing the above points with Peter Bardsley, the Agency's Contaminated Land Officer on Tel. No: 01768 215727.

Environment Management

The proposed development will only be acceptable from a Environmental Management viewpoint if the following measure(s) are implemented and secured by way of the following planning conditions on any planning permission.

Condition:

The development hereby permitted shall not be commenced until such time as a scheme to treat and remove suspended solids from surface water run-off during construction works has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved.

Reason

In order to protect local watercourses from the polluting effect of silt.

Environment Agency staff should be consulted relative to on-site liaison during the construction phase in order to discuss the protection of local watercourses.

Any waste materials which need to be removed off site must be taken to a suitably permitted waste management facility by a registered waste carrier.

The Agency is aware of United Utilities' consultation comments on this proposal and would concur with them that an agreement relative to disposal of foul sewage should be formalised prior to planning permission being granted.

The Agency are in receipt of a copy of suggested draft planning conditions compiled by Macfarlanes LLP dated 28 October 2008. The draft conditions appear appropriate where relative to the Environment Agency's areas of responsibility and could be inserted in the absence of an appropriate Agency one on any planning permission;

East Cumbria Countryside Project: no comments received;

English Heritage - (Hist Bldg & Monuments): see below;

English Heritage (Hadrian's Wall) - NE Region: As raised in connection with previous applications in this area, the main concern of English Heritage for developments such as the current one is with respect to their impact on the setting of Hadrian's Wall and, more specifically, how such an impact on setting impacts on the Outstanding Universal Value of the Hadrian's Wall World Heritage Site (WHS).

In order to allow such assessment, it is welcomed that the applicant has provided photographs and photomontages of their proposed development from areas identified as representative of view from and within the WHS.

When Hadrian's Wall was accepted as a World Heritage Site by Unesco it was clear that a key component of its Outstanding Universal Value (OUV) that gives the site its importance is its landscape setting, which allows an ability to comprehend, understand and interpret Roman military planning and development. Therefore, for a development such as this, English Heritage's role is to assess the impact of a proposal on this ability to understand the site, and therefore to protect the OUV of the WHS. In this way such an assessment is based on how a development impacts on what is important about the site, not on simple questions of whether it is visible or not from the WHS.

In this area, it is clear that much of the Roman attention was concentrated in defending the area to the north of the Wall itself, and although views to the south would have been of interest to the Romans, it is EH's judgment that views along the Wall would have been more important for communication in connection with the operation of the Wall itself, with no evidence that they intended to visually command the area to the south in its entirety from the Wall. The only potential exception to this would have been around the Watchclose Roman camp which may have enjoyed a

visual link with the line of the Wall when it was in operation.

As such, in the context of the current land use around this part of Hadrian's Wall, although the proposed development will be of some scale, in EH's view its location to the south of the Wall means that it would not disrupt the ability to understand Roman military thinking both in terms of the area they were looking to for threats or in their communications along the Wall. In addition, although parts of the development stand between the site of Watchclose camp and part of the line of Hadrian's Wall to the east of the site, most (and certainly the closest sections) views will remain unaffected by the proposal, particularly in the context of the current development.

In light of this assessment, English Heritage does not believe that the Outstanding Universal Value of the World Heritage Site will be affected by this proposal, and therefore does not wish to sustain an objection to the proposal on World Heritage Site setting grounds.

With reference to noise impacts on the enjoyment of the WHS and the carbon footprint of the development, although information on these are provided as part of the ES, EH believes that these are issues for the City Council to reach a view on without further advice from EH.

With reference to direct physical impact on archaeological remains, it is understood that the development site (which lies away from the line of the Stanegate Roman road, which was English Heritage's concern with the earlier application for this site) has been the subject of archaeological evaluation, and provided the County Archaeologist is content with the suggested archaeological mitigation (which should be secured by an appropriate condition), EH does not wish to sustain an objection on these ground also.

Summary

Although this proposal does represent a development of considerable size within the defined buffer zone of the Hadrian's Wall World Heritage Site, in EH's view it would not have an adverse impact on the Outstanding Universal Value for which this site was inscribed.

As such, although EH would expect the Council to give appropriate consideration to issues such as the potential direct archaeological impact of the scheme, the noise impacts on the enjoyment of the WHS and the carbon footprint of the development, as in its view the Outstanding Universal Value of the World Heritage Site will not be adversely impacted on, EH do not wish to sustain an objection to this proposal.

Recommendation

EH urges the City Council to address the above issues, and recommend that the application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice. It is not necessary for it to be consulted again. However, if the City Council would like further advice, EH should be contacted to explain the request;

Environmental Services - Environmental Quality: have identified the following

matters-

Site Contamination

Due to the nature of the development site a condition should be applied as there is a possibility that unexpected contamination may be found. For this reason it is recommended that a condition should be placed on any planning permission, containing the following requirements.

In the event that contamination is found at any time when carrying out the approved development, it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken and where remediation is necessary a remediation scheme must be prepared which shall be subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared which is subject to the approval in writing of the local Planning Authority.

Dust

Dust emissions will always be created during the construction phase of a development, therefore the proposed measures to mitigate dust are required. Best practices are stated in Building Research Establishment guidance on controlling dust from construction sites should be followed (BRE 2004).

It is recommended that the following measures be placed in a condition requiring their adoption.

- Use of water-sprays to ensure that any unpaved routes across the site are maintained in a damp condition when in use;
- Imposition and enforcement of a 5 mph speed limit on unpaved ground;
- Hard surfacing of the proposed new access road at an early stage of the works;
- Minimising any dust generating activities on very dry or windy days;
- Sheeting of all lorries carrying materials on and off site;
- Location and /or covering of stockpiles as far from sensitive locations as possible; wherever practicable, off-road plant to use Ultra-Low Sulphur Diesel and be equipped with exhaust after-treatment; regular cleaning of all paved areas on site; use of a jet-spray vehicle and wheel wash for all vehicles leaving the site; and
- Use of water suppression during any cutting of stone or concrete.

Air Quality

Based on the information supplied in the Environmental Impact Assessment and the supplementary information of the 18th of November 2008 from Scott Wilson, there are no concerns regarding the impact of the development on Air Quality;

Environmental Services - Food, Health & Safety: no comments received;

Environmental Services - Green Spaces: no comments received;

Friends Of The Earth: no comments received;

Government Office North West: not required to be formally consulted but notified of the submission of an application accompanied by an Environmental Statement;

Hadrians Wall Heritage Limited: no comments received;

Health and Safety Executive: HSE no longer provides Land Use Planning advice other than through the PADHI+ system;

Ministry of Defence/Defence Estates: no comments received;

National Air Traffic Services: the proposal has been examined from a technical safeguarding aspect and does not conflict with safeguarding criteria. Accordingly there are no safeguarding objections to this proposal.

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

Natural England: as your Council is aware, Natural England has commented on the previous planning application by Stobart Air Ltd for development on this site (application 07/1127). Detailed responses were given in our letters of 14.12.07 and 28.02.08 and in meetings and discussions with the City Council, developers and consultants. The key areas of concern included:

- Nationally and internationally designated sites for nature conservation
- Biodiversity and protected species
- Landscape, recreation and amenity
- Traffic and transport

Natural England note that the current application has removed the aviation elements of the previous proposals and now concentrates on on the freight storage and distribution component of the development in the south-east corner of the site.

Natural England advises the City Council to refer to its previous advice in relation to development on this site, where this remains relevant to the current proposals. Unfortunately, NE staff do not have the capacity to review or discuss the new application in detail at this time and it must, therefore, reiterate previous comments in relation to the non- aviation element of development on this site.

Staff of NE have separately discussed the new for a new Habitats Regulations Assessment with the Council's ecological consultant and will review this in due course;

Northumberland County Council: no comments received;

Northwest Regional Assembly: Thank you for consulting 4NW on the above application. The following represent officer level comments on the proposals.

Unlike the previous Carlisle Airport proposal (ref. 07/1127) this application is not classed as regionally significant under 4NW Schedule of Regionally Significant Planning Applications. Application 07/1127 was of regional significance due to the scale of the proposals and the airport related development. We note that there is no airport related development in the current proposals. The material submitted suggests that the applicants will commit to works to the airport itself through a Section106 agreement. However presumably these will be limited as they will not require a planning application. This leaves the question as to whether they will be sufficient to secure the financially viable future of the airport.

As the proposals are not regionally significant we will not be making representations. However, as we did provide comments on the previous application ref. 07/1127, we are willing to offer the following observations.

As you will be aware, the Regional Spatial Strategy for the North West of England was published on 30 September 2008, although it is currently still in the six week period for potential legal challenge. The plan replaces the previous RSS (formerly RPG13).

The proposals needs to be considered against the following development principle policies in RSS (DP4, DP5, DP6, DP7, and DP9) and the spatial development framework policy RDF1. In particular, DP4 includes a sequential test directing development initially to land within existing settlements, and DP5 states that development should reduce the need to travel, especially by car, and that all major development should be genuinely accessible by public transport.

In terms of thematic policies, W1, W3, RT1, RT2, RT4, RT7 are the most pertinent.

- Policy W1 refers to realising the opportunities for sustainable development to increase the prosperity of Carlisle.
- W3 directs office development, as far as possible, to town and city centres
- Policy RT7 includes the need to take account of the aims and objectives of the Regional Freight Strategy and the linkages to the regional highway network;
- Policies RT1, RT2 and RT4 provide the strategic framework for managing transport networks and ensuring a coherent approach to managing travel demand;

Thematic policies EM1 to EM18 more generally provide a framework for protecting and enhancing environmental assets, and for sustainable design and construction.

Following contact with NWRA, regarding the thresholds for formal comment on planning proposals, a further letter has been received which states:

Thank you for clarifying the following:

- The "build" area of the development is just under 11 hectares, that area comprising the buildings, car parks, access roads, haulage and distribution yards including lorry parking in those, fuel storage and wash areas; and
1. The office floorspace provided by the development is 4 floors of 1,997m² (total floorspace 7,988m²).

These factors mean the application would in fact be classed as regionally significant under 4NW Schedule of Regionally Significant Planning Applications. Consequently I would like to add the following to the original 4NW comments, dated 7 November 2008.

It is noted that the applicant's agents have assessed the site against RSS Policy W2 – Locations for Regionally Significant Economic Development. 4NW does not agree Policy W2 applies to these proposals. This is because W2 refers to sites identified as Regionally Significant in LDFs. The proposed site has not been allocated in an LDF or Local Plan as being a regional site, neither does it appear on the NWDA's list of strategic regional sites. Admittedly the site does meet the thresholds of 4NW's Schedule of Regionally Significant Planning Applications. However, these thresholds are merely a guideline to suggest where a planning proposal may be significant enough in the implementation of the RSS to warrant consultation of 4NW. They are not intended to pre-empt the LDF allocation process. Just because a site meets the thresholds in the Schedule should not therefore be taken as an indication that W2 applies to that site.

NWRA's original response outlines the key relevant policies in RSS. Broadly, the warehouse proposals are likely to be in line with these policies, provided that:

2. the road links and junctions have sufficient capacity for the trips generated,
- it can be demonstrated that no suitable sites can be found that are better related to the urban area (policy DP4 sequential approach),
- the provisions of the sustainable design and construction policies are met, and
- effective implementation of the travel plan is ensured.

However there are also proposals for significant office development (nearly 8,000 square metres). These appear to go well beyond what is ancillary to the warehouse, including the entire head office operations of the Stobart Group. The application suggests that there will be significant business benefits of having all the Stobart Group offices co-located with the warehousing. This needs to be weighed against a number of RSS policies, which clearly do not favour major office development at this location, as follows-

- DP4 includes a sequential test directing development initially to land within existing settlements,
- W3 directs office development, as far as possible, to town and city centres, consistent with the sequential approach in PPS6.
- DP5 states that development should reduce the need to travel, especially by car, and that all major development should be genuinely accessible by public transport.

If the business case is considered sufficient justification for major office development at such a location then the following will be necessary:

- The use of the offices will need to be limited to the Stobart Group alone, with no possibility of speculative office use, which cannot be justified at this location.
- The travel plan will need to be strengthened in terms of reducing car use, for example, going beyond simply providing bus stops by including committed provision of on-site public transport links.

You refer to RSS policy RT5 - Airports. RT5 predominantly refers to airport related development so is generally not relevant to this application. However RT5 does state that development that would impede the operational requirements of the airport should not be permitted within its boundary;

Northwest Regional Development Agency: as you will recall, the Agency commented on the previous application (number 07/1127) to redevelop Carlisle Airport. That application proposed substantial investment in the airport, including a replacement runway, associated instrument landing equipment and reconfigured taxiways. A single new building comprising a new passenger terminal, hangers, air traffic control centre, warehousing and distribution facilities and offices would have provided a new base for Eddie Stobart Ltd, Stobart Air and WA Developments. The application was subsequently withdrawn following the Secretary of State's decision that it be called-in for her determination.

Because the earlier application involved the construction of a new runway and new airport terminal, it fell within the scope of the Agency's notification to local planning authorities setting out the types of development on which it has asked to be consulted in its role as a statutory consultee. This latest application does not entail such development and thus no longer falls within the scope of our notification. For this reason, the following observations are offered on an informal basis rather than in our role as a statutory consultee.

Our comments on the previous application focused on the potential benefits to be derived from the growth and expansion of Carlisle Airport having regard to objectives in the Regional Economic Strategy, the Regional Tourism Strategy and national policy as set out in the Aviation White Paper. For these reasons, the Agency supported the proposed development subject to there being no unacceptable adverse impacts on the character and/or setting of the Hadrian's Wall World Heritage Site, which is identified as a signature project in the Regional Tourism Strategy.

The current application differs from the previous application in that it entails landside development only, comprising a 34,475sq metre freight storage and distribution facility, a chilled cross dock facility (1,139 sq metres) offices, gatehouse and staff canteen and welfare facilities, together with landscaping parking and a new access via a new roundabout on the A689. We understand that the applicant intends to carry out improvements to the existing runway and passenger terminal by way of a Section 106 Agreement, although as these improvements will not require planning permission they do not form part of the current application.

The Regional Economic Strategy (RES) provides the basis for the Agency's comments on major planning applications. This sets out a clear vision for the North West's economy as:

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

- Growth opportunities around the towns and cities of Carlisle, Crewe, Chester, Warrington and Lancaster are fully developed.

The RES sets out a range of actions through which this vision will be delivered. Most of these remain relevant to this latest proposal:

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

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

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

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

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

The Economic Impact Appraisal submitted in support of the application highlights the need for additional revenues from non-aeronautical activities in order to ensure the airport's continued operation. It indicates that the direct economic benefits arising from the proposed development are:

- the retention of approximately 565 jobs currently based at the Stobart Group's existing site at Kingstown;
- 85 additional full-time equivalent jobs associated with the proposed new chilled cross dock facility (after two years of operation);
- the retention of existing employees at the airport plus an estimated 30 additional full-time equivalent jobs when the airport introduces scheduled flights; and
- 60 full-time equivalent jobs during the construction phase.

The Economic Impact Appraisal suggests that taking account of leakage, displacement, substitution and multiplier effects, the proposed/development would safeguard 1,255 full-time equivalent (FTE) jobs; create and additional 157 FTE jobs and provide a further 92 FTE jobs during the construction phase.

Clearly, the Stobart Group is a major employer within the Carlisle area and the Agency would wish to support the retention of these jobs and associated spending power within the local economy.

The Economic Impact Appraisal notes the difficulty of predicting potential future passenger numbers at the airport. Nevertheless, it suggests 100,000 as a reasonable target following the proposed infrastructure improvements. It also

suggests that there may be niche opportunities to develop air cargo services, with some potential for multi-modal integration with Stobart's proposed development. The Agency 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 the wider sub-region. However, since the airside improvements proposed under the previous application no longer form part of the current application, it may be more difficult for the airport to secure new air services.

As noted in our comments on the previous application, the Hadrian's Wall Military Zone World Heritage Site is one of the signature projects in the Regional Tourism Strategy. Since the airport lies within the World Heritage Site buffer, the City Council will need to consider the proposal in terms of its impact on the World Heritage Site, having regard to the expert advice of English Heritage;

Brampton Parish Council: support development at the Airport but consider that sight of a legally binding S106 Agreement prior to approval of the development should be available for all consultees. The Parish Council also state that assurance that the Airport (passenger flights) will be developed within an established timescale is a major concern and state that Airport activities should be defined. The Parish Council would also like to see an improvement of the current design and the size of the proposed facility which should be lower in height and more in keeping with the surrounding area;

Hayton Parish Council: does not wish to comment;

Irthington Parish Council: Irthington Parish Council offers the following comments on this planning application:

Planning Policy

- The developer is keen to press his view that this development complies with both policy DP3 and EC22 of the Local Plan, adopted as recently as September 2008. We do not agree with this position.
- Policy DP3 states: *'Proposals for development at Carlisle Airport will be supported where they are related to airport activities and in scale with the existing infrastructure and minimise any adverse impact on the surrounding environment'*. *Proposals for larger scale redevelopment to facilitate an improved commercial operation will have to take into account the impact of the development on uses outside the perimeter of the airport including nature conservation interests, the historic environment including Hadrian's Wall World Heritage Site and its buffer zone, the existing highways network and road safety.*(Parish Council's emphasis)

This development specifically avoids any relationship with airport-related activities, and is presented only as 'enabling development'. Its dimensions and stark industrial design are completely out of keeping with the local rural environment and cannot avoid having an adverse impact on the surrounding rural environment.

- Policy EC22, in para 4.88 states: *'... In addition, development which 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... (Parish Council emphasis). Eddie Stobart Limited (ESL) is not a local business in the Brampton area, the development proposed is not airport-related, nor has the developer demonstrated a requirement to be located at the airport. Indeed, the business is currently located in Kingstown, some distance from the airport and is said to be thriving nonetheless.

Section 106 Agreement

- As statutory consultees we expect to be allowed sight of, and an opportunity to comment on all matters relating to any planning application. As this proposal is said to be enabling development to ensure the future of the airport, the resurfacing of the runway and the provisions for passenger handling, (which are said to be the subject of a future legally-binding Section 106 Agreement), are important matters. These improvements may not require planning consent, but the terms of such a Section 106 agreement are crucial to the acceptance of this development. The developer has said that the text would be available early in the consultation process. This has not happened at the time of this submission.
- Should the City Council choose to enter into such an agreement, it is important that it is worded in such a way to ensure that it is legally binding on both Stobart Air and any successor as lease-holder, for example Eddie Stobart Ltd.
- The Section 106 Agreement should also incorporate an obligation for Stobart Air or its successors to maintain the commercial status of the Airport beyond the current limiting date of 2011/2012. We would suggest a date of end-2020.

Airport Operations

- The possibility of commercial flying resuming from Carlisle Airport causes some anxiety among local residents. If permission for this development is granted, then some limitation on the number of commercial movements per day should be imposed, similar to those incorporated into the conditions attached to the grant of permission for application 07/1127. Night movements should remain limited to eight, between the hours of 11.00p.m. and 06.00a.m., and be part of this total.
- It should be a condition of any grant of permission that the runway resurfacing and improved passenger facilities should be in place before work commences on the terminal/warehouse/distribution complex. A section 106 agreement will not be sufficient of a safeguard; because once the warehouse is built it is unlikely that the City Council would be able to enforce such an agreement should the applicant renege on his obligation. It is unlikely that the City Council would seek to make the developer vacate the premises should this happen. Legal action would be costly for the council tax-payer and very time-consuming.

Distribution Warehouse

- This building is very large and of starkly modern appearance. Policy DP3 of the Local Plan (2001-2016) states "Proposals for development at Carlisle Airport will

be supported where they are related to airport activities *and in scale with the existing infrastructure and minimise any adverse impact on the surrounding environment.*" The warehouse building, as proposed, is nearly 60ft high and of a general scale and design so as to be completely out of keeping with this quiet, attractive rural setting. This building should be redesigned to provide a less intrusive appearance to those people travelling through or living near the vicinity. It should be reduced in height and in floor space. No justification has been offered for requiring such a large building.

The main building is monolithic and unrelieved by obvious architectural input. It appears to be very much at the 'functional' end of transport infrastructure design and will be an enormous eyesore in this quiet rural parish. It is difficult to understand why such a high building is necessary, and no explanation has been offered. Heating such a large enclosed space will require the expenditure of much energy, and make a significant contribution to greenhouse gas production.

- The planned landscaping is inadequate to screen this intrusive building from the public. Significant improvements to this scheme are required if permission is to be granted. The tree plantation proposed cannot be expected to provide adequate screening for a building of such height, even after some years of maturation.
- This large new development will also add a considerable load to the foul drainage provision in the area. It is proposed that the foul water will be routed to Irthington Water Treatment Works for treatment. It has been stated (United Utilities) that the existing facilities at Irthington WTW are near capacity at the present time. This development will add very significantly to the burden that this plant is expected to process. We do not believe that the proposed "preliminary pre-treatment" as described is adequate. The capacity of this WTW should be increased before the development is allowed

Lighting and Noise Considerations

- The proposed lighting at night of this site causes considerable concern to our parishioners. The main building alone has 25 x 400watt sodium lights attached to it at a height of 10 metres (about 32.5ft) from the ground. This will be much higher than any screen planting can be expected to mitigate. As the development is expected to be in 24hr/day operation, this will cause unacceptable annoyance to the site neighbours, and the resulting glow will light up the night sky for many miles around.
- The operation of the distribution warehouse on a 24 hour basis means that lorries will be arriving and leaving round the clock and will be manoeuvring on the site during the dark hours. The noise of heavy vehicle engines, fork-lift trucks and reversing warning beepers will be unacceptably disruptive. Some restriction on night operations should be incorporated into the grant conditions, should the City Council be minded to grant permission for this development. This would be consistent with the restrictions on night air movements already in place.

Traffic & Road Safety

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

This Parish Council has, for a long time, sought for improvements to the layout and sight-lines at the three A689 junctions at Watch Cross, Irthington Lane Ends and Newby Lane Ends. These junctions are dangerous because high speed traffic approaching from the east has only limited opportunity to see traffic emerging from these junctions before arriving at them. Similarly, traffic emerging from these junctions does not have adequate visibility of traffic approaching from the east. The proposed increase in traffic, both light vehicles and HGV's, will exacerbate these problems.

The proposed roundabout is poorly sited, just after and very close to Irthington Lane Ends. It is adding an additional obstacle to traffic at a point already considered dangerous by road users. However, it would probably help safety at the Newby Lane Ends junction by slowing traffic from the west.

Alternatively, the provision of a roundabout on the A689 located precisely at the Irthington Lane junction with the A689, with an access road to the new terminal building would have been a safer solution, without adding an additional junction on the A689. Improvements to the Watch Cross and Newby Lane Ends junctions should go hand-in-hand with the establishment of the roundabout. Improved sightlines for traffic emerging onto the A689 and central safety lanes for right turning traffic from the A689 are requirements at both these junctions.

- Although the traffic studies seem to indicate excess road capacity, this does not correspond to the daily experience of users of the A689. At peak traffic times it can be extremely difficult for vehicles to emerge from any of the above mentioned junctions or from adjacent properties onto the A689. This development, along with the projected opening of the CNDR and the current up-grading of the "Cumberland Gap" will increase the traffic density still further. Increased traffic will inevitably lead to more accidents, unless the road junctions are up-graded.
- The re-siting of Eddie Stobart Ltd. at the airport has been justified on the grounds that this site has good connectivity to the motorway system. In fact, it is significantly further from the motorway than the existing Kingstown site. The need to vacate the Kingstown site is a result of the actions of Eddie Stobart Ltd in selling their lease. This should have no material bearing on this planning application. We contend that there are a number of alternative suitable sites nearer to the motorway system, for instance on the Kingmoor Park development. The developer has not established a need to move to this site. The move to the airport site will cause loss of amenity, due to increased heavy vehicle traffic, to many more people and communities through which they will then have to pass, than the use of one of these alternatives.
- We note that, when considering the previous application for development (07/1127) the North West Regional Assembly Principal Planning Officer called into question whether the location of offices, warehousing and distribution

facilities can be justified at this location. Citing policies DP1, EC8 and draft policy W3, she said that a stronger justification is needed with respect to the offices. In relation to the warehousing, she says that the applicants need to demonstrate that there are no other, more sustainably located sites for the warehousing development. This remains our view.

- We have concerns that the increased number of heavy goods vehicles and of lighter vehicle traffic associated with this development will impose an unacceptable load on the surrounding rural road system. It must be a condition of permission that all heavy vehicles arriving at, or departing from this haulage and distribution complex must do so by a prescribed route, which does not allow passage through any of the local villages, particularly Irthington, Laversdale, Newtown or Newby East. A copy of this route should be presented to each driver intending to use this site, and enforcement provisions made. This restriction should also apply during the construction phase as well as during operations.
- Many of the local roads are already used as “rat-runs” by vehicle users wishing to take a short cut between the A69, A689 and/or the A6071. The development will make this situation worse. In mitigation of this we would expect, at minimum, 30mph speed limits in place for each of the above villages, where they are not already present. Traffic calming arrangements on the approaches to these villages, similar to those installed at Newby East, should also be provided. A weight limit on vehicles allowed to pass through these villages should be imposed, set at such a weight that it does not inconvenience current agricultural traffic, but prevents access by heavy goods vehicles. Such a weight limit should be in place before construction commences.

We note that although projections of increased traffic volumes have been made for studies have been made for Newtown. This is a serious omission, which should be corrected, because any traffic from the North and West is likely to pass through this village before passing through Irthington en route to the Airport site.

The local road signage should be up-dated so that all traffic for this development, both during the construction phase and continuing when operational, is directed to the site via A-class main roads from whichever direction the traffic travels.

Conclusion

This development is a clear departure from the Local Plan, and involves a large number of problems for the local population. If minded to grant permission we request that these comments and concerns are carefully noted and conditions added to the grant to mitigate these many problems;

Scaleby Parish Council: no comments received;

Stanwix Rural Parish Council: the Parish Council reserves its right to speak at the meeting of the Development Control Committee when the application will be decided; and, as a consultee, requests that it be invited to be represented at any site visits made by the Development Control Committee, in respect of this application.

The Parish Council fully supports the principle of ensuring the commercial viability of

the airport and securing its long-term future, for the benefit of the local area and its inhabitants. However, it harbours major concerns regarding this application and fully supports the view that it must be considered as a 'Departure'.

The Parish Council believes that should Members be minded to approve the proposal then, as it a 'Departure' which may conflict with national policies on important matters, it would be in the wider public interest to refer the application to Government Office for the North West requesting that it be called in for Public Inquiry.

Non Airport Related Activity

Policy DP3 Carlisle Airport of the Carlisle District Local Plan - adopted September 2008, states:

"Proposals for development at Carlisle Airport will be supported where they are related to airport activities and in scale with the existing infrastructure and minimise any adverse impact on the surrounding environment."

However, this policy does not specify, or even refer to, any activities, which Carlisle City Council may regard as being airport related. For guidance reference must be made to what appears to be the only recent indicator of the City Council's view, of what constitutes airport related activity, contained in Final Recommended Condition B) Airport Use - framed in connection with previous application 07/1127, (application later withdrawn by the applicant).

This condition lists, "For the avoidance of doubt", those activities which the City Council considers to be airport related.

Of these uses only two, "Air Freight forwarders" and "Warehousing and storage of goods which have been brought into or are to be sent out of the UK by air or are transported within the UK for air" (sic), bear even a passing resemblance to those currently proposed.

Freight storage and distribution and chilled cross dock facilities, and their associated offices, cannot then be considered to be airport related activities unless they are to be used solely for the purpose of handling air freight.

The remainder of Policy DP3 will apply to any and all proposals for larger scale applications be they or be they not airport related.

The proposal is then clearly not for an airport related activity and requires the construction of a main building 240m x 150m x 17.6m; area 36,000m² (787ft x 492ft x 58ft; area 8.9 acres) - that is approximately half the height of Carlisle Civic Centre and covering the approximate area of The Lanes Shopping Centre. In addition 4 satellite buildings are also proposed. The proposal is thus massively out of scale with existing airport infrastructure and does not therefore comply with Policy DP3, Carlisle Airport, of the Local Plan.

Policy DP3 refers to Policy E22 Employment & Commercial Growth Land Allocations, of The Carlisle Local Plan. Making particular reference to uses B1, B2, B8 & A1, the policy also suggests several potential employment uses for the airport.

Policy W3, Supply of Employment Land, of The North West of England Plan Regional Spatial Strategy to 2021, also focuses on allocations for B1 & B8 land use, however it states quite clearly at paragraph 6.14 that:

“There is currently an oversupply of land in Cheshire and Warrington, and Cumbria which results in the requirement to de-allocate land over the RSS plan period. Where allocated employment sites are of a poor quality, poorly located, or unlikely to become available for development within the foreseeable future, local planning authorities should remove the allocations in question in the relevant Local Development Documents.”

Due to the airport's rural location land allocated there for employment is poorly located, in respect of non airport related activity. Policy E22 should then be reviewed having regard to sustainability objectives, and the employment land allocation should be de-allocated in respect of all save airport related uses.

Sustainability Issues

The primary objective of The North West Regional Freight Strategy, published by the DfT, is:

“To assist the promotion of sustainable development by maximising the use of existing transport infrastructure, implementing selective enhancements where necessary and minimising the environmental impact of freight transport;”

However, the proposal seeks to relocate a major road haulage operation from a location close to J44 of the M6, and the line of the Carlisle Northern Development Route, to a location 8½ kilometres (more than 5 miles) distant from these. Following relocation vehicles needing to access the M6 would be obliged to travel an additional 17 km (10 miles), per vehicle round trip.

An HGV relocating to the airport would therefore produce an additional 18.887kg of CO₂, a notorious ‘greenhouse gas’, per round trip. Such an increase multiplied by the number of HGV's making daily journeys to and from the M6 would significantly increase local levels of CO₂, and other greenhouse gas emissions. (Based on Defra 2008 guidelines, average CO₂ emission from a fully laden HGV = 1111 grams per kilometre).

Such re-location and its resultant increases in emissions are entirely contrary to the Regional Freight Strategy and to the overarching priority of sustainability contained in Policies DP1, DP2, DP4, DP5, DP6, DP7, DP9, RT1, RT2, RDF1 & W1 of the North West of England Plan Regional Spatial Strategy to 2021; and also in the Carlisle City Council Draft Climate Change Strategy 2008-2012.

RSS Policy DP4 indicates a requirement for a sequential test in respect of development. However, the applicant fails to provide convincing proof that no alternative and more sustainable sites exist for the proposal.

Such proof is made more difficult to establish set against the recent announcement of plans to significantly expand Kingmoor Park, a site close to the M6; the proposed line of the Carlisle Northern Development Route; and the main west coast railway line. An ideal sustainable location for the uses proposed in this application.

RSS Policy DP5 urges greater reliance on public transport and states that development should reduce the need to travel, especially by car. Importantly it states that:

“A shift to more sustainable modes of transport for both people and freight should be secured, an integrated approach to managing travel demand should be encouraged, and road safety improved.”

Local Impact on Highways

The proposal, if permitted, would undoubtedly generate significant increases in traffic density on the A689 and other parts of the road network local to the airport.

The opening of the Carlisle Northern Development Route (CNDR) along with future de-trunking of the A69 will further enlarge this volume of traffic. Such increased traffic volume can only enhance the hazard levels at the already quite dangerous junctions at Laversdale, Irthington and Newby East lane ends where high speed traffic on the main road and or limited sight lines from the minor roads have conspired to cause several serious road accidents. These factors apply particularly to the Irthington and Newby East lane ends, where drivers approaching at speed, from the east, may suddenly encounter slow moving or even stationary vehicles just a few yards ahead.

Turning right, at any point on the road, is often a hazardous undertaking as vehicles, many of them HGV's, approach, at or in excess of, 60 mph. Local drivers report witnessing attempts at overtaking which often narrowly avoid collisions with stationary vehicles that are waiting to turn right, from the A689.

The A689 also suffers a variable surface condition some sections being impaired through wear and tear while some sections are also narrower than others.

Although the proposed roundabout goes some way toward mitigating these dangers, its effect may be significantly enhanced by moving its location a short distance to the east, to incorporate the Irthington Road junction.

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

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

A689 to A69 via Newby East and Warwick Bridge

A689 to A69 via Crosby-on-Eden

A689 to A6071 via Irthington

A689 to A6071 via Laversdale

A689 to A695 via B6264

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

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

The Parish Council urges that, should permission be granted, conditions be imposed which to ensure that 'rat-running' by HGV's on minor roads through local settlements and communities, will impact punitively upon the operator. Such conditions would properly reflect the objectives of Policy RT7 of North West of England Plan Regional Spatial Strategy to 2021.

Visual Impact and Lighting

The proposal requires the construction of a main building 240m x 150m x 17.6m; area 36,000m² (787ft x 492ft x 58ft; area 8.9 acres) - that is approximately half the height of Carlisle Civic Centre and covering the approximate area of The Lanes Shopping Centre. In addition 4 satellite buildings are also proposed.

The proposed colour scheme and minimal landscaping do little to mitigate the brutally intrusive massing of the proposal in an essentially rural landscape setting.

It has been suggested that the use of green roof and walls would help to lessen the visual impact, however an unrelieved block of any colour will be obtrusive; a somewhat disrupted finish, along with enhanced landscaping, may be of greater assistance in reducing the building's impact.

The rural area around Carlisle enjoys one of the least light polluted night skies in Britain. The proposal's overall lighting requirement will generate significant light pollution leading to greatly enhanced level of sky-glow, which will impact not only upon the residents of nearby settlements but also across a considerable radius around the airport.

Should permission be granted then stringent conditions would be required to mitigate these effects. Local residents who may suffer a nuisance from light pollution must be adequately compensated.

Noise

The proposed 24-hour warehousing and transport operations would be clearly audible over some distance, especially at night. These operations could easily generate sufficient levels of noise to become a genuine nuisance to households even some distance from the site. The applicant should therefore make provision for mitigating such nuisance through the implementation of effective on site measures to suppress such noise, and or by compensating any households proven to be affected.

Wildlife Habitat

The most obvious impact will be loss of an appreciable area of grassland habitat from the County Wildlife Site, for which no mitigation appears to be proposed. This could have a measurable impact upon local populations of wading birds, which breed at the site.

The greatly enhanced level of human activity, noise, and disturbance, especially at night, will undoubtedly be prejudicial to the future wellbeing of many species comprising the Biodiversity of the site.

The height and area of the roof may prove to be an attractive roost for large numbers of seagulls certain species of which may then prey upon the smaller, rarer, species of birds; or the small rodents, reptiles & amphibians which inhabit the airport and nearby protected sites.

The lighting requirement mentioned above would also impact upon the nocturnal habits of wildlife especially those of bats, and the insects upon which they feed. Bats may desert an illuminated roost, while light falling on a roost access will delay bats from emerging and thus shorten their foraging time. As insect activity is at its peak around dusk, this opportunity may be missed.

Artificial lighting is also thought to increase the chances of bats being hunted by birds of prey. "Observations have been made of kestrels (diurnal raptors) hunting at night under the artificial light along motorways." (Bats & Lighting in the UK, The Bat Conservation Trust)

Securing the Airport's Future

Policy RT5 of the North West of England Plan Regional Spatial Strategy to 2021, seeks to safeguard the future operational effectiveness of the regions smaller airports, stating:

"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." However, the proposed main building has a footprint of approximately equal in area to The Lanes shopping centre and at almost 60 feet tall is approximately half the height of the Civic Centre. A development of such height and massing may be prejudicial to the future development of enhanced air operations.

Annex 3 of Joint Circular 01/2003 from The Office Of The Deputy Prime Minister, The Department For Transport, and The National Assembly For Wales; states: "A building or structure can, because of its size, shape, location or construction materials, act as a reflector or diffractor of the radio signals on which navigational aids, radio aids and telecommunication systems depend, while almost any development in the vicinity of these aids and systems has the potential to interfere with them. ... In addition the lighting elements of a development have the potential to distract or confuse pilots, particularly in the immediate vicinity of the aerodrome and of the aircraft approach paths." (Annex 2, paragraph 6.)

While the proposal may not impede the current operational requirements of the airport, this is not to say that future operational requirements will not be so impeded.

Paragraph 8.22 of Circular 01/2003 states:

" Local authorities should therefore recognise in their plans and strategies the contribution general aviation can make to the regional and local economies. 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.”

Any development which may prejudice future expansion or airside activity would also challenge the advice of 2003 White Paper ‘The Future of Air travel’ which states, of the potential for expansion at Carlisle Airport:

“There are no major local physical or environmental constraints....”; and continues: “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.”

As the application does not contain any proposals for airside/airport related development, and may actively dis-enable the future long term growth of airport operations, the Parish Council contends that no justifiable case can be made, in any way, for supporting the application as an ‘enabling development’, in respect of airport improvements;

RAF Spadeadam: awaited;

Ramblers Association: awaited;

Royal Society for the Protection of Birds: In the given timescale, it has not been possible to formulate a detailed response. The following matters are highlighted:

- The RSPB support the Cumbria Wildlife Trust's objection to this application, based on the permanent loss of 11 hectares of the County Wildlife Site grassland at Carlisle Airport, with no proposed mitigation for the loss of this area. Loss of 11 hectares of habitat and associated disturbance/ displacement will undoubtedly have an impact on the qualifying feature of the County Wildlife Site, namely breeding wading birds.
- It is still unclear as to the future for the aviation aspect of Carlisle airport and the RSPB are concerned that this could be a staged application which could result in an increased aviation usage in the future, which could impact on important populations of bird species (that are associated with the Upper Solway Flats and Marshes Special Protection Area).

Please refer to previous correspondence from the RSPB regarding Carlisle Airport. The responses were dated 14th December 07 (direct habitat loss- page 5 and mitigation- page 6) and 8th May 08;

Scottish Enterprise: does not wish to comment on the proposals;

TCCE - Econ Dev Unit - Business & Employment: no comments received;

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

United Utilities (former Norweb & NWWA): there is no objection to the proposal in principle. However, a tentative agreement is in place between the developer and United Utilities for the funding of improvements likely to be required by the Environment Agency at the local wastewater treatment works to mitigate for the immediate increase in domestic load that the development would bring. United Utilities ask for a condition to be imposed stating that "Before occupation of the premises is permitted, formalisation of the current arrangements regarding improvements to the Wastewater Treatment Works, so far informally agreed between United Utilities and the developer and subject to the agreement of the Environment Agency, need to be ratified and the required improvements to the Wastewater Treatment Works agreed therein must be completed".

3. Summary of Representations

Representations Received

Initial:	Consulted:	Reply Type:
Road	26 Skiddaw 16/10/08	
Red Hills	16/10/08	Objection
Scotia Safari Ltd	16/10/08	
Carlisle Flight Training	16/10/08	Support
Teck Nite Ltd	16/10/08	
Old Walls	16/10/08	
Romanway	16/10/08	
Romanside	16/10/08	
The Bungalow	16/10/08	
East Old Wall	16/10/08	
Haulage Contractors	16/10/08	Support
Laversdale Timber Co.	16/10/08	
Dundee Tyres Ltd	16/10/08	
Unit 3	16/10/08	
System Group Ltd	16/10/08	Support
Gillmorran	16/10/08	
Gill House Farm	16/10/08	
Watch Close	16/10/08	
Henderson's Croft	16/10/08	
Old Wall Cottage	16/10/08	Support
Hollinstone Farm	16/10/08	Objection
Greystones	16/10/08	
Croft House	16/10/08	
Lorton House	16/10/08	
256 Chesterholm	16/10/08	
Buttermere Pavillion	16/10/08	
Douglan	16/10/08	
Burtholme East	16/10/08	Support
Etive House	16/10/08	Objection
Strathaven Airfield	16/10/08	
46 Irthing Park	16/10/08	Support
53 Main Street	16/10/08	Support
Flat 2, Darley House	16/10/08	

West Lakes Renaissance	16/10/08	
- Upperby	16/10/08	
5 Helstfell Hall	16/10/08	
57 Coledale Meadows	16/10/08	
Barney Nook	16/10/08	
The Croft	16/10/08	
Scotstown	16/10/08	Objection
21 Whiteclosegate	16/10/08	
Beckstones	16/10/08	
Mintsfeet Place	16/10/08	
Low Holm	16/10/08	Objection
7 The Old Brewery	16/10/08	Objection
23 Millriggs	16/10/08	
Damhead	16/10/08	
Roman Lea	16/10/08	
Main Band House	16/10/08	
Hillcrest	16/10/08	Support
12 Wentworth Drive	16/10/08	Support
C/O Woodrow	16/10/08	
Hall		
3 Kingwater Close	16/10/08	Support
Orchard House	16/10/08	Support
47 Westmorland Street	16/10/08	
Solway Industrial	16/10/08	
Estate		
The Swan Hotel	16/10/08	
Corbett House	16/10/08	Support
278 Yewdale Road	16/10/08	Support
West Lakes Dairy Park, Unit 8	16/10/08	
Hawthorns	16/10/08	
High Syke	16/10/08	Objection
13 Watermans Walk	16/10/08	
1 The Barrel House	16/10/08	Support
Gateside	16/10/08	
Dumfries	16/10/08	
Enterprise Park		
14 Michaelson Road	16/10/08	Support
18 Holme Fauld	16/10/08	
44 Belah Crescent	16/10/08	Support
75 Townfoot Park	16/10/08	Objection
Meadow View	16/10/08	Support
Quarry Hill House	16/10/08	
64 Guildford Crescent	16/10/08	Objection
5 Hall Moor Court	16/10/08	Objection
17 Nook Lane Close	16/10/08	
29 Brougham Street	16/10/08	Objection
25 Croftlands	16/10/08	
The Strand House	16/10/08	
78 Fellview	16/10/08	
74a John Street	16/10/08	
25 Taunton Avenue	16/10/08	
10 Distington Park	16/10/08	
20 Knowe Park	16/10/08	
Avenue		
Ms Claire Patterson		
8 Low Road Close	16/10/08	
37 Station Close	16/10/08	
Cairnvale	16/10/08	Objection
	16/10/08	
Limited		
Keystone	16/10/08	Support

	37 Carlisle Road	16/10/08	Objection
	Langthwaite	16/10/08	
	The	16/10/08	Objection
Cops			
	9 Ridley Gardens	16/10/08	
	101 Castlesteads Drive	16/10/08	Support
	The Nook	16/10/08	Objection
	Barras Top Banks	16/10/08	Support
	123 Tribune Drive	16/10/08	
	7 Scawfell Road	16/10/08	
	22 Becksides Gardens	16/10/08	
	4 Chapel Burn Cottages	16/10/08	
	South House	16/10/08	Objection
	The Elms	16/10/08	Support
	Nook Cottage	16/10/08	Objection
	7 Irthing Court	16/10/08	Objection
	53 East Dale Street	16/10/08	
	89 Scotland Road	16/10/08	
	116 Hurley Road	16/10/08	
	Seymour House	16/10/08	
	Rise Mill Hill	16/10/08	
	11 The Banks	16/10/08	
	Carlisle Glass Limited	16/10/08	
	Voluntary Action Cumbria	16/10/08	
	Rose Bank Sawmill	16/10/08	
	28 Castle Green Lane	16/10/08	Objection
	4 Gatefoot Cottages	16/10/08	
	92 Windermere Road	16/10/08	
	Communications	16/10/08	
Limited			
	Cumbria Vision	16/10/08	
	Highcroft	16/10/08	
, 2 Cherry Brow		16/10/08	
	2 Humphrey Cottages	16/10/08	
	3 Airethwaite	16/10/08	
	1 Hillside Road	16/10/08	
	7 Whinfell Drive	16/10/08	
	12 Cliff Terrace	16/10/08	
	Cumbrian Newspapers Ltd	16/10/08	
	6 Dale View	16/10/08	
	PO Box 160	16/10/08	
Constructions		16/10/08	
	Pilgrims Rest	16/10/08	Objection
	74 Brook Street	16/10/08	
	Milnthorpe Road	16/10/08	
	Friends Of The Earth	16/10/08	
	47 Laurel Gardens	16/10/08	
	36 Victoria Road North	16/10/08	Objection
	17	16/10/08	
Entry Lane			
Ltd		16/10/08	
	3 Stanegate	16/10/08	Objection
	8 Castle Crescent	16/10/08	
	Bleatarn Park	16/10/08	
	I, Allerdale House	16/10/08	Support
	The Orchard	16/10/08	Objection
	Nook Cottage	16/10/08	
	Partnership,	16/10/08	
Project Officer			
	14 Irthing Park	16/10/08	Support
	46 Kirkbie Green	16/10/08	Objection

Sellafield Site	16/10/08	Support
Robinson House	16/10/08	
Left On The Shelf	16/10/08	
26 Tullie Street	16/10/08	
Mitre House	16/10/08	Objection
Vallum Barn	16/10/08	Support
Fifteen Rosehill	16/10/08	
Victoria Place	16/10/08	
7 Grizedale Avenue	16/10/08	
17 Nook Lane Close	16/10/08	
The Lodge	16/10/08	
197 Scotland Road	16/10/08	
2 Ashford Way	16/10/08	
Low Head Barn	16/10/08	
256 Willow Lane	16/10/08	
8 Low Wood	16/10/08	
, Appleby Business Centre	16/10/08	
Pinewood Farm	16/10/08	Objection
Blackrack Barn	16/10/08	
Lakeside	16/10/08	
Derby Road	16/10/08	
3A The Crescent	16/10/08	
St Ninian's Road	16/10/08	
Appleby Business Centre	16/10/08	
Mayfield	16/10/08	
Pirelli UK Tyres Ltd	16/10/08	
Low Blackburn Bank	16/10/08	
26 Skiddaw	16/10/08	
Road		
Engineering Services	16/10/08	
40 Oaktree Crescent	16/10/08	
Brampton	16/10/08	
Etive House	16/10/08	
Capita	16/10/08	
The Arches	16/10/08	
Maidenway	16/10/08	Undelivered
The Old Byre	16/10/08	
Swarthmoor Lane	16/10/08	
1st Floor Flat	16/10/08	
Middle Cottage	16/10/08	
1 Hillside Road	16/10/08	
The Brambles	16/10/08	
2 Lamley Gardens	16/10/08	
Owsen Place	16/10/08	
Low Luckens	16/10/08	Objection
4 Lynstead	16/10/08	Objection
2 Thornthwaite Cottages	16/10/08	
Bleatarn Farm	16/10/08	
Little Barco	16/10/08	
5 Spring Gardens	16/10/08	
Clint Mill	16/10/08	
1 Coastguard Cottages	16/10/08	
54 Dale Street	16/10/08	
Strathmore	16/10/08	
12 Whinlatter Way	16/10/08	
M-Sport Ltd	16/10/08	Support
20 Riselaw Terrace	16/10/08	
45 Jackson Road	16/10/08	Objection
Seymour House	16/10/08	
16 Highfield Road	16/10/08	

The Chapel House	16/10/08	Objection
6 Greenbank	16/10/08	
High Grassrigg Barn	16/10/08	
Granary Cottage	16/10/08	
71 Tribune Drive	16/10/08	
6 Irthing Court	16/10/08	Objection
Construction Limited	16/10/08	
Irthing House	16/10/08	
Crag Foot	16/10/08	
Chiswick	16/10/08	
6 Quarry Howe	16/10/08	
28 Castle Crescent	16/10/08	
Merbeck	16/10/08	Objection
House	16/10/08	Support
Cleugh Head	16/10/08	
Red Gables	16/10/08	Support
	16/10/08	
Sandysike	16/10/08	
12 Hall Moor Court	16/10/08	
4 Irthing Park	16/10/08	
43 Punton Road	16/10/08	Objection
Pa ish Council	16/10/08	
Marl Business Park	16/10/08	
7 Princes Gate	16/10/08	
Fell Duke	16/10/08	
Lane End Farm	16/10/08	Objection
Fernlea	16/10/08	
High Syke	16/10/08	
Brackenfield	16/10/08	Support
East Wing	16/10/08	
Watch Cross	16/10/08	
Military Cottage	16/10/08	
Ryecroft	16/10/08	
The Golden Fleece PH	16/10/08	
Romanway	16/10/08	
Ruleholme Cottage	16/10/08	
Over The Way	16/10/08	
The Bungalow	16/10/08	Objection
Netherfield Cottage	16/10/08	
Netherfield Farm	16/10/08	Comment Only
The Lodge	16/10/08	Objection
Highfields House	16/10/08	
The Stables	16/10/08	Objection
The Chase	16/10/08	Objection
1 The Courtyard	16/10/08	
2 The Courtyard	16/10/08	
3 The Courtyard	16/10/08	Objection
Beanlands	16/10/08	
Pilgrims Rest	16/10/08	Objection
39 Newfield Drive	28/10/08	Support
The Limes	28/10/08	Support
Stablehills	16/10/08	
Redbank House	16/10/08	Objection
Oakfield House	16/10/08	Objection
Redhills Cottage	16/10/08	
Wall House	16/10/08	Objection
Garden House	16/10/08	
The Old Vicarage	16/10/08	Objection
Acorn Grange	16/10/08	
The Beeches	16/10/08	
Whitrigg	16/10/08	

	New Vicarage	16/10/08	
	St Catherines Cottage	16/10/08	Support
	Rosewood	16/10/08	
	Hurtleton Farm	16/10/08	
	EMC Ltd	16/10/08	
	107 Fairladies		Support
	Motte Cottage		Support
	10 Singleton Park		Objection
	13 Old Lound		Objection
	2 Park Avenue		Objection
	Wallfoot Hotel		Support
	29 Hopeshill Drive		Support
	33 Eskdaill Street		Support
	8 Warwick Square		Support
	94 Wigton Road		Support
	Raven Barn		Support
	15 Walkmill Crescent		Support
	Hillcrest		Support
	41 Criffel Road		Support
	32 Scotland Road		Support
	24 Ryehill Park		Support
	26 Henderson's Croft		Support
	146 Greenacres		Support
	1 Millees Cottages		Support
	176 Stonegarth		Support
r	84 Pinecroft		Support
	26 Brisco Meadows		Support
	33 Eskdaill Street		Support
	16 Sands		Support
	94 Nelson Street		Support
	Bridge House		Support
	Delta House		Comment Only
	Unit 13		Support
	124 Dalton Avenue		Support
	Moss Bay House		Support
	Boyken House		Support
	PO Box 6		Support
	Lane End Farm		Objection
	Harbour Office		Support
	Bute House		Support
	Armstrong Watson		Support
	Armstrong		Support
Watson			
	Armstrong		Support
Watson			
	Armstrong Watson		Support
	Cavaghan & Gray		Support
	15 Victoria Place		Support
	15 Victoria Place		Support
	Stanbury		Support
	26 Wolsty Close		Support
	21 Knowe Road		Support
	Green Trees		Support
	41 Criffel Road		Support
	Red Hills		Objection
	Komatsu Forest Ltd		Support
	47 Dalesman Drive		Support
	7 Rickerby Court		Support
	16 St James Avenue		Support
	Orchard House		Support
	The Lawns		Support

157 Tribune Drive	Support
4 St Pierre Avenue	Support
9 Wellbank Place	Support
Croftend	Support
1 Moorpark	Objection
80 Tribune Drive	Support
6 Holly Drive	Support
148 Watermans Walk	Support
55 Tribune Drive	Support
55 Tribune Drive	Support
55 Tribune Drive	Support
8 Irthing Walk	Support
21 Irthing Park	Support
2 Furze Street	Support
48 Knowe Road	Support
3 Church Close	Support
111 Cumwhinton Road	Support
24 St Helens Avenue	Support
49 Waver Street	Support
76 Tribune Drive	Support
Melkridge	Objection
64 Guildford Crescent	Objection
75 Runnymede Road	Objection
Ebenezer	Support
7 Rickerby Court	Support
Lammermuir	Support
157 Tribune Drive	Support
Newbiggin On Lune	Support
86 Hurley Road	Support
86 Hurley Road	Support
64 Guildford Crescent	Objection
55a Bury Old Road	Support
5 Howard Place	Support
18 The Garth	Support
Logic House	Support
9 Edmond Castle	Support
, 65 Briar Bank	Support
3 Blackwell Road	Support
Dovenby Hall	Support
Dovenby Hall	Support
Black Bank House	Objection
Santa Ponsa	Support
97 Tribune Drive	Support
18 Brow Nelson	Support
Vallum Barn	Support
Dovenby Hall	Support
38 Criffel Road	Support
25 Carlisle Road	Support
5 Elizabeth Street	Support
Green Edge	Support
200 Orton Road	Support
6 Curlew Rise	Support
West Highberries Lodge	Support
Green Edge	Support
KitKat Brand Manager	Support
Hollinstone Farm	Objection
7 Willow Place	Support
Gale Rigg	Support
Station Road	Support
6 Greystoke Park Avenue	Support
2 Fosse Way	Support

18 Berkeley Grange	Support
66 Meadow Croft	Support
Wath Green	Support
39 Newfield Drive	Support
Garth House	Support
176 Hebden Avenue	Support
157 Tribune Drive	Support
5 Howard Place	Support
91 Scotby Road	Support
224 Hebden Avenue	Support
1 Coopers Close	Support
1 Earl Grey Cottages	Support
Corbett House	Support
5 Elizabeth Street	Support
5 Elizabeth Street	Support
Ingwell Hall	Support
5 Howard Place	Support
32 Foster Street	Support
6 Tribune Drive	Support
19 Collin Croft	Objection
22 Romney Gardens	Objection
The Garden House	Objection
Red Nook Cottage	Support
Furnace Hill	Support
23 Mayfield	Support
23 Mayfield	Support
25a Newtown Road	Support
224 Hebden Avenue	Support
16 Sanderson Close	Support
4 Stanley Crescent	Support
Merbeck	Objection
Merbeck	Objection
11 Jackson Croft	Support
24 Tait Street	Support
27 Atkinson Road	Support
Aviation House	Support
29 Forgeholm	Support
Meadow View	Support
The Orchard	Objection
Elm Croft	Objection
Low Wall	Objection
Low Wall	Objection
Brackenfell	Objection
Townhead House	Objection
Aviation House	Support
Aviation House	Support
18 Higginson Mill	Support
26 Lowther Street	Support
26A	Support
Lowther Street	
37 Eskdaill Street	Support
68 Brookside	Support
29 Forgeholm	Support
20 Moorwood Close	Support
39 Bernardines Way	Support
39 Bernardines Way	Support
39 Bernardines Way	Support
39 Bernardines Way	Support
Milton Cottage	Support
Milton Cottage	Support
Lonsdale Cottage	Support

Lonsdale Cottage	Support
Lonsdale Cottage	Support
Lonsdale Cottage	Support
Oakfield House	Objection
Merbeck	Objection
51 Moorville Drive South	Support
The Cops	Objection
Oakfield House	Objection
20 Forest Hill	Support
Bowman House	Objection
Posthouse	Objection
46 Irthing Park	Support
37 Carlisle Road	Objection
16 Kingwater Close	Objection
3 Raffles Avenue	Support
14 Townfoot Court	Support
Aviation House	Support
Aviation House	Support
Linden Cottage	Support
39 Newfield Drive	Support
6 Low Padstow	Support
68 Broad Street	Support
Fairfield	Support
10 Pear Tree Gardens	Support
8 Hadrians Crescent	Support
Hawklemas	Objection
45 Argyle Street	Support
124 Dalton Avenue	Support
Cotehill Farm	Objection
Cottage	
Aviation House	Support
11 Fulmar Place	Support
4 Rigmaden Farm Cottages	Objection
66 Shady Grove Road	Support
61 Skiddaw Road	Support
7 Berkeley Grange	Support
, 3 Whoott House	Support
68 Shady Grove Road	Support
5 Westgarth Court	Support
44 St Johns Street	Support
Etive House	Objection
Etive House	Objection
20 Albert Gardens	Support
5 Hasell Street	Objection
Aviation House	Support
Aviation House	Support
5 Townhead Farm Courtyard	Support
Drigg	Support
The Lanes Shopping Centre	Support
Burn House	Support
83 Burnfoot Road	Support
Kingstown Broadway	Support
127 Brentfield Way	Support
The Cherries	Support
6 Grove Park Road	Support
Old Parks	Support
2 South Western Terrace	Support
2 Holm Street	Support
Burwain Hall	Support
37 Falcon Drive	Support

	40 Lingey Close	Support
	43 Bassenthwaite Street	Support
	3 Whinrigg	Support
	Low Moor Head	Support
	8 Corporation Road	Objection
	20 Caulstran Road	Support
	21 Milner Mount	Support
	6 Chells Lane	Support
	Sycamore Villa	Support
	12 Lincoln Close	Support
	22 Annan Road	Undelivered
	Westwinds	Support
	9 Pennyhill Park	Support
	Aston Hotel	Support
	PO Box 77	Support
	Brookfield	Support
Services		Support
	7 Prestonfield Road	Support
	DuPont Teijin Films UK Ltd	Support
	Galloway Holidays	Support
	Meadow House	Support
	Auchen Castle	Support
	Easterbrook Hall	Support
	7 Irthing Court	Objection
	Three Crowns	Support
Court		
	Roucan Road	Support
	6 Oliver Place	Support
	20 Brunton Avenue	Support
	Canabela	Support
	63 Firth View	Support
	9 Lodge Close	Support
	59 Beaumont Road	Support
	55 Broadacres	Support
	48 Corporation Road	Support
	15 Findlay Place	Support
	30 Burrow Walls	Support
	63 Firth View Walk	Support
	44 Vulcans Lane	Support
	228 Moss Bay Road	Support
	77 Ashfield Road	Support
	12 Coniston Close	Support
	33 Coniston Close	Support
	15 Sunnyside	Support
	115 Hight Street	Support
	4 Springfield Gardens	Support
	Rolyne	Support
	2 Hunter Street	Support
	6 Brookside	Support
	Hilltop	Support
	26 Millbanks Court	Support
	43 Ullswater Avenue	Support
	2 Banklands	Support
	2 Banklands	Support
	9 Archer Street	Support
	9 Northumberland Street	Support
	21 Sarsfield Road	Support
	323 Pennine Way	Support
	16 Gray Street	Support
	2 Uldale Road	Support

9 Archer Street	Support
8 Garfield Street	Support
46 Lorton Avenue	Support
63 Barco Avenue	Support
2 Inner Ling Road	Support
5 Abbey Close	Support
10 Richmond Close	Support
22 Hartington Street	Support
6 Crosthwaite Court	Support
18 Gray Street	Support
170 John Street	Support
82 Holy Bank	Support
20 Needham Drive	Support
21 Hartington Street	Support
25a Udale Court	Support
9 Northumberland Street	Support
6 Sunningdale Gardens	Support
6a Main Road	Support
82 Elterwater Avenue	Support
1 Tarn Street	Support
74 Mitchell Avenue	Support
41 Brayton Street	Support
38 Rowe Terrace	Support
49 Westfield Drive	Support
3 Brayton Street	Support
40 Mason Street	Support
81 Newlands Gardens	Support
81 Newlands Gardens	Support
14 Rosehill	Support
20 Darcy Street	Support
10 Ennerdale Avenue	Support
16 Frostoms Road	Support
93 Ennerdale Road	Support
12 St Michaels Road	Support
4 Irving Street	Support
80 Cumberland Street	Support
106 John Street	Support
48 Hunday Court	Support
21 Berwick Street	Support
55 Wastwater Avenue	Support
55 Wastwater Avenue	Support
98 Harrington Road	Support
8 Chaucer Road	Support
43 Ullswater Avenue	Support
2 Oakley Owe	Support
3 Valley View	Support
151 Corporation Road	Support
35 Jane Street	Support
21 Elizabeth Street	Support
Harwineth	Support
114 Curwendale	Support
112 Corporation Road	Support
29 Hundey Court	Support
19 Patterson Hill Close	Support
4 Winifred Street	Support
23 Princess Street	Support
150 Newlands	Support
178 Newlands Lane	Support
19 Darcy Street	Support
20 Lingbeck Park	Support
25 The Gravels	Support

	12 Rowe Terrace	Support
	37 Cumberland Street	Support
	Hillside	Support
	4 Banklands	Support
	54 Harrington Street	Support
	54 Cumberland Street	Support
	16 Tarn Street	Support
	12 Mountain View	Support
	31 Banklands	Support
	21 Sarsfield Road	Support
	8 Fountains Avenue	Support
	3 Crosthwaite Court	Support
	9 hyde Street	Support
	15 Wastwater Avenue	Support
	9 South Walk	Support
	89 Wastwater Avenue	Support
	17 Stanbeck Meadows	Support
	13 Brayton Street	Support
	1 Elder Close	Support
	Lingcroft Farm	Support
	31 Berrymoor Road	Support
	34 Ashfield gardens	Support
	High Garth	Support
	Manor Barn	Support
	Lingcroft Farm	Support
	54 Greystone Road	Support
	Blennerhazel	Support
	The Lough House	Support
	45 Drumburgh Avenue	Support
	17 Albert Street	Support
	8 Coniston Crescent	Support
	37 Briery Acres	Support
	4 The Ridgeway	Support
	31 Laybourn Court	Support
	Easterbrook Hall	Support
	4 St Aidans Road	Support
	Castle Inn	Support
	Jesmond Cottage	Support
	9 Croft View	Support
	72 Dunmail Drive	Support
	Meadow Barn	Support
	1 Church Street	Support
	7 Princes Court	Support
	The Old Stables	Support
	1 Stackbraes Road	Support
	3 Riverside Walk	Support
	181 Green Lane	Support
	3 The Meadows	Support
	3 Beech Grove	Support
	Hamilton House	Support
	Economic Development	Support
Unit	Castle Hill Cottage	Support
	43 Eskdail Street	Support
	15 Kentmere Grove	Support
	21 Hillcrest Avenue	Support
	36 St Martins Close	Support
	23 Spencer Street	Support
	2 Friary Field	Support
	Stanegarh	Objection
	Lyngrove	Support

12 Birchdale Road	Support
40 Lingey Close	Support
13 Ladyseat Gardens	Support
28 The Parklands	Support
I hornlea	Support
9a Scaw Road	Support
, 22 Portland Square	Support
22 Portland Square	Support
4 The Laurels	Support
17 Albert Street	Support
Kirlin	Support
Kirlin	Support
3 Warmanbie Road	Support
22 High Street	Support
62 Currock Park Avenue	Support
Locharmoss	Support
19 Annandale Road	Support
4 Springfield Road	Support
33 School Close	Support
60 Hebden Avenue	Support
30a Sarkfoot Road	Support
Beech Grove	Support
15 Beckside	Support
69 Larch Drive	Support
155 Scotland Road	Support
Parkhouse Road	Support
Treetops	Support
36 Stanger Street	Support
30 Caroline Street	Support
3 Elm Garth	Support
18 St Johns Close	Support
25 Pennine View Close	Support
16 Eskdaill Street	Support
Pinewood House	Objection
75 Edenside	Support
26 Brentfield Way	Support
Arbol House	Support
7 St Anns Road	Support
5 Cherry Gardens	Support
27 Wentworth Drive	Support
75 Edenside	Support
2 Whitelee	Support
Lorton Vale	Support
Bexton House	Support
8 Townhead Court	Support
Torquin Cottage	Support
14 South Croft	Support
53 Eskdale Avenue	Support
342 London Road	Support
43 Prestonfield Road	Support
67a Springfields	Support
10 Solway Park	Support
10 Solway Park	Support
Waygill Hill	Support
14 Hillcrest	Support
5 Friars Vennel	Support
Kingmoor Business Centre	Support
35 Holmwood Drive	Support
3 The Green	Support
Westgrove	Support
28 Castle Green Lane	Objection

8 Cosgrove Avenue	Objection
14 Grasmere Road	Objection
19 Folly Lane	Objection
20 Central Avenue	Support
Howard Cottage	Support
2 Manor Place	Support
2 Manor Place	Support
28 Ness Way	Support
26 Wastwater Close	Support
26 Wastwater Close	Support
39 Cresswell Avenue	Support
2 Cromwell Court	Support
22 James Street	Support
Beech House	Support
2 Petteril Terrace	Support
1 Broom Farm Cottage	Support
14 Tenby Lane	Support
12B Rydiards Yard	Support
148 Bower Street	Support
5 Howard Street	Support
1 Brancana Court	Support
Pridelands	Support
Brantwood	Support
1a Moresby Close	Support
2 Mayfield	Support
33 Balmoral Road	Objection
5 Howard Place	Support
121 Blenheim Crescent	Objection
10 Martyns Grove	Objection
116 Blenheim Chase	Objection
22 Langport Drive	Objection
77 Brendon Way	Objection
31 Cairnwood	Support
31 Cairnwood	Support
26 Hillary Grove	Support
4 Colin Grove	Support
9 Vale Avenue	Support
19 Brackenridge	Support
6 Bellgarth Road	Support
14 Willow Place	Support
Rose Cottage	Support
Ridgewood	Support
Brantfield	Support
1 Crosshill	Support
1 Crosshill Drive	Support
Innovation Centre	
1 Laybourn Court	Support
Ashville	Support
Stonelea	Support
6 The Island	Support
6 Ruskin Drive	Support
70 Melbourne Avenue	Support
The Hawthorns	Objection
6 Walden Grove	Support
7 James Street	Support
Five Oaks	Support
Maple Croft	Support
1 Brancana Court	Support
	Support
Exchange Buildings	Support

10 Cruden Terrace	Support
Meadoway	Support
, 6 Valley Drive	Support
201 Woodside	Objection
53 Somerset Avenue	Objection
53 Somerset Avenue	Objection
23 High Street	Support
	Support
The Enterprise Centre	
31 Chiswick Street	Support
Rose Cottage	Support
Tobermory	Objection
6 Westgill Road	Support
269 Crackley Bank	Support
17 John Roberts Gardens	Support
8 Hillersdon Terrace	Support
17 Mayfield	Support
17 Mayfield	Support
Hollygarth	Support
35 The Beeches	Support
- A division of the Stobart Group, Multitmodal Gateway (3MG)	Support
37 The Hawthorns	Support
29 Sybil Street	Support
C&D Property Services,	Objection
17/19 High Street	
Militia House	Support
51 Central Road	Support
2 Low Row Cottages	Support
2 Low Row Cottages	Support
1 Dalzell Gardens	Support
25 Peatfield Road	Support
24 Riverside	Support
24 Riverside	Support
25 Peatfield Road	Support
Derwent Grange	Support
5 Ellerbeck Lane	Support
4 Lorne Villas	Support
38 Bale Road	Support
8 Hyde Street	Support
23 Trinity Drive	Support
54 Wastwater Avenue	Support
Solway Crest	Support
34 The Gravels	Support
Keys House	Support
24 Douglas Road	Support
96 Copenhagen Close	Support
26 Edinburgh Avenue	Support
23 Hawksfield Avenue	Support
2 West Grove	Support
55 Seaton Road	Support
2 New Grove	Support
12 Glenfield Place	Support
142 Vulcans Lane	Support
47 Central Road	Support
14 Douglas Road	Support
50 Brook Street	Support
11 Cromwell Crescent	Support
64 Curwendale	Support
2 Shore Road	Support
Inverewe	Support

11 Scotts Croft	Support
7 Senhouse Street	Support
32B Bowness Court	Support
84 Holden Road	Support
6 Bowflatts	Support
3 Curwen Street	Support
39 Coronation Drive	Support
43 bolton Street	Support
24 St Andrews Road	Support
Castle Gardens	Support
12 Purses Road	Support
19 Station Road	Support
Etterleigh Road	Support
131 Newlands Gardens	Support
19 Banklands	Support
37 Grasmere Avenue	Support
44 Greenfield Way	Support
51 Maryport Road	Support
3 Couiston Crescent	Support
110 Harrington Road	Support
1 Tarn Street	Support
18 Scawfell Avenue	Support
11 Hillary Close	Support
48 Newlands Lane	Support
65 Westfield Drive	Support
7 Derwent Street	Support
21 Hartington Street	Support
7 Yeowaryville	Support
, 11 Hilary Close	Support
149 The Parklands	Support
2 Derwentsink Gardens	Support
9 Ashmore Gardens	Support
18 Scawfell Avenue	Support
50 Harrington Street	Support
17 James Street	Support
9 Ashmore Gardens	Support
44 Greenfield Way	Support
1 Coniston Crescent	Support
147 John Street	Support
2 Curwen Street	Support
37 Kipling Avenue	Support
32 Wastwater Avenue	Support
17 King Street	Support
24 Douglas Road	Support
46 Moorclose Road	Support
23 Hawkshead Avenue	Support
, 15 Ashfield Gardens	Support
70/72 John Street	Support
, 29 Wollens Croft	Support
, 6 Dora Crescent	Support
, 124 Westfield Drive	Support
3 Elvet Close	Support
, 8 Holden Road	Support
, 56 Needham Drive	Support
, 34 Harringdale Road	Support
, 102 Gray Street	Support
, 2 Princess Avenue	Support
, 9 Abbey Close	Support
, 34 Ellerbeck Lane	Support
, 56 Needham Drive	Support
, 44 Needham Drive	Support

	, Braemar	Support
	, 20 Briary Dale	Support
	, 36 Douglas Road	Support
c	49 Udale Court	Support
	88 Rowe Terrace	Support
	, 6 Walls Road	Support
	, 6 Walls Road	Support
	, 27 Ullswater Road	Support
	, 37 Glaramara Drive	Support
	, 6 Hartington Street	Support
	, 17 Eldred Road	Support
	, 59 George Street	Support
	, 7 York Street	Support
	, Ellgar	Support
	, 69 Lonsdale Road	Support
	, 11 Red Beck Park	Support
	, 29 Meadow View	Support
	, 5 Ismay Warf	Support
	, 38 Holden Road	Support
	20 Brierydale	Support
	, 6 Walls Road	Support
	38 Gladstone Street	Support
	, 45 Stainburn Road	Support
	, 46 Queen Street	Support
	, 18 Ashton Street	Support
	, 37 New South Watt Street	Support
	, 3 Needham Drive	Support
	, 5 Chapel Street	Support
	, 17 Little Croft	Support
	, 9 Yeowartville	Support
	, Richard James Newsagent	Support
	, 98 Lonsdale View	Support
	, 23 Far Moss	Support

- 3.1 The proposals have been subject to extensive publicity and notification. That has involved the posting of two statutory Public Notices in the local Press, one indicating the application was supported by an Environmental Statement and the other giving Notice that the application was a "Departure" from the Development Plan. In addition, Site Notices to the same effect have been posted on two occasions at 6 locations around the perimeter of the Airport. Following its receipt, over 270 letters, giving notice of the application being made were sent to any member of the public or business that commented upon and/or was notified of the previous application, submitted in October 2007, for the development of Carlisle Airport.
- 3.2 Members should note that the expiry period for responses to be made to the Council as a result of the "Departure" Notice expires on 12th December and so this Report records only those comments received up to 5th December. Any further comments received during the remainder of the publicity period will be included in the Supplementary Schedule or verbally reported at the Committee meeting.
- 3.3 At 10th December, however, the foregoing publicity measures had resulted in the submission of 633 responses, 531 being in general support, 100 being objections and 2 being comments.

3.4 The points made in favour of the application are:

1. it is an opportunity for the area to develop, bringing growth and prosperity which is required in the current financial climate;
2. it will benefit the local economy and support local businesses which might otherwise have to reduce staff;
3. it will make Cumbria a more recognised place and attract people who own their own aircraft to visit;
4. the lorry traffic will move from an existing busy area of the city, thereby reducing the numbers of wagons in Carlisle;
5. Carlisle needs to come into the 21st century and the County needs an airport;
6. Carlisle and Cumbria cannot afford the loss of jobs which would occur if Eddie Stobart moves to Cheshire nor the income those jobs generate to the local economy;
7. Rejection of the proposals would be a dis-incentive to other potential investment in this area;
8. This is a golden opportunity not to be missed, building on the newly opened and long-awaited University of Cumbria;
9. opposition from people who drive and fly from elsewhere is hypocritical;
10. proposals might help retain the population that leaves this area to further their lifestyle, education, career;
11. as a small haulage firm based at the Airport, we think this will be a great venture for the area;
12. this will bring necessary infrastructure and communications networks to support tourism and commercial activities;
13. the business economy of Cumbria and SW Scotland will benefit from a regional airport with increased connectivity to national/international markets;
14. throughout Europe, the re-vitalisation of local airports has brought marked economic growth to the regions they serve and Carlisle should be no different;
15. a re-vitalised airport will reduce travel times to air services for businesses based in West Cumbria by 50-70% which, when factored in with reduced road miles and the fuel efficiency of the small turbo-prop aircraft likely to be operated, will bring real environmental benefits;

16. in order to survive, Carlisle Airport needs to be a multi-functional site so the costs of running the airport are offset by other activities;
17. the planning proposals are sensible and robust from a business point of view;
18. the economic future of Cumbria depends on improved transport links and Carlisle Airport is a major part of that;
19. the airport development would be complimentary to the activities progressing at the Port of Workington;
20. the development of the airport is opposed by a minority of people and this small amount of public opposition and indecisiveness of the Council could possibly lose the city of one of its major employers and as well as the airport in its current state;
21. the development of the airport will help local businesses to attract and retain candidates of suitable calibre into this area;
22. the revised plans fits in with local planning policy of the area, Cumbria and national planning policy;
23. This type of joint use is found in many smaller airports e.g. Coventry, Doncaster, Gloucester, exeter, Bournemouth and Blackpool;
24. It is well known from similar sites and applications that the new habitats give homes to existing and new species and they live quite happily alongside industry and airport related operations.
25. How can sellafield exapnd with all its assocaited risks, yet we can not have an airport?
26. A local airport will help decongest Heathrow, Stansted, Gatwick and Manchester is used for chartered flights.
27. Without this activity , the site will become derelict and unproductive
28. The development will be a major element in helping to open up the West of the country for business development and growth.

3.5 The writers opposing the application have identified the following concerns:

1. there is no analysis of "worse case" hazard risk assessment for any air traffic levels of activity;
2. there are no varying air traffic usage levels at volumes of air traffic movements above the unbelievably low "best case" scenarios the applicants present;

3. there is no "worse case" hazard risk assessment for road traffic levels in relation to possible hazard risk of fatalities in road accidents or of traffic seizing up with potential long delays or even the isolation of Brampton from acceptable road communication levels;
4. there is no "worse case" hazard risk assessments, or indeed of any kind, for aircraft being downed by a bird strike possibly over homes (or schools) in Irthington or Brampton;
5. the application involves re-location of the Stobart haulage firm from Kingstown to a rural site and is contrary to planning policy which requires the airport to be developed for airport-related purposes;
6. planning policy intends that large industrial development of this kind is consolidated into an area designated for that purpose, which is adjacent to rail infrastructure and to the route of the proposed Carlisle Northern Development Route;
7. approval of the proposal would damage the integrity of the Local Plan, which has been through the due statutory process, and also departs from the Regional Spatial Strategy;
8. the need for the airport development has not been subject to any airport planning strategy;
9. as far as is known, the airport site has not been subject of a masterplan which would "co-ordinate the approach to planning and investment" as stated in the Local Plan;
10. an 18m high, 34,000 sq m building in an open rural area is staggeringly inappropriate;
11. the building will be in the "Buffer Zone" of the Hadrian's Wall World Heritage Site, will be highly visible from the Wall itself, and potentially damage its World Heritage status;
12. the development will result in an increase in greenhouse gas emissions in the area and, nationally, by the encouragement of more passenger air travel and air freight for journeys which either are not currently being made, or are being made in lower emitting ways. The freight distribution centre involves a 14 mile round journey from the motorway which will increase levels of emissions from the existing site which is only 1 mile from the motorway;
13. there are other sites within the Carlisle/Cumbria area that are specifically allocated for this form of development, being significantly closer to the Primary Highway Network than the airport site is;
14. the development of facilities to encourage the global transport of goods is inappropriate at this time, when the priority should be to encourage the

localisation of economies;

15. undue pressure as the application is again accompanied by the "threat" of the removal of the Stobart business from Cumbria if the airport development does not go ahead (voiced publicly across all media). This is effectively blackmail and makes it very difficult for Councillors to arrive at an independent, unbiased decision;
16. if the application involves any increase of air freight flights from Carlisle it will add to global warming, increasing risks from climate change and particularly the damage that will cause not just to the UK but much more seriously its effect on developing countries;
17. a large scale air and road freight development in this location would be harmful to tourism;
18. the withdrawal of the new runway and terminal building indicates there was never any intention to make Carlisle Airport into a regional passenger airport. The Council's own planning policy requires the Airport to be developed for airport related purposes: this application seems to be a haulage yard and warehouse facility;
19. the number of vehicle movements that this development would bring would place an intolerable strain on the A689. At peak times this road runs nose to tail at 40 mph and this will only get worse with the northern relief road and the de-trunking of the A69;
20. the application is even more of a departure from the Local Plan as the previous application as the majority of the application is in relation to the plan to move the road haulage business 7 miles away from a motorway junction, from an industrial site to an area of World Heritage status, in surrounding countryside with numerous small villages within close proximity. It is no more airport-related than the previous application nor is it any more in scale with the existing infrastructure. Other than in the economic statement there is little in this application to suggest that there is to be very much in the way of "airport development";
21. there are to be around 52 lights in and around the development causing light pollution and an ambient lighting at night which may cause visual intrusion to many properties close to the development;
22. the security fencing and building will be an eyesore in this rural and mainly natural environment;
23. the issue of the 565 jobs being lost to Cumbria is scare-mongering and inaccurate as allocated land for this type of development, on well-connected sites, is available in the Carlisle area;
24. why can a road haulage company not trade from an industrial estate which is what they were developed for? The airport development is a smokescreen to relocate;

25. the application includes no provision for mitigation of the damage to the ecological integrity of the 11 hectares of grassland which is, inter alia, an important breeding ground for wading birds. There will be significant harm to biodiversity if 11 hectares of this important County Wildlife Site is lost;
26. the application should be refused on the basis of flawed and inadequate environmental information, irreversible damage to a County Wildlife Site and absence of mitigation for potential biodiversity losses all of which are contrary to national policies including PPS1 and PPS9. The application is also contrary to Policy E35 of the Cumbria and Lake District Joint Structure Plan and Policies CP1, CP2, CP4, LE2, LE3 and LE4 of the Carlisle Local Plan;
27. the application will have a big impact on the area's population of red squirrels because of the proposed felling of many wooded areas. Red squirrels are protected by the Wildlife and the Countryside Act 1981 which requires that their habitat is not disturbed. The area is also known for its population of bats which has European protection;
28. it is unclear what this application is proposing. In the Economic Statement it talks about the probable limited demand for passenger flights, yet passenger flights are the tool by which this development is being sold to the public. The Economic Statement also talks about freight flights as part of a "multi-modal transport synergy" yet there are no figures for types of freight planes or numbers to be flown in the main body of the application. If the Economic Statement is read alone, this application would appear to be about the economic benefits of a "multi-modal" freight and haulage business with a few passenger flights thrown in. If the main body of the application is to be believed, then all that is being proposed is a change of premises for a road haulage business. So which is it;
29. if the principle of large scale non-airport development is ceded it could lead to even more pressures for further non-airport development at the expense of investment in "airside" facilities;
30. the proposal conflicts with local and regional planning policies

3.6 The writers commenting on the application refer to the following matters:

1. while believing that the proposals are contrary to the criteria set out in the Local Plan for development of this nature, if the application is permitted there must be no increased use of the minor roads to Irthington and Laversdale;
2. an existing property has been omitted from the development plans so can their integrity be trusted?
3. the trees planted with the development will potentially overshadow the property on the opposite side of the Irthington road, reducing light and increasing flies which would be detrimental to cattle

4. Planning History

- 4.1 The Air Ministry opened Crosby-on-Eden in February 1941 as a wartime training base for RAF pilots and it remained as a military airfield until its closure in 1946.
- 4.2 It was, for a short period of time, thereafter used by British European Airways who operated flights from Carlisle to the Isle of Man but when that service ceased it reverted to agricultural use.
- 4.3 An application by Carlisle Corporation for Planning Permission to create a civil airport and erect buildings thereon was made to Cumberland County Council in January 1959. Following an Appeal, against that authority's failure to give a decision within the statutory period a Public Inquiry was held in Carlisle in September 1959. The Minister of Housing and Local Government issued his decision in December 1959 advising that he allowed the Appeal and granted planning permission. The permission was subject to one planning condition that the siting, design and external appearance of any buildings, and the location and design of any accesses, and the extension or alteration of any existing buildings shall be as may be agreed with the Local Planning Authority.
- 4.4 The City of Carlisle duly purchased the land from the Air Ministry in 1961. Transferred to the City Council following Local Government Reorganisation in 1974, Carlisle Airport was thereafter run for many years by a directly appointed Airport Manager and related support staff. The Airport provided commercial scheduled services, principally between Carlisle and London, but also at various times between Carlisle and other UK destinations such as Aberdeen, Dundee, Belfast and the Isle of Man, until the mid-1990's although charter public transport category services continued until 2004.
- 4.5 There have been a number of applications involving development at the Airport. These included an application made by the City Council for Outline Consent for new development including the provision of small industrial units, flying training facilities, a high security area, small business park, a new terminal complex and support facilities. That application was approved in October 1989 but was never implemented and the consent has lapsed.
- 4.6 Also in 1989, under planning application 89/1140, full planning permission was granted for a new flying training facility incorporating small hanger, workshop and amenity facility, and the erection of a maintenance workshop.
- 4.7 In 1994, full planning permission was granted for the erection of a hanger to house and maintain police support aircraft and for the temporary siting of 3 no. Portacabins for use as office and stores.

- 4.8 In 2001, full planning permission was granted for the erection of a new hangar to house aircraft.
- 4.9 Also in 2001, full planning permission was granted for an extension to the existing fire station, adding 3 no. 6m bays, to house further fire vehicles.
- 4.10 Haughey Airports obtained a 150-year lease of the Airport in 2001 but that Company was subsequently acquired by WA Developments. The Airport is now managed by Stobart Air Limited, a subsidiary of WA Developments.
- 4.11 The Airport is used now by private flying clubs and pilot training on a regular basis, aviation club activities including use by the Solway Aviation Museum, private and business aviation and occasionally by the Ministry of Defence for military exercises in the area. The applicants have stated that in 2006 there were approximately 23,000 Air Traffic Movements at Carlisle Airport associated with these uses.
- 4.12 Members will, of course, recall that in October of last year the applicants submitted a detailed planning application, accompanied by an Environmental Statement and other specialist studies, for works comprising:
- “Construction Of Replacement Runway With Associated Instrument Landing Equipment And Reconfigured Taxiways And Hard Standing; New Development To The South Of The Runway Including Warehousing And Distribution Facilities, New Passenger Terminal, Offices, Hangars, New Air Traffic Control Centre, Aircraft Apron And Car Parking, With New Road Junction And Access From The A689, And Other Associated Infrastructure And Facilities, Including Aviation Fuel Storage, Local Refuelling Facility For The Distribution Operations And Improved Drainage”*
- 4.13 This Committee considered the application on 28th March, 4th April and 25th April 2008. On the latter occasion Members resolved that they were “minded to approve” the application subject to the attainment of an Agreement under S106 of the Town and Country Planning Act 1990 and to compliance with a number of conditions. However, following referral to GONW as a “Departure” from the Development Plan the Secretary of State concluded that the proposals raised matters of more than local importance and “called-in” the application for her consideration following a Public Inquiry. Although arrangements were made for that Inquiry to commence in October of this year, the applicants withdrew the application in July.

5. Details of Proposal/Officer Appraisal

Introduction

- 5.1 Members are reminded of the recent planning history of Carlisle Airport, which culminated in July with the withdrawal, after it was "called-in" by the Secretary of State, of the planning application lodged 14 months ago for extensive development, including a realigned runway and an extensive building that was proposed to be used for warehousing, hangarage and as a Terminal.

Members had previously resolved to grant conditional permission.

- 5.2 Like that previous submission, the current proposals seek Full Planning Permission. The application before the Committee now, however, is a much more "scaled-down" application omitting the intended re-aligned runway and related aprons and taxiways, the proposed new Terminal facilities, new air traffic control tower, Instrument Landing System and other navigational aids including approach lighting. The applicants have indicated that they intend, instead, to repair/resurface rather than replace the existing main runway (07-25) and are likely to utilise part of an existing recently constructed building, sited close to the original core of 1940's buildings adjacent to the northern boundary, as a passenger Terminal. The applicants rely on carrying out those works under the "Permitted Development" rights that apply to relevant airport operators under the Town and Country Planning (General Permitted Development) Order 1995. Likewise, they say that the previously expressed imperative that an ILS be installed has been overtaken by developments in new technologies (GNSS precision approaches, a form of GPS), the potential release by the MOD of more airspace around RAF Spadeadam and following discussions with an airline operator which has indicated interest in operating a passenger service and whose fleet can operate out of airports that do not have Instrument Landing Systems.
- 5.3 The current application proposes the erection of a substantial amount of floorspace, principally to be used for warehousing, although it is again of a smaller scale (in terms of area) than previously envisaged i.e. the previous application had total "build" footprint of 49,864 m² (or 536,736 ft²) whereas the current application has a "build" footprint of 38,075 m²/ 409,839 ft². The proposed floorspace also differs in that the original application proposed a total floorspace of 60,967 m² (656,250 ft²) compared to this application which proposes a total floorspace of 44,048 m² (474,133 ft²). There is a key difference, however, in that the current application has a larger element of "office" floorspace than the previous application, which itself proposed a substantial increase in floorspace above that currently utilised by the two principal occupiers. That is demonstrated in the table which follows:

ORIGINAL APPLICATION:

Stobart Air Leased Offices:	5,181m ² (55,768 ft ²)
Stobart Air Office/Mtg Rooms:	1,298m ² (13,972 ft ²)
Total Office Floorspace:	6,469m ² (69,740 ft ²)

CURRENT APPLICATION

Office Floorspace:	7,988m ² (85,983 ft ²)
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EXISTING EDDIE STOBART LTD/WA DEVELOPMENTS FLOORSPACE:

Kingstown/Parkhouse/Appleby:	4,112m ² (44,262 ft ²)*
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* Taken from data supplied with previous application.

This represents a significant increase above the existing levels of office floorspace the two Companies currently occupy (+3876m² or 41,721ft²) and an increase above the Office element of the previous application (+1519m² or 16,243ft²).

- 5.4 The application is supported by a range of detailed specialist studies and plans and particulars of the intended site layout, buildings, plant, equipment and infrastructure. Supporting documents comprise a modified Transport Assessment and Travel Plan; a revised Design and Access Statement augmented by a further "Supplementary" document; a Planning Policy and Position Statement; and a Flood Risk Assessment. An entirely new Economic Impact Appraisal has also been submitted with the application and that has been commissioned by Cumbria Vision Ltd from an economic consultancy, EKOS (working with AviaSolutions), "to assess the wide ranging economic value of the proposed developments by Stobart Air Limited at Carlisle Airport".
- 5.5 The applicants consider that the development falls within Part 10(a) of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999, and accordingly the application requires to be and is accompanied by an Environmental Impact Statement (variously referred to as the EIA, ES or EA). The Environmental Statement comprises Volumes 1, containing relevant chapters on key issues such as Cultural Heritage (including archaeology), Ecology and Nature Conservation, Air Quality and Dust, Noise and Vibration; Volume 2 providing Technical Appendices; and Volume 3 which provides a compendium of plans, photographs, photo montages and Figures referred to in Volumes 1 and 2. As required by the Environmental Assessment Regulations the applicants have also provided a "Non-Technical" Summary of the Environmental Statement.

Background

- 5.6 Carlisle Airport lies approximately 8.5kms (5.3 miles) north-east of Carlisle and about 3.5kms (2.2 miles) west of Brampton. Its current operational site extends to about 176 hectares and straddles a low east-west ridgeline within generally open countryside, the nearest settlements being the villages of Irthington and Laversdale that respectively lie about 0.5kms and 0.6kms to the north-east and north of the existing Airport perimeter.
- 5.7 In many ways the Airport is little changed from when it was first built in 1941 and began operations as RAF Crosby-on-Eden, a wartime training base for pilots. The three asphalt runway strips (all known by their magnetic bearings), namely the principal runway 07/25 [i.e. it is aligned on an axis 70 degrees east of north (0 degrees) and 250 degrees from that northern point] which is aligned broadly north-east to south-west; the shorter 01/19 which has a north-south axis; and 13/31 which is orientated south-east to north-west, are all very evident as are the linking taxiways, aprons and hard standings. Only the first two are still used by aircraft with the latter being now just used for storage and vehicle parking. Likewise, the cluster of low, 1940's buildings with their taller, adjacent control tower still dominates the immediate area close to the northern site boundary and in relation to the more recent, but more

scattered, additional hangers and fire fighting facilities close by. Other features such as abandoned air raid shelters and structures near to the western boundary also provide a reference to the Airport's origins and first use for military purposes.

- 5.8 The Airport sits within a predominantly agricultural landscape characterised by small farmsteadings but there are, to the west of the Laversdale road (close to Watchclose Woods) and immediately opposite the existing Airport administration buildings adjoining the northern site boundary, clusters of industrial/commercial development occupying sheds/sites that were formerly part of the Airport but were sold off some years ago.
- 5.9 The existing site area is almost wholly enclosed by roads with most of the southern site boundary possessing a lengthy frontage onto the most significant, in highway terms, the A689 which is a strategic road link from the A69(T) west of Brampton to the M6/A7/M74 junction at Kingstown (Junction 44 of the M6) at the northern fringes of Carlisle. Currently, there is no direct vehicular access from the A689 to Carlisle Airport with all traffic using the minor roads to Laversdale (skirting the west and north fringes of the Airport) or, to a much greater extent, the more direct access leading from the road to Irthington.
- 5.10 While in its wider setting the Airport sits within a generally rolling and undulating landscape, its immediate environment is fairly open and featureless, the only significant visual interest being created by Watchclose Woods at the western perimeter. However, it occupies a very important position from both an archaeological and nature conservation perspective due to its proximity to the Hadrian's Wall World Heritage Site (WHS) and the River Eden Special Area of Conservation (SAC), the River Eden and Its Tributaries SSSI, Whitemoss SSSI and more distantly to the west, the Upper Solway Flats and Marches Special Protection Area (SPA).
- 5.11 Although no part of the proposed development area actually lies within the World Heritage Site, the whole of the Airport is within the "Buffer Zone" of the WHS. It has further archaeological potential and, indeed, interest, due to the presence within the Airport site of the Watch Close Roman Camp (a Scheduled Ancient Monument near the south-west boundary) and the remains of part of Stanegate Roman road, an associated feature of the Wall and Vallum, which are present within Watchclose Woods. Likewise, whilst the application site is not within a national or internationally designated area of nature conservation importance (the Airport being a County Wildlife Site while Watchclose Woods is a non-statutory "local" wildlife site) it is very close to the River Irthing (0.4km to the east) which forms part of the River Eden SAC and is also within the River Eden & Its Tributaries SSSI designation.

Details of the Proposals

- 5.12 Unlike the previous application site, which included land on the western and eastern sides of the minor roads to Laversdale and from the road to Irthington respectively, the current application site relates entirely to the existing operational land and, hence, is marginally smaller [176 hectares/435 acres]

than the 182.5 hectares to which the previous application related. The proposed "development area", i.e. where the works described in the application will be undertaken, is significantly smaller than the whole site, and extends to just under 11 hectares.

- 5.13 The proposed "building" zone is located in the south-eastern corner of the existing operational land close to the perimeter boundary with the minor road to Irthington from the A689. Access to the development would, however, be taken off part of the southern site frontage onto the A689, broadly in the same location as previously proposed where there is an existing field gate from the county highway. Distinct from the previous submission, the application involves no "airside" works but instead seeks Planning Permission for the construction of the following elements:

Freight Storage and Distribution Centre (FDC)

- a) The largest, and most visually dominant element of the application proposals is the proposed erection of a substantial 5-bay building (240m by 150m on plan and 17.650m in height) that is described as a Freight Storage and Distribution Facility. It has a floorspace of circa 36,000m² or 387,500 ft² and, with the exception of a 3,000m²/27,800 ft² portion that is labelled as being "Stobart Rail Storage Area", is indicated as being a distribution warehouse. The building would be finished in grey profiled sheet cladding with shallow pitched roof finished in grey, composite panels with roof lights. Two indented loading bays, each with 4 no roller shutter doors (7m wide) and hence capable of loading/unloading a minimum of 4 vehicles at a time, are incorporated in its south-eastern façade (facing away from the runway). A similar width loading bay with roller shutter door (but not indented as a loading "dock") is also intended in the same façade, at its northern end. Seven narrower roller shutter door openings, two serving the Stobart Rail accommodation, are also proposed in the opposite elevation, facing towards the runway while vehicle access is also obtainable from the south-western gable end of the building;

Office Administration Centre

- b) Adjacent to the south-west corner of the proposed Freight Warehouse, but separated from it by a 24m wide vehicle circulation route, it is proposed to erect a 4 storey office building. It has a footprint of broadly 31m by 66m, is also 17.650m high and has a total floorspace of 7,988m²/86,000 ft². It is proposed to be finished in extensive curtain wall glazing and composite cladding panels using the same colour that is used on the warehouse (albatross). The building is intended to accommodate, in one location, an office administration centre for Eddie Stobart Limited and Stobart Rail (formerly WA Developments) which presently operate out of separate buildings in the Kingstown and Parkhouse areas, both close to J44 of the M6 at the northern edge of the urban area of Carlisle;

Vehicle Access

- c) 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, which links J44 with the A69(T) at Brampton and is a Route of Regional Importance identified within the Regional Spatial Strategy. The spur road is proposed to have a 7.3m wide carriageway with 2m wide footways to each side. Inside the site it would have two left turns off the main carriageway, one leading to a staff, visitor and driver car park [see description under i) below] while the further turn-off would directly serve the proposed Freight Storage and Distribution Facility, the related ESL/Stobart Rail office centre, and a further building (a Cross Dock) that is to be located adjacent to the north-eastern side of the warehouse. The main access road would extend to serve the vehicle wash/sprinkler tank and fuelling areas and afford emergency access to other areas of the Airport;

Cross Dock Facility

- d) The Chilled Cross-Dock Facility is an entirely new element of the proposals that has arisen from the applicants' acquisition, since the previous application was made, of a company known as Innovate. The proposed building, broadly 31m by 36m on plan and 13.5m high, would be constructed of composite profiled coated steel sheeting, coloured to match the other buildings in "albatross", surmounting a buff brown wire cut brick plinth. Labelled a "chill store" on detailed building drawings it has 5 lorry entry doors on both its front entrance elevation and rear elevation. It is understood the building allows bulk, chilled perishable freight to be sorted and transferred from one truck to another for onward delivery;

Gatehouse

- e) Adjacent to the vehicle access, leading to the Freight Storage and Distribution warehouse and the chilled cross-dock, it is proposed to erect a proposed Gatehouse building containing two floors of accommodation (totalling 264m²/2,840ft²). It would be finished in the same facing brickwork as used elsewhere but to all of its ground floor combined with flat profiled composite cladding panels (albatross) to upper areas these being punctuated with ribbon windows. It would have a curved, low-pitch profiled steel clad sheet roof with extended overhangs and radiused fascias so that its height varies from a maximum of 9m to 5.3m. The upper roof area at its northern end would contain plant. The floorspace within the proposed building includes office space, a boardroom and driver management/meeting room and personnel based within the building will operate the entry/exit barrier system supervising access to and from the FDC yard;

Canteen/Welfare Building

- f) Close to the Gatehouse, it is proposed to erect a further single storey building containing 200m²/2,150ft² floorspace. It would provide canteen/welfare facilities and would, again, employ the same pallet of wall finishes as used elsewhere but will have a curved low-pitch profiled steel sheet roof with extended overhangs;

HGV Wash/Fuelling/Sprinkler Tank

- g) Immediately south of the service yard to the Freight Storage and Distribution warehouse, and served off a separate spur from the internal road system, it is proposed to provide an area to be used for HGV washing and fuelling together with accommodating a sprinkler tank and pump house. A further HGV wash facility is proposed adjacent to the north-east gable of the FDC with a vehicle lance wash area and housing unit also being provided within the yard area to the north side of the FDC opposite the Stobart Rail area of the warehouse;

Sub-Station and Back-Up Generator

- h) Two sites for Sub-Stations are provided close to the south-east corner of the proposed FDC (including provision for a back-up Generator) and between the east side of the car park and the HGV access to the FDC, the latter including a potential future additional Generator. Similarly, an intake substation compound and gas meter housing for gas supplies are also proposed to the immediate south of the access road and an LPG store is proposed within the service yard to the FDC;

Car Parking, Cycle Parking, Bus Access and HGV Parking

- i) The development proposes a 339 space (including 20 disabled persons spaces) car park for staff, visitors and drivers, positioned to the south-west of the proposed "Stobart Offices" block. The layout of that car park also provides for a bus/coach loop with two Bus Stops with Shelters being positioned at its northern end, close to the entrance to the offices, and its southern end. The northern shelter is combined with a cycle shelter and a small taxi parking area for 5 vehicles is also proposed close to the northern stop. Parking for 46 no. HGV cab units is proposed within the security controlled HGV yard area i.e. beyond the Gatehouse barrier system. In addition, standing space for 96 trailer units is also proposed, these being distributed within the "secure" hardstanding areas adjacent to the north-western and south-eastern facades of the FDC;

Storm Water Storage

- j) Located between the A689, east of the proposed new roundabout, and the internal road serving the development it is proposed to construct two no. storm water balancing lagoons which form part of the overall surface water drainage system for the development. These lagoons will receive surface water from the roundabout junction, access roads, car and lorry parks, vehicle and service yards/refuelling areas and from the roofs of buildings to be erected. 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;

Security Fencing and Lighting

- k) The car park areas will be enclosed by a 1.8m high black coated zinc paladin fence to deter unauthorised access. Anti-intruder security fencing, 2.88m high and designed to meet BS1722 Parts 10 and 14, will be erected around the HGV yard and airport perimeter. It appears there will be no direct access between airside activities at Carlisle Airport and the proposed development although the security fencing enclosing the development will incorporate "crash" gates and the layout allows for emergency access when needed. 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 a combination of 52no. building or column mounted luminaires, these being mounted 10m in all cases above ground. These will employ fittings that range from 150 watts (2 locations), 250 watts (14 locations) to 400 watts (which are in the majority (36 locations)).

Landscaping

- 5.14 The application is also accompanied by a landscaping scheme which, in relation to the site margins, proposes 6no. blocks of woodland mix planting in 3 distinct areas of the site. Area 1 is located in the north-west corner of the Airport site fronting the road to Laversdale, and comprises two proposed blocks of linear planting, 2552m² and 3004m² in area, which would be 10m deep and extend for 250m and 320m respectively. Area 2 is situated to the north-east of the proposed FDC and it is proposed to undertake planting of the woodland mix in two additional blocks. One, 1081m² in area and broadly 62m by 20m on plan, occupies a roadside location between an "emergency" access road and the security fencing enclosing the north-east edge of the development site while the other area, extending to 1181m² and broadly 90m by 15m on plan, also provides a roadside belt linking to the existing tree belt alongside the road to Irthington. Area 3 comprises the sections of road frontage onto the A689 to the east and west of the proposed new roundabout leading to the development. In this location, two linear belts of planting are proposed, each broadly 15m deep, which extend for approximately 500 metres along the road to the west of the access and for about 240 metres to the east of the access. These will provide, respectively, 7449 m² and 3379m² areas of planting.
- 5.15 The proposed woodland mix will comprise species of Lime, Ash, Hazel, Silver Birch, Scots Pine and Oak trees. While existing hedgerows are to be retained as far as possible, the formation of the roundabout will entail removal of sections of hedging for construction but reinstatement of a new hedge using Field Maple, Beech, Silver Birch, Hornbeam and Privet is proposed.
- 5.16 While the foregoing landscaping works represents what might be loosely termed as "structural" planting for the development, further planting is envisaged associated with the access road and the perimeter area of the buildings and yards. In this regard, the applicants have adopted a strategy of "avenue" tree planting of individual Lime trees planted at intervals of about 13m. That form of planting within grassed verges from the roundabout at the

A689 to the car park entrance is further extended along the access road leading to the vehicle wash/fuel storage area but at that point then becomes, effectively, a row of trees along the hedgeline to the Irthington road. More planting in a row of Limes continues in the banking from that access road, down to the yard areas to the south-east of the building and wraps around the yard beyond the north-east gable where the Limes give way to a line of 7 Field Maples.

- 5.17 The planting specification for those trees is intended to be "extra heavy standard" quality which comprises trees 4.5-6m in height planted in pits with stakes, ties and anchors. Otherwise the landscaping scheme provides for proposed areas of grass, with limited numbers of Lime trees, planted to the same specification, within them. Although no planting, including low level shrub or ground cover planting, is shown to break up the extensive car park or soften pedestrian routes from the car park to the offices and the bus stops or, likewise, any proposals to undertake screen planting around the sub-station and generator areas near to the site entrance, the applicants have previously accepted that this could be covered by a planning condition and have, again, nominated a condition as part of any planning approval the Council may grant.
- 5.18 Members should note that, unlike the previous application, the development does not require any loss of trees or reduction in the height of trees within Watchclose Woods nor does it require removal of extensive sections of hedgerows, other than where the access is to be created. In overall terms, with the landscape measures that are proposed, woodland cover would ultimately be increased.

Assessment

- 5.19 Members will observe from the Summary of Representations in Section 3 that this application has attracted considerable public interest and that the majority of persons who have commented on the proposals are in favour of the application. As was the case with the previous application, that support is overwhelmingly due to the anticipation that the development will lead to the regeneration of Carlisle Airport, the restoration of passenger services with enhanced business links to other services and markets, the potential for a regenerated Airport to lead to inward investment and/or safeguard existing jobs and the increased opportunity that it would give for greater connectivity with the rest of the UK and possibly overseas for both business and leisure flights.
- 5.20 These are worthy aspirations and undoubted benefits if they can be delivered. There is little doubt that an operational Airport would be a major boost to the local economy and that passenger service air links to other parts of the United Kingdom, which this area is acknowledged as severely lacking in comparison with other parts of the country, would reduce Cumbria's perceived isolation and remoteness. Members were, of course, fully supportive of the previous application on the basis that it could be the catalyst to fulfilling these aspirations.

5.21 Although the planning application before Committee offers no “aviation” proposals for the Council’s approval as part of the development, the applicants have stated that they are prepared to commit to investing in essential infrastructure improvements to the Airport, notably re-surfacing of the runway and provision of passenger terminal facilities. They have, accordingly, offered to enter into an Agreement under S106 of the Town and Country Planning Act 1990 to undertake and complete those works to give the Council “comfort” that they will be delivered as part of their cumulative investment plans at the Airport. Obviously the wording of the agreement is very important and discussions are still taking place. Members should be aware that there may be little functional link between the haulage operations themselves and the airport. The Economic Impact Appraisal prepared by EKOS states: *“From a cargo perspective, our analysis suggests that it is unlikely that significant cargo volumes can be generated from Carlisle Airport. Nevertheless, once upgraded infrastructure is in place, there may be niche opportunities that can be developed on a tactical basis, plus some potential for multi-modal integration with Stobart warehouses.”*

5.22 It is important to stress the Planning Policy context in which these proposals (in their totality) have to be considered. In that regard, Members should appreciate that the policy position has been modified since Committee last considered proposals for Carlisle Airport, following the approval of the North West of England Plan (Regional Spatial Strategy to 2021) and the Carlisle District Local Plan 2001-2016 (both adopted in September 2008) with consequential effects on the relevance of the Cumbria And Lake District Joint Structure Plan. In short, the following documents now constitute the “Development Plan” for purposes of assessing the proposals against operative planning policy:

1. The North West of England Plan (Regional Spatial Strategy to 2021);
2. The Carlisle District Local Plan 2001-2016; and
3. The “saved policies” of the Cumbria and Lake District Joint Structure Plan 2001-2016.

Regional Spatial Strategy

5.23 The RSS is intended to replace the Structure Plan but some policies within the latter have been retained or “saved” as it is considered they remain relevant until such times as they can be replaced after a future RSS review. There are a limited number of such “saved” policies but some of those are pertinent to the application proposals. Together, the RSS, “saved” Structure Plan Policies and the provisions of the adopted District Local Plan provide a compendium of inter-related adopted planning policy to guide development to appropriate locations and set out relevant criteria against which individual planning applications should be assessed.

5.24 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.

- 5.25 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).
- 5.26 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”*.
- 5.27 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.
- 5.28 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).

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.

- 5.29 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.

- 5.30 Members will note that the 4NW, the regional planning body for the North West, has been consulted on the application. While initially believing the application did not fall within the formal consultation "thresholds" (due to a

mis-understanding of the extent of the site area and the level of office floorspace being proposed) when the correct site area and floorspace proposals were appreciated, 4NW commented formally as a statutory consultee. Both the initial “observations” made, and supplementary formal consultation response when the position was clarified, are reported in Section 2 of this Report: Summary of Consultation Responses. These have since been further clarified.

- 5.31 Although the applicants, and the Assessment within this Report, make reference to the policy provision under Policy W2 of the RSS, 4NW does not agree that this policy applies to these proposals because Policy W2 is 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; neither does it appear on the NWDA’s list of strategic regional sites. That is factually correct: within Carlisle District only Kingmoor Park has been identified in adopted Policy documents as a “Regional Investment Site”.
- 5.32 The 4NW response acknowledges that the development falls within the consultation “thresholds” for its “Schedule of Regionally Significant Planning Applications” but points out that these are merely guidelines to suggest where a planning proposal may be significant enough in the implementation of RSS to warrant consultation with 4NW; they are not intended to pre-empt the LDF allocation process and just because a site meets the thresholds in the Schedule should not therefore be taken as an indication that Policy W2 applies to the site.
- 5.33 In their response to consultation, 4NW outlines the key relevant policies in RSS and, regardless of the fact that it considers Policy W2 to not be applicable, advises that *“broadly, the warehouse proposals are likely to be in line with these policies, subject to:*
- *road links and junctions have sufficient capacity for the trips generated;*
 - *it can be demonstrated that no suitable sites can be found that are better related to the urban areas (in line with Policy DP4’s sequential approach);*
 - *the provisions of the sustainable design and construction policies are met;*
 - *and*
 - *effective implementation of the Travel Plan is ensured”.*
- 5.34 However, the proposal for “significant office development” is noted and 4NW was initially concerned that these proposals appear to go well beyond what is ancillary to the warehouse, including the entire head office operations for the Stobart Group. While recognising that the application sees significant business benefits of having all the Stobart Group offices co-located with the warehousing, 4NW considers that *“this needs to be weighed against a number of RSS policies which clearly do not favour major office development at this location”* (Policies DP4, DP5 and Policy W3 being highlighted).
- 5.35 The objectives of Policies DP4 (setting out the sequential process for identifying suitable sites) and DP5 (reducing the need to travel by private car and giving emphasis to major development being genuinely accessible by public transport) have been explained earlier in this Report (paras 5.27 and

5.28). Policy W3: Supply of Employment Land sets out the targets for the supply of employment land over the plan period. It states that Local Planning Authorities should undertake a comprehensive review of commitments, to secure a portfolio of sites that complies with spatial development principles (Policies DP1-9 and RDF1) and sub-regional policies (Policies CNL1 and CNL2 in this instance) and to ensure 7 criteria are satisfied.

The sub-text of the Policy states that *“Office development should, as far as possible, be focussed in the regional centres, or adjacent to town/city centres listed in (Policy) RDF1 and in Key Service Centres, consistent with Policies RDF2 and the sequential approach in Planning Policy Statement 6”*.

- 5.36 The consultation response from 4NW concludes that *“if the business case is considered sufficient justification for major office development at such a location then the following will be necessary:*
- *the use of the offices will need to be limited to the Stobart Group alone, with no possibility of speculative office use which cannot be justified at this location; and*
 - *the Travel Plan will need to be strengthened in terms of reducing car use, for example, going beyond simply providing bus stops by including committed provision of on-site public transport links”*.
- 5.37 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"*.

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

The policy 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.

The consultation response from 4NW points out that Policy RT5 predominantly refers to airport related development so is generally not relevant to this application. It goes on to reinforce the caution within Policy RT5 that development which would impede the operational requirements of the airport should not be permitted within its boundary.

- 5.38 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"*.

- 5.39 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.

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).

- 5.40 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.
- 5.41 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.

- 5.42 Thus, in summary, the development [unless the office space is ancillary] would not appear to accord with the RSS. Generally development should be located in and around the centre of Carlisle or a sequential test followed first. The site has not been identified yet for regionally significant economic or office development. Officers have also considered whether, having regard to the comments of 4NW, a personal condition, restricting the use of the offices to Stobart, would be appropriate but Government policy in Circular 11/95 is hostile to such conditions when permanent building is proposed. It follows that the office development, if it were not occupied only as ancillary accommodation to the warehouse, distribution and other related activities of the Stobart Group, would be contrary to policy.
- 5.43 A Section 106 Agreement which secured improvements to Carlisle Airport would, in itself, clearly accord with the RSS.

Saved Structure Plan Policies

- 5.44 Of the 23 "saved" Policies within the Cumbria and Lake District Joint Structure Plan 2001-2016, Policies ST5 and EM13 are particularly relevant. The former expects new development to be focussed on the key service centres with major development being focussed on Carlisle to strengthen 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. Policy EM13 requires that an adequate supply of employment land is available, for a variety of business uses, in the most appropriate locations. It identifies 5 market sectors of employment land ranging from Regional Investment Sites to Port Related Sites and the characteristics of each type of site are identified. The Policy allocates 4 tiers of sites within the city of Carlisle, including a Regional Investment Site of 50 hectares (at Kingmoor) and a Strategic Employment Site of 30 hectares, the fifth category, "Port Related Sites", clearly not being applicable. A Strategic Employment Site for North Cumbria is also allocated at Carlisle Airport, with 6 hectares supply of readily available land being expected to be provided at that location at the start of each 5-year period from 2001-2006; 2006-2011 and 2011-2016.

Strategic Employment Sites display the following characteristics:

1. They are over 5 hectares in extent and can be developed in large plots
2. They are suitable for development in Use Classes B1(b and c), B2 and B8
3. Uses falling within Use Class B1(a) are acceptable if ancillary
4. Access is available to the Primary Route Network
5. They have the potential to be served by public transport
6. They should have good links/proximity to Key Service Centres
7. They should have a Masterplan incorporating landscaping.

- 5.45 Thus, the Saved Policies allocate a Strategic Employment Site at Carlisle Airport and the permitted uses include B8 (Storage & Distribution) but not B1 (a) unless it is "ancillary". The office development, as "ancillary" does, therefore, accord with these Policies as does the storage and distribution use.

Carlisle District Local Plan

- 5.46 The Carlisle District Local Plan 2001-2016, adopted in September of this year, provides localised, specific policy guidance and proposals to ensure the provision of an adequate land supply and to direct development to appropriate locations within the District. Its key policies, in relation to these proposals, are Policies DP1: Sustainable Development Locations; DP3: Carlisle Airport and EC22: Employment and Commercial Growth Land Allocations.
- 5.47 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 within 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 City of Carlisle, the Key Service Centres of Brampton and Longtown and the 20 Local Service Centres which include Dalston, Wetheral and Houghton. Outside those locations, development is required to be assessed against the need to be in the location specified. The supporting text to the Policy states that the main location for the majority of development will be Carlisle not only because of the ability to cater or alternative forms of transport, but also pursuant to its designation as a sub-regional centre. Thus, Carlisle will be the prime location for employment and residential development during the Plan period and the focus for new development proposals should be the urban area, with limited rural development.
- 5.48 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 and observes that *"the development of Carlisle Airport has the potential for supporting economic development throughout the region"*.
- 5.49 Policy EC22 is an employment land allocations Policy, setting out the cumulative minimum requirements, in addition to land with planning permission, for land for a variety of employment needs within the District over the Plan period. That total target, for an additional 77 hectares, is dis-aggregated to ensure proper provision is made within the urban and rural areas of the District although, reflecting Policy DP1 (and mirroring the Spatial Priorities of Policy RDF1 of the RSS), the bulk of provision is made within the

urban area of Carlisle. Of the rural allocation, a site of 21.15 hectares is identified for a Strategic Employment Site at Carlisle Airport, that allocation broadly reflecting the extent of land subject to a previous planning permission for employment development (the 1989 permission described in para 4.5).

- 5.50 The reasoned justification for the policy provision for the Carlisle Airport allocation is explained in supporting para 4.88 of the adopted Local Plan. It will assist Members, in considering the overall acceptability of the application, for a clear explanation of the Policy and how it is expected to be applied to be set out. The allocation at Carlisle Airport has 4 components within it:
1. It has potential as a strategic site for inward investment and would therefore be suitable for industrial and commercial development including development with a need to be located at the airport;
 2. 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;
 3. In addition, development that is airport or transport related with a requirement to be located at the airport will be considered favourably; and
 4. Additionally, development that meets the needs of local businesses in the Brampton area will be considered favourably. Although located over 4 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.
- 5.51 The distribution and storage/haulage proposal does not fall within any of the above 4 categories. It is not inward investment (Stobart are already located in Carlisle), it is not airport related development (though the proffered section 106 could secure this), it does not have a need to be located at the airport and it is not a local business in the Brampton area.
- 5.52 The applicants have made submissions, including Opinions from two Queen's Counsel, to the effect that the proposals are "policy compliant" since they relate to a Strategic Employment Site allocated under the provisions of Policy EC22 of the adopted Local Plan, cross-referenced under Policy DP3, and are not in conflict with the very recently adopted Regional Spatial Strategy. Accordingly, they consider that the proposals do not constitute a "Departure" from the Development Plan. That view is not accepted by Officers and this position is supported by an Opinion obtained by the Council from Leading Counsel. While there has been disagreement on a point of law, it is ultimately a matter for the City Council, as Local Planning Authority, to come to a view on this issue and, if satisfied that it is a Departure application, to undertake the necessary requirements to refer the application in accordance with the Town and Country Planning (Development Plans and Consultation) (Departures) Direction 1999, if Members are minded to approve the application. Accordingly, the application has been formally advertised as a "Departure" from the Development Plan.

5.53 The Departures Direction and its implications and obligations in relation to these proposals are discussed in detail later in this Report. Quite separately from that, Officers have given further consideration to the office development. As already noted, the Structure Plan defines Strategic Employment Sites (SES) as:

1. over 5 hectares in extent and capable of being developed in large plots
2. suitable for development in Use Classes B1(b and c), B2 and B8
3. suitable for uses falling within Use Class B1(a) only if it is "ancillary"
4. having access available to the Primary Route Network
5. having potential to be served by public transport
6. having good links/proximity to Key Service Centres
7. having a Masterplan incorporating landscaping.

From this, it is apparent that the proposed B8 Use (Storage and Distribution) and its ancillary B1 (a) office development would be compliant with the Structure Plan policy EM13. The Glossary to the Local Plan, however, refers to a Strategic Employment Site as being defined in the Structure Plan as *"large sites of a minimum of 8 hectares, designed specifically to provide sites for large-scale business, general industry, storage and distribution uses. The site should be close to the primary road network. Small scale uses would not normally be permitted on such sites"*. This reference to "Business" i.e. seemingly all of the B1 Use Class creates an apparent anomaly; however, reference to the SES allocations in the Urban and Rural areas (pages 63 and 66 of the Local Plan), fully explains that these are suitable only for Uses in the B1 (b and c), B2 and B8 Classes with B1 (a) only being acceptable if it is ancillary.

5.54 Officers consider that taken as a whole and in the light of the definition of SES in the Structure Plan, there is no contradiction between the Structure Plan Policy EM13 and the Local Plan allocation for the Airport as a Strategic Employment Site.

Planning Policy Guidance Note 13

5.55 As Members know, all levels of adopted planning policy are informed by the Government's Planning Policy Guidance Notes and Planning Policy Statements. Of particular relevance to these proposals is the advice contained within PPG13: Transport regarding the aviation sector although it is reflected in the development plan. In its Annex B, 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. The PPG

further advises that local authorities should identify, and where appropriate, protect sites and surface access routes that could help to enhance aviation infrastructure serving the regional and local area. They should also avoid development at or close to an airport or airfield, which is incompatible with any existing or potential aviation operators.

- 5.56 However, recognising that airports have become major transport interchanges and traffic generators that attract a range of related and non-related development, PPG13 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”.
- 5.57 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*” [underlining added for clarity].

Economic Considerations

- 5.58 The substance of the case made by the applicants for the proposed development at this location is that by consolidating all of the Stobart Group's core Carlisle businesses i.e. Eddie Stobart Limited, Stobart Rail and Stobart Air (already operating from the Airport) at a single site, this will generate the financial resources to enable expenditure to be directed at the aviation infrastructure at Carlisle Airport. In short, the argument is that it is essentially a financial (rather than a functional or operational) imperative for the Freight Warehouse and Distribution Centre to be developed at this site but, by doing so, the applicants maintain that this will deliver the only realistic capital stream to enable the investment that is required to upgrade the Airport infrastructure and allow it to survive, let alone grow.
- 5.59 The economic benefits that operational airports can bring is fully recognised in Planning Policy guidance at every pertinent level e.g. Annex B of PPG13, Policy RT5 of RSS (continuing the themes expressed in Policies ST8 and T26 of the Structure Plan, neither a “saved” policy but superseded by RSS) and Policies DP3 and EC22 of the adopted District Local Plan. The wider case for the development on economic grounds is also made by the EKOS Economic Impact Assessment commissioned by Cumbria Vision and submitted to support the application. Support for the proposals from the business community is also readily apparent from the many letters received from local businesses, the Cumbria Chamber of Trade and Commerce, the Economic

Development Unit of Cumbria County Council and Members of Parliament representing Constituencies in Cumbria and South-West Scotland.

- 5.60 The EKOS Report is a detailed analysis of the proposal, its economic value and its relationship to the economic performance of this area. It identifies that the Stobart Group's presence in Carlisle, principally the Eddie Stobart Limited and Stobart Rail operations, provides employment for approximately 565 persons, these being well-paid jobs with an average salary of £30,000 and their Cumbrian based staff derive a total yearly income of £15m. The two businesses, currently based at Kingstown/ Parkhouse in urban Carlisle, have an annual spend of £40m in the Cumbrian economy and this supports other businesses and jobs within the economy.
- 5.61 The proposed re-location of the two businesses to the development at Carlisle Airport would, it is stated, safeguard 280 jobs transferred with Eddie Stobart Limited and the 285 employees of Stobart Rail, and retain them in the Carlisle area. It is accepted that the majority of the latter jobs, about 200, would not actually be located at the Airport (the nature of the work means they operate from remote sites where the Company secures contracts for rail engineering work) but the city is their business "base". They attend their city premises for meetings and training activity on a regular basis and, since most of the employees live in rural locations, a site in the Carlisle area is generally accessible. Similarly, many of the ESL jobs are drivers who will not be at the premises during the working hours for obvious reasons but, as with Stobart Rail employees, ESL drivers and holders of management and administration posts will all regard the Airport as their "place of work".
- 5.62 In addition to the transfer of the foregoing jobs to the Airport, the proposals will also safeguard a number of existing jobs located there, notably within Stobart Air (24.5 full-time equivalent posts) where staff fulfil security, baggage, air traffic control, fire safety and management roles. Likewise, aircraft maintenance and flying training provided by other businesses currently provides employment for another 11 people (FTE). Stobart Air have indicated to EKOS that the introduction of scheduled flights would lead to a further 20 jobs (FTE) mainly in passenger handling and fire cover.
- 5.63 New jobs are also to be provided as a result of the development of the proposed Chilled Cross-Dock Facility [see item d) of para 5.13] which is expected to provide initial employment for 54 persons but will rise to 85 FTE posts by the end of its second year of operation. It will operate 24/7 on a 3 shift system with changeover at 0600 hours, 14.00 hours and 22.00 hours.
- 5.64 EKOS estimate that for every job transferred to, or that are new jobs arising because of, the development there is a "multiplier effect". In short, that employment generates employment elsewhere in the area through provision of goods and services, supplies, expenditure by employees, and in the longer term induced inward migration. The "multiplier" is variable, in that it differs between Transport Services, Distribution Services and the Construction Sector, but the EKOS Report estimates that the development will contribute net additional employment and associated GVA to the Cumbrian economy from 1,255 safeguarded jobs (FTE) with an annual GVA of £36.25m; 157

(FTE) new jobs with a annual GVA of £2.12m; and 92 jobs (FTE) in the Construction Sector during the build period, giving a GVA of £1.24m. The EKOS Report maintains that, without the proposed development, these benefits would be lost to the city/regional economy.

- 5.65 The EKOS study, with input from AviaSolutions, has also attempted to quantify the potential role and benefits that would accrue from the Airport being restored to operational use. It acknowledges that the majority of the catchment for passenger services is essentially within Cumbria, principally north and west, with some additional catchment in Dumfries and Galloway and the Borders. Competition from Newcastle in the east, Blackpool/Liverpool/Manchester Airports in the south and Glasgow/Edinburgh/ Prestwick to the north would suppress demand to use Carlisle for people living closer to the catchment for those Airports but distance might be outweighed in some cases by speed of travel to Carlisle as the road system is less congested than in the conurbations. EKOS considers the immediate population catchment is of the order of 160,000 people with a potential core catchment of 500,000 people. That is much less than is attributable to Humberside, Southampton, Exeter, Oxford, Norwich, Dundee and Blackpool Airports. Only Newquay Airport, of the 9 regional airports where comparisons have been made, has a smaller "core" catchment population but is stated to have a larger "immediate" population than Carlisle Airport.
- 5.66 Whilst EKOS considers that Cumbria's attraction as a tourist destination might encourage some air travel for in-bound tourism, as has been experienced at Newquay, this is likely to be quite limited and would not be particularly high in comparison with other small UK regional airports with existing regular services. It is likely that there would be significant demand for a London service linked, for example, to Cumbria Tourism's marketing of the County as an active and extreme sports destination where visitors from the south-east would benefit from the shorter journey times an air service would offer.
- 5.67 The Study notes that the potential for commercial passenger services is currently restricted by the weight limit imposed by the Civil Aviation Authority. However it is considered that the plans to improve the runway to allow use by turboprop and some small jets would make it more attractive to regional full-service airlines (e.g. Eastern, VLM, BMI Regional, CityJet) or regional low-cost airlines such as Flybe, Manx2, Aer Arran. Whilst EKOS/AviaSolutions confirm that they have *"seen clear evidence of well-progressed dialogue with one of the target airlines mentioned"*, they state that firm plans will only be made once the airport infrastructure issues are addressed.
- 5.68 That is likely to favour a London service although success will depend on obtaining attractively timed slots at London Airports. Heathrow, Gatwick and London City Airports are most attractive for business travellers and onward destinations but slots are likely to be unavailable and expensive. Slots at Stansted and Luton would be relatively straightforward to obtain but these airports are less suitable for business travellers and the travel distance to central London dilutes advantages of air travel over rail centre-rail centre travel. During the writing of this Report it has been announced that the Stobart

Group has sealed a deal to purchase Southend Airport.

- 5.69 A London route is likely to attract 30,000 to 50,000 annual passengers, based on two rotations per week day on regional aircraft though this would be expected to grow as the market became more established. While some other demand might arise for services to places such as Belfast (due to unattractive surface alternatives) and for possible domestic air links on a low frequency basis to destinations such as Inverness, Cardiff, Bristol, Exeter and Southampton (depending on the airline that would be attracted to use Carlisle) EKOS accept that *“given the small immediate catchment, the competition from other airports and airport infrastructure restrictions.... potential for passenger air transport developments at Carlisle airport is limited”*.
- 5.70 EKOS, thus, conclude that it is difficult to predict the potential for future air traffic at Carlisle with any degree of confidence but believe that their outline analysis would suggest 100,000 passengers is a reasonable target following infrastructure improvements, within a range of 50,000 to 200,000.
- 5.71 The opportunity for air cargo operations to be provided has also been considered by the EKOS/AviaSolutions Report. It notes that air cargo (freight and mail) is a very consolidated industry within the UK with the top 5 airports accounting for almost 90% of cargo volume (1997 figures). Cargo is less time sensitive than passenger travel so economies of scale from focusing on major airports outweigh any disadvantages in longer travel times to those airports.
- 5.72 The trend for consolidation has been continuing, such that between 1997 and 2007, Manchester and East Midlands Airports combined share of regional cargo in the UK grew from less than 50% to two-thirds. Some airports, including Glasgow, Birmingham and Prestwick, have experienced a notable decline in cargo volumes they handled over the decade. Only 8 regional airports handle more than 10,000 tonnes of cargo and, of the top 20 regional airports, only 8 experienced growth over the ten year period from 1997, despite an increase in overall regional air cargo volumes averaging more than 4% per year.
- 5.73 EKOS observe that the runway length and its unsuitability for common cargo carrying aircraft would be a restricting factor at Carlisle Airport and believe that passenger services from it would be unlikely to have significant cargo carrying capability. Of airports with comparable restricted runway length in the UK, only Coventry has material cargo volumes (circa 10,000 tonnes) while Southampton's tonnage was 297 tonnes in 2007 and Belfast City 1,100 tonnes.
- 5.74 Although Carlisle has no immediate competition, from a cargo perspective, EKOS notes that Prestwick and Manchester are relatively close for cargo operators. East Midlands Airport (200 miles distant) is regarded as reasonably close. EKOS state that a sample survey of the Air Cargo industry undertaken in 2006 generated limited interest in Carlisle from a range of airlines, freight forwarders, handling companies and general sales agents. The peripheral location of Carlisle, combined with lack of import/export critical mass indicated

significant development of cargo at the airport would be a challenge.

- 5.75 However, some niche business opportunities were discussed with 3 freight forwarders located in the area around Carlisle and EKOS comment that the integration with the Eddie Stobart warehousing has some potential to generate some multi-modal synergies. They conclude, as already noted earlier in this Report, that they *“consider it unlikely that significant cargo volumes can be generated from Carlisle Airport. Nevertheless, once upgraded infrastructure is in place, there may be some niche opportunities that can be developed on a tactical basis, plus some potential for multi-modal integration with Stobart warehouses”*.
- 5.76 The EKOS Report examines the case for non-aeronautical activities and the revenue stream they can provide to support aviation. It notes that most regional airports (15 out of 19) derive between 40% and 70% of their income from non-aeronautical sources. Some, such as Blackpool Airport with just 19% of income and London City with just 22% of income from non-aeronautical revenue can operate viably while, at the other end of the spectrum, Doncaster/Sheffield Robin Hood Airport relies upon 84% of its income from non-aeronautical revenues.
- 5.77 The profitability of airports is dependent upon key factors such as who uses it (low cost carriers expect lower charges) and how many passenger movements they attract. The smaller the airport, the lower the level of profitability. Those which handle less than 1m passengers per annum are on the whole unprofitable although there are notable exceptions such as Humberside and Exeter which both generate significant incomes from fuel sales or because they have ancillary businesses which generate revenues outside of the scope of commercial passenger operations. Southend Airport, for example, has a substantial aircraft maintenance operation and Bournemouth has a large Business Park.
- 5.78 EKOS considers that, in comparison with the operational experience of other regional airports and the estimated passenger market potential of 100,000 passengers per annum using Carlisle Airport, the revenue solely derived from passenger activity would not be a profitable operation. It regards the development of non-passenger related non-aeronautical revenue as critical to Carlisle Airport's on-going financial viability.
- 5.79 The challenges the Airport faces are summarised as:
- It needs to arrest its current loss making whereby a financial deficit of £1.4m was recorded in the year ending February 2008
 - It has no commercial passenger services and the restoration of those is entirely dependent upon the return of the runway to full operational capacity and provision of passenger processing facilities
 - The airport infrastructure is poor resulting in a 12.5 tonne weight restriction being imposed on the runway by the CAA. In order to allow viable commercial passenger operations this has to be increased, through a complete re-surfacing, to around 30 tonnes, sufficient for commercial turboprop operations. The current terminal building is a relic of piecemeal and incremental expansion in the 1960's, 70's and 80's

- Investments in those aspects to a sufficient standard to attract commercial services will require a significant financial outlay and even though it will increase the level of aero and non-aeronautical revenues, experience suggests that these are unlikely to be sufficient to justify this investment
- Any increase in aero and non-aeronautical revenues as a consequence of the restoration of commercial passenger services is likely to be negated by the increased operational costs required to service them e.g. fire and rescue cover for larger aircraft, longer opening hours and employment costs for passenger terminal staff
- The scale of passenger non-aeronautical revenue will be limited by the likely passenger profile which is largely domestic, business and short leisure break orientated, all of which are relatively low yielding.

5.80 Given the foregoing analysis, EKOS maintain that in order to have a sustainable long term future it is necessary for Carlisle Airport to overcome two hurdles. First the significant gap between revenues and costs needs to be bridged so that any future investment in aeronautical activities and infrastructure can be justified. Secondly, the Airport is unlikely to generate sufficient passenger volumes and passenger and aeronautical related revenues to bridge this gap.

5.81 Its future is, thus, wholly dependent upon the development of further non-aeronautical activities which are independent of commercial passenger operations. EKOS refer to other small regional airports in a similar situation to Carlisle and point to measures they have taken to ensure the sustainability of their business, despite minimal passenger throughput, through the development of non-core operations. Examples cited are Southend which has developed a major aircraft maintenance and re-spray facility; Bournemouth has a large on-site Industrial Park complex; and Oxford is developing as a major executive jet and flight training centre. These aeronautically related facilities are stated as having been developed because of the favourable geographical location of these airports and could not be replicated at Carlisle.

5.82 EKOS regard the proposed development of the Freight Storage and Distribution Facility and accommodation for Eddie Stobart Ltd and Stobart Rail as a similar form of non-aeronautical on-airport diversification. The note that, according to the applicants information, a similar facility, if rented on the open market, would generate a rental income of around £2m each year. Based on the current financial performance of the Airport this additional revenue would result in an overall profit of £600,000 per annum which combined with the additional aeronautical and passenger related non-aeronautical revenues would more than close the current revenue/cost gap and help secure the long-term financial security of the business.

5.83 EKOS regard the economic case for the development to be persuasive and assert that *“a high level assessment of the proposed Stobart warehouse facility indicates it should generate sufficient additional non-aeronautical revenues to help safeguard the long term viability of the airport and its role as a major growth engine for the Cumbria region”*.

5.84 Although this proposed development is not considered to be unique as an

option to bridge the revenue/cost gap, EKOS believe that any alternative scheme is likely to be business premises orientated and thus rental income dependent. As a result they assert that should this application be rejected on the basis of planning, given the amount invested in its development to date it is considered unlikely that an alternative option for the development of Carlisle Airport would be forthcoming.

The Assessment of the Economic Benefits which the development of the Airport would give rise to, in terms of the local economy, have been evaluated by the Head of Economy, Tourism and Property and his Report is printed in full as Appendix 2 of this Report.

Archaeology

- 5.85 The previous application, largely due to associated works arising from the proposed re-aligned runway and intended drainage lagoons, raised some concerns in respect of a potential adverse impact upon a section of Stanegate, within Watchclose Woods. The current proposals do not involve any disturbance of that area, nor do they affect the Watchclose Roman temporary camp which lies below ground at the western end of runway 07/25.
- 5.86 The most significant archaeological consideration associated with the present proposals concerns possible impacts upon the setting of the Hadrian's Wall Military Zone World Heritage Site. Hadrian's Wall and vallum lie about 200m north of the Airport. Planning policy protects both the Wall and its setting. Impacts on the integrity of the World Heritage Site are, in this instance, potentially associated with impact on the landscape.
- 5.87 That aspect has been considered in some detail within the Environmental Statement and the specialist advice of both English Heritage and the County Archaeologist has been sought through the application consultation process.
- 5.88 The study area for the assessment of the archaeological resources within the Environmental Statement comprised the area within 0.5km of the development site although a larger area (2km radius) was adopted for the assessment of impacts on the "built heritage". Survey work, including trial trenches, has been carried out within the bounds of the Airport but this did not reveal any features of significance or that would contribute to the appreciation or understanding of the Hadrian's Wall Military Zone World Heritage Site.
- 5.89 The ES concludes that there will be some direct impact on archaeological assets during the construction phase of the development through the removal of post-medieval field boundaries and potential archaeological remains may be disturbed by the construction of security fencing. The effects are assessed as negligibly low; a watching brief will, nonetheless, be implemented during construction in relation to areas not previously evaluated.
- 5.90 Likewise, there will be no physical impacts that affect the individual integrity of the archaeological assets that constitute the Hadrian's Wall Military Zone World Heritage site. There will be some minor adverse visual impact on

Hadrian's Wall and the vallum though that is mitigated by the presence of existing large-scale industrial structures within the present landscape and the restricted views that exist from the monuments to the development.

- 5.91 During the operational stage, the Environmental Statement considers that there will be no impacts on archaeological remains or the setting of the World Heritage Site. Members will note that these conclusions are supported by English Heritage, which states that *"although the proposal does represent a development of considerable size within the defined buffer zone of the Hadrian's Wall World Heritage Site, it would not have an adverse impact on the Outstanding Universal Value for which this site was inscribed"*. Those comments are also mirrored in the response of the County Archaeologist who notes that the archaeologically sensitive areas that were affected by the original application are avoided by the reduced area of the development site and that the area of proposed development has been archaeologically evaluated with results indicating that no significant remains would be disturbed.
- 5.92 Accordingly, it is clear that the proposals do not conflict with planning policy objectives in relation to either the World Heritage Site, its setting or localised archaeological features within or adjacent to the development area.

Highway Considerations

- 5.93 The original planning application initially proposed a priority junction access to the development but this was not supported by the Highway Authority and was later amended to a roundabout with the A689. That latter form of access is encapsulated within the current proposals. It has been evaluated as part of the County Council's overall consideration when commenting as the "strategic" planning authority and, although it is necessary for a Road Safety Audit to be undertaken, this will be carried out at the S278 stage. The County Council confirm that the roundabout proposal complies with Local Transport Plan Policies LD8 (Design Standards) and LD9 (Safety and Security).
- 5.94 The County Council response also notes that traffic volumes associated with this application are lower than that expected to have been generated by the previous application. Since those previous traffic volumes, and their effects on the highway network, were regarded as acceptable it is apparent that traffic generation levels associated with the current proposals are also not an issue. Members should note that the views of the Highway Agency, which has responsibility for the motorway and trunk road network, has no objections to the proposals.

Noise, Vibration and Air Quality

- 5.95 The Environmental Statement includes relevant chapters that assess the potential impacts from noise and vibration and air quality and dust, both during construction stages and when the development is operational. It also has regard to noise and vibration and air quality and dust impact due to the increased levels of road traffic.

- 5.96 The ES considers the site is relatively well-located in noise terms stating that there are only a few noise sensitive dwellings in the vicinity and none close by. It further remarks that, although a rural setting, the existing noise environment is dominated by noise from the Airport and from road traffic.
- 5.97 The nearest noise sensitive properties, a bungalow at Netherfield Farm to the east and Lane End Farm to the south, are about 400m from the centre of the development area. The ES states that having regard to typical noise impacts from construction activity, the initial assessment indicates that considerable construction work related to the proposed development can be carried out without exceeding usual construction noise limits. It adds that construction noise can be adequately controlled by adoption of a Construction Management Plan (one of the suggested planning conditions).
- 5.98 Noise from the development during operation has also been evaluated. The ES notes that the relevant receptors are Lane End Farm (368m to the south and closest property in relation to external noise from plant associated with the offices); a dwelling known as Fernlea (also to the south and 345m from the Chilled Cross-Dock facility); and the bungalow at Netherfield Farm (to the east and 250m from the chillers at the Cross-Dock facility). The ES considers that, from experience of the noise levels associated with a slightly larger Cross-Dock facility elsewhere, the noise levels from that have been obtained and have been evaluated to give the likely anticipated noise impacts on the nearest noise sensitive property (bungalow at Netherfield). It is concluded that through measures such as its siting at ground level, on site levels that are 8m lower than the bungalow, identification of an appropriate design specification for the purchased chiller and the distance between the premises and the bungalow, predicted noise levels will be well within acceptable levels. The ES also maintains that the impact of yard activity such as lorry manoeuvres will not cause noise impact.
- 5.99 It is, perhaps, important to remind Members that the development is intended to operate 24/7, throughout the year. Whilst there will be limited occupation of the offices outside of "typical" work times for any offices i.e. circa 0800-1800 hours, employees based at the Chilled Cross Dock will operate a 3-shift work pattern while the Freight Distribution element will also be a 24 hour operation.
- 5.100 Vehicular activity associated with the development at year of opening (2010) reflects those operational hours: most car movements to the site occur between 0500 hours and 1000 hours (242) with most leaving between 1600 hours and 2000 hours (233) but there are 52 HGV "in" movements between 2000 hours and 0700 hours and 90 "out" HGV movements during the same period. Of those "in" HGV movements, 33 occur between 0300 hours and 0600 hours while 77 HGVs leave the site between 0400 hours and 0700 hours. Some quite high "in" movements of cars (83) are expected between 0500-0700 hours but this seems to closely coincide with the "out" lorry movements during the same time-span (80) so are presumably drivers' private car journeys to their "workplace".
- 5.101 The Transport Assessment builds in a "growth" in the intensity of operation between the year of opening and the future year for assessment (2016).

There is expected to be a 25% increase in both the office and storage and distribution operation. This would result in an increase in the inward and outward car movements over the 24 hour day from 299 (year of opening) to 374 and a change in inward/outward HGV movements to 165 from 132 (each way). These increases will continue to display the same movement patterns described in para 5.88 with 41 HGV movements arriving at the site between 0300-0600 hours and 95 HGVs leaving the site between 0400-0700 hours.

- 5.102 It is anticipated that 97% of the development HGVs will journey to/from the A689 westwards of the access roundabout. Allowing for natural traffic growth by “future year” (2016) the “night-time” road traffic activity i.e. between 2300-0700 hours is predicted on the A689 at Crosby Moor as 542 cars and 413 HGVs if there was no development increasing to 696 cars and 571 HGVs with the development. The ES states this would represent a 2% growth in HGV activity on the road and a 1.4dB (A) increase in traffic noise. It concludes that this will not give rise to any perceptible increase in vibration or noise levels at properties.
- 5.103 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 along this road. 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 minor adverse.
- 5.104 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 re-location of ESL and Stobart Rail 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 that is relevant to carbon dioxide emissions.
- 5.105 In order to fully evaluate these issues, the Council has appointed the same consultancy (Transport Research Laboratory) which advised on the previous application in terms of Noise & Vibration and Air Quality & Dust. They have liaised closely with Officers of the Council and with the applicants’ specialists and have submitted a Report with conclusions and recommendations.
- 5.106 TRL concur with the conclusions of the Environmental Statement that the potential effects of construction on dust are likely to be minor adverse and that the potential effects of the development on local air quality are likely to be negligible beneficial to minor adverse. Although concurring with the conclusion that it is not possible to assess the significance of local changes in greenhouse gas emissions, the reasoning to support the conclusion should be

provided as they are only mentioned in the summary and conclusions of the relevant chapter in the ES.

- 5.107 Although agreeing in most part with the assessment of Noise and Vibration, TRL have, however, strong concerns with the assessment of night-time noise impacts, particularly that arising from the increase in HGV movements travelling along the A689 between the site access and Junction 44 during the period from 0500-0700 hours. They regard the work undertaken for the applicants within the ES as too simplistic and consider that a more cautionary approach would be more appropriate.
- 5.108 These concerns reflect the fact that the development will generate an increase in overall traffic on the road between 2300-0700 hours (the pertinent time period for night-time assessment as it includes the hours when most people are either trying to get to sleep and the period just prior to waking- the times most sensitive to noise impact). The predicted traffic increase- from 955 vehicles to 1267 vehicles- is about 33% which, according to the ES is regarded as a “major increase”. Within that overall total, there is an increase in HGV movements from 413 to 571 (158 events- a percentage increase of 38%) due to the development of which 107 will occur during the period 0500-0700. The ES notes that typically each of these events will exceed the night-time noise max criteria by more than 10 dB (A) outside properties fronting onto the A689.
- 5.109 TRL asserts that this increase should not be assessed as imperceptible or not significant as is attributed within the ES but should be upgraded to at least “minor impact”. They go on to recommend that some form of mitigation should be offered by the developers either by re-scheduling night-time movements outside the period 2300-0700 hours or by offering sound insulation packages to properties within the study area.
- 5.110 If the latter is adopted, it is proposed that the scheme would offer sound insulation to the bedrooms of all properties within a 100m corridor either side of the A689 where bedrooms face or partially face the A689. Only properties within the study area located on the A689 between the site entrance and Junction 4 would be eligible and it is estimated this would be applicable to about 30 to 40 properties.
- 5.111 It is also recommended that prior to opening an appraisal of the road surface in the vicinity of those properties is carried out to ensure there are no problems associated with body noise and TRL advise that HGVs operating from the site should follow the recommendations in the DETR publication “Control of Body Noise from Commercial Vehicles”.
- 5.112 Although TRL agree with the conclusions of the ES in relation to noise from the Depot, it is recommended that once operational, attended noise measurements during the night are monitored to check compliance. Suitable screening of the facility should provide adequate mitigation if it is found that the night-time noise criteria is being exceeded.
- 5.113 Officers of Environmental Quality have expressed concern that the night-time

criteria set [60 dB (A) LA max outside dwellings] is too high (rural areas having a lower background noise level). TRL, however, consider it would be difficult to argue it is unacceptable as it is based upon World Health Organisation guidelines as the onset for annoyance and is also the criteria which is beginning to be adopted to assess noise from freight distribution depots with regard to night-time deliveries. The above concerns need to be addressed therefore by a Section 106 Agreement and/or planning conditions.

- 5.114 Since no noise assessment has been carried out to demonstrate to the contrary, Environmental Quality Officers are not able to confirm whether the “on-site” operations of the proposed development will or will not be such as to give rise to noise complaints by residents in the area, but point out that the general noise climate in the area especially at night is very quiet: a 24 hour activity will therefore increase the noise environment and may have a detrimental impact on the use and living conditions of residential dwellings in the area. Similarly, since no light contour map indicating the extent of light spillage has been provided, they are unable to confirm that the lighting system will not cause annoyance to residents in the area. In both these instances mitigation measures can usually be employed to reduce noise and light impact. Environmental Quality Officers also have some concerns relating to construction noise and the hours of construction though these may be addressed through the Construction Management Plan.

Nature Conservation

- 5.115 Key issues in relation to this proposal concern the possible impacts of the proposals 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.
- 5.116 Because of the aviation elements of the previous application proposal, and their potential effects on nature conservation interests within the most sensitive designated areas, the Council was required to undertake “Appropriate Assessments” of those potential impacts under the Habitats Regulations. Officers take the view that the Appropriate Assessments and the Environmental Impact Statement identified the likely significant effects of the larger proposal. The Assessment undertaken with the present application identified potential effects limited to just the River Eden SAC, principally through issues associated with drainage discharges and disturbance through noise, vibration, lighting and general activity (including increased traffic), and habitat modification/loss. Although the proposed development may give rise to the larger development, as already indicated, Officers take the view that the likely significant effects of the larger development have already been identified as well.

- 5.117 The Council has appointed the same Ecological Consultancy, which advised

upon and undertook the Appropriate Assessments (AA) in relation to the original application, to review the nature conservation issues associated with this application, including Appropriate Assessment of the current proposals. The views of Natural England, a statutory consultee, have been sought and the Cumbria Wildlife Trust and Royal Society for the Protection of Birds have also both been informed of the application and invited to comment.

- 5.118 The Council's nature conservation advisors (Lloyd Bore) have completed the Appropriate Assessment and it has been "signed off" by Natural England. The Assessment concludes that *"sufficient information has been provided by the applicant 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"*.
- 5.119 The Assessment goes on to identify the matters in question which, during the "Construction" stage, comprise potential siltation; disturbance of contaminated ground; chemical pollution; and noise, vibration and lighting disturbance (to otters and breeding birds on the River Eden). Issues during the "Operational" stage have also been identified and comprise: contaminated surface water drainage; sewage effluent/foul drainage; pollution events/spillage incidents; contaminated ground; noise, vibration and lighting disturbance; and increased road traffic.
- 5.120 The Appropriate Assessment considers that "construction stage" issues are capable of being addressed through a combination of a Construction Management Plan and the production of an approved remediation strategy in the event that contamination is identified.
- 5.121 The "operational stage" concerns are regarded as capable of being addressed through measures such as the production and implementation of a full Drainage Strategy (covering surface water and sewage effluent/foul drainage) and incorporating an Emergency Plan to deal with any specific pollution events, including fires that could lead to contamination within the River Eden; a Remediation Strategy for contamination found within the site; production and implementation of a Noise Management Plan; a permanent Lighting Plan to minimise impacts of lighting outside of the site boundary; and monitoring arrangements for recording all otter road traffic incidents around the Airport site, regularly reporting those to Natural England or the City Council and taking appropriate action to deal with an increased trend in collisions if such a trend is observed.
- 5.122 The Appropriate Assessment therefore concludes that *"providing the issues highlighted are adequately conditioned in agreement with Natural England, the proposed development (either alone or in combination with other plans or projects) will not lead to an adverse effect on the integrity of the River Eden SAC"*.
- 5.123 In relation to the impacts on the County Wildlife Site, designated for its

breeding bird populations, the key concern is the development of approximately 11 hectares of grasslands resulting in habitat clearance and permanent loss. Both Cumbria Wildlife Trust and the RSPB have objected to the application because of that loss and the absence, within the submission, of compensatory habitat provision or other mitigation measures. Cumbria County Council, in its consultation response, has also touched upon this matter with reference to Policy E35 of the Structure Plan which sets out protection for 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.

- 5.124 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”*. Policy LE4 of the adopted District Local Plan expresses the same sentiments.
- 5.125 The position adopted within the Environmental Statement is that the loss of 11 hectares is acknowledged but it is contended that the loss will not affect any breeding birds since none of the species listed in the CWS citation sheet were recorded within the footprint of the proposed development in the Breeding Bird Survey undertaken in May-July 2007. The ES concludes that there are no significant impacts on habitats or features of nature conservation interest as a result of the development and no significant effect on the nature conservation value of the site. No mitigation for that loss is proposed.
- 5.126 Cumbria Wildlife Trust and the RSPB are critical of these conclusions and the former point to the fact that a limited Breeding Bird Survey has been conducted and comment that the absence of evidence in one survey period does not demonstrate that the site has not been used in the past and would not be used in the future. The Trust believes that the loss of 11 hectares is important since reduction of the overall size and extent of the Wildlife Site as a whole dilutes what makes it attractive to the bird species that use it. The Trust maintains that the loss of County Wildlife Site should be mitigated for by purchase and management of at least a like-for-like area of compensation land and that this should be secured by a S106 Agreement. They consider their position is consistent with the advice contained within PPS 9: Biodiversity and Geological Conservation.
- 5.127 As part of the liaison with the Council’s nature conservation consultants, the applicants have reiterated their position in this matter. In stating that *“the application will result in no likely significant harm to biodiversity, to the features for which the County Wildlife Site was designated, or to that site’s integrity”* they re-affirm that no additional mitigation or compensation relating to the County Wildlife Site is proposed. They go onto to justify that position by making the following points:
- Previous discussions relating to the original application and provision of compensatory habitat involved the Cumbria Wildlife Trust, and were

witnessed by both the Council and Natural England. These discussions ultimately related to the number of bird territories that were estimated to be affected by the proposals. The current application has been developed taking these discussions into account, and partially as a consequence of this, the proposed application would occupy significantly less area than previously proposed. Importantly, the specific area of land associated with the current application does not affect any such bird territory when applied against the same criteria and the same surveys that formed the basis of previous discussions about compensation.

- The total area of suitable breeding wader habitat identified on the airport site and cited in the original 1999 County Wildlife Designation is 80 ha. Even with the proposed development in place, the area of suitable breeding wader habitat (calculated to be some 104 ha) continues to exceed that of the original designation by 24 ha or 30 %.
- Much of the land associated with the current application was previously not suitable for use by waders, since it supported an area of woodland and scrub. This has only recently been lost from the site (as part of unrelated Airport management procedures seeking to minimise bird-strike hazards).
- All issues relating to bird conservation on the site should be considered in the context that the overall number of breeding birds on the Airport is artificially controlled as part of routine bird-hazard management, and increases beyond acceptable levels would not be tolerated, irrespective of the application being considered. This is a particularly relevant topic given the recent events at Rome's Ciampino airport, where a Ryanair jet was forced to make an emergency landing as a result of a bird strike incident.
- With regard to the wording of Cumbria and the Lake District Joint Structure Plan Policy E35, the policy states that *"....the loss of nature conservation interest should be minimised and, where practicable, mitigation should be provided"*. It is our opinion that the loss of nature conservation interest has been minimised, and that mitigation to provide suitable alternative habitats to attract ground nesting waders in the vicinity of an operational airport is neither justified, nor practicable given the risks of bird strike.

5.128 Discussion has taken place with the applicants' representatives in relation to the provision of compensatory habitat loss and this is now proposed to be addressed, through the Section 106 Agreement to ensure compliance with Structure Plan Policy E35 and Local Plan Policy LE4, i.e. to redress the loss of part of the County Wildlife Site.

5.129 Further advice has been obtained from the Council's nature conservation advisors in relation to the potential effect of the development on European Protected Species, principally Great Crested Newts and Bats, as well as other wildlife interests. The consultants advise that *"provided the issues 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"*.

Landscape and Visual Impact

- 5.130 The proposed development is, in terms of its scale, smaller than the previous application in relation to both the extent of site works and the footprint of the buildings to be erected. That said it is still a large-scale development in what is a small-scale (in terms of existing buildings and structures) setting. The ES acknowledges that there will be localised adverse effects on landscape character and visual amenity.
- 5.131 However, the buildings (warehouse and detached office building) are no taller than the previous warehouse/terminal structure that the Committee considered earlier this year, its overall siting is largely the same and the pallet of finishes is not dissimilar. Landscaping measures have been increased, along both the A689 and adjacent to the northern site boundary, while there is no loss of Watchclose Woods which is the strongest existing landscape feature in this area and will afford screening from the west. It is hoped that some additional landscape measures within the car parking area will also be possible.
- 5.132 In summary, the Committee did not take exception to the larger building with less screening that was encapsulated in the first application. It would seem self-evident that the current proposals are, if anything, less intrusive in landscape/visual impact terms.

The “Aviation” Investment

- 5.133 As explained in para 5.21, the applicants have stated that it remains their intention to upgrade the Airport for operational use by re-surfacing the principal runway 07-25 and by providing passenger terminal facilities. Although not part of the formal planning proposals before the Committee, there are several references within the submission documents to those elements e.g. the Transport Assessment comments that the aim is to achieve a PCN value of about 30 through the works to the runway.
- 5.134 From the outset, prior to making this current application, the applicants have stated that they are prepared to enter into a S106 Agreement with the City Council binding them to commit to the Airport investment. They have subsequently provided initial “Heads of Terms” for that Agreement and these have been discussed directly with Council Officers and the input of key consultees, and the Council’s Consultants has been sought.
- 5.135 Additionally, the applicants have obtained tenders from 4 contractors that specialise in runway reconstruction work, these being obtained on the basis of an initial broad specification across a range of possible PCN values. Officers have seen documentation confirming that preliminary pre-contract 1st Stage Tenders, which includes the estimated duration of the work, assessed by each of the 4 Companies, have been sought and secured. It is understood that, subject to planning permission being obtained, the applicants will select 2 of those contractors for Final Stage tender purposes and, thereafter, duly appoint their preferred contractor.
- 5.136 Many objectors have questioned the applicants’ commitment to the Airport,

believing the proposal to be largely about re-locating the haulage and railway engineering businesses. Some correspondence goes as far as to suggest that if the Council approves the current application, rather than assisting in securing a future for the Airport, it will result in the “impairment” of its use to the detriment of its wider potential. Part of that contention focuses on the indication on the “Masterplan” of the apparent reduction in the length of the cross-wind runway 01-19. This, it is stated, means it will be less usable than at present and make it a less attractive option for potential passenger service providers as it would not be capable of offering an alternative when the main runway could not be used, for example due to wind conditions. They also say this would be prejudicial to the interests of the companies that provide flying training as they need a longer runway, with no obstacles to distract, when tutoring untrained or novice pilots. The location of the buildings, car park and lighting associated with these features and with the access road and roundabout with the A689, are all cited as impediments to the use of runway 01-19.

- 5.137 Other assertions made in objections concern the Council being liable if, by approving these proposals, it ultimately leads to increased use of the Airport, including air freight use which it is claimed is not as closely regulated as passenger flights, and thus leads to a major accident.
- 5.138 Members will, however, appreciate that, whatever final proposals emerge relating to both the application development and related re-surfacing works/terminal/security measures, the approval of the Civil Aviation Authority and TRANSEC (security at Airports) is necessary and safety considerations are paramount in the attainment of the necessary approvals.
- 5.139 Nonetheless, mindful of the importance of this proposal and its ability to unlock the potential of Carlisle Airport, while having regard to concerns within the community, the City Council has appointed a specialist aviation consultancy (Alan Stratford Associates) to provide advice on a number of key aspects of the proposals. They have extensive experience and acted in relation to major airport initiatives nationally and internationally, and have a client base that extends from national governments to airline companies, Airport Operators and Local Authorities affected by airport development projects. Since being appointed by the Council they have been involved in recent discussions when the nature of intended “airport-investment” works, how they are being organised and the specification they are intended to achieve have been explained and elaborated on by the applicants. Their Report to the City Council is appended in full as part of this overall Report on the application.
- 5.140 The applicants have stated, in discussions, that they anticipate that the proposed runway resurfacing work is likely to achieve a PCN of 30-35 which they regard as a good standard, and state that the existing dimensions (notably the “declared distances” which determine the type of aircraft that use any runway) will not be altered. They have also affirmed that there is no “impairment” arising from the works or their effect on the cross-wind runway (01-19) as it will continue to have the same operational length as at present. Officers have also spoken to, and received correspondence from, the operators of the Flight Training schools, which are based at the Airport and

principally use runway 01-19, and they confirm the proposals will not impinge on their use of Carlisle Airport. They further advise that they support the application *“to secure the future of the Airport as a whole than to have no airfield at all in a couple of years which....is a very realistic possibility if the plans are not approved”*.

- 5.141 In relation to the provision of “passenger terminal” facilities, the applicants expect that this will be provided within the northern bay of a large hangar/office building constructed near to the northern site boundary late last year/early this year and, as yet, not in use. That building, which was able to be erected as “Permitted Development”, includes in its northern bay two floors of accommodation that had been expected to provide displaced office space for the flying training schools (as they would have lost their existing accommodation were the previous application approved and implemented). There is now no need for that office space to be re-located and the applicants have indicated that they see the ground floor area of the building being adapted to provide all necessary passenger facilities such as check-in, baggage handling, security, departure lounge, toilets, arrival/baggage recovery, administration etc. They also believe that part of the first floor could make an excellent “air-side” restaurant for use by staff, persons using the Airport and the general public although, at this stage, this is just a tentative possibility.
- 5.142 ASA have been asked to review the nature of the application and its capability to assist in delivering the aviation benefits that the many supporters of the application wish to see whilst avoiding any unacceptable adverse effects on the local community. The author of their Report has visited the site, inspected the facilities that exist and evaluated the proposals, including relevant sections of the Environmental Statement and Economic Study. The Brief, prepared as part of appointment of the Consultant by the Council, required advice to be provided that would give the Council as much confidence as possible that the development was a realistic facilitator of the investment the Airport requires and would deliver those aviation benefits.
- 5.143 A further factor that has emerged in the public domain over the last few weeks has been the conditional agreement by the Stobart Group to acquire Southend Airport, in Essex. That aspiration was intimated to Officers several months ago but, clearly, was highly confidential and could not be included in the application submission. It could, nonetheless, be regarded as indicative of the applicants’ commitment to aviation and promoting air services (freight as well as passenger).
- 5.144 The proposed Heads of Terms within the S106 Agreement cover a range of matters but, critically, the key points relate to the actual undertaking of the re-surfacing work and the provision of passenger terminal facilities. Officers believe that it is imperative the Agreement provides a mechanism to ensure there is a proper specification of what the runway works will entail, their extent by reference to a plan and construction standard to be achieved, a timetable for when they will be begun and, very importantly, a timetable when they will be expected to be completed. The latter is important: the submission documents indicate the development works, i.e. what the planning application

seeks permission to do, are expected to take 10 months to complete while indicative timescales for runway re-surfacing suggest duration of up to 24 weeks. Synergy between the respective contracts needs to be established.

- 5.145 Similarly, and accepting that there is currently no identified operator committed to commencing passenger services, there needs to be a suitable mechanism for ensuring the implementation of the fit-out works that would be needed to create the passenger terminal facilities within the building thus far indicated or its provision in any other accommodation that might be proposed and the associated access and car parking provision for that facility.
- 5.146 The Heads of Terms also provide proposals for the development of a Noise Management Plan, a Green Travel Plan, the development of an Airport Surface Access Strategy, the re-establishment and augmentation (by appointments to it) of the Airport Forum and measures to maximise the economic benefits through recruitment of staff from the local area, etc.
- 5.147 ASA's Report highlights a number of points regarding the aviation infrastructure works that the applicants state will be linked to the proposed development. It confirms that the proposed re-surfacing works will not be prejudicial to the use of runway 01-19 and that *"there will be no impact on existing users of this runway"*. ASA advise that it is not clear whether the applicants have made any obligation to resurface runway 01-19 or indeed resurface any other pavement areas such as the main apron or taxiways but state that *"it is not believed that this is essential at this point in time"*.
- 5.148 In relation to proposals affecting the main runway (07-25), ASA acknowledge that the applicants have agreed to resurface to an appropriate standard to enable scheduled passenger and freight services. ASA believe this will require both strengthening of the runway and, in order to meet the CAA licensing conditions, the removal of existing humps exceeding the CAA longitudinal slope constraints (the Airport has a concession on this at present although this likely to be removed if the runway is upgraded). The Consultants' Report states that *"given these requirements it is important that a specification for the new runway is provided within the proposed S106 Agreement"*.
- 5.149 The Report explains the system of rating of runway pavements and the relationship to the type of aircraft that can use it and notes that, given the restricted length of Carlisle's runway, the number of possible aircraft types used for passenger (or freight) operations is limited. However, since some deterioration can occur to runways which may reduce their PCN (Pavement Classification Number) over time, ASA believe it is prudent that the PCN of the resurfaced runway is of an appropriate specification to maintain a classification of 31 throughout the expected useful life of the runway surface (the order of 20 years is suggested).
- 5.150 In relation to the Council's support for a regenerated Airport, evidenced by its stance on the previous application, and indeed the support the current application has attracted from the community as whole, ASA state *"it is important that the resurfaced runway is constructed and fully operational*

within a reasonable time span following construction of the new freight and distribution centre". They add that on the basis that the ground preparation and resurfacing of the runway is likely to take between 7-24 weeks, they *"propose that the Section 106 Agreement should contain a condition that the resurfaced runway should be fully operational within 12 months of completion of the freight and distribution centre"*. Officers agree with the sentiments but are concerned that the requirement is not sufficiently robust: if the works are not carried out the Council may have little power to require the works to be undertaken. The proper approach, in such circumstances, would be for the runway works to be completed before any part of the proposed warehouse and office development permission can be implemented.

5.151 ASA have also reviewed the position in relation to the current absence of an Instrument Landing System at Carlisle Airport, the initial proposal to install it and the current position whereby it is not, seemingly, part of the applicants current intentions. The Report refers to discussions that have been taking place between the applicants and a potential operator which does not require an ILS but points out that an ILS is currently provided at all other UK regional airports offering scheduled passenger services with the exception of some Scottish island airports such as Stornoway and Barra. An alternative to ground based aids for low visibility conditions, GNSS (Global Navigation Satellite Systems), has now been approved by regulatory bodies, although this is only available at a limited number of airports in the UK. ASA consider that, theoretically, there is no reason why Carlisle could not carry out the required development and approval process (for GNSS), rather than install one of the ground based systems, but it is commented that this may not meet the approval of potential airlines using the Airport who are more used to conventional landing aids.

5.152 Part of the Brief that ASA was asked to address concerned "safety issues" as this has been raised in some representations and, understandably, is a worry to people living in the locality. ASA confirm 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"*. However, under the traffic levels assumed in the previous planning application, the level of risk was such that no building would infringe the relevant¹ in 10,000 risk contour of a fatality due to an aircraft accident.

- 5.153 Whilst it is not clear whether the Airport aspires to install an ILS, ASA are aware of the recent discussions the applicants have held with the Ministry of Defence concerning the possible relaxation of use of RAF Spadeadam airspace which might then allow an ILS-based approach to the existing runway 07-25. The putative proposal for a “Carlisle Box” i.e. an assigned area of RAF Spadeadam airspace which might be shared with Carlisle Airport (but where RAF air traffic has priority) is considered by ASA to be, in general terms, “workable” although a definitive view cannot be formed without further assessment of Spadeadam traffic levels at the appropriate times of day i.e. for commercial flights to Carlisle.
- 5.154 ASA acknowledge that the potential catchment for Carlisle is relatively small in comparison with other regional airports in the UK but point out that CAA passenger surveys indicate that 750,000 passengers had an origin or destination within Cumbria in 2005. ASA accept that a Carlisle link to London would be a key route that a passenger service might operate but landing slots, and the times they would be available, are critical and believe that a double daily frequency offers the likeliest viability (early morning departure from Carlisle and mid-morning return from the arrival airport with a second early evening departure from Carlisle returning mid-evening). Alternatively the Airport might be served as a transit stop such as occurred in the past with a Dundee-Carlisle-Heathrow service.
- 5.155 ASA draw attention to the need for public subsidy in relation to many of the regional air services, particularly during early years of operation. This can be implemented through the designation of a Public Service Obligation whereby a subsidy is provided to an operator of a route from a peripheral or developing region. Each PSO needs to be approved by the Department of Transport and subsidy is normally provided by the Regional Development Agency with routes tendered to the highest bidder.
- 5.156 Freight potential from Carlisle Airport is also examined by ASA but they note that there is no detailed assessment of potential freight operations from the Airport within the EKOS Report, which is considered surprising in view of the Airport’s purchase by a major haulage company. ASA note, however, that freight operations would be limited to certain aircraft types such as freighter or “combi” (combine passenger and freight) versions of certain aircraft. ASA believe the payload and range would be low although recognise that this suits certain markets [examples are mail, whilst certain products need to be distributed quickly such as flowers (from Amsterdam) and fresh fish from Iceland/Norway]. The applicants’ client base with retailers is noted, as is the potential logical “fit” it would seem to offer for air cargo.
- 5.157 The recent announcement of the conditional agreement for the Stobart Group to purchase Southend Airport is accepted by ASA as indicating the Stobart Group’s intentions to expand its aviation activities. However, their Report notes that *“while there may be linkages between Carlisle and Southend for air freight services (which are not so time-constrained as passenger services) we do not believe that passenger services between the two airports will be commercially viable , due to the relatively small catchment of both airports”*. The Report adds *“while we believe that a route between Carlisle and*

Southend is unlikely to be sustainable in the longer term, any possible commercial viability will be dependent on the construction of the proposed rail station at Southend airport to provide a link into London Liverpool Street Station”.

5.158 As instructed in their Brief, ASA have advised the Council in relation to the matters that should be incorporated in any S106 Agreement which the Council may be disposed to enter into with the applicants to secure the “aviation investment” linked to the applicants’ planning proposals. ASA state that typically the “aviation-related” components of a S106 Agreement will cover one or more of the following topics:

- Airport operating hours
- Aircraft movement limits (including night-time constraints)
- Noise preferential routings/track keeping
- Aircraft noise levels (e.g. size/no of households in the 57 dBA Leq contour)
- Dwelling insulation schemes (where applicable)
- Noise management systems
- Noise complaints procedures
- Pollution monitoring
- Green Transport Plan
- Enforcement/penalties

5.159 ASA advise that the “key” topics for inclusion in the S106 Agreement that has been promoted by the applicants are:

- The specification for re-surfacing of the runway (as discussed in paras 5.139-5.141 of this Report)
- Given the nature of the proposed increase in aviation activity, the Airport’s current operating hours would need to be reviewed e.g. to reflect the demands of passenger flights
- Aircraft movement limits (reflected as a commitment to review these after the commencement of passenger and freight operations after, possibly, 5 years)
- Aircraft noise particularly on the village of Irthlington, having regard to the applicants intention to “tighten up” its noise preferential routings at the Airport, through potential installation of noise monitoring and track-keeping terminals to ensure noise tracks are maintained and/or noise levels are not exceeded
- Noise management systems are expensive to install, operate and manage but this should be considered if the level of airport activity grows in the future
- Noise complaints process incorporating how the Airport operator will identify how it will deal with complaints, what contact arrangements will be established to allow complaints to be made, how they will, be publicised, targets for response and follow up actions, and arrangements for regular reporting of the nature, scale and action taken in response to complaints received
- Green Transport Plan, incorporating an Airport Surface Access Strategy (ASAS) providing short-term and long-term targets for decreasing the proportion of car journeys by car, and increasing the proportion using public transport, for passengers and airport workers

- Enforceability arrangements, such as incorporation of penalties for breaches of provisions made within a S106 Agreement, perhaps linked to the establishment of a community fund.

5.160 ASA analysis of the proposals, to assist the Council in dealing with the application's potential to deliver aviation benefits, is based on their own assessment of the aviation development implications of resurfacing the runway, given the lack of supporting documentation. ASA has not endeavoured to evaluate any environmental impacts of the development although, given the likely numbers of increased movements resulting from the development, ASA believe that *"the impacts of aircraft noise and air quality are likely to be minor in terms of magnitude and the numbers of those affected in comparison with other similarly sized airports"*.

Summary and Conclusions

5.161 The proposed development of the Freight Distribution Centre, related administrative offices and accommodation for Eddie Stobart Limited and Stobart Rail and construction of the proposed Chilled Cross-Dock are clearly not, on their own terms, compliant with Policy EC22 of the District Local Plan (as explained in para 5.50). That is why it was advertised as a "Departure". The initial consultation responses from 4NW also indicated concerns in relation to the office floorspace that is proposed, i.e. that it appeared to be more than "ancillary" and, hence, challenged the policy intentions of RSS Policies W3, DP4 and DP5. A similar concern might apply to the Strategic Employment Site allocation under Local Plan Policy EC22, cross-referenced in Policy DP3, both consistent with the related "saved" employment Policy (EM13) of the Structure Plan. Consequently, Officers have sought clarification of the requirement for that level of floorspace and its intended use. The applicants have set out, in clear terms, how the office premises will be utilised and Officers are satisfied that it will be "ancillary" to the "warehouse" space which 4NW has already considered as acceptable at this location under RSS policy. That information has been forwarded to 4NW which regards this as a matter for the Council to decide i.e that it is justified as "ancillary" at this location.

5.162 In relation to the issue of compliance with Policy EC22, the improvements to the Airport, which could be secured, would accord with the development plan. It is open to debate whether the development as a whole would accord with the development plan as a whole. It is probably more appropriate to regard the development for which planning permission is sought as not in accordance with the development plan as a whole but to regard the development as financially enabling development for improvements to the airport which would be a considerable benefit and which could override harm. In this regard, the Economic Benefits have to be weighed against the possible harm arising from the policy tension with Policy EC22, especially when these are matched with the regeneration opportunities the application brings to Carlisle Airport, as proffered through a Section 106 Agreement.

5.163 The proposed Heads of Terms for the intended S106 Agreement are printed as an Appendix to this Report: Members will see that, amongst other relevant

matters, they set out requirements in relation to:

- The provision of public transport services (as required by RSS and saved Structure Plan policies)
- The provision of replacement habitat loss for the 11 hectares that the development will consume of the County Wildlife Site
- Agreement to undertake a detailed assessment of the effects of increased noise from the intensified overnight lorry movements on the A689, as a result of the development, on residential properties on the corridor from the site entrance to Junction 44 and to identify and implement a package of measures to attenuate those properties where it is identified that noise levels would be above an accepted limit
- To provide a specification of the intended works, and related timetable for implementation of them, for the runway re-surfacing and the provision of passenger terminal facilities

5.164 Circular 05/2005 sets out Government policy on the use of planning obligations. They should be (1) relevant to planning; (2) necessary to make the proposed development acceptable in planning terms; (3) directly related to the proposed development; (4) fairly and reasonably related in scale and kind to the proposed development; and (5) reasonable in all other respects. In Officers' view these tests are met. The distribution development is to enable improvements to be carried out at the airport. It is reasonable, therefore, for those improvements to be secured. The obligation is plainly relevant to planning, necessary in the view of Officers to make the proposed development acceptable in planning terms, directly related since the development will fund the improvements and fairly and reasonably related, in the view of Officers, to the proposed development.

5.165 The Town and Country Planning (Development Plans and Consultations) (Departures) Direction 1999 requires that where a planning proposal is not in accord with one or more provisions of the development plan the Local Planning Authority, if minded to permit the application, must refer it to the Secretary of State as a "Departure".

5.166 The Council has already advertised the application as not according with the provisions of the development plan pursuant to the 1995 Town and Country Planning (General Development Procedure) Order.

5.167 Members will recall from the previous application that, generally, where an Authority proposes to grant approval to a "Departure" application it must first refer it to the Secretary of State under para 3 of the Departures Direction. That is what happened with the previous proposals.

5.168 However, the Departures Direction also provides that *"a local planning authority may grant planning permission on a departure application without complying with paragraph 3 if they impose such conditions on the permission as will ensure, in their opinion, that if the development is carried out in accordance with those conditions it will be in accordance with the provisions of the development plan"*.

5.169 The Opinion the Council has obtained from Leading Counsel advises that *“although the paragraph quoted refers only to conditions, there is no reason, in principle, why the paragraph should not be treated as including a S106 obligation, particularly if the relevant terms of the S106 obligation could equally well be the subject of planning conditions”*. That view is supported by Case Law whereby a High Court Judgement ruled that *“conditions and section 106 agreements can affect the “accordance” of the determination with the development plan”*. By analogy, Counsel takes the view that this may be said to recognise that a S106 obligation can in principle affect the “accordance” of the proposal with one or more of the provisions of the development plan.

5.170 In evaluating the application proposals, and the provisions that the Heads of Terms contain, it is open to Members to come to a view that, with a combination of appropriate planning conditions and S106 obligations, the proposals in their entirety would be “in accordance” with the Development Plan. The situation differs from that of the previous application in that the Council has commitments to matters that the applicant had not previously committed to deliver e.g. public transport, replacement for habitat loss, specification for the runway works.

5.171 Essentially, therefore, whilst the application has been properly advertised as a “Departure” (since there was throughout much of the period since the application was lodged insufficient detail attached to the Heads of Terms that had been promulgated) it is open to Members to take the view that, with the provision of the matters identified in para 5.163, the Heads of Terms, as now firmed up and fleshed out by the applicants, is:

- sufficient to secure the City Council’s support for the development; and
- achieve “accordance” of the proposal, in planning terms, with the Development Plan.

In short if it is accepted that, by linkage with the intended S106 Agreement, approval of the development will be the facilitator of the Airport investment and thus might realise its potential economic benefits (which are widely supported by key stakeholders, Agencies, Authorities and the business community) the application would become policy compliant in its full sense and would not require to be referred to the Secretary of State.

5.172 Consequently, and in conclusion, if Members are satisfied that:

- a) The associated planning conditions that are recommended will deliver an acceptable development as proposed; which
- b) Coupled with the related obligations under S106 that the applicants will commit to as part of the development will lead to the delivery of a fully operational, modern Airport, potentially yield the restoration of passenger services, lead to an expansion of the area’s wider connectivity and give Cumbria better access to markets, suppliers and services, all the economic benefits flowing from these fully justify support for the proposals

the Committee may resolve to grant planning permission, subject to the prior

attainment of the S106 Agreement.

Departure From Development Plan

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

6. Human Rights Act 1998

- 6.1 Several provisions of the above Act can have implications in relation to the consideration of planning proposals, the most notable being:

Article 6 bestowing the "Right to a Fair Trial" is applicable to both applicants seeking to develop or use land or property and those whose interests may be affected by such proposals;

Article 7 provides that there shall be "No Punishment Without Law" and may be applicable in respect of enforcement proceedings taken by the Authority to regularise any breach of planning control;

Article 8 recognises the "Right To Respect for Private and Family Life";

- 6.2 **Article 1 of Protocol 1** relates to the "Protection of Property" and bestows the right for the peaceful enjoyment of possessions. This right, however, does not impair the right to enforce the law if this is necessary;

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

7. Recommendation - Grant Subject to S106 Agreement

1. Time Limits

The development shall be begun not later than the expiration of 3 years beginning with the date of the grant of this permission.

Reason: In accordance with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).

2. Highways

No construction operations on the new access from the A689 shall begin until full details (including a safety audit) of the proposed roundabout junction and associated internal junction and access routes have been submitted to,

and approved in writing by, the local planning authority. The proposed access junction with the A689, and any associated internal junction and access routes, shall be completed in accordance with the approved details prior to the occupation of the proposed development.

Reason: To ensure that the highway network can accommodate the traffic associated with the development and to support Local Transport Plan Policies LD5, LD7 and LD8.

3. No construction of the carriageway, footways and footpaths to be provided within the site shall begin until full details of their specification, and a programme for their implementation, have been submitted to, and approved in writing by, the local planning authority. The construction of the carriageways, footways, and footpaths within the site shall be completed in accordance with the approved details.

Reason: To ensure a minimum standard of construction in the interests of highway safety and to support Local Transport Plan Policies LD5, LD7 and LD8.

4. The development shall not be occupied until car and cycle parking facilities for use by staff and visitors of the development have been completed and are available for use in accordance with details previously submitted to, and approved in writing by, the local planning authority. All such parking facilities shall be kept available for such use at all times and shall not be used for any other purpose, unless otherwise approved in writing by the local planning authority.

Reason: To ensure that vehicles can be properly and safely accommodated clear of the highway and to support Local Transport Plan Policies LD7 and LD8.

5. **Archaeology**

No works to construct the proposed fencing which will run in a north-westerly to south-easterly direction along the north-eastern boundary of the proposed development shall commence until implementation of an archaeological watching brief has been secured in relation to the land on which the fencing will be constructed. The fencing shall subsequently be constructed in accordance with a written scheme of investigation which has been previously approved in writing by the local planning authority.

Reason: To (1) To afford reasonable opportunity for an examination to be made to determine the existence of any remains of archaeological interest within the site and for the preservation, examination or recording of such remains; and (2) to avoid the risk of damage to unrecorded archaeological features or remains.

6. **Landscaping**

Unless otherwise approved in writing by the local planning authority, notwithstanding the details shown on drawings numbered [D121812/LA/001 and D121812/LA/002] the development shall not begin until a detailed landscaping and screening scheme for the immediate perimeter area adjacent to the proposed new freight and distribution facility and its associated car, coach and lorry parking and servicing areas, loading/unloading and fuelling yards has been submitted to, and approved in writing by, the local planning authority. The scheme shall specify the proposed planting heights and densities of all species and for substantial screen planting and/or earth moulding to be undertaken adjacent to the north eastern gable of the proposed freight and distribution facility. The scheme shall be carried out in accordance with the approved details, prior to the occupation of the freight and distribution facility.

Reason: To ensure that an appropriate and effective landscaping scheme is prepared and to ensure compliance with Policy CP5 of the Carlisle District Local Plan 2001-2016 Revised Redeposit Draft.

7. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the completion of each stage of construction operations and shall be maintained thereafter. Any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation.

Reason: To ensure that a satisfactory landscaping scheme is implemented and that it fulfils the objectives of Policy CP5 of the Carlisle District Local Plan 2001-2016.

8. **Construction**

The development shall not begin until a plan, which shall reserve adequate land within the site for the parking of vehicles engaged in construction operations associated with the development and shall show the intended means of vehicular access to the development, has been submitted to and approved in writing by the local planning authority. The land so identified shall be used, or kept available, for these purposes at all times until completion of the construction works associated with the development. The proposed means of access shall be retained for the duration of the construction works unless it is replaced following the formation and the bringing into use of a main site access from the proposed new roundabout junction with the A689.

Reason: To protect the environment and prevent statutory nuisance.

9. The development shall not begin until a construction site management plan has been submitted to, and approved in writing by, the local planning authority. The plan shall include:-

- (a) the proposed date and sequence of works/construction phases;
- (b) details of proposed normal working hours and intended start up and close down times;
- (c) an outline of any work which may require construction outside of normal working hours (per (b) above) together with any control that will be applied to mitigate against nuisance and complaints;
- (d) details of measures to control noise emissions;
- (e) the location of any proposed compounds and access points, routes for construction vehicles, equipment and plant during construction;
- (f) details of equipment and plant to be used (including type, make and expected number);
- (g) the identification of any sensitive receptors (such as trees, watercourses, local residents and commercial businesses) which are likely to be affected by the works;
- (h) the proposed method of delivery/removal of materials and plant;
- (i) procedures (for all persons engaged in construction of the development) for dealing with major incidents, unexpected occurrences or finds during construction particularly related to air quality (such as dust), ground quality (contamination issues), noise and vibration, light nuisance and water resources;
- (j) procedures for handling external communication, liaison and complaints;
- (k) measures to minimise siltation of the River Eden SAC during construction;
- (l) measures to prevent chemical pollution of the River Eden SAC during construction;
- (m) details of proposed wheel cleaning facilities for construction vehicles, and measures to remove any material that is deposited within the site by such vehicles;
- (n) measures to be undertaken to prevent contamination of the River Eden SAC through surface water drainage during construction and operation;
- (o) measures to be undertaken to prevent contamination of the River Eden SAC in the event of a pollution event/spillage during construction;
- (p) measures to be undertaken to minimise risk of toxic pollutants arising from contaminated ground being transferred to the River Eden SAC via

surface and/or ground water during construction and operational phases; and

- (q) measures to minimise disturbance of the River Eden SAC and SSI by way of noise, vibration and lighting during construction and operation.

The development shall not be constructed otherwise in accordance with the approved construction site management plan.

Reason: To protect the environment and prevent statutory nuisance.

- 10. Any vehicle travelling to and from the development, during its construction, which are carrying material which has the potential to give rise to dust shall be covered in such a manner so as to minimise the emission of dust during transit.

Reason: To protect the environment and prevent dust nuisance.

- 11. Any material which is stored on site, during construction of the development, and has the potential to give rise to dust shall be stored away from the site boundary, and any moulds of materials shall be profiled in order to minimise dust.

Reason: To protect the environment and prevent statutory nuisance.

- 12. **Detailed Design**

No works of construction of any building hereby permitted shall begin until detailed plans, elevations and sections of that building (and any associated circulation area), together with a schedule and sample of finishes to be used on its external elevations, have been submitted to and approved in writing by the local planning authority. The submitted details shall include any proposals intended to be employed to secure articulation of the principal facades, the intended site and finished floor levels to identify its physical relationship with the existing ground levels, any measures to be incorporated to secure high levels of energy conservation, and the intended use of appropriate materials and colour to assimilate the form and scale of the building within its rural setting. The development shall not be carried out otherwise than in accordance with the approved details.

Reason: To accord with the advice contained within Planning Policy Statement 12, and comply with Policy CP5 of the Carlisle District Local Plan 2001-2016.

- 13. Prior to occupation of any building hereby permitted detailed plans and particulars of the proposed surface treatment, drainage, marking out and lighting of all access routes to, from and within the car and HGV parking areas shall have been submitted to, and approved in writing by, the local planning authority. No building hereby permitted shall be occupied until the access routes have been constructed in accordance with the approved details.

Reason: To ensure an appropriate and acceptable quality of development.

14. Works to erect the proposed fencing to the site perimeter and between “airside” and “landside” shall not commence until details of the visual appearance of the fencing have been submitted to, and approved in writing by, the local planning authority. The fencing shall be erected in accordance with the approved details prior to occupation of any building hereby permitted.

Reason: To ensure the appearance of the fencing is visually acceptable in this rural location.

15. Unless otherwise approved in writing by the local planning authority, no works of construction of any building hereby permitted shall begin until detailed plans of all proposed external plant and machinery (including the proposed Chiller Units, electrical substations, LPG store and sprinkler tank) to service and/or associated with that building have been submitted to, and approved in writing by, the local planning authority. The submitted particulars shall include details of noise control measures. No building shall be constructed otherwise than in accordance with the approved details.

Reason: To ensure the details are acceptable and will, in operational use, result in no adverse impact in terms of noise or nuisance.

16. **Noise**

The development shall not be occupied until a service/haulage yard management plan has been submitted to, and approved in writing by, the local planning authority. The plan shall include measures to:

- a) minimise the use of audible reversing alarms on site between the hours of 2300 and 0700 Mondays to Sundays; and
- b) minimise the need to undertake loading and unloading of HGVs outside the service/haulage buildings;

All haulage activities, including the unloading and loading of vehicles, shall be undertaken in accordance with the approved service/haulage yard management plan, unless otherwise approved in writing by the local planning authority.

Reason: To protect the living conditions of residents and businesses living and/or operating in the immediate locality of the Airport and to prevent statutory nuisance.

17. **Foul and Surface Water Drainage**

The development shall not be occupied until a drainage scheme has been completed in accordance with details previously submitted to, and approved in writing by, the local planning authority. The scheme shall:-

- a) where relevant, be produced in accordance with the Environment Agency's greenfield run off criteria;
- b) include details for the collection/containment/treatment and/or disposal of all foul waste (including contamination from fuel;
- c) include details for dealing with all surface water from buildings, roads, car parks and service yards; and
- d) incorporate an emergency plan as to how it is proposed to deal with any specific pollution events during site operation to minimise the risk of potential pollutants reaching the River Eden SAC.

Reason: To prevent the increased risk of flooding and to protect receiving waters by ensuring the provision of a satisfactory means of foul and surface water disposal. in accord with the advice contained within PPS25, Policies DP9 and EM5 of the North West of England Plan (Regional Spatial Strategy), and Policies CP10, CP11 and CP12 of the Carlisle District Local Plan 2001-2016.

18. Any proposed liquid storage tanks shall be located within bunded areas having a capacity of not less than 110% of the largest tank. If tanks are connected by pipework in such a way to allow equalisation of the level of contents, than the bund capacity should be 110% of the largest combined volume. The floor and walls of the bund shall be impervious to oil and water (and resistant to any stored chemicals). Any inlet/outlet/vent pipes and gauges must be within the bunded area. The bunds to be installed shall be in accordance with details previously submitted to, and approved in writing by, the local planning authority The approved details must also include information on the frequency of maintenance. If contamination is found within the bund the contents shall be suitably disposed of. A record shall be made detailing the contamination, action taken and results of any investigation undertaken to identify the cause of the contamination.

Reason: To protect the environment and prevent harm to human health.

19. All vehicle washing facilities and freight loading/off-loading areas shall either incorporate effluent containment facilities or shall allow drainage from them to be connected to the foul sewer.

Reason: To prevent pollution of the water environment.

20. No piling shall be commenced until a method for piling foundations has been submitted to, and approved in writing by, the local planning authority. Piling work shall be undertaken in accordance with the approved details.

Reason: Should the site be contaminated, piling could lead to the contamination of groundwater in the underlying aquifer.

21. **Nature Conservation**

No vegetation suitable for nesting birds shall be cleared or removed during the period 1 March to 15 August in any calendar year unless a breeding bird survey of the area to be cleared or removed has been undertaken and the results have been previously submitted to, and approved in writing by, the local planning authority. If works cannot be avoided during the breeding bird season, vegetation should be checked for the presence of nesting birds within four days of the works being undertaken. Any active nests found should be left undisturbed until the young birds have fully fledged.

Reason: To ensure no impact on nesting birds.

22. **Contamination**

Notwithstanding the proposed measures identified within the application submission, in the event that contamination is found at any time when carrying out the approved development, it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken and where remediation is necessary a remediation scheme must be prepared which shall be subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority.

Reason: To protect the environment and prevent harm to human health.

Appendix 1

**Report on Proposals for Development at Carlisle Airport: Alan Stratford
Associates (Aviation Consultants)**

**Carlisle Lake District Airport
Consultancy advice in relation to a
Planning Application**



Consultant's Report

December 2008

ASA
Alan Stratford & Associates

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Appendices

Appendix A: Study brief

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Appendix C: CAA Aerodrome Public Use Licence No P855 (Carlisle)

1. Introduction

1.1 Background to assignment

This report has been prepared by the specialist aviation consultancy, Alan Stratford and Associates Ltd in response to a brief from Carlisle City Council (Appendix A). It provides a review of certain aviation-related issues at Carlisle Lake District Airport arising from a Planning Application for a new freight and distribution centre and a proposed Section 106 Agreement for the development of the airport. Carlisle Lake District Airport is currently operated by Stobart Air Limited, part of the Stobart Group.

1.2 Carlisle Lake District Airport

Carlisle Lake District Airport is situated some 5 miles east north-east of Carlisle off the B6264 to Brampton. Constructed in World War II when it was used as a training base for Hurricanes, the airport was transferred to the ownership of Carlisle Corporation during the 1960s. Under the operation control of Casair and subsequently the Oxford-based CSE Group, the airport was used for a variety of aviation purposes including a limited number of scheduled and charter passenger services. In 1967, Dan Air started a seasonal service to the Isle of Man and subsequently a similar service to Jersey. These continued until the mid 1980s, when Air Ecosse introduced a short-lived service connecting Carlisle, Liverpool, Blackpool, Barrow, Glasgow and Aberdeen. Air Ecosse later started a service from Dundee to Heathrow using Embraer Bandeirantes, which transited in Carlisle. This service was taken over by Euroair and was finally withdrawn in 1987. Although various airline operators have subsequently put forward proposals to restart scheduled passenger services, none of these have so far come to fruition.

The airport was sold by Carlisle City Council in 2001 under a 150 year lease to Haughey Air (part of Norbrook Laboratories) who subsequently sold this on to WA Developments International, a company chaired by Mr Andrew Tinkler, who is also separately Chief Executive of the publically-listed haulage company, the Stobart Group.

At present the airport is used by two fixed-wing and a microlight flying schools, by air taxi, commercial test and training, private and military aircraft. The breakdown of aircraft movements in 2005-2007 is shown in Table 1.1.

Table 1.1 Carlisle Lake District Airport – Breakdown of Aircraft Movements – 2005-2007

	2005	2006	2007
Air Taxi	159	123	138
Positioning	152	66	60
Local	306	136	754
Test and Training	74	42	56
Aero Club	17,026	14,374	15,114
Business	79	192	282
Private	4,704	4,750	4,812
Other	506	820	704
Military	1,420	1,086	1,340
Total	24,426	21,589	23,260

Source: Stobart Air Group

The airport has two usable runways (07/25 with dimensions of 1837m x 30m and 01/19 with dimensions of 938m x 23m). Both runways are of asphalt construction. Due however, to its condition, the Civil Aviation Authority (CAA) has placed a maximum

aircraft weight limit of 12.5 tonnes for public transport category and training flights using the main 07/25 runway. (Runway 01/19 is too short for operations above this weight).

The airport's facilities include a small passenger terminal and control tower, apron, fuel farm and fire station on the northern side of the airfield. There are also several hangars for general aviation use, an aircraft maintenance company and other buildings for administration and flying school purposes. A new multi-purpose shed has recently been constructed for aircraft hangarage – which includes a 500 sq m area earmarked for use as a new passenger terminal.

Carlisle Lake District Airport has a CAA Public Use Licence (No P855) that allows flights for the public transport of passengers and for flying instruction up to an MTWA (Maximum Take-off Weight Authorised) of 12.5 tonnes (see Appendix C). This weight limit would need to be increased to at least 45.0 tonnes following the proposed runway upgrade in order to handle the typical aircraft types used for passenger services from a 1,800m runway (eg BAe146, ATR72, BAe Jetstream 41 etc). The airport operator would therefore need to reapply for the licence on this basis after satisfying the CAA that all relevant operational criteria under CAP 168 (Licensing of Aerodromes) are met. This will include the obstacle clearance limitation surface as defined after construction of the new freight and distribution centre (and associated street lighting etc). In addition the operator is required to propose an annex to the existing safety management system for the safe operation of the airfield during the construction phase which must be approved by the CAA.

2 Proposed airport masterplan

2.1 Scope

Following its acquisition, WA Developments International, through its subsidiary company, Stobart Air, put forward a Planning Application in 2007 for a major £35m development of the airfield incorporating a new freight and distribution centre, passenger terminal, air traffic control tower and a replacement runway (for 07/25) with a 3.5 degree displacement from the current orientation. This Planning Application, which was supported by a detailed Environmental Statement and other supporting documentation for both the freight and aviation use of the proposed development, was approved by Carlisle City Council in April 2008 and referred to the Government Office for the North West (GONW). It was subsequently called in by GONW at which point Stobart Air withdrew the Planning Application.

Later in the year, WA Developments submitted a new Planning Application for a modified freight and distribution centre on the southern side of the airfield. Although the Application itself did not feature any specific aviation-related development, Stobart Air agreed to resurface the existing (07/25) runway to enable the airport to be used for scheduled passenger (and freight) services. This would be implemented through a Section 106 Agreement with Carlisle City Council. The Planning Application itself, however, contained no specific assessment of the planning and environmental impacts of increased aviation use and it was assumed that any necessary infrastructure improvements required (eg new passenger terminal facilities) would be achieved through permitted development rights. A diagram showing the new Airport Masterplan is shown in Appendix B.

Given the nature of the revised Planning Application and the development of aviation through the terms of the proposed Section 106 Agreement, it is arguable as to whether it is strictly necessary for the Applicant to provide a detailed environmental statement for increased aviation use. That said, it is our view that it might be regarded as good practice for this to have been done (particularly for key areas of concern to local residents such as aircraft noise, night-time movements, safety risk etc). Indeed we are surprised that, given the relatively low number of passenger and freight aircraft movements that are likely to be commercially viable following the runway upgrade, that this has not been provided, if only to attempt to allay the fears of local residents.

Given the lack of supporting documentation, our analysis is based on our own assessment of the aviation development implications of resurfacing the runway. We have not endeavoured to evaluate any environmental impacts of the development – although, given the likely numbers of increased movements resulting from the development, we believe that the impacts of aircraft noise and air quality are likely to be minor in terms of magnitude and the numbers of those affected in comparison with other similarly-sized airports.

2.2 Runway 01/19

The proposed masterplan indicates that usable length (TORA – Take-off run available) of Carlisle's cross runway (01/19) would be reduced to some 620m (Runway 01) and 710m (Runway 19) as a result of obstacle clearance criteria resulting from the siting of the new freight and distribution centre. We have reviewed the analysis undertaken by Stobart Air's advisors, Scott Wilson, and confirm that this is in accordance with the CAA statutory requirements stipulated in CAP168.

Runway 01/19 is used by light aircraft (predominately flying school and private aircraft) in a crosswind of up to 20 knots. Larger aircraft can use the main runway in these conditions. The airport has advised that the use of the 01/19 runway applies to about 15% of all movements.

Although there will be some foreshortening of the 01/19 runway, the resulting length in both runway directions would exceed the take-off and landing distance requirements for the light aircraft used by the flying school (eg Piper Tomahawk, Warrior and Archer) and other similar private aircraft. As such there will be no impact on existing users of this runway.

It is not clear whether Stobart Air have made any obligation to resurface Runway 01/19 or indeed resurface other pavement areas such as the main apron or taxiways – although it is not believed that this is essential at this point in time.

2.3 Runway 07/25

As part of the overall development of the airport, Stobart Air has agreed to improve the main runway (07/25) to an appropriate PCN (Pavement Classification Number) for the operation of scheduled passenger and freight services. This will require both strengthening of the runway and, in order to meet the CAA licensing conditions, the removal of existing humps exceeding CAA longitudinal slope constraints (the airport has a concession on this at present, although this is likely to be removed if the runway is upgraded). Given these requirements it is important that a specification for the new runway is provided within the proposed Section 106 Agreement.

The ACN-PCN system of rating airport pavements is designated by the International Civil Aviation Organization (ICAO) as the only approved method for reporting strength. The ICAO system for civil airport pavements involves comparison of an airport's PCN with an Aircraft Classification Number (ACN). According to this world-wide ICAO standard, aircraft can safely operate on a pavement if their ACN is less than or equal to the pavement load bearing capacity or PCN. An aircraft having an ACN equal to or less than the PCN can operate without weight restrictions on a pavement. The PCN is formally published in an Aeronautical Information Publication (AIP).

The ACN number for each aircraft type is defined by the take-off weight, the tyre pressures, the nature of the runway pavement (flexible or rigid) and by the runway subgrade strength. Given the restricted length of Carlisle's runway, the number of possible aircraft types used for passenger (or freight) operations is limited. The ACN numbers for these types is shown in Table 1.2

Table 1.2 Carlisle Lake District Airport – Future aircraft types (ACN classification)

Aircraft type	ACN range
ATR 42	9 – 12
ATR 72	11 – 15
BAe 146-300	24 – 31
BAe ATP	12 – 16
DH Dash 8-400	15 – 21
Fokker 50	9 – 13
BAe Jetstream 41	3 – 7
ERJ-145	12 – 16
HS 748	9 – 14
Saab 2000	11 – 15

It should be noted that some deterioration can occur to runways which may reduce their PCN over time. On this basis, we believe that it is prudent that the PCN of the resurfaced runway is of an appropriate specification to maintain a classification of 31 throughout the expected useful life of the runway surface (say 20 years).

Given the intent behind the Section 106 Agreement and any future Planning Consent for the proposed development, it is important that the resurfaced runway is constructed and fully operational within a reasonable timespan following construction of the new freight and distribution centre. We understand that the ground preparation and resurfacing of the runway is likely to take between 7-24 weeks. We would therefore propose that the Section 106 Agreement should contain a condition that the resurfaced runway should be fully operational within 12 months of completion of the freight and distribution centre.

2.4 ILS and other navigational aids

At present, the airport offers an instrument approach using a NDB (Non-Directional Beacon) and a co-sited DME (Distance Measuring Equipment). This, however, is mainly used by general aviation rather than by larger commercial passenger or corporate aircraft. The current preferred landing aid for these larger aircraft types is an Instrument Landing System (ILS) which enables aircraft to land during low visibility conditions under different criteria down to a 'blind landing' (Category III approach) at zero decision height.

Most larger regional airports do have an ILS certified to at least Category I levels and this is often preferred by airlines in order to minimise disruption in the event of fog etc. The cost of providing ILS is, however, comparatively expensive both in terms of its initial capital cost and on-going maintenance and flight testing. The airport operator maintains that the airfield has a low incidence of fog and a specific airline who has expressed interest in operating passenger services from the airport) has indicated that they do not require this. Stobart Air have stated that any decision to install ILS would be made on a commercial basis taking account of the wishes of the airline. We note, however, that an ILS is currently provided at all other UK regional airports offering scheduled passenger services (except at some Scottish island airports eg Stornaway, Barra etc).

ICAO, and the State Regulator in the UK – the Civil Aviation Authority (CAA) – have now also approved the use of Global Navigation Satellite Systems (GNSS) as an alternative to ground based landing aids for low visibility conditions, although this is only available at a limited number of airports in the UK. GNSS requires aircraft hardware and pilot qualifications just as ILS/MLS but there is no need for ground installations unless there is a need for greater than normal accuracy – in which case a ground installation known as ‘augmentation’ may also be installed. Theoretically there is no reason why Carlisle could not carry out the required development and approval process, rather than install one of the ground based systems – although this may not meet the approval of some potential airlines that might use the airport that may prefer conventional landing aids.

3 Aerodrome safety issues

3.1 CAA Operating Licence

Carlisle Lake District Airport has a CAA Public Use Licence (No P855) that allows flights for the public transport of passengers and for flying instruction up to an MTWA (Maximum Take-off Weight Authorised) of 12.5 tonnes (see Appendix C). This weight limit would need to be increased to at least 45.0 tonnes following the proposed runway upgrade in order to handle the typical aircraft types used for passenger services from a 1,800m runway (eg BAe146, ATR72, BAe Jetstream 41 etc). The airport operator would therefore need to reapply for the licence on this basis after satisfying the CAA that all relevant operational criteria under CAP 168 (Licensing of Aerodromes) are met. This will include the obstacle clearance limitation surface as defined after construction of the new freight and distribution centre (and associated street lighting etc). In addition the operator is required to propose a safety management system for the safe operation of the airfield during the construction phase which must be approved by the CAA.

It should be pointed out 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 licence. In line with recommended practice, an Official Safeguarding Map is lodged with Carlisle City Council, indicating where proposed development in the vicinity of the airport should be subject to consultation with the airport operator. This does not, however, place any responsibility on the Council for aviation safety either within or outside the airport boundary.

3.2 Public Safety Zone

Public Safety Zones (PSZs) are areas of land at the ends of airport runways within which development is restricted in order to minimise the number of people on the ground at risk of death or injury in the event of an aircraft crash on take-off or landing. There should be a general presumption against new or replacement development, or changes of use of existing buildings within the PSZ. No new or replacement dwellings, mobile homes, caravan sites and other residential buildings should be permitted. Nor should new or replacement non-residential development be permitted. Exceptions to this general presumption are set out in circular 1/2002 Control of Development in Airport - Public Safety Zones.

Government guidance sets out the types of development appropriate within the PSZ and therefore permission will only be granted for:

- an extension to a dwelling house which is for the purpose of enlarging/improving the living accommodation for the benefit of the people living in it, such people forming a single household, or which is for the purpose of a 'granny annex';
- an extension to a property (not being a single dwelling house or other residential building) which could not reasonably be expected to increase the number of people working or congregating in or at the property;
- a change of use of a building/ land which could not reasonably be expected to increase the number of people living, working, congregating in or at the property or land.

The PSZ itself is based on the area within a 1 in 100,000 risk contour of a fatality due to an aircraft accident – and generally involves an elongated strip extending beyond both runway ends. No residential or commercially-occupied buildings are permitted within the inner 1 in 10,000 risk contour.

The statutory requirement for a PSZ is dependent on the number of ATMs (Air Transport Movements) by commercial aircraft not the number of aircraft movements (by all aircraft types). As such the level of future ATMs at Carlisle will be significantly less than the limit of 30,000 ATMs per annum whereby a statutory PSZ is required. Nevertheless, it is good practice to prepare a safety risk assessment for aviation-related Planning Applications. Under the traffic levels assumed in the earlier Planning Application, the level of risk was such that no building would infringe the 1 in 10,000 contour by 2016.

4 Air traffic control implications

Carlisle operates a fully licensed Air Traffic Control Service providing both Aerodrome and Approach Control using Civil Aviation Authority licensed Air Traffic Controllers.

As indicated in Section 2.3, the only instrument approach procedures to the airport are through the use of a co-located NDB and DME. In low visibility conditions, pilots of larger aircraft prefer the use of an ILS.

Whilst the airport operator originally believed that, due to the proximity of RAF Spadeadam, it would necessary to re-orientate the main runway in order to give the

necessary distance for the aircraft to be established on the ILS, the airport operator believes that these difficulties can now be overcome. Whilst there is a proposal for a 'Carlisle Box' to protect the use of the Spadeadam airspace danger area (D510), it is not totally clear exactly how this would operate.

The ICAO recommendation is that aircraft using an ILS approach should be established on the centreline no later than 5nm from touchdown, however aircrew usually expect this to take place somewhere between 8 and 12nm. Potential infringement of the Spadeadam danger area would arise at around 7 nm under the current runway alignment.

Under the principles of the 'Carlisle Box', Spadeadam traffic would have priority – and Carlisle traffic would be requested to hold or fly an alternative procedure to the airport. There could, therefore be delays to Carlisle traffic using the ILS, although this would be dependent on the nature, level and timing of Spadeadam activities.

In general terms, we believe that the 'Carlisle Box' proposals are workable – although we cannot form a definitive view on this without further assessment of Spadeadam activities at the appropriate times of day (ie for commercial flights).

5 Future airport operations

5.1 Passenger services

The potential for passenger and freight services from Carlisle has been assessed in a report by Ekos entitled 'Economic Impact Appraisal – Carlisle Airport' which was commissioned by Cumbria Vision and was submitted by Stobart Air as part of the new Planning Application.

The Ekos report acknowledges that the catchment area for Carlisle is relatively small in comparison to other UK regional airport – with an immediate catchment of 160,000 (within 30 minutes drive time) and a core catchment of around 500,000 where Carlisle is the nearest airport. The most recent passenger survey conducted by the CAA in 2005 indicated that approximately 750,000 passengers had an origin or destination within Cumbria in that year.

The report proceeds to show that Carlisle has a smaller immediate catchment area than other similar UK airports including Newquay, Dundee, Exeter and Norwich. In practice, the airport would compete with Manchester, Newcastle and Glasgow on any routes served by Carlisle – whilst these airports would offer the only available services on other routes.

The key route that Carlisle might serve would be to a London airport (in practice, probably Stansted – although Luton or Gatwick might also be feasible). London City does have quicker surface access into the City and the West End, although there may be difficulties with peak time slots and/or high airport charges – whilst Luton has a longer overall surface access time into Central London. We believe that this would only be viable with a double daily frequency (early morning departure from Carlisle returning mid-morning with a second early evening departure returning mid-evening). Assuming that this service was flown by a suitable aircraft types such as an ATR 72 or Saab 2000, this would imply that traffic levels would need to be a minimum of 40,000 – 50,000 passengers per annum. An alternative might be that Carlisle is served as a

transit stop on a route from Scotland to London. (This was previously the case in the 1970s with a Dundee-Carlisle-Heathrow service. The difficulty with this is that the additional overall journey time for passengers travelling on the full London-Scotland route is significantly increased. We do not believe that a route between Carlisle and Southend would be commercially viable (despite Stobart Air's acquisition of Southend) even if the proposed airport rail station with its service to London Liverpool Street is built.

Passenger services to other destinations are probably not commercially viable at present – although there may be opportunities in the longer-term. In particular, flights to Amsterdam would offer significant hubbing opportunities whilst Dublin remains a popular destination from all UK airports.

We understand that Stobart Air have held positive discussions with a specific airline about the possibility of providing services from Carlisle either under its own name or under a newly formed airline using the Stobart name. Given public awareness of the Eddie Stobart 'brand', it has been suggested that the airline might fly under this name – although the airline overhead expenditure may increase significantly. Although the discussions with the airline have been positive, we understand that there is no commitment on either side – and it is unclear whether Stobart Air would merely charter aircraft from the airline or whether it would share the commercial risk. It is also possible that airline might use Carlisle as a transit stop on an existing service – particularly during an introductory period to enable traffic levels to build up – although this does significantly increase the overall journey times of passengers travelling the full length of the route.

Given the types of aircraft flown, there are a limited number of UK (and European) regional airlines that might potentially be interested in providing services from Carlisle including Flybe, Loganair (now a Flybe franchise), Eastern Airways, Aer Arann and CityJet. Clearly some of these are likely to be more suitable than others due to the potential fleet operating pattern within an integrated route network.

It should be pointed out that the commercial viability of regional airline services often depends on public subsidy, particularly during the early years of operation. This can be implemented through the designation of a Public Service Obligation (PSO) in which a subsidy is provided to an operator of a route from a peripheral or developing region. Each PSO route needs to be approved by the Department for Transport. The subsidy is normally provided by the Regional Development Agency (in Carlisle's case – North West Regional Development Agency) and routes are tendered to the highest airline bidder.

The detailed operation of PSO route subsidies is set out in the Department for Transport Guidance published in 2005 and in European Commission Regulations 2408/92 and 95/93.

5.2 Freight

The Ekos report does not provide a detailed assessment of the potential for freight operations from the airport, which is perhaps rather surprising in view of its purchase by a major haulage company.

Freight operations would be limited to certain aircraft types such as freighter (or 'combi' – combined passenger and freight) versions of a BAe 146, ATP, ATR 72 or HS 748.

The payload and range would therefore be low – although this does suit certain markets. In particular, a significant volume of mail is flown overnight from UK regional airports – whilst certain products such as flowers (from Amsterdam) and fresh fish (from Norway/Iceland) need to be distributed quickly to retail outlets. Indeed, given Eddie Stobart client base for retailers such as Tesco, this potentially would seem a logical fit. It is preferable, however, that full or at least partial loads are carried on both outbound and inbound legs.

To achieve this, it would be necessary to attract a home based cargo airline (or perhaps for Stobart Air to purchase or build up its own airline. Examples of similar regional cargo airlines in the UK include Janes Aviation (based at Southend) and Atlantic Airlines (based at Coventry) which was recently acquired by WestAir of Sweden.

5.3 Linkages with Southend Airport

On 1st December 2008, the Stobart Group announced that it had conditionally agreed to acquire London Southend Airport for a maximum consideration of £21.0m of which £5.0m will be due on achievement of certain aspects of the airport's development.

The acquisition of Southend does indicate the Stobart Group intentions to expand its aviation activities. The airport is currently profitable, although this is achieved from property rental income from tenants on the airport site eg aircraft maintenance, light engineering etc, rather than from aeronautical revenue.

Whilst there may be linkages between Carlisle and Southend for air freight services (which are not so time-constrained), we do not believe that passenger services between the two airports will be commercially viable due to the relatively small catchment areas of both airports. Whilst we believe that a route between Carlisle and Southend is unlikely to be sustainable in the longer term, any possible commercial viability will be dependent on the construction of the proposed rail station at Southend Airport to provide a link into London Liverpool Street Station.

6 Section 106 Agreement

6.1 Potential content

Section 106 (S106) Agreements between airports and local authorities are generally designed to provide operational constraints to limit the environmental impact of development. It is recognised, however, that in the case of this particular development, the S106 will also include a specification for the resurfacing of the main 07/25 runway. The S106 may also incorporate additional provisions for road traffic etc arising from the development, although these are not considered in this analysis. Typically the aviation related components of the S106 will cover one or more of the following topics:

- Airport operating hours
- Aircraft movement limits (including night-time constraints)
- Noise preferential routings / track-keeping

- Aircraft noise levels (eg size/no of households in 57 dBA Leq contour)
- Dwelling insulation schemes (where applicable)
- Noise management systems
- Noise complaints procedures
- Pollutant monitoring
- Green transport plan
- Enforceability / penalties

The key topic areas for possible inclusion in the proposed S106 are shown in Sections 6.2 – 6.9 below.

6.2 Resurfacing of Runway 07/27

It is recognised that the proposed S106 Agreement at Carlisle Lake District Airport will need to cover the specification for the resurfacing of Runway 07/27. This is discussed further in Section 2.2 above.

6.3 Airport Operating Hours

The airport's current operating hours are:

Monday-Friday:	0830-1900
Saturday, Sunday and Public Holidays	0900-1700

Prior permission is required for movements outside these hours and additional charges are incurred.

Given the nature of the proposed increase in aviation activity, these operating hours will need to be reviewed and possibly shown in the S106.

6.4 Aircraft Movement Limitations

Many S106 Agreements place a total daily or annual ATM or aircraft movement limit for daytime and/or night-time operations. Often this is presented in terms of a QC (Quota Count) based on the noise levels of individual aircraft types. It is also possible to place limits on certain types of operations (eg helicopter movements) – although those by the emergency services are usually exempt from this limit. It should, however, be noted that, under the terms of the current lease, Stobart Air are entitled to operate a maximum of night-time eight movements between 2300-0600 hours (where a movement is defined as a landing or take-off or, alternatively a combined landing and take-off in a single night).

It is probably not appropriate to include movement limits in the proposed S106 Agreement at this stage unless there is strong community feeling on this. It would be

prudent however to review this after, say a five year period after commencement of passenger and freight operations.

6.5 Aircraft Noise

A key impact of expansion will be the effect of airborne aircraft noise, particularly in the village of Irthington. The previous Planning Application suggested that, on the basis of the forecasted aircraft movement levels, daytime noise levels would rise from 51.0 to 54.8 dB $L_{Aeq, 16hr}$. This increase would certainly be regarded as perceptible, although is below the current level of the 'onset of significant noise disturbance' -57.0 dB $L_{Aeq, 16hr}$. The definition of this level is however, under debate, and is possible that a lower figure of 54.0 – 55.0 dB $L_{Aeq, 16hr}$ may be more appropriate. The earlier Planning Application did not include any assessment of future night-time noise levels.

Whilst it is recognised that forecasted movement levels may have potentially changed following the development arising from the new Planning Application, it would normally be regarded as good practice for the operator to prepare forecasted noise contours (eg for the Carlisle Airport Forum).

Many airports provide noise insulation schemes for properties affected by daytime noise levels in excess of 57.0 dB $L_{Aeq, 16hr}$ although this is unlikely to be required at Carlisle within the next 10-15 years.

We understand that the Stobart Ait intends to 'tighten up' its noise preferential routings at the airport – which might be shown in the S106. Potentially noise monitoring and track-keeping terminals could be installed to ensure that these tracks are maintained and or noise levels are not exceeded.

6.6 Noise Management Systems

Noise monitoring has become a virtual requirement for airports in developed countries as a prerequisite for developing noise mitigation strategies, for both the short term and the long term. In the 1970's only a few airports had noise monitoring systems, whereas by the late 1990's a large proportion of commercial airports had installed such systems. Over the same period the level of performance and technical sophistication of the noise monitoring systems improved dramatically.

In consequence, the overall cost of the installation, operation and management of these systems has also increased considerably. Therefore the requirement to provide a system at an airport must be tempered by a thorough evaluation of its likely utility and application at the level of airport activity currently being experienced, combined with clear proposals for future enhancement and added sophistication as the activity of an airport might grow.

The essential features of a modern noise monitoring system are a series of remote sensors/microphones – Noise Monitoring Terminals (NMTs) - located strategically around an airport, with emphasis on positions under flight paths or in the vicinity of residential or other noise sensitive areas. These sensors collect and transmit data on individual noise events to a central computing and reporting system. Such systems can also be specified to receive air traffic movement data, enabling individual aircraft to be identified with the recorded noise events.

In the more comprehensive systems, air traffic radar data from the Secondary Surveillance Radar (SSR) serving the airport can be fed into the monitoring system to give positive aircraft identity, speed, altitude and physical location above the ground. This information can then allow a visual, three dimensional, image of the exact aircraft behaviour relative to a ground map of the airport vicinity. In realtime, an immediate comparison against noise and flight path regulations relating to taking off or landing at the airport becomes possible. Historic stored data will also allow any subsequent noise complaint to be fully assessed, as necessary. Carlisle, however, does not have a SSR radar.

The level of sophistication of some Airport Noise Monitoring Systems (ANOMS) available can include the ability to produce continuously available noise contours, if required by the nature of the monitoring circumstances. However, in normal circumstances noise contour production on an annual or seasonal basis is adequate, and the contours are more efficiently obtained as a specific and separate task by specialist contractors.

The introduction of a monitoring system involves considerable capital, even for the most basic arrangements, covering not only the cost of the system itself, but the also the purchase of sites off airport to house the NMT sensors, high quality communication links from the NMTs to the central computer. There are also revenue costs related to system management training, and the recurring maintenance and calibration tasks once the system is installed. Equally essential to any of these systems are staff resources dedicated to its operation, and to administrate any resulting reporting and complaints processes introduced.

6.7 Noise Complaints

It is important that the airport establishes an open and clearly accessible noise complaints process and this is often enshrined in a Section 106 Agreement between the airport operator and the relevant local authority. Complaints can be received directly by letter, telephone, email and individual visits to the airport, as well as through feedback from the local authority, community groups, the Airport Forum, individuals or the media.

Phone, email and website contact details need to be published widely identifying the responsible manager at the airport, together with guidance to the complainant on the complaints procedure. Targets for a response by the airport should be established and monitored by the local authority and the Airport Forum. If out of hours complaints are made – in relation to night flights for example – a dedicated contact line to a recording device should be provided, and the procedures for followup and subsequent action must be in place and clearly publicised. Regular reporting of the nature, scale and action taken in response to complaints received must be a fundamental element of overall reporting procedure.

6.8 Green Transport Plan

All airports in England and Wales with annual air transport movements of more than 1,000 per year are required to prepare an *Airport Surface Access Strategy (ASAS)* and set up an *Air Transport Forum*. The ASAS should set short term and long term targets for decreasing the proportion of by car, and increasing the proportion using public

transport, for both passengers and airport workers. A *Green Transport Plan (GTP)* would be a subsequent product of the ASAS and the ATF

The reality is that the ATF is a monitoring, advisory and consultative body – not an executive body - whose key role is to assess the implementation of the ASAS and recommend how it could adapt to respond to its original targets, and as time passes perhaps more stringently revise these targets, together with agreeing the form and also monitoring the success- or otherwise - of the GTP. It is possible that an ATF, in its initial years, could be a specialist subcommittee of the Airport Forum.

An initial action therefore should require the production of a comprehensive traffic and access strategy for at least a five year period, to include searching modal shift targets for passengers and employees, as required by the Department for Transport's guidelines.

With an ASAS established the additional impact of any unanticipated development would then need to be assessed as outlined in principle in Section 10.2

Ideally the Airport ought to have submitted an ASAS by now, so that realistic and binding targets can be incorporated into the S106 Agreement completion. This does not appear to be the current intention.

6.9 Enforceability

Some S106 Agreements incorporate penalties for breach of its conditions. Typically these involve breach of noise preferential routings, noise quotas or movements outside agreed operating hours. Often a community fund is established for this purpose. Fines are usually passed on to the airline involved. A typical fine imposed (eg for breach of noise preferential routings at Kent International Airport) is £1,000.

Appendix A

Study Brief

Issues Arising From Development at Carlisle Airport

1. Would the proposed siting of buildings or other related features such as lighting on it or the lighting columns in the car parking and access road, as shown on the Masterplan, necessarily preclude the use of the full length of the existing 01/19 runway?
2. Objectors refer to 01/19 as a "vital, cross-wind" runway. Do you agree and if it is effectively rendered incapable of use or its length restricted to any great degree, how significant is that loss? It has been suggested that, as Carlisle is a remote airport, anyone expecting to land on 07/25 (but discovers they cannot) should be able to depend on 01/19 being available?
3. If a reduction in its length is unavoidable, is there an acceptable minimum length we should be seeking to secure to enable it to still be used on occasions when 07/25 cannot be used?
4. Similarly, there is much use of Carlisle Airport for flight training and for private aviation. Would the proposals be likely to harm those existing activities and any potential they might have for growth e.g. as a result of the loss or reduction in length of 01/19?
5. What PCN would you expect the re-constructed/re-surfaced runway (07/25 but also, perhaps, 01/19) to be designed to achieve?
6. Objectors have suggested that the applicants' motives are really to use the Airport for freight by air and that they have no real intentions/ambitions for passenger services. They maintain that such flights are not subject to CAA licensing restrictions or proper safeguards for the local community and that key matters e.g. fire cover at the Airport, air traffic control facilities do not have to be provided. Is that the case?
7. There is a paradox between the original application made in 2007 and what we have now. The original application sought approval for substantial "aviation" works including a new re-aligned runway, replacing 07/25, together with a new Terminal, air traffic control tower and centre, approach lighting, an Instrument Landing System and other navigational aids whereas the current application is devoid of such works. A key part of the case made by the applicants in the previous application was that the re-aligned runway was essential to enable the installation of the ILS, to avoid the use of air space over RAF Spadeadam and that, without an ILS, there was little prospect of attracting commercial aviation services. When we have questioned why these are no longer an "imperative" the applicants have responded that:
 - a) Technology has move on and the CAA now allow GPSS navigation systems that obviate the need for an ILS and that this i.e. GPSS can be installed at Carlisle;

- b) RAF Spadeadam now say more airspace can be released which allows the existing runway to be used; and,
- c) The applicants have an interested operator whose fleet does not depend upon an ILS being installed at the airport.

Do you have any views on the apparent change of position? Do the 3 responses of the applicants stand up, from an operational aviation viewpoint?

- 8. You may be aware that the applicants are, reputedly, in negotiation to purchase Southend Airport. It has been suggested that this would allow a Carlisle-Southend passenger air service to be operated by one of the smaller airlines, with high-speed rail links from Southend enabling direct access to central London. Have you a view on whether this is a realistic possibility in terms of how Southend currently functions?
- 9. Can you confirm the position regarding the issue of safety and where responsibility lies for safety issues? Objectors keep referring to the possibility of air crashes on Irthlington or Brampton and suggest that the City Council will be liable for any such future incidents if it approves the planning application and this leads to increases in flights, notably air freight.

Our view is that it is the CAA who is responsible for air safety and not the responsibility of the LPA for approving a planning application. Can you advise? Should, as objectors insist, CAA approval for runway works have been secured before the application is submitted so the Council knows what it is getting? Is that your experience of the "process" as a whole?

- 10. What are the key components that the Council should expect to have included in the S106 Agreement to ensure, as far as is possible, that we get the "aviation" benefits that the applicants imply are linked to the proposed development? We believe we need to ensure there is reference to the nature of construction works related to the resurfacing i.e. is it a full reconstruction by excavating out and replacing the sub-base coupled with resurfacing or is it merely a superficial "top-coat"? What is the final surface finish treatment?
- 11. What should we look to see covered in a "specification" for the works? We are also conscious of the issue of "timescale" when the works would be executed and anxious to avoid a scenario where the warehouse is built but we never see the runway upgrade. How should we seek to best protect ourselves?
- 12. Finally, are there any aspects of the submission that concern you in general terms? Similarly, are there any aspects that arise in relation to the information provided or, perhaps that should be considered but cannot because the applicants have not provided information that you would have, from your experience, expected to have before you?

Appendix B

Airport Masterplan

Appendix C

CAA Aerodrome Public Use Licence No P855 (Carlisle)

Licence No. P855	
1 Name of Aerodrome	Carlisle
2 Position of Aerodrome	5NM ENE of Carlisle
3 Name and Address of Licensee	Stobart Air Limited Carlisle Airport Carlisle Cumbria CA6 4NW

The Civil Aviation Authority (in this licence referred to as 'the CAA') in exercise of its powers under Article 128 of the Air Navigation Order hereby licenses the above-named aerodrome as an aerodrome to be used as a place of take-off and landing of aircraft engaged in flights for the purpose of the public transport of passengers or for the purpose of instruction in flying, subject to the following conditions:

- 1 The aerodrome is licensed for public use and shall at all times when it is available for the take-off or landing of aircraft be so available to all persons on equal terms and conditions.
- 2 No aircraft shall take-off or land at the aerodrome unless such fire-fighting and rescue services and such medical services and equipment as are required in respect of such an aircraft in the CAA's publication CAP 168 (Licensing of Aerodromes) are provided there. Such services and equipment shall at all times when the aerodrome is available for the take-off or landing of aircraft be kept fit and ready for immediate turnout.
- 3 Changes in the physical characteristics of the aerodrome including the erection of new buildings and alterations to existing buildings or to visual aids shall not be made without prior approval of the CAA.
- 4 The licensee shall, by the quickest means available, notify the CAA of any material change in the surface of the landing area, or in the obstruction characteristics of the approach, take-off or circuit in relation to the aerodrome.
- 5 Any public right of way crossing or bordering the landing area shall be adequately sign-posted with notices warning the public of danger from aircraft.
- 6 The aerodrome is licensed for the take-off and landing of aircraft at night. Such systems of lighting appropriate to the Category of runway in use as described in the CAA's publication CAP 168 (Licensing of Aerodromes), shall be in operation at all times when aircraft are taking-off or landing at the aerodrome at night, provided that minor temporary unserviceability, not of a character likely to affect the safety of operations, shall not preclude the take-off or landing of aircraft.
- 7 The licensee shall inform the CAA of the times during which the aerodrome is to be generally available for the take-off or landing of aircraft, and of any changes in those times, and whether the aerodrome is to be available by arrangement with the licensee outside those times. The aerodrome shall be kept available for the take-off or landing of aircraft at all times when, in accordance with the information furnished by the licensee to the CAA it is notified as being generally available and shall not be used for the take-off or landing of aircraft at any other time, unless it has been notified in accordance with such information as being available for use by arrangement with the licensee outside the times when it is generally available and is used pursuant to such arrangement.
- 8 No fixed wing aircraft engaged in public transport or flying training shall take off or land where the MTWA exceeds 12.5 tonnes.
- 9 Without prejudice to condition 1, nothing in this licence shall be taken to confer on any person the right to use the aerodrome without the consent of the licensee.
- 10 Expressions used in this licence shall have the same respective meanings as in the Air Navigation Order.
- 11 'The Air Navigation Order' in this licence means the Air Navigation Order 2005 and any reference to the Order or to any Article of the Order shall, if that Order be amended or replaced, be taken to be a reference to the Air Navigation Order for the time being in force or the corresponding Article of that Order.

This licence shall remain in force until it is varied, suspended or revoked.

Date 30 May 2006

FOR THE CIVIL AVIATION AUTHORITY



Alan Stratford & Associates

Delta House
175-177 Borough High Street
London SE1 1HR

Tel: 020 7939 9938
Fax: 020 7939 9901

Email: info@alanstratford.co.uk
Web: www.alanstratford.co.uk

Appendix 2

**Carlisle Airport- An Assessment of the Wider Economic Benefits of its
Development: David Beaty Head of Economy, Tourism and Property (Carlisle
City Council)**

CARLISLE AIRPORT – AN ASSESSMENT OF THE WIDER ECONOMIC BENEFITS OF ITS DEVELOPMENT.

Comment on Application 08/1052

1 Introduction

- 1.1 The wider economic benefits of Carlisle Airport can be assessed through its potential contribution to: -
- (a) The economic regeneration of Carlisle and Cumbria and the extent to which the Airport's development would support regional and sub-regional priorities.
 - (b) The improvement of Cumbria's image and the perception of the sub-region's peripherality.
 - (c) Support for existing public investment in the sub-region
 - (d) The potential to create of sector opportunities
 - (e) Economic efficiency and competitiveness advantages to business
 - (f) The creation of on-site development opportunities arising from an operational Airport.

2 Economic Strategy And Priorities

- 2.1 The economic objectives for the area as set out in the Regional Economic Strategy, in Cumbria's sub-regional Economic Plan, and in economic strategies for Carlisle, and West Cumbria all refer to the improvement of the operational capability of Carlisle Airport as a priority action for the area. It is seen as one of a suite of key investments that will be essential to the future success of the Cumbrian economy.
- 2.2 For Carlisle alone, the presumption of economic growth is central to the City's economic strategy and has been supported by its designation as a 'Growth Point'.
- 2.3 The Airport, together with the development of the University of Cumbria headquarters and the prospect of substantial public and private investment through the realisation of the 20-year Carlisle Renaissance vision for Carlisle, are part of an integrated plan to grow Carlisle both physically and in terms of its economic role as a 'regional' city within the North-west. This aligns with the RES Action 55 that identifies Carlisle, with 5 other towns in the NW as having potential for growth and the attraction of private investment.
- 2.4 The link between airport policy and economic growth is generally acknowledged. Study findings for the North of England show a 'direct relationship between airport capacity and employment and

productivity'¹. The encouragement of the growth of business and inbound leisure travel is seen as particularly important. It is assumed that these general conclusions can be proportionately applied to a small airport such as Carlisle, as much as to large international airports such as Manchester

- 2.5 Productivity and business efficiency calculations for the UK show also show a clear sensitivity between air passenger demand and GDP². Clearly the impact of an operational airport at Carlisle on Cumbria's GVA will, in itself, be small. However, as part of a wider sub-regional regeneration package, it could be significant in the long term and could provide a clear link to enable Cumbria to contribute to wider economic objectives and targets for the north of England.

3 Image And Peripherality

- 3.1 The availability of scheduled air services from Carlisle would reduce the perception of geographical isolation and the sense of the area being 'behind the times' - a 'backwater' etc. There have been many instances over the years of key businesses and business people citing poor access as one reason for not investing in Cumbria
- 3.2 The poor access to air travel services means that Cumbria cannot claim to have a 'modern' business infrastructure or claim to be a fully competitive location in a global marketplace. The business and social case for better IT connectivity throughout Cumbria has been accepted and a broadband infrastructure is in place. The development of scheduled air services will improve the competitiveness of the Cumbrian 'offer' in a similar way.
- 3.3 If the Airport prospers there will be the potential for improvements in 'connectivity', [in terms of the number of hub business destinations served], and these will be a driver of business opportunity and efficiency. The development services to these 'hubs' will help change the perception of Cumbria as a business location over the long term.
- 3.4 The availability of air access should reduce the adverse connotations associated with working or running a business in a rural and remote area, such as lack of access to higher level services, and being cut off from 'the mainstream' within any given business sector. It should strengthen the positives by offering [in due course] better connectivity to key business centres, particularly in Europe. This may be an important factor in attracting new businesses in the knowledge and creative sectors to north and west Cumbria

¹ Quote from the Northern Way Growth Strategy Connectivity Technical Report October 2004, which also refers to work by York Aviation and Oxford Economic Forecasting on the role of Airports in enhancing business efficiency and productivity in the north.

² As 1 above page 7 quoting Oxford Economic Forecasting

- 3.5 For journeys over three hours air provides a competitive alternative to rail³. It is unlikely that the recently announced 'fast' services taking around 3 hours 15 minutes from Carlisle to London will be bettered in the foreseeable future. The difficulties in arranging a day visit to London [or from London to Cumbria] remains one of the criticisms of Cumbria's rail services.
- 3.6 Air also provides a long-term strategic alternative to rail. It is probable, given the projected growth in rail traffic [both passenger and freight] that capacity problems will begin to re-emerge on the WCML in about 10-15 years⁴. There is no longer-term commitment to further enhancements of the WCML beyond the current major reconstruction programme.
- 3.7 The perception [and real impact] of remoteness is illustrated in comments made in research into reinvestment by externally owned firms carried out by CRED in 1998⁵. This [still felt to be true now] stated;
- "When questioned about transport and communications, managers generally regarded these as marginal issues. The advent of advanced communications and distribution technology was felt by interviewees to be sufficient to negate this as an issue. However, the issue of remoteness and accessibility does appear to become an issue when considering the loss of management time in travelling to meetings and difficulties associated with organising visits from key customers. The very process of negotiating reinvestment is itself an illustration of these potential difficulties in arranging for management from head office to visit the site in Cumbria. Local managers adopt 'coping strategies' for dealing with this issue."*

4 Support For Public Sector Investment

- 4.1 The investment in the airport infrastructure is a key plank in the overall strategy for the Cumbrian economy and will complement and support other areas of public investment. This is particularly important for the 'Energy Coast' master-plan for West Cumbria and for the growth ambitions of Carlisle itself.
- 4.2 Cumbria has two Regional strategic investment sites at Westlakes in West Cumbria and Kingmoor Park near junction 44 of the M6 at Carlisle.
- 4.3 In the case of Westlakes, this is the 8th largest science park in the UK with 30 companies and 700 people working on site. A major £6 million

³ source DfT

⁴ source Richard Bowker of the Strategic Rail Authority at a West Coast Rail 250 General Council meeting, London, July 2004.

⁵ Investment in the Cumbrian Industrial Sector: the Impact of External Ownership. Centre for Regional Economic Development, University of Northumbria at Carlisle, Frank Peck and others, Research Paper No 2 March 1998

investment programme that began in 2003 will put Westlakes on its way its target of 1500 jobs by 2010⁶. The nature of the activities at Westlakes - environmental technologies, nuclear decommissioning support and other knowledge based businesses include many from sectors that, according to the DfT, are "more dependent" on air service accessibility.

4.4 Kingmoor Park, comprising 2 million sq. ft. of existing buildings on a 400 acre site, has grown so that it now employs around 1500 people. When combined with the adjoining Kingstown and Parkhouse Estates the total employment in the immediate area around M6 junction 44 reaches about 6,000 people. This concentration of jobs and business activity is only 5 miles from Carlisle Airport.

4.5 With the completion of the Carlisle Northern Development Route [scheduled for 20010/11] access to and from West Cumbria to the Airport will be significantly improved. This will directly support the business case for investment in West Cumbria.

5 Sector Opportunities

[I] Tourism

5.1 The availability of an operational airport within Cumbria presents opportunities to develop new Tourism markets linked to internationally known brands, particularly the Lake District, Hadrian's Wall. Air services would enhance the credibility and accessibility of Cumbria as a tourist destination.

5.2 There will be the opportunity to tap more effectively into the lucrative markets in the South East and Europe, particularly for week-end and high value added holidays and short breaks. The current perception of the Lake District in the S.E. is that it is remote and difficult to get to. An air service would present an opportunity to improve this image. The number of people from the South East visiting the Lakes is currently declining.

5.3 There is a further opportunity in the development of markets linked to Hadrian's Wall. The move from a 'Northern 'ought to see' towards a Global 'must see, stay and return for more' ⁷ implies that visitors from new and more distant markets need to be attracted. The proximity of the Airport to the Wall [it is within the Wall corridor] means that it is well placed to service new markets.

⁶ Information from Factsheet on Westlakes Science and Technology Park; published by Careers Northwest 08/03 and available on www.careersnorthwest.com

⁷ Agreed audacious goal for Hadrian's Wall – Major Study Report Summary Sep '04 page4

[ii] Nuclear Sector

- 5.4 Improved access to air services will improve the prospects of attracting inward investment business most of whom operate internationally and for whom access to air service is a pre-requisite.

[iii] Other Sectors

- 5.5 The airport may support other smaller local sectors that have potential to develop which have strong dependency on Air Service accessibility - e.g. cultural and media, transport and communications, R & D activities.

6 Economic Efficiency and Competitiveness

- 6.1 Air access provides better opportunities to access to suppliers, markets and supply chain network opportunities. This relates to the quotation from CRED above and the dis-efficiencies that branch plants experience in Cumbria because of perceived or actual peripherality. There are known examples of business opportunities being lost because of the difficulties in arranging visits by prospective customers who are not prepared to endure the travel and overnight stays that a visit to Cumbria often involves.
- 6.2 The availability of a fully operational Airport should support the re-investment case by overseas-owned companies by improving accessibility for overseas management.

7 Development Opportunities Arising From An Operational Airport

- 7.1 The presence of an operational airport with scope to attract new businesses provides a new opportunity for Carlisle to extend the diversity of its business base.
- 7.2 It is well known that an airport location in itself has attractions for some business sectors for whom air travel is important. Carlisle Airport has the advantage of a location on the highway network that gives easy access to major cities in the NW, NE and Scotland.
- 7.3 When combined with a very high quality environment, it is plausible that Carlisle Airport could attract new companies from sectors hitherto not represented in Carlisle. Add the prospect of a new and developing University and the proposition for Carlisle as an investment location is dramatically enhanced.

David Beaty: Head of Economy, Property and Tourism Carlisle City Council
December 2008

Appendix 3

Proposed Heads of Terms for Section 106 Agreement under the Town and Country Planning Act 1990

CARLISLE AIRPORT

PROPOSED PLANNING OBLIGATION – HEADS OF TERMS

Runway/Terminal

- 1 Unless otherwise approved in writing by the Council, not to commence works to construct the Development (i.e. the proposed new freight and distribution facility) until a construction programme in respect of the completion of:-
 - (a) works to resurface the existing runway (25/07); and
 - (b) a new passenger terminal at Carlisle Airport,have been submitted to, and approved in writing by, the Council PROVIDED THAT (in each case) the requirements of the CAA and the DfT (TRANSEC) shall be paramount in all circumstances PROVIDED FURTHER THAT in any event the existing runway (25/07) shall be repaired to a PCN value/specification of no less than 31.
- 2 Unless otherwise approved in writing by the Council, not to commence works to construct the Development until the Council has been consulted in respect of the details (including size, location and associated car parking) of the new passenger terminal.
- 3 Unless otherwise approved in writing by the Council, not to occupy the Development until works to resurface the existing runway (25/07) have commenced in accordance with the approved construction programme (as above) PROVIDED THAT the works shall be carried out in accordance with the requirements of the CAA and/or the DfT (TRANSEC) (as the case may be) and the minimum PCN specification/value as set out in 1 above.
- 4 To complete the resurfacing of the existing runway (25/07) and the new passenger terminal in accordance with the approved construction programmes (as above).
- 5 Once completed, to use reasonable endeavours to keep open the new passenger terminal for a period of no less than 10 years from the date of substantial completion PROVIDED THAT it is commercially viable to do so.

Public Transport

- 6 To operate a shuttle/transfer service at appropriate times of the day (having regard to shift change times) to serve employees working at the Development for so long as the Development is in occupation PROVIDED THAT it shall not be necessary to do so if appropriate public transport services are made available to serve the Development.
- 7 To work with bus operators operating public services (from time to time) in and around the vicinity of Carlisle Airport so as to secure the diversion of their services and/or the introduction of new services (in either case) to serve the Development during (at least) core business hours (i.e. between 7a.m. - 9a.m. and between 5p.m. – 7p.m.) for a period of no less than 2 years from the date when

the Development is first occupied, and to include the details of all such services in a report to the Carlisle Airport Forum (as below).

Travel Plan

- 8 Not to occupy the Development until a travel plan (in respect of the Development) has been submitted to, and approved in writing by, the Council. The travel plan shall include the following measures:-
- (a) short and long term targets for reducing the number of single occupancy car trips to and from the Development by employees of the Development;
 - (b) a strategy for achieving those targets having regard to the best practice available including the identification of resources of funding for implementation;
 - (c) a monitoring programme to include modal split surveys of passenger and staff journeys every two years and a full census every five years following occupation of the Development;
 - (d) a review of the employee shuttle/transfer service (as above) having regard to employee travel patterns and shift times PROVIDED THAT if any such review identifies possible enhancements to the employee shuttle/transfer service to use reasonable endeavours to implement those enhancements unless it is not practicable to do so; and
 - (e) measures to aid the access and comfort of disabled users.
- 9 The travel plan shall be implemented, as approved, within three months of its approval by the Council.
- 10 Not to occupy the Development until a suitably qualified and experienced person or organisation has been appointed to act as travel plan co-ordinator. The post of the travel plan co-ordinator (from time to time) shall be maintained for a period of no less than five years from the date when the Development is first occupied. The travel plan co-ordinator shall be responsible for:-
- (a) monitoring compliance with the travel plan;
 - (b) preparing information packs for employees and visitors of the Development;
 - (c) negotiating with public transport operators for season ticket and travel incentives for employees of the Development;
 - (d) undertaking a full travel survey every two years;
 - (e) producing and maintaining a staff travel database;
 - (f) liaising with the County Council's travel plan co-ordinator; and
 - (g) promoting a car sharing scheme.
- 11 Not to operate the Development otherwise than in accordance with the approved travel plan and any approved changes to it.

- 12 Not to amend the travel plan without the prior written approval of the Council.

Carlisle Airport Forum

- 13 Unless otherwise approved in writing by the Council, to convene a meeting of the Carlisle Airport Forum no less frequently than once every six months in accordance with the details set out in the Second Schedule PROVIDED THAT the Carlisle Airport Forum shall be responsible for (among other things) reviewing and monitoring the effectiveness of the Airport Surface Access Strategy and the Noise Management Plan.

Airport Surface Access Strategy

- 14 No later than three months after the opening of the new passenger terminal to prepare and submit the ASAS to the Council for approval PROVIDED THAT the ASAS shall include the following matters:

- (a) a car parking strategy to provide for the implementation of car parking to meet residual passenger and employee demand with regard to modal shift targets and the passenger throughput from time to time of the passenger terminal;
- (b) measures to encourage an increase in public transport accessibility to and from the passenger terminal;
- (c) modal shift targets set by the Carlisle Airport Forum from time to time;
- (d) subject to first obtaining any necessary consents, the provision on the land of facilities for use of public transport (including bus stops and cycle and changing facilities); and
- (e) the display of public transport information in respect of the passenger terminal on staff and passenger notice boards.

- 15 No later than one month after the Council's approval to implement the ASAS.

- 16 Not to operate the passenger terminal otherwise than in accordance with the approved ASAS and any approved changes to it.

- 17 Not to amend the approved ASAS without the further written approval of the Council.

Noise

- 18 Not to operate the Airport otherwise than in accordance with the noise management plan as set out in the First Schedule (as amended from time to time).

- 19 Not to commence the Development unless a senior member of the Airport company's management has been appointed as the noise manager who shall have responsibility for the co-ordination and delivery of the noise management plan.

- 20 Where noise exposure at residential properties within 100m corridor on each side of the A689, from the site access of the Development to junction 44 of the M6, exceeds an agreed threshold, to offer a financial contribution to provide sound

insulation for all bedrooms within those properties which face, or partially face, the A689 PROVIDED THAT the quantum of contribution shall be subject to an agreed cap in respect of each property.

Economic Impact

- 21 To make known and publicise locally all new employment opportunities arising out of the construction and operation of the Development and to work with local employment and regeneration agencies in order to make known and publicise such employment opportunities.
- 22 To use reasonable endeavours to procure that contractors engaged in the construction of the Development make known and publicise locally all new employment opportunities arising out of the construction of the Development and work with local employment and regeneration agencies in order to make known and publicise such employment opportunities.

Ecology

- 23 To provide an appropriate and commensurate habitat (or pay the Council a financial contribution as to provide such a habitat) to replace that which is lost (i.e. 11.85 hectares) as a result of the Development, in accordance with details (including a programme for implementation) previously agreed in writing with the Council (acting in consultation with other appropriate stakeholders) PROVIDED THAT any financial contribution may (at the Council's discretion) be forwarded to an appropriate nature conservation body.

**11 DECEMBER 2008
MACFARLANES LLP**

First Schedule

Noise Management Plan – Heads of Terms

- **Flying Activity** – summary of current categories of users
- **Aircraft noise** – runways; departures; arrivals; circuit training; ground running; night flying
- **Air Transport Movements** – review after 5 years (from commencement of passenger/freight operations)
- **Low flying** – Air Navigation Order regulations summary
- **Good neighbourliness** – sections on: fixed wing departure and arrival procedures; circuit heights; helicopter routings in and out; over-flying built-up areas; non standard visual joining; date / time restrictions; aircraft and vehicle loading / unloading; maintenance work on vehicles and aircraft
- **Ground running** – rules; locations related to runway in use
- **Night flying** – restrictions
- **Public Noise Complaints** – process to deal with complaints
- **Fixed wing circuit flying** – standard patterns and rules
- **Helicopter circuit flying** - standard patterns and rules

Second Schedule

Carlisle Airport Forum [Overview]

1 Aims and Purpose

It shall be the aim of the Carlisle Airport Forum ("the Forum") to provide an effective body for the discussion of all matters concerning the development or operation of the Airport which have an impact on the users of the airport and on people living and working in the surrounding area.

The work of the Forum should be seen as a positive and interactive process through which the concerns of interested parties can be taken into account with the object of allowing the efficient operation of the Airport while moderating its impact on local communities. It should be seen as a means of keeping all interested parties adequately informed of matters affecting them, of providing an opportunity to reconcile differences of view that may arise and for resolving difficulties through agreed voluntary action. The Forum is not intended to detract from the responsibility of the Airport's management to manage the Airport.

2 Terms of Reference

To monitor the environmental impact of all aspects of the operation of the Airport (including the ASAS and the Noise Management Plan) and to advise on operating procedures resulting from such monitoring with a view to minimising noise or other pollution from whatever source.

To monitor the implementation of the provisions of this Agreement and advise from time to time on the need for any revision thereof.

To agree with the Airport formal procedures for recording complaints about aircraft noise and any other adverse affects of the Airport. Such procedures should provide for complaints to be made to the Airport by telephone or in writing, for the complainant to provide his/her name, address and telephone number and information in sufficient detail to enable any necessary investigation of the complaint to be carried out. The Airport shall take such steps as it may agree with the Forum to ensure that the complaints procedure is fully and widely publicized. The Airport shall keep a record of all such complaints which shall be made available to the Forum

To consider any matter that the Airport might raise with the Forum as well as issues arising directly or indirectly from the operation of the Airport.

Generally, to keep all interested parties adequately informed of matters affecting them and to provide an opportunity for reconciling any differences of view that may arise, and for resolving difficulties through agreed voluntary action.

3 Membership

Unless otherwise agreed by the Forum, the following shall be invited to attend each meeting of the Forum:-

Chairman

Secretary (to be provided by the Airport company)

2 representatives of Airport Management

1 Representative of Airport tenants

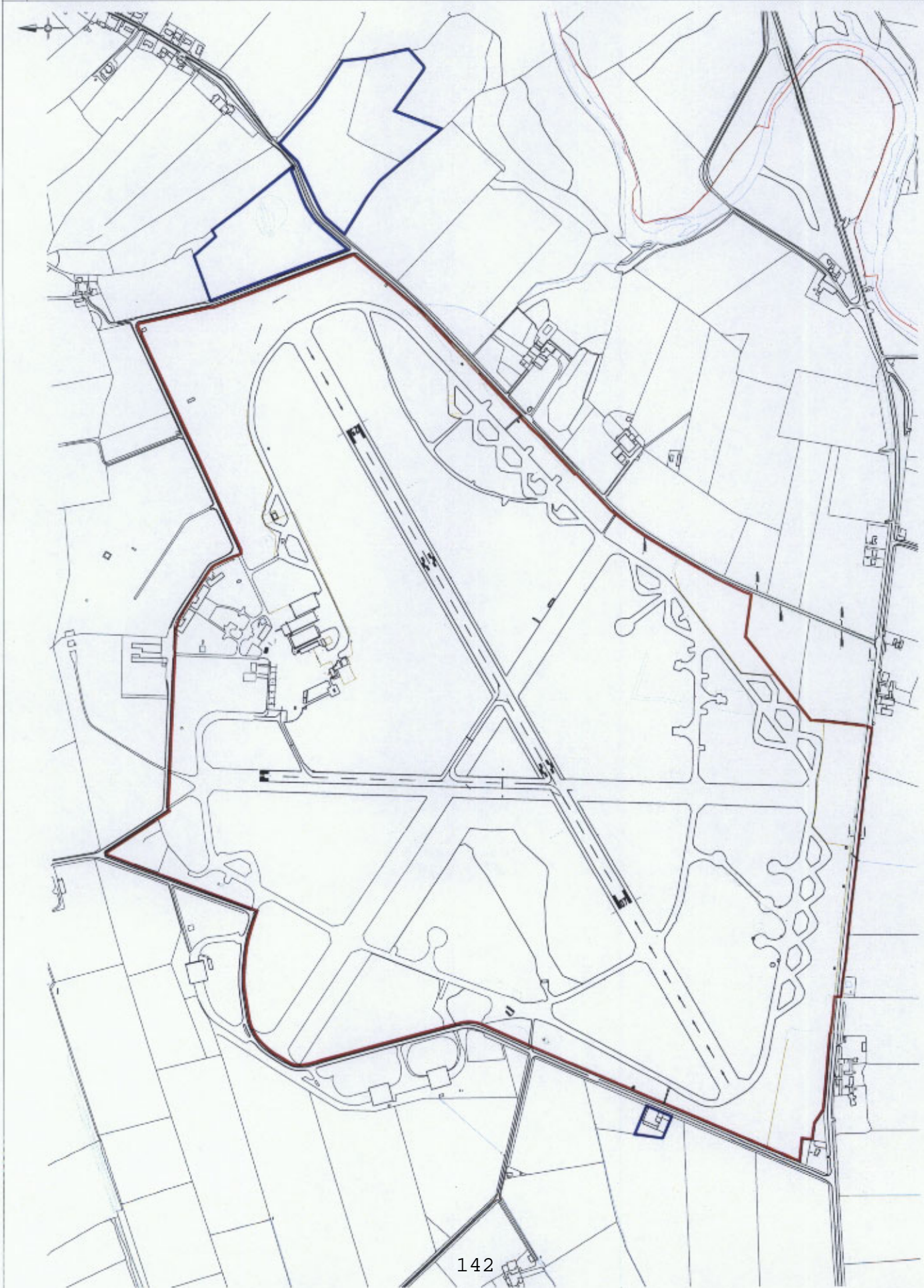
1 Representative of Airport users

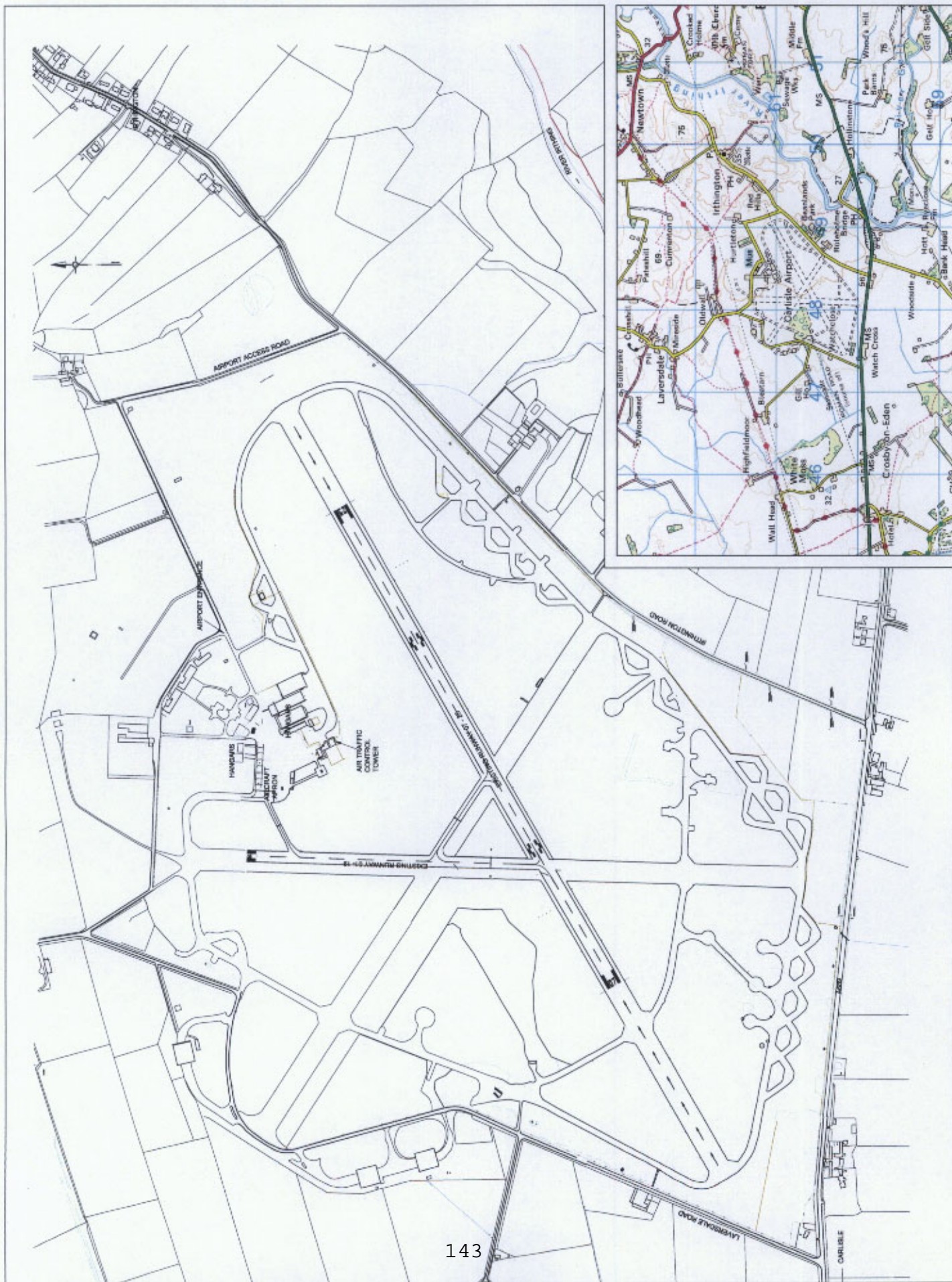
1 Representative of the Airport Museum

- 2 Representatives of local commercial interests
- 1 Representatives of Irthington Parish Council
- 1 Representative of Carlisle City Council
- 1 Representative of Friends of the Earth
- 1 Representative of Cumbria County Council
- 1 Representative of Dumfries and Galloway Council
- 1 Representative of Natural England
- 1 Representative of English Heritage
- 1 Representative of a cycling group
- 1 Representative of a walking group
- 1 Representative of a public transport operating company serving the Airport

PROVIDED THAT for the avoidance of any doubt the Forum shall be entitled to invite such other persons or organisations as it shall deem appropriate.

PLANS





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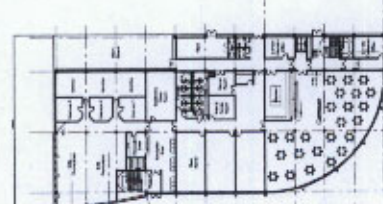
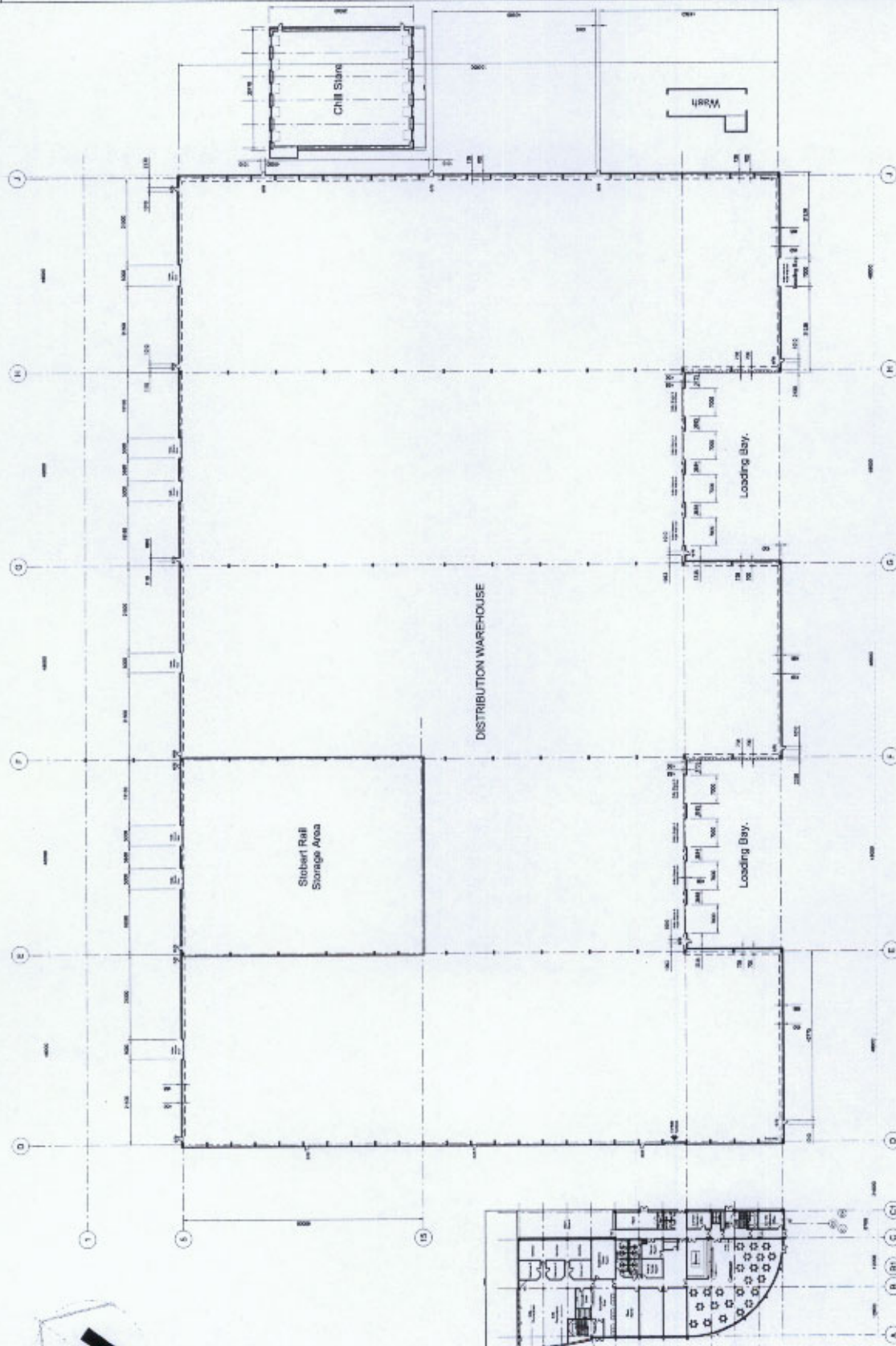
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 Drawing Date: 15-11-2020
 Drawing Scale: 1:500
 Drawing Status: Final
 Drawing Author: [Signature]
 Drawing Checker: [Signature]
 Drawing Approver: [Signature]

Stobart Air
 Carlisle Lake District Airport

Drawing Title: Ground Floor Plan
 ACD 47,000

Scale: 1:500
 Date: 15-11-2020
 Author: [Signature]
 Checker: [Signature]
 Approver: [Signature]
 Project: Stobart Air
 Drawing: Ground Floor Plan
 Drawing No: 405006 - 1004
 Drawing Date: 15-11-2020
 Drawing Status: Final
 Drawing Author: [Signature]
 Drawing Checker: [Signature]
 Drawing Approver: [Signature]



Ground Floor Plan

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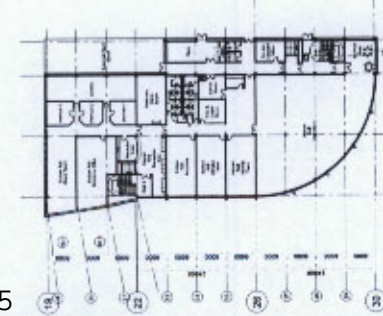
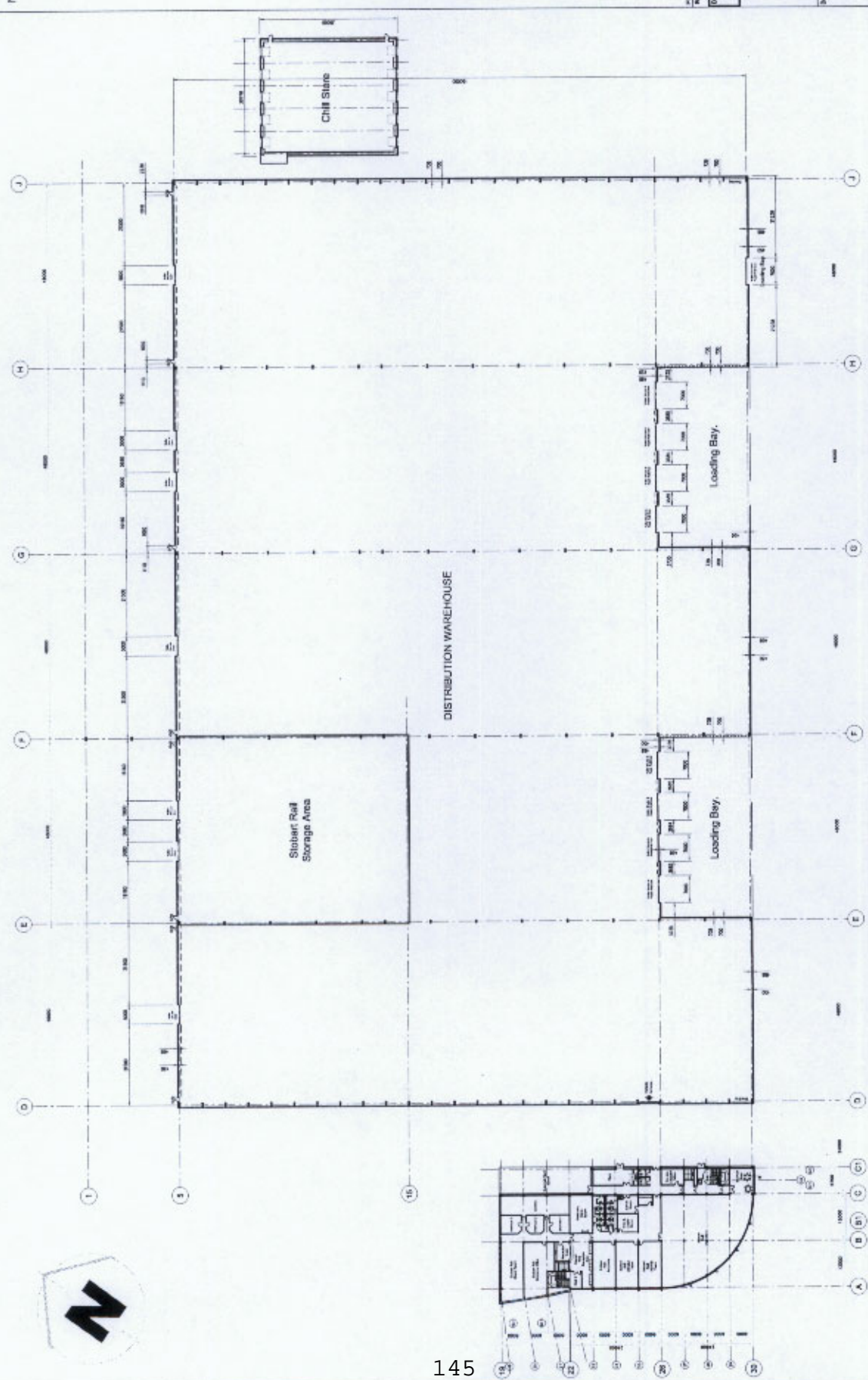
Project Name: Stobart Air
 Project Number: 405006 - 1005
 Drawing Number: 405006 - 1005

Stobart Air
 Carlisle Lake
 District Airport

Showing The
 First Floor Plan
 A03 47.000

Scale: 1/8" = 1'-0"
 Date: 11/11/08
 Drawn: J. Wilson
 Checked: J. Wilson
 Approved: J. Wilson

Scott Wilson Ltd
 1000 Highway 101
 Suite 100
 Richmond, BC V6X 3E9
 Tel: (604) 273-8800



First Floor Plan

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NOTES

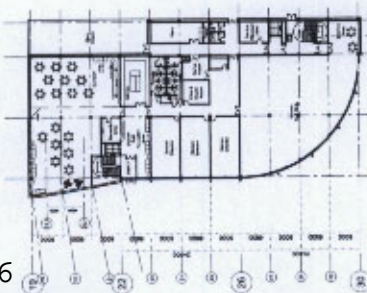
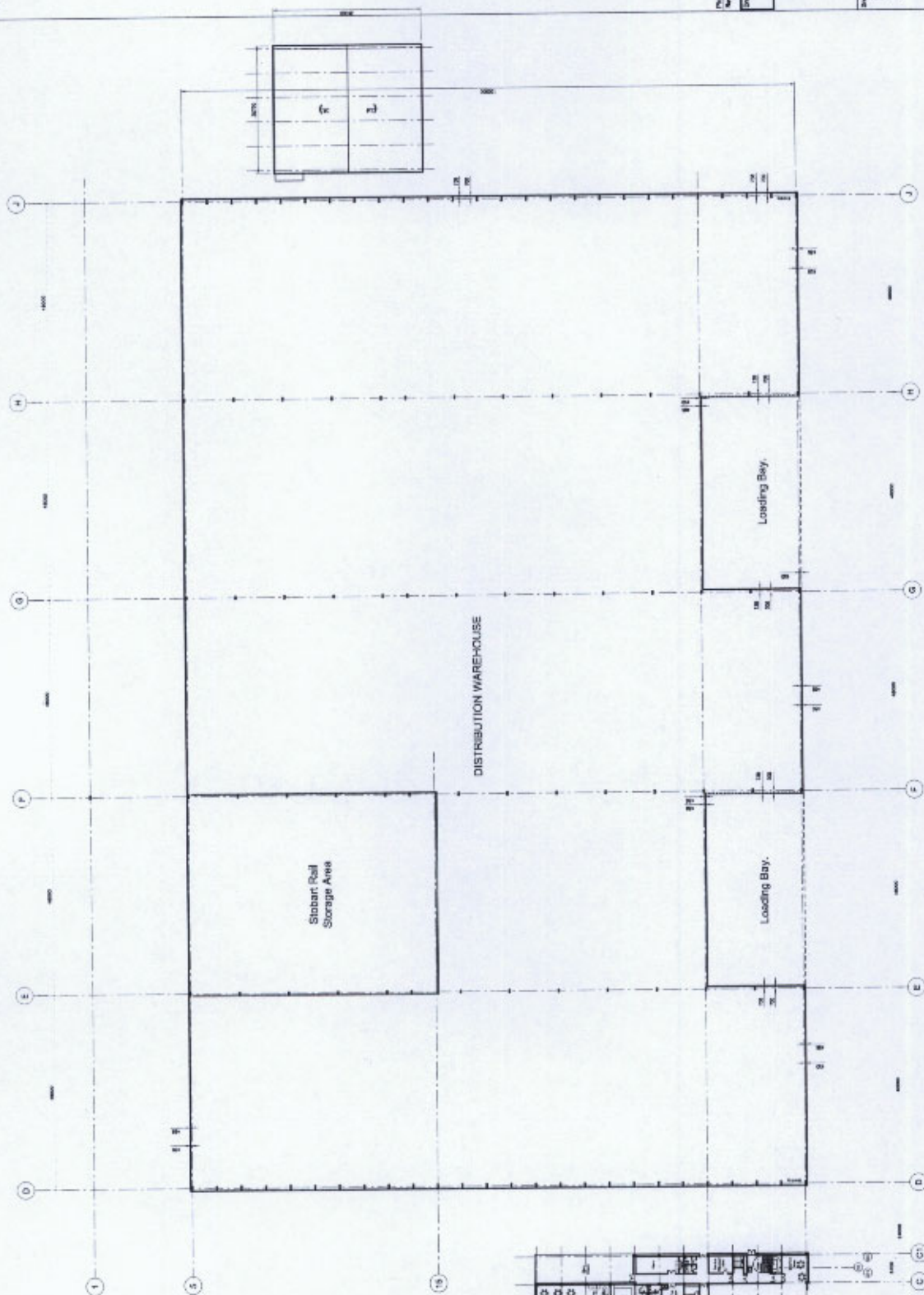
Project Name
Stobart Air
Carlisle Lake
District Airport

Drawing No.
405006 - 1006

Second Floor Plan
A00 47.000

Scale: 1/8" = 1'-0"
Date: 12-14-13

Stobart Air
Carlisle Lake
District Airport
405006 - 1006



Second Floor Plan

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THE PROJECT AND SITE SPECIFICALLY
IDENTIFIED. ANY OTHER USES
WITHOUT PERMISSION SHALL BE VOID.

NOTES

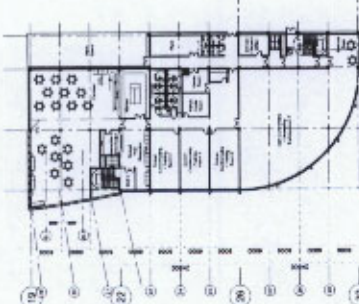
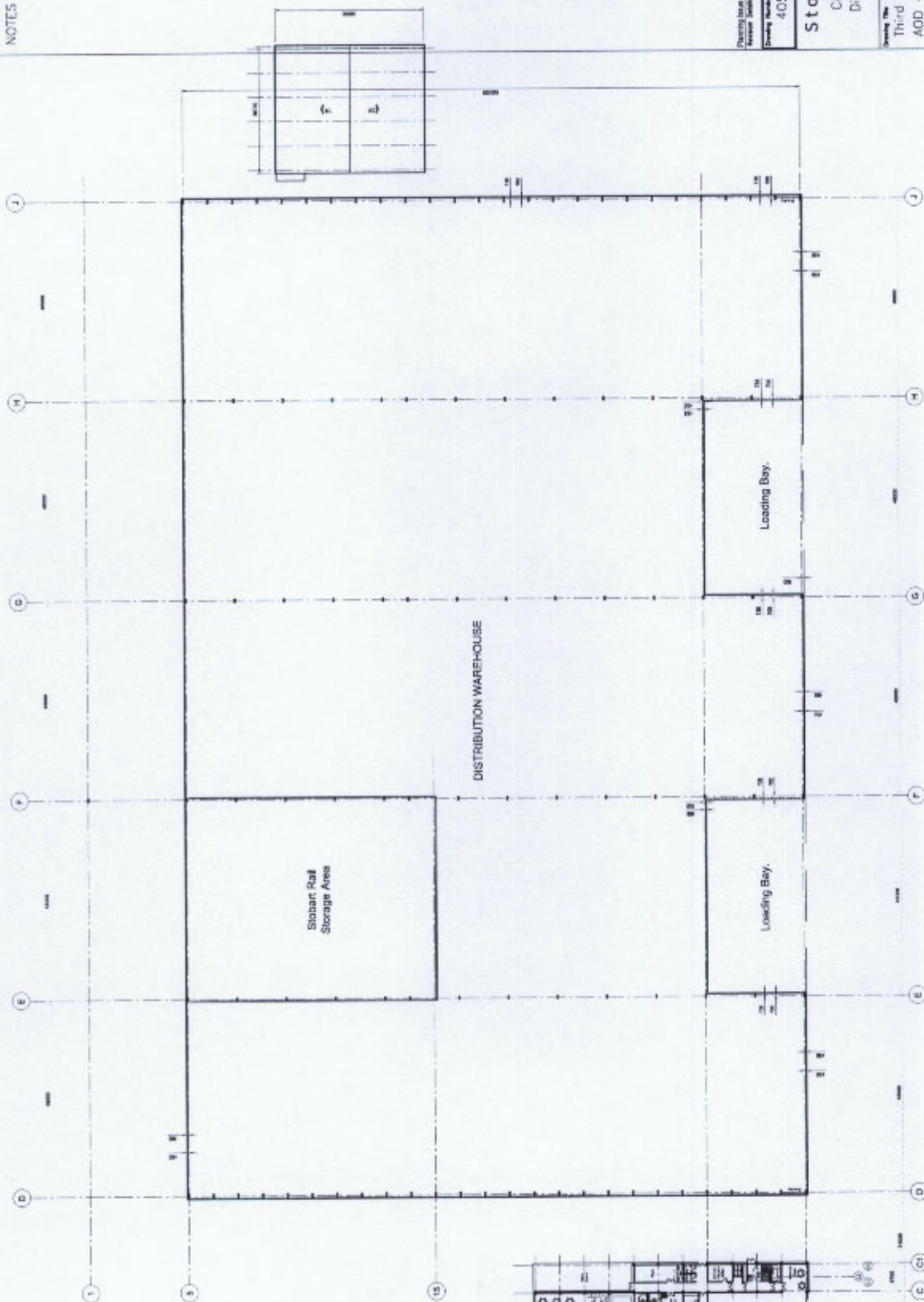
Project Name
Mission Station
Drawing Number
405006 - 1007

Stobart Air
Corlisle Lake
District Airport

Drawing Title
Third Floor Plan
AOD 47,000

Scale: 1/8" = 1'	Author: J. D.	Approvers:
Drawn: J. D.	Checked: J. D.	Design: J. D.
Field: J. D.	Field Notes: J. D.	Field: J. D.
Field: J. D.	Field Notes: J. D.	Field: J. D.

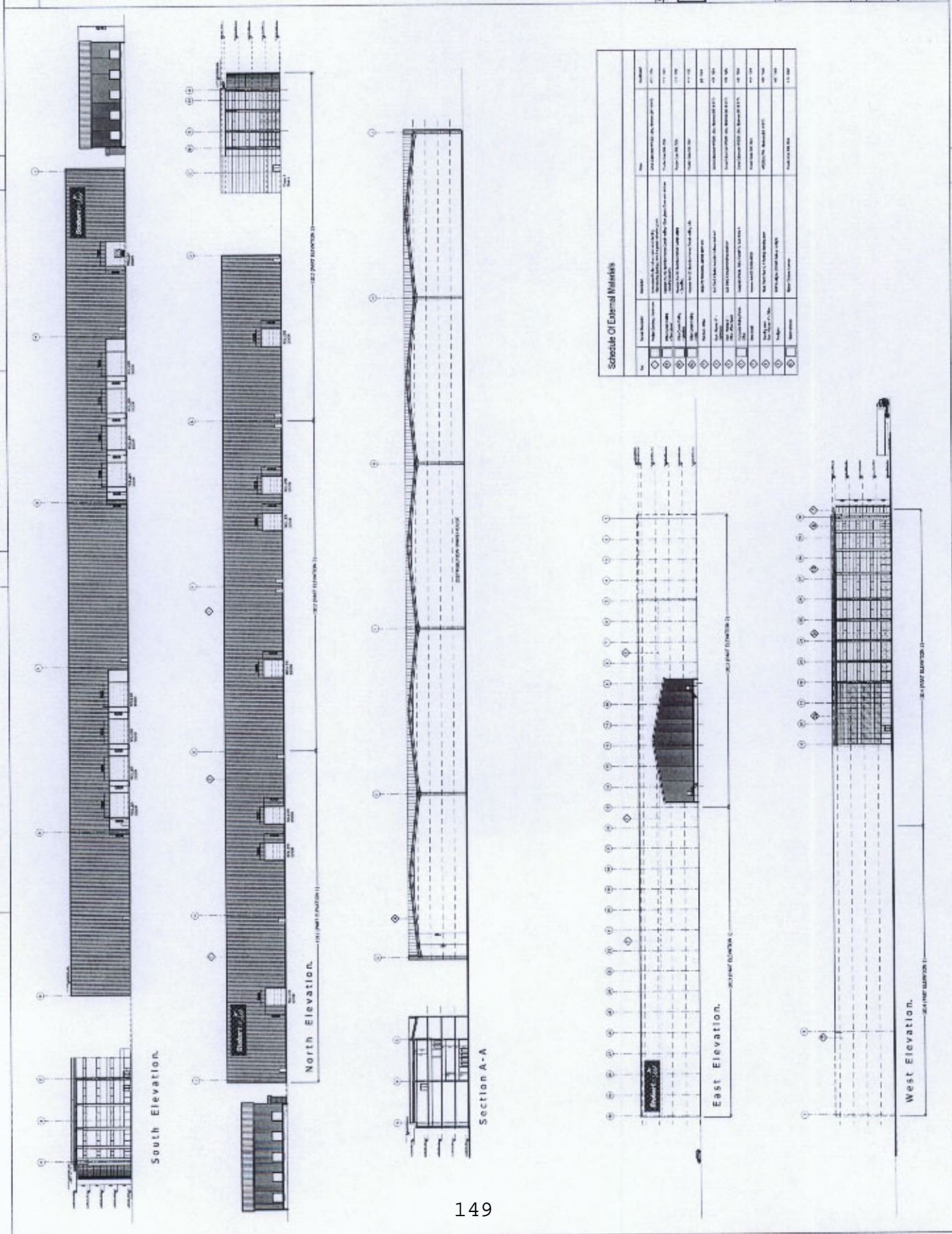
Project: Stobart Air
Location: Corlisle Lake
Drawing: 405006 - 1007
Date: 12-29-20



Third Floor Plan

THIS DOCUMENT IS TO BE USED ONLY FOR THE PROJECT AND NOT FOR ANY OTHER PROJECT. ANY REUSE OF THIS DOCUMENT WITHOUT PERMISSION SHALL BE VOID.

NOTES



Schedule of External Materials

No.	Item	Material	Notes
1	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
2	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
3	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
4	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
5	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
6	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
7	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
8	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
9	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
10	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
11	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
12	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
13	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
14	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
15	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
16	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
17	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
18	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
19	Roofing	Asph/Flt Shingles	Asph/Flt Shingles
20	Roofing	Asph/Flt Shingles	Asph/Flt Shingles

Stobart Air
Corralle Lake
District Airport

405006 - 1010

Stobart Air
Corralle Lake
District Airport

405006 - 1010

Stobart Air
Corralle Lake
District Airport

405006 - 1010

Stobart Air
Corralle Lake
District Airport

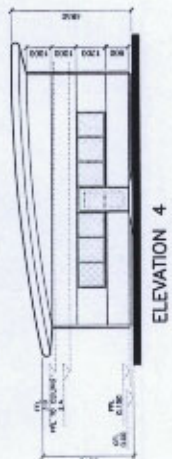
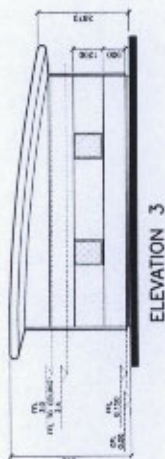
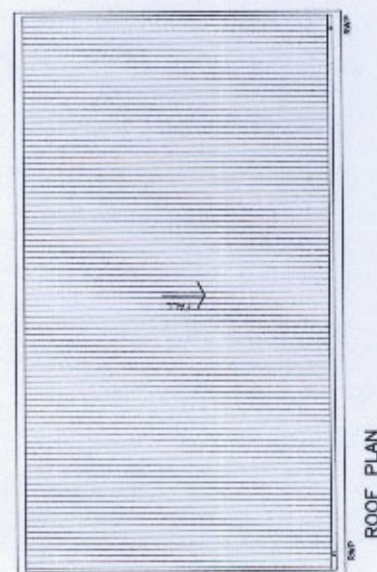
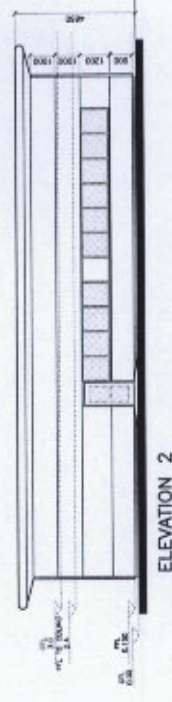
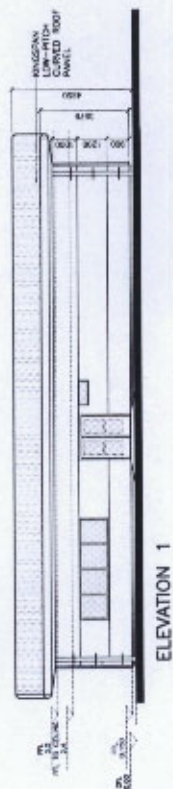
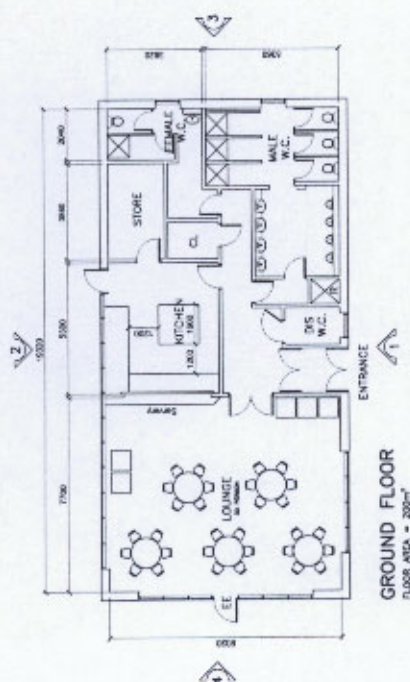
405006 - 1010

Stobart Air
Corralle Lake
District Airport

405006 - 1010

Stobart Air
Corralle Lake
District Airport

405006 - 1010



NOTE: PLANT FOR THIS BUILDING
HOUSED EXTERNALLY










- NOTES

[illegible][illegible]

Proposed Canteen & Welfare Plans, Elevations & Roof Plan

1 - 1 2 D			Notes
Page no.	Detail	Page no.	
1	10.10.10	10.10.10	10.10.10
2	10.10.10	10.10.10	10.10.10
3	10.10.10	10.10.10	10.10.10
4	10.10.10	10.10.10	10.10.10
5	10.10.10	10.10.10	10.10.10
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69	10.10.10	10.10.10	10.10.10
70	10.10.10	10.10.10	10.10.10
71	10.10.10	10.10.10	10.10.10



LUNAR & SOLAR DATE						
Symbol	MOON	DAY	Capacity	Number	Direction	Time
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	☾	+	5,140,817	4,910	0.87113	14:11:44.461 15:05:55.001

NOTE: COMMENTS LISTED IN ADJACENT SCHEDULE SHALL BE MOUNTED ON NEW COLUMN.
 (3) FOLD TO THE BOTTOMS AT 10- APR.

NEW AND REBUILT TWO WHEELER TRAILER STEEL CARRYING CAPACITY RATED WITH WFTS, 1000 LBS. MAX. GROSS WEIGHT. NEW AND REBUILT TWO WHEELER TRAILER STEEL CARRYING CAPACITY RATED WITH WFTS, 1000 LBS. MAX. GROSS WEIGHT.

SPECIES IN LOCALITY OF THE CAMERA MOUNTED ON THE COLUMN

ISSUED FOR PLANNING	By <u> </u>	Date <u>03-14-06</u>	PN <u> </u>
Location Details	By <u> </u>	Date <u> </u>	PN <u> </u>
Drawing Number			Number <u> </u>
405006/5050			

CARLISLE LAKE
DISTRICT AIRPORT

PROPOSED EXTERNAL LIGHTING AND CCTV

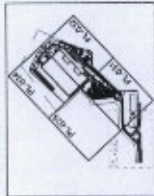
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RESEARCH

THIS DRAWING MAY BE USED ONLY FOR THE PURPOSES INTENDED AND ONLY WRITTEN DIMENSIONS SHALL BE USED



KEY PLAN



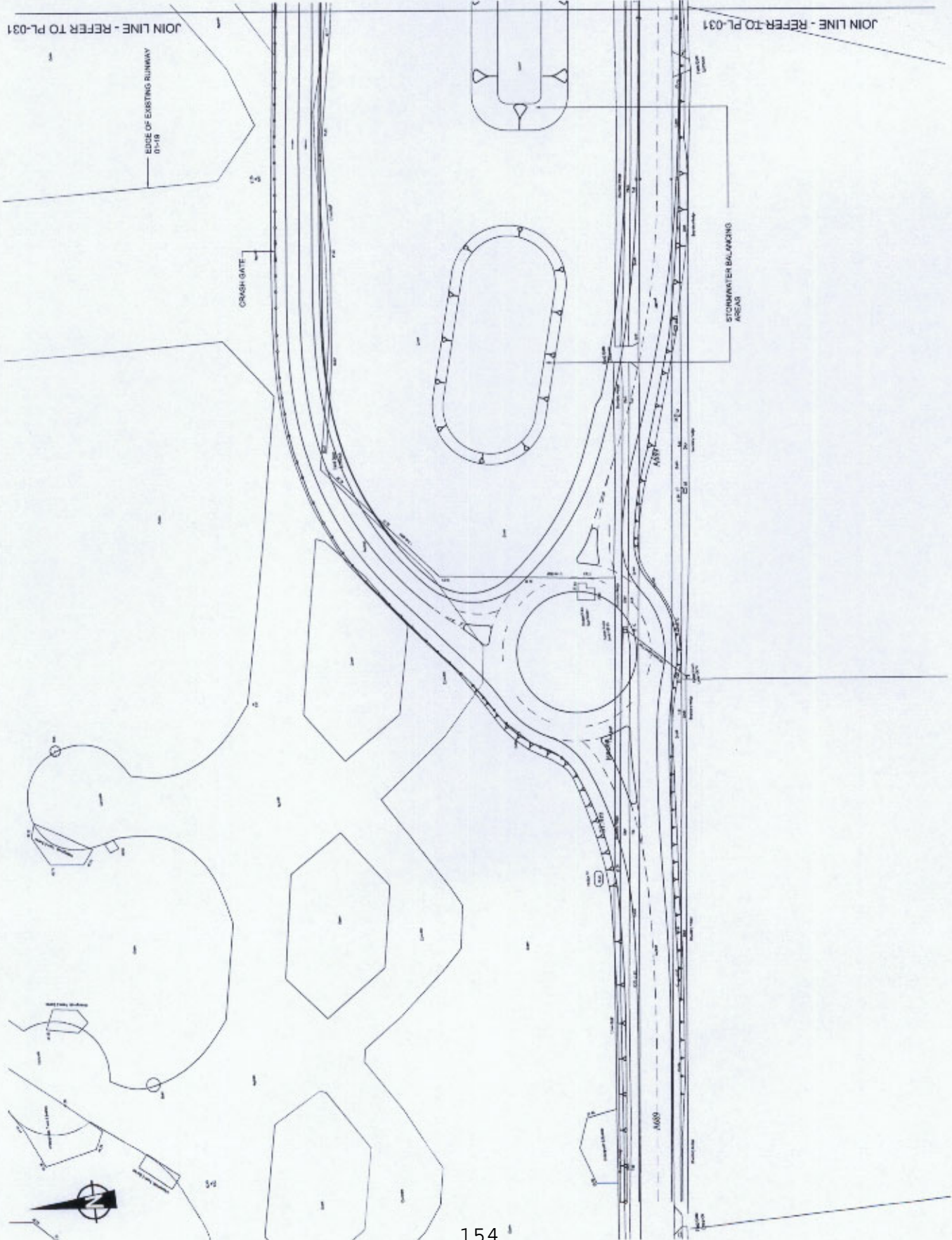
DESIGNED BY	DATE	BY	DATE
DESIGNED BY	DATE	BY	DATE
DESIGNED BY	DATE	BY	DATE
DESIGNED BY	DATE	BY	DATE

D113877_PL_030

CARLISLE LAKE
DISTRICT AIRPORT

DETAILED SITE PLAN
SHEET 1 OF 5

DATE	BY	DATE	BY
DATE	BY	DATE	BY
DATE	BY	DATE	BY
DATE	BY	DATE	BY



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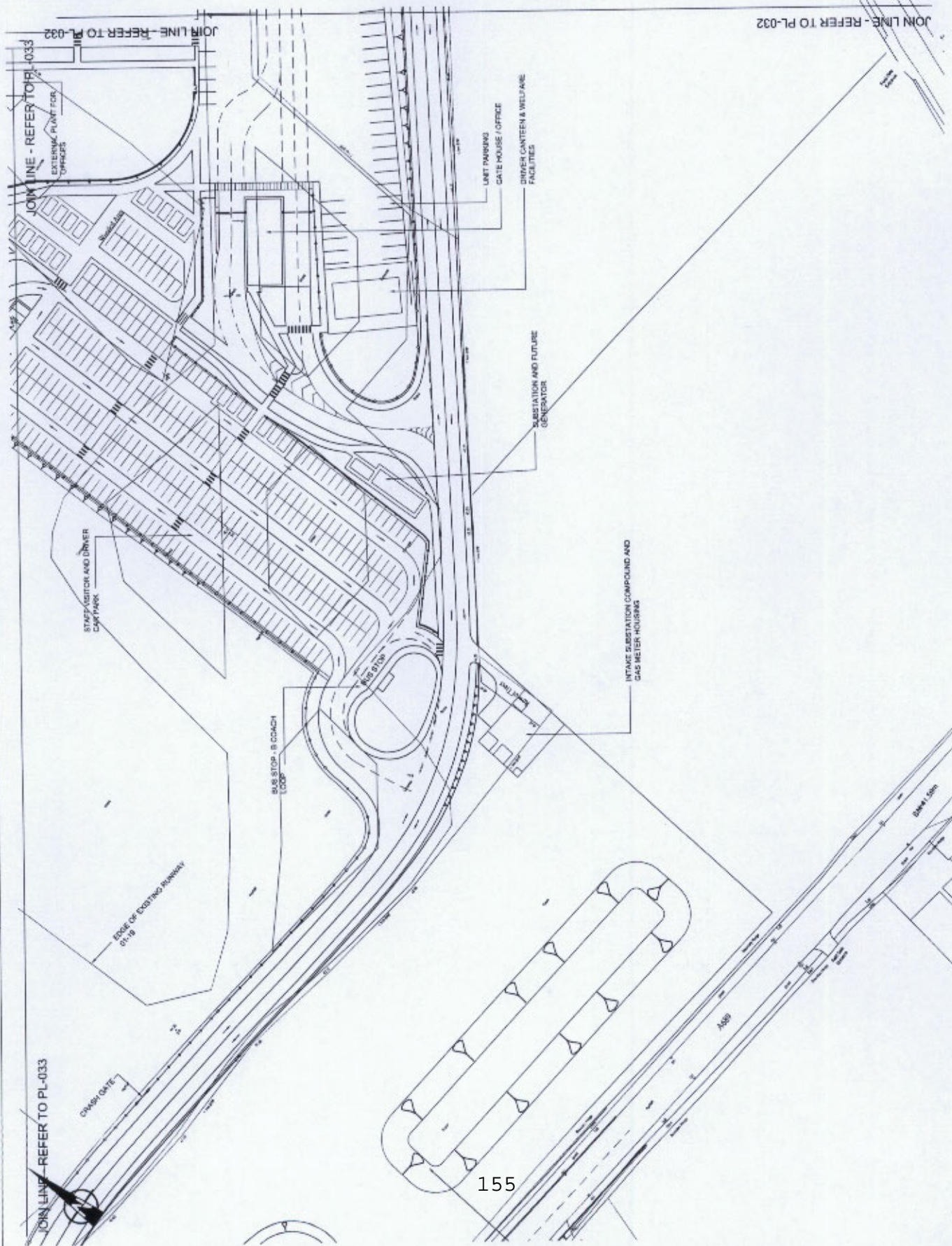


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Issued Date	10/10/10	10/10/10	21
Drawn By	10/10/10	10/10/10	21
Checked By	10/10/10	10/10/10	21
Project No.	D113677_PL_031		

CARLISLE LAKE
DISTRICT AIRPORT

DETAILED SITE PLAN
SHEET 2 OF 5

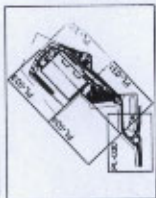
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Checked	10/10/10	Checked	10/10/10
Project	D113677_PL_031		
Client	Stobart Air		
Location	Carlisle Lake District Airport		
Revision	10/10/10		
File Path	D:\113677\031.DWG		



155



KEY PLAN:

[illegible]

B ₂	T ₂ = 0	
	Left	Right

D113877 PL 032

CARLISLE LAKE
DISTRICT AIRPORT

Drawing Title
 DETAILED SITE PLAN
 SHEET 3 OF 5

	1-869		Average Jd.
Suite #:	Cc	Detailed	
Cash	P/M	Tech Track	Jar Cases
			Date OCT 28



Book: 9780130333330
Ginn's Building
Large font
St. Charles, MO 63073
Telephone: 636/271-0900

JOIN LINE REFER TO PL-004

JOIN LINE - REFER TO PL-034

JOIN LINE - REFER TO PL-031

SECURITY BARRIER (LIMITS EMERGENCY ACCESS)

LPG STONE

COVERED LOADING BAY (TO
ACCOMMODATE 4 X HGVs)

VEHICLE WASH AREA

WERNER D. J. VAN DER LINDEN

Copyright Clearance Center, Inc. 222 Rosewood Drive, Danvers, MA 01923

NOTES

CONFIDENTIAL

THE JOURNAL OF THE

— **CLUMP DOUSE** —
— **SUNSHINE TANN AND** —

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1000 JOURNAL OF CLIMATE

JOIN LINE REFER TO PL-031

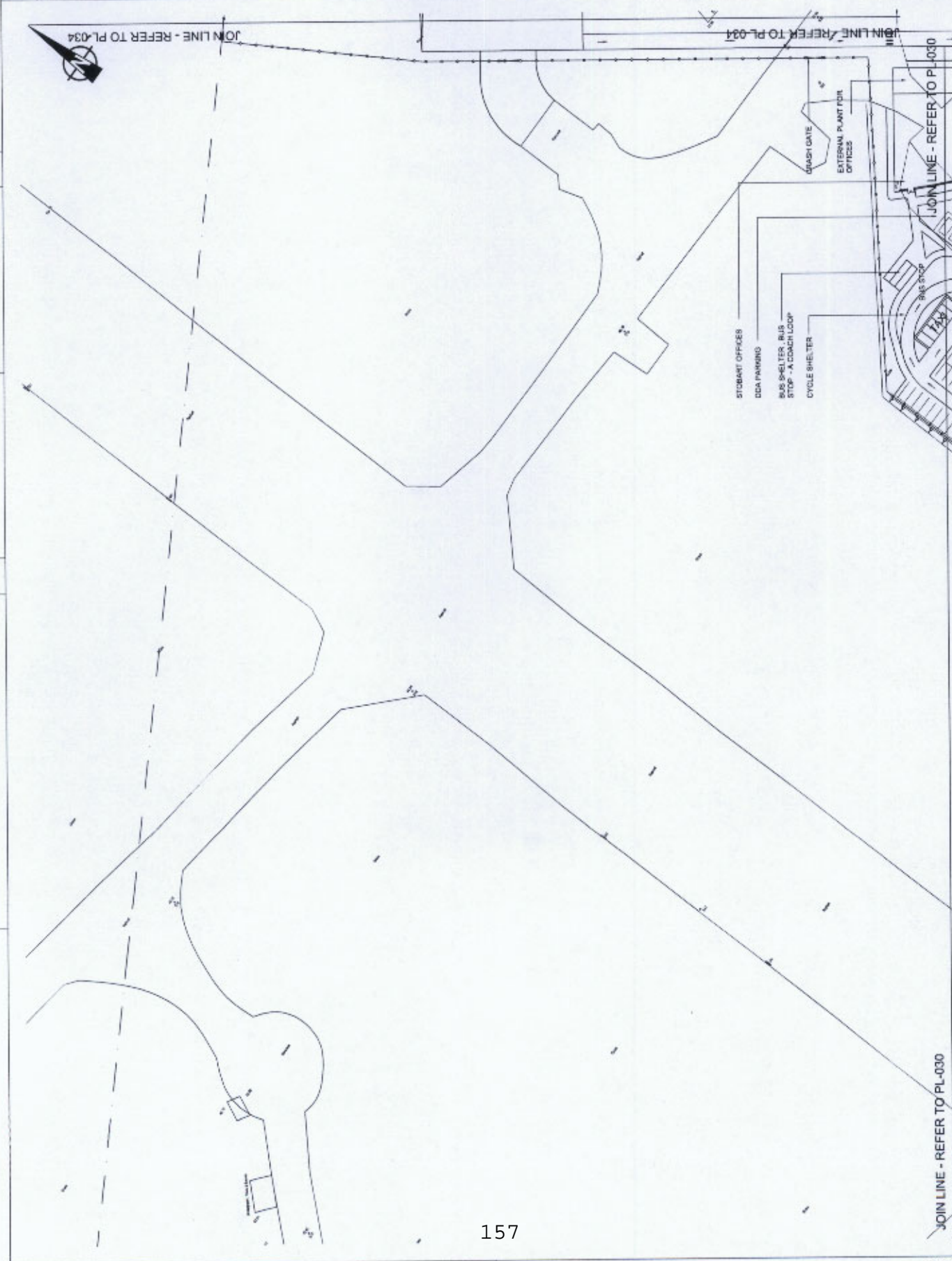


ORDERED FOR PLANNING	DATE	BY	DATE	BY
Random Events				

Ordering Number: D113877 PL 033

CARLISLE LAKE
DISTRICT AIRPORT

DETAILED SITE PLAN
 SHEET 4 OF 5

[illegible]

JOIN LINE - REFER TO PL-030

NOTES:

1. SITE OF CONSTRUCTION SHALL BE AS SHOWN ON THIS DRAWING.
2. CONSTRUCTION SHALL BE IN ACCORDANCE WITH THE DESIGN AND CONSTRUCTION SPECIFICATION.
3. THE DRAWING IS THE PROPERTY OF STOBARTY LTD. AND IS NOT TO BE REPRODUCED OR USED IN ANY MANNER WITHOUT THE WRITTEN PERMISSION OF STOBARTY LTD.

PROJECT NO.	D113877_PL_040
PROJECT NAME	CARLISLE LAKE DISTRICT AIRPORT
DATE	10/10/2018
BY	10/10/2018
CHECKED BY	10/10/2018
APPROVED BY	10/10/2018

SITE ACCESS & CONTRACTORS COMPOUND

DATE	10/10/2018
BY	10/10/2018
CHECKED BY	10/10/2018
APPROVED BY	10/10/2018



MAIN AIRPORT ACCESS



NORTH ACCESS GATE 2



NORTH ACCESS GATE 4



NORTH ACCESS GATE 1



NORTH ACCESS GATE 6



NORTH ACCESS GATE 4



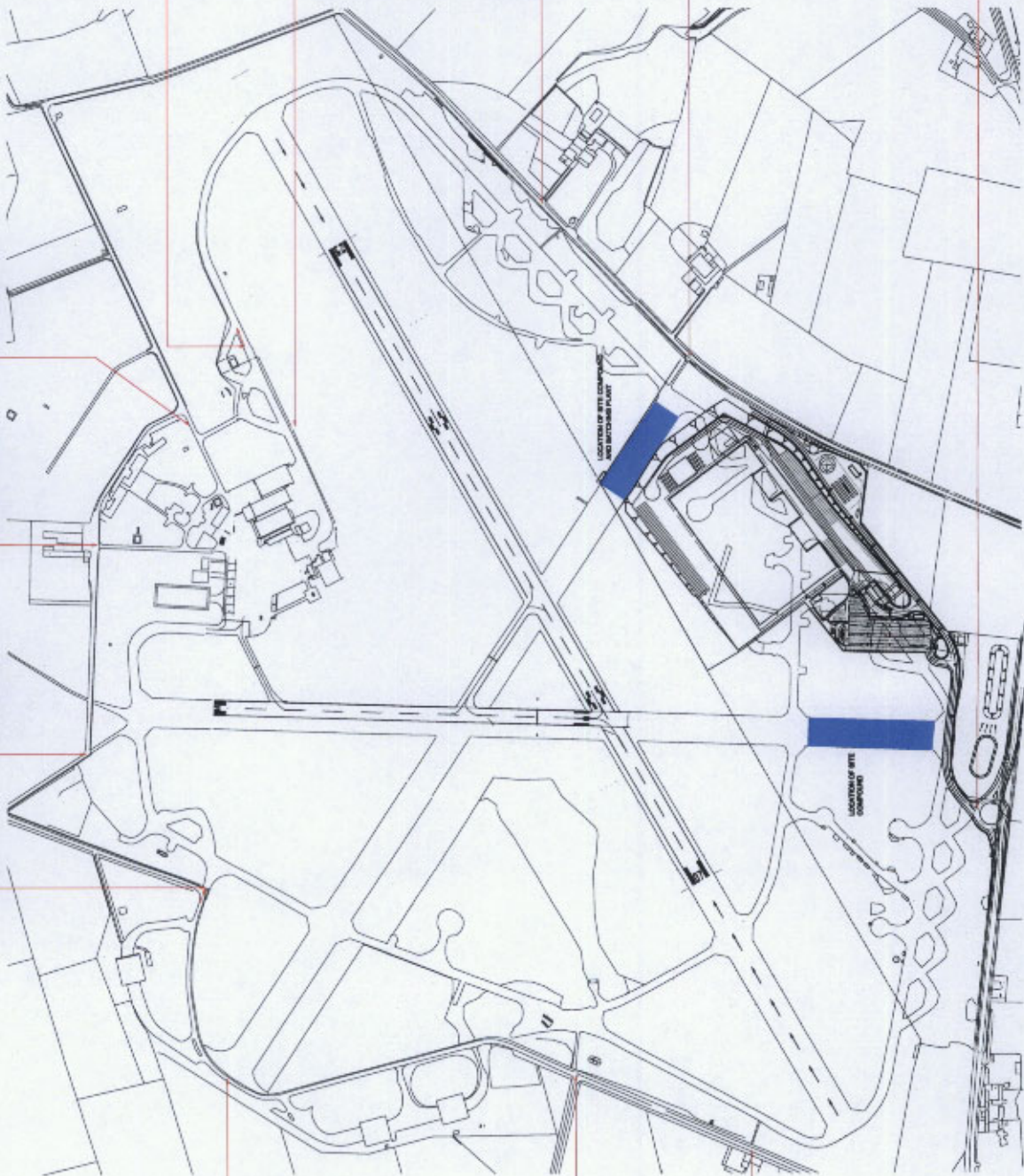
NORTH ACCESS GATE 2



NORTH ACCESS GATE 1



PROPOSED NEW ACCESS TO SITE



WEST ACCESS GATE 3



WEST ACCESS GATE 1



WEST ACCESS GATE 1

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NOTES:

1. ALL DIMENSIONS ARE IN MILLIMETERS UNLESS STATED OTHERWISE.
2. DETAILS OF PORTA FRAME COMPONENTS (FENCING, GATES, ETC.) ARE TO BE TO THE PORT 18 SYSTEM UNLESS OTHERWISE SPECIFIED.
3. ALL PORTA FRAME COMPONENTS (FENCING, GATES, ETC.) ARE TO BE TO THE PORT 18 SYSTEM UNLESS OTHERWISE SPECIFIED.
4. ALL PORTA FRAME COMPONENTS (FENCING, GATES, ETC.) ARE TO BE TO THE PORT 18 SYSTEM UNLESS OTHERWISE SPECIFIED.
5. ALL PORTA FRAME COMPONENTS (FENCING, GATES, ETC.) ARE TO BE TO THE PORT 18 SYSTEM UNLESS OTHERWISE SPECIFIED.
6. ALL PORTA FRAME COMPONENTS (FENCING, GATES, ETC.) ARE TO BE TO THE PORT 18 SYSTEM UNLESS OTHERWISE SPECIFIED.
7. THE WIRE IS TO BE SUPPLIED BARBED, GALVANIZED OR GALVANIZED AND BARBED UNLESS OTHERWISE SPECIFIED.
8. ALL PORTA FRAME COMPONENTS (FENCING, GATES, ETC.) ARE TO BE TO THE PORT 18 SYSTEM UNLESS OTHERWISE SPECIFIED.
9. ALL PORTA FRAME COMPONENTS (FENCING, GATES, ETC.) ARE TO BE TO THE PORT 18 SYSTEM UNLESS OTHERWISE SPECIFIED.
10. ALL PORTA FRAME COMPONENTS (FENCING, GATES, ETC.) ARE TO BE TO THE PORT 18 SYSTEM UNLESS OTHERWISE SPECIFIED.
11. THE DRAWING IS TO BE USED IN CONJUNCTION WITH THE PORT 18 SYSTEM UNLESS OTHERWISE SPECIFIED.
12. ALL PORTS SHALL BE SET IN TO THE VERTICAL.
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Scale	1:50
Sheet No.	1
Total Sheets	1

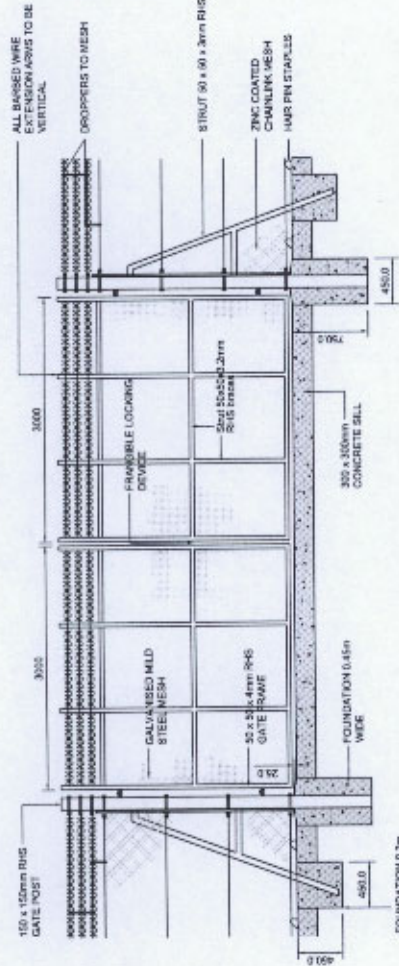
CARLISLE LAKE DISTRICT AIRPORT

AIRFIELD SECURITY FENCE

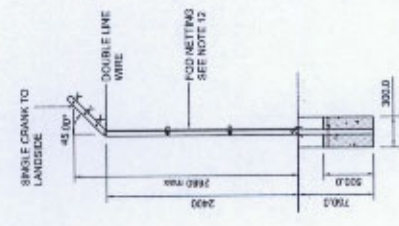
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Project	RAF
Location	RAF
Drawn by	RAF
Checked by	RAF
Approved by	RAF



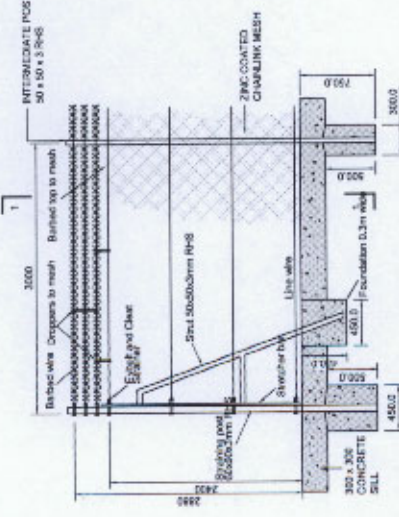
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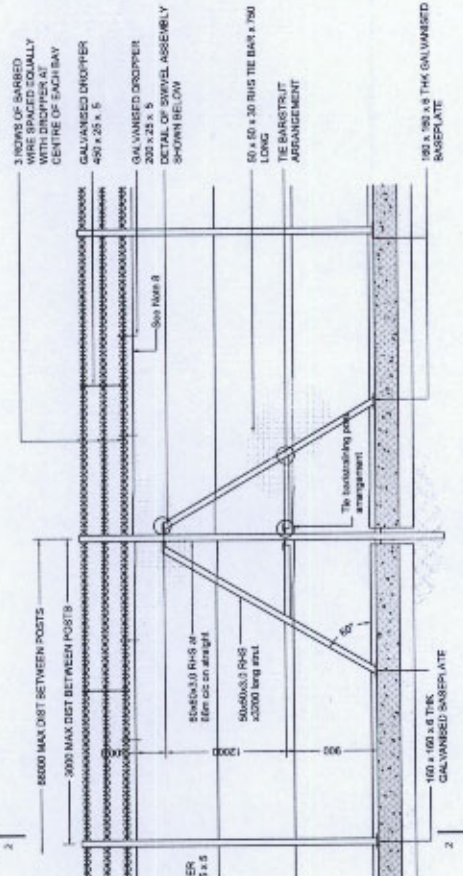
TYPICAL CRASH GATE
SCALE 1:25



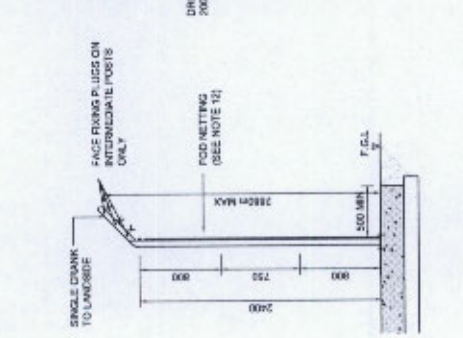
SECTION 1-1
SCALE 1:25



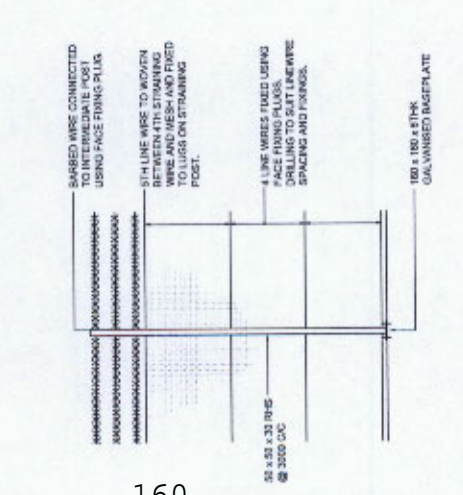
TYPICAL SECURITY FENCE
SCALE 1:25



TYPICAL STRAINING POST
SCALE 1:25



SECTION 2-2
SCALE 1:25



TYPICAL SECURITY FENCE
SCALE 1:25

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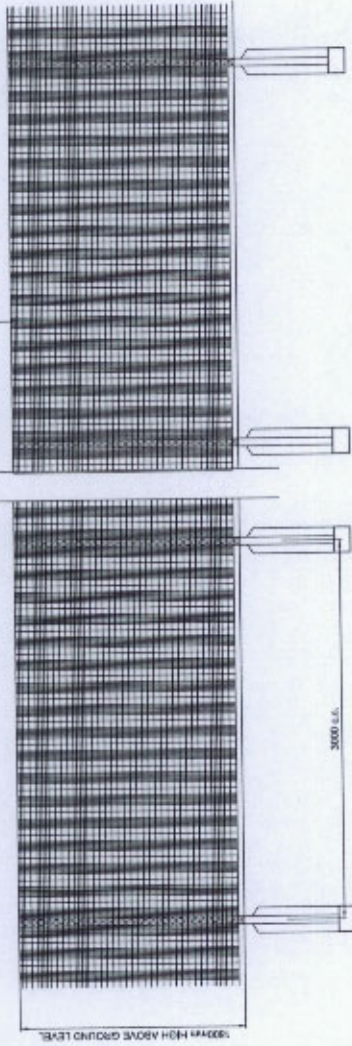


PROJECT NO. D113877_PL_062
CARLISLE LAKE DISTRICT AIRPORT

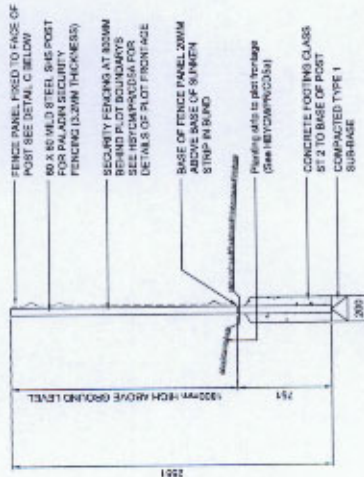
CAR PARKS
PALADIN FENCE

SCALE 1:100			
Overall	100m	100m	100m
Detail	10m	10m	10m
Section	10m	10m	10m
Plan	10m	10m	10m
Profile	10m	10m	10m
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4D	10m	10m	10m
5D	10m	10m	10m
6D	10m	10m	10m
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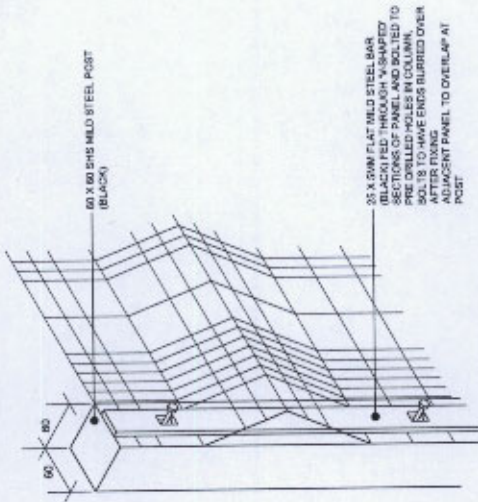
1.8M SECURITY FENCE PANEL, OR EQUIVALENT APPROVED, BLACK, ZINC COATED MILD STEEL WIRE MESH



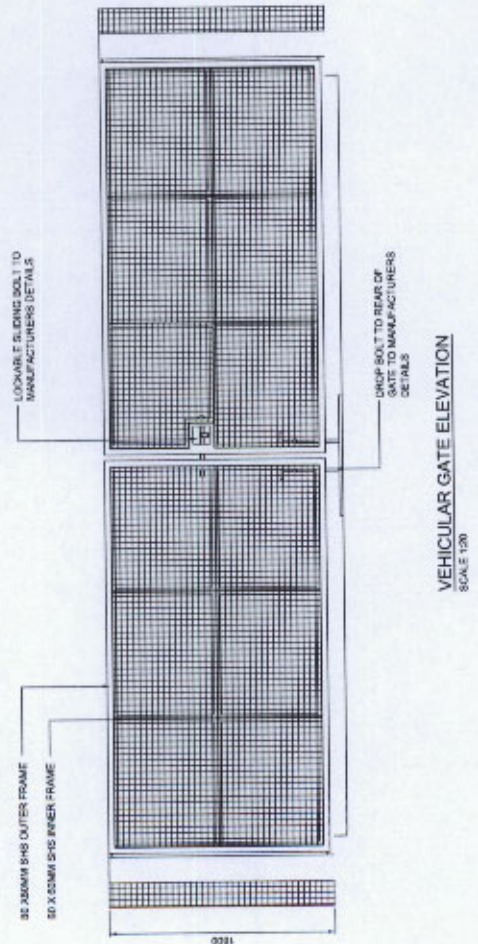
TYPICAL ELEVATION
SCALE 1:20



DETAIL OF POST
SCALE 1:20



DETAIL OF FIXING TO POST



VEHICULAR GATE ELEVATION
SCALE 1:20



SUBSTATION



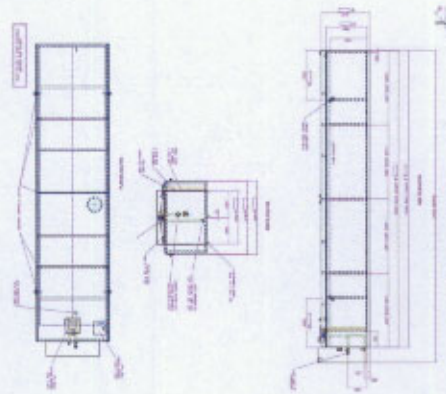
LPG TANKS



HIGH WASH



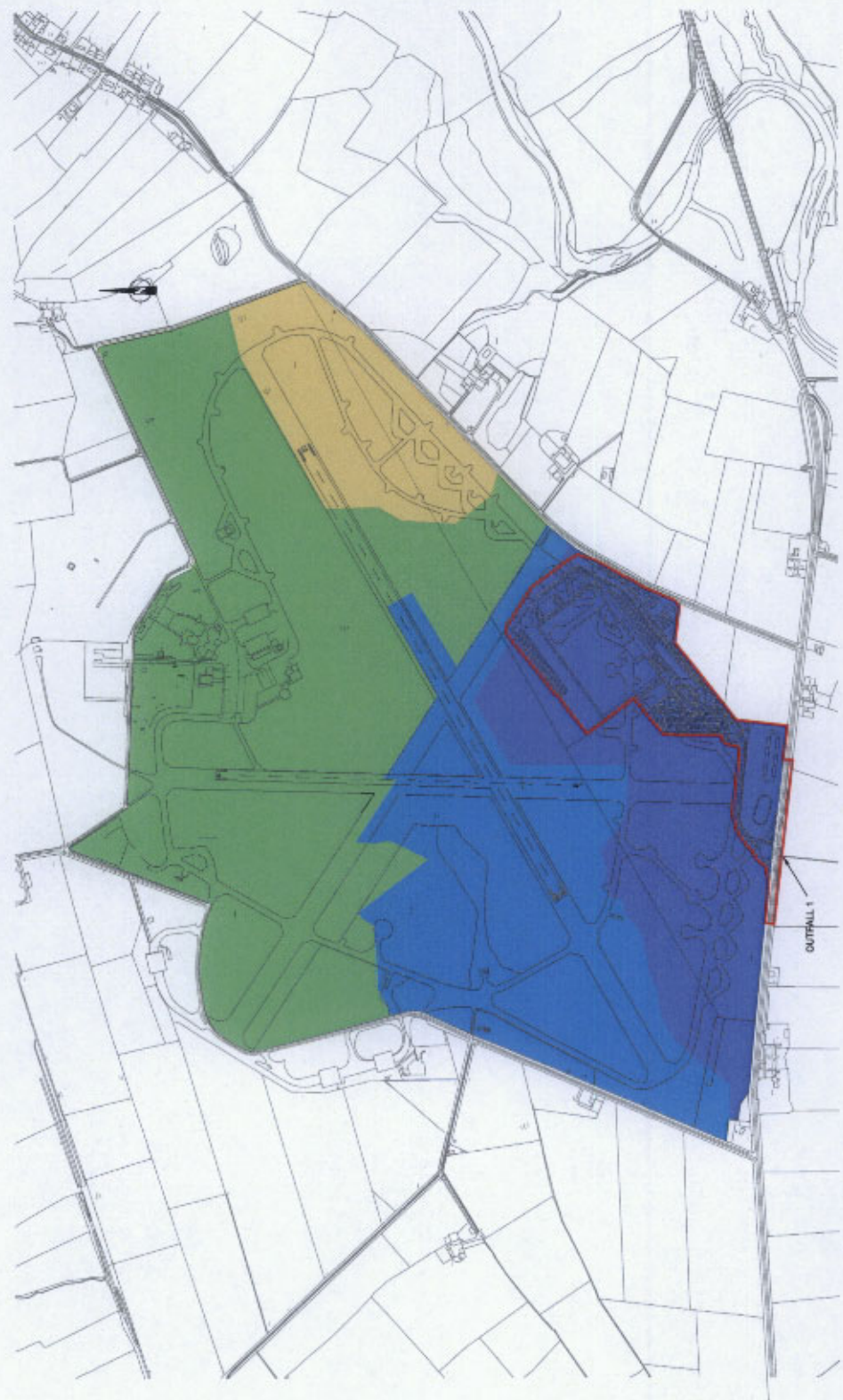
SPRINKLER TANK



FUEL TANK PLAN

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**FREIGHT STORAGE AND DISTRIBUTION FACILITY,
CARLISE
Environmental Statement – Non Technical Summary**

**Prepared for
Stobart Air**

October 2008

Freight Storage and Distribution Facility, Carlisle

Environmental Statement – Non Technical Summary

Job Ref : D121812

Date	Status	Version	Prepared by	Reviewed by	Approved for Issue
Oct 2008	Final	1	Scott Wilson technical specialists	Chris Taylor	Neil Stephenson

*Stobart Air Limited
Carlisle Lake District Airport
Carlisle
Cumbria
CA6 4NW*

Tel: 01228 573641

*Scott Wilson
WestOne
Wellington Street
Leeds
West Yorkshire
LS1 1BA*

*Tel: 0113 204 5000
Fax: 0113 204 5001*

NON TECHNICAL SUMMARY

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1.0 INTRODUCTION

- 1.1 This document provides a summary of the Environmental Impact Assessment (EIA) process for the proposed freight storage and distribution facility at Carlisle Lake District Airport, using non-technical language.
- 1.2 The EIA has been carried out following the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.
- 1.3 Stobart Air appointed Scott Wilson to co-ordinate the EIA process and compile the Environmental Statement (ES).
- 1.4 Specialist assessments have been carried out by Scott Wilson, Bickerdike Allen Partners and Air Quality Consultants.
- 1.5 The ES describes the assessment of the likely environmental effects of the proposed development under the headings listed in Table 1.

Table 1: Assessment topics covered in the ES and authors

Assessment topic	Author
Planning Policy	Scott Wilson
Socio-Economics	Scott Wilson
Surface Access	Scott Wilson
Noise and Vibration	Bickerdike Allen Partners
Air Quality and Dust	Air Quality Consultants
Ecology and Nature Conservation	Scott Wilson
Landscape and Visual Amenity	Scott Wilson
Water Quality, Flood Risk and Drainage	Scott Wilson
Cultural Heritage	Scott Wilson
Ground Contamination	Scott Wilson
Waste and Resource Management	Scott Wilson

- 1.6 The predicted environmental effects are measured against baseline environmental conditions (i.e. the conditions without the proposed development). The assessment scenarios considered are:
 - **Existing Baseline 2008, with no development** – the year when the surveys and assessment have been undertaken;
 - **Construction 2009, with development** – the year in which the majority of construction will be undertaken;
 - **Opening 2010, with development** – the year the proposed development is anticipated to open;
 - **Future Baseline 2016, with no development** – the same year as the Operation year, so that the future conditions with the development can be compared against the future conditions without the development (which may be different to the Existing Baseline); and
 - **Operation 2016, with development** – a year when the proposed development will be fully operational.

2.0 THE PROPOSED DEVELOPMENT

- 2.1 The freight storage and distribution facility is to be located at Carlisle Lake District Airport, which is approximately 8.5 km north-east of Carlisle city centre and approximately 3.5 km west of the small market town of Brampton. There are a number of small villages and properties surrounding the Airport, including Irthington (about 0.5 km north-east). The Airport has an operational area of approximately 176 ha. Local roads follow the east and west boundaries, and the A689 forms the southern boundary.
- 2.2 The Airport itself lies within Hadrian's Wall World Heritage Site and is designated as a (non statutory) County Wildlife Site. Watchclose Roman Temporary Camp Scheduled Monument is also located within the Airport boundary at the western end of the existing main runway.
- 2.3 The location of the proposed development is shown in Figure 2.1.
- 2.4 The Stobart Group, a multi-modal logistics company, plans to relocate its Carlisle operations to the Airport site. The proposed development will bring together the relocated activities of Eddie Stobart Haulage and Stobart Rail. This move also enables the former sites to be redeveloped as part of the Carlisle Renaissance initiative and to remove large goods vehicle (LGV) traffic from the main approaches to the centre of the town. The Stobart Group is a major locally-founded local employer and wants to remain in the area. The Airport is an optimal site as it has good road and motorway access via the A689.
- 2.5 To meet the needs and aspirations outlined above, Stobart Air proposes to erect a freight storage and distribution facility (including a chilled cross dock facility) with associated offices, gatehouse/ office, canteen welfare facilities, landscaping, new access, parking and other infrastructure works.
- 2.6 The proposed site development plan is shown in Figure 2.2.
- 2.7 Construction will be undertaken in one phase and is expected to have a duration of 11 months, beginning in 2009.
- 2.8 The alternatives to the proposed development are to 'do Minimum' and 'do Nothing'. The Stobart group previously considered developments at strategic employment locations in Cumbria, but was unable to obtain planning permission. No further sites have been identified by the Stobart group, Cumbria County Council or Carlisle City Council.
- 2.9 The 'do minimum' option would involve making the required improvements to the existing sites which would be prohibitively expensive. It would also not have the advantages of removing traffic from the main access roads to Carlisle and allowing the existing site to be redeveloped nor would it overcome the inefficiencies of multiple locations.
- 2.10 The 'do nothing' option would not be considered feasible for the reasons on the need of the development described above.

3.0 PLANNING POLICY

- 3.1 The Proposed Development has been considered in terms of its consistency with national and development plan policy. The Proposed Development and the proposed methods of mitigation contained in the ES are consistent with national planning policy contained in Planning Policy Guidance's and Planning Policy Statements
- 3.2 The Proposed Development is consistent with the policies contained in the statutory development plan, notably:
- 3.3 In summary, the proposed development complies with the recently adopted statutory development plan. Moreover, there are no significant issues that indicate that the planning application should not be considered in accordance with the development plan. To the contrary, the Proposed Development is supported because it complies with national planning policy guidance

4.0 SOCIO-ECONOMICS

- 4.1 The proposed development is in accordance with the aims of economic development policies for the North West and the Carlisle District.
- 4.2 The development plan allocates Carlisle Lake District Airport 21.15 ha of land for employment uses at what is a strategic location. The proposed development will provide approximately 85 new permanent full-time jobs, which could be sourced from the Carlisle authority area and the sub-region. In addition, approximately 60 temporary jobs will be created during the 11-month construction phase. Salary spend from the jobs will generally remain within the region and Carlisle District Council will benefit from business rates paid by the freight storage and distribution facility.
- 4.3 In the longer term, the operation of the proposed development will continue to provide employment on a highly accessible site.
- 4.4 The additional non-aeronautical revenue would also ensure the sustainability and future viability of the Airport, which is currently loss-making.
- 4.5 Taking into account the details as presented above, the proposed development would make a contribution towards delivering some of the socio-economic aims contained within regional and local planning policies and related strategies.

5.0 SURFACE ACCESS

- 5.1 There are two key routes providing access to the Freight Storage and Distribution development site, the A689 and the A69. Both are strategic routes that provide direct access to the national motorway network. Current operations at the development site generate a small volume of traffic.
- 5.2 The capacity of the road network has been considered. There is a reasonable percentage of reserve capacity on the roads and junctions in the study area and therefore the additional traffic from the proposed development can be accommodated.
- 5.3 To minimise any traffic problems during Construction, a Construction Management Plan will be prepared and implemented. The Plan will cover the routing of traffic and the control of access to and from the construction site.
- 5.4 A Green Travel Plan has been prepared to reduce car use and promote alternative methods of transport.
- 5.5 The proposed development, during construction and operation, will have a very small impact on the surrounding highway network and will not result in any unacceptable congestion or road safety issues.

6.0 NOISE AND VIBRATION

- 6.1 The development area is generally well located in noise terms as it only has a few noise sensitive dwellings in the vicinity of the development area.
- 6.2 The baseline noise conditions primarily arise from aircraft operations at the Airport, vehicles arriving and departing at the Airport, and from road traffic on local roads. In particular, the largest contribution to the current noise levels is road noise from road traffic on the busy A689 trunk road, which carries approximately 10,000 vehicles per day.
- 6.3 The noise impacts of the construction and operation of the proposed freight storage and distribution facility indicate that the proposed development can be constructed and operated without causing an unacceptable degree of disturbance to receptors. No significant effects are anticipated as a result of the development in terms of environmental noise.

7.0 AIR QUALITY AND DUST

- 7.1 Existing air quality in the area is generally good, but there is poor air quality along the A7, south of M6 Junction 44, and elsewhere within the city centre. As a result, Carlisle City Council has declared Air Quality Management Areas in these locations. There are also some sensitive ecological sites that might be affected by changes in air quality, and these have been considered in the assessment.
- 7.2 There is likely to be some dust generated while construction works are carried out, but this will not spread far and is only likely to be occasional and temporary.
- 7.3 Changes to traffic flows with the proposed development will affect local air quality. Effects are predicted to range from 'negligible beneficial' to 'minor adverse'. The beneficial effects will occur for people living within the A7 Air Quality Management Area. The minor adverse effects will occur near to the roads serving the Airport.
- 7.4 Traffic produces greenhouse gas emissions, but it is not possible to assess the significance of any local changes within the national context.

8.0 ECOLOGY AND NATURE CONSERVATION

- 8.1 The semi-natural features within or immediately adjacent to the boundary of the proposed development area are dominated by improved grassland, with smaller areas of semi-improved grassland, felled woodland, dense scrub and sections of species-poor hedgerow.
- 8.2 Two sites of international or national importance to nature conservation are present within 2 km of the proposed development. The River Eden Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) is 0.7 km from the site, and Whitemoss, Crosbymoore SSSI is 1.3 km from the site. It has been concluded in this assessment that the proposed development will not result in any significant impacts on international and national designated sites for nature conservation importance.
- 8.3 The proposed development will result in the loss of *c.* 11 ha of the Carlisle Airport County Wildlife Site. However, the loss of habitat will not affect any of the breeding birds for which the CWS was designated and is therefore considered to result in no significant effect on the nature conservation value of the site.

9.0 LANDSCAPE AND VISUAL AMENITY

- 9.1 Due to the location and nature of the proposed development within a rural area, it is expected that there will be some localised adverse effects on landscape character and visual amenity.
- 9.2 The proposed development is located within the boundaries of the Carlsile Airport. There will be no loss of important landscape features in the long term.
- 9.3 The proposed development will have a moderate effect on the landscape character of the buffer zone for the Hadrian's Wall World Heritage Site, but this assessment of landscape character considers only the aesthetic appreciation of views and not the effect on the historic landscape which is considered in the Cultural Heritage section. The development is not easily seen from Hadrian's Wall. Views across the Buffer Zone to the location of Hadrians' Wall are maintained and unaffected.
- 9.4 Views from the majority of visual residential properties, footpaths and roads will experience a minor or negligible effect, with only one of the remaining receptors experiencing a greater visual effect.

10.0 WATER QUALITY, FLOOD RISK AND DRAINAGE

- 10.1 The proposed development will involve construction and operational activities that have the potential to affect ground and surface water quality and dynamics.
- 10.2 A Flood Risk Assessment has been carried out which shows that the site is not at risk of flooding from any source. Measures will put in place to ensure that any impacts relating to a potential increase in surface water runoff is managed through the use of sustainable drainage systems, and greenfield runoff rates will be achieved in the development area.
- 10.3 A number of waterbodies have been identified within the study area, notably the Rivers Irthing and Eden, both of which are of very high importance. A number of possible sources of pollution have been identified, which, if unmitigated, have the potential to have varying but limited impacts, depending on the watercourse that they could affect and the source of the pollution. Mitigation measures have been proposed to reduce any impacts and minimise the risk of any pollution occurring as much as possible.
- 10.4 The aquifer (groundwater) is also considered potentially sensitive to water quality impacts due to its use as a water supply for general domestic and farming purposes, and again mitigation measures are proposed.
- 10.5 With the proposed mitigation measures in place, all of the potential impacts identified would have effects of low significance and/ or considered to be of very low risk of occurring.

11.0 CULTURAL HERITAGE

- 11.1 This assessment has considered potential impacts on archaeology, built heritage and the historic landscape.
- 11.2 It has concluded that the proposed development will have no significant effects on archaeological remains. The assessment identified that the proposed development would have a limited adverse effect on Hadrian's Wall Military Zone World Heritage site. The development would provide for an increased public appreciation of Hadrian's Wall Military Zone World Heritage Site by incorporating a publicly accessible display of information on the archaeology and history of the area.
- 11.3 This assessment has concluded that there would be no significant effect on historic buildings surrounding the development.

12.0 GROUND CONTAMINATION

- 12.1 Baseline information and previous land uses have been collected and assessed from an Envirocheck report, historical maps, data obtained from site investigations and other available sources.
- 12.2 The results of the ground investigations indicate that concentrations of potential pollutants within the soils and groundwater not in contact with a main aquifer were generally low and represent a moderate adverse effect to human health and the wider environment, if the development were to go ahead without mitigation.
- 12.3 However, following the implementation of the proposed mitigation measures it is considered that there will be no significant effects on the receptors identified and potential impacts will be reduced to an acceptable level.

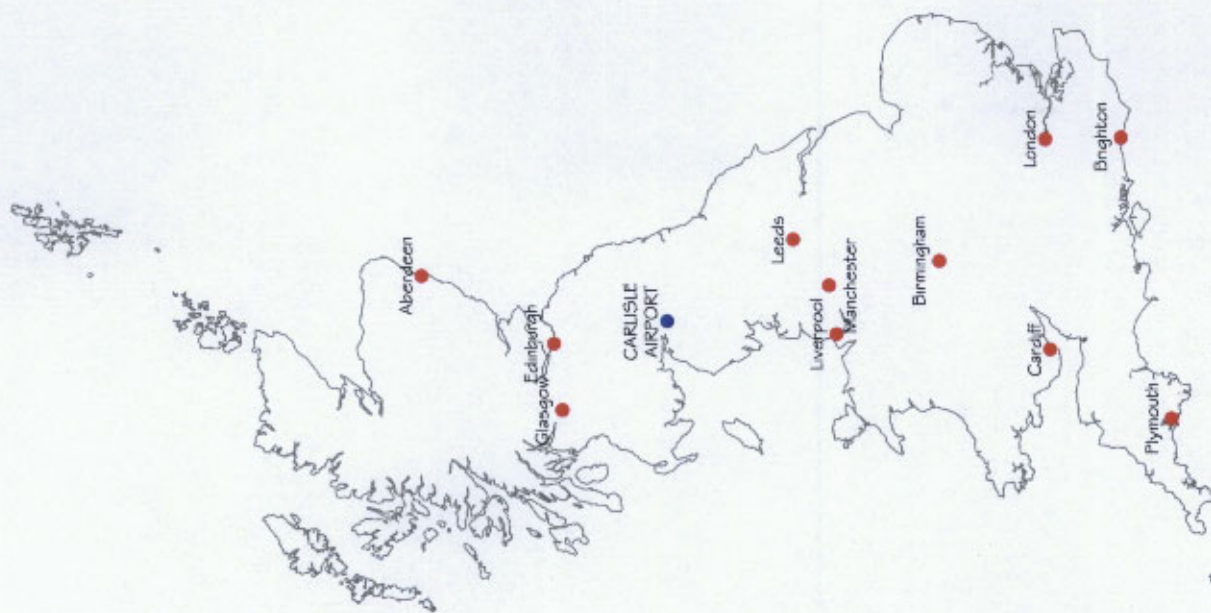
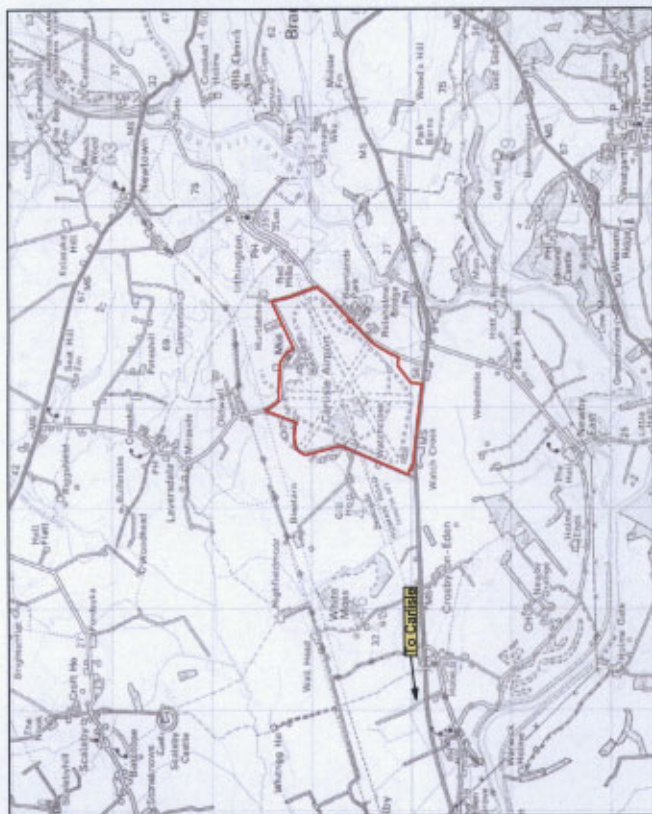
13.0 WASTE AND RESOURCE MANAGEMENT

- 13.1 The management of both construction and operational solid waste and waste oil has been considered.
- 13.2 Construction spoil from earthworks will be kept on-site for re-use, so will not affect local waste management.
- 13.3 It is estimated that just under 4,800 tonnes of construction waste would be generated by the development and there are potential opportunities for re-using a significant fraction of this material, as well as other recycled aggregates, at the site. The volumes of construction waste generated requiring disposal are therefore not anticipated to be significant.
- 13.4 It is estimated that the proposed development will generate 142 tonnes of operational solid waste per year. Sufficient waste management infrastructure currently exists to manage this waste which could also help to support the expansion of local recyclable material bulking capacity.



Key

	Airport boundary
	Development Area



Location of the
Proposed Airport Development

Figure 2.1

Drawn: G. Shaver
Check: C. Taylor
Date: 08/10/08
Revision:

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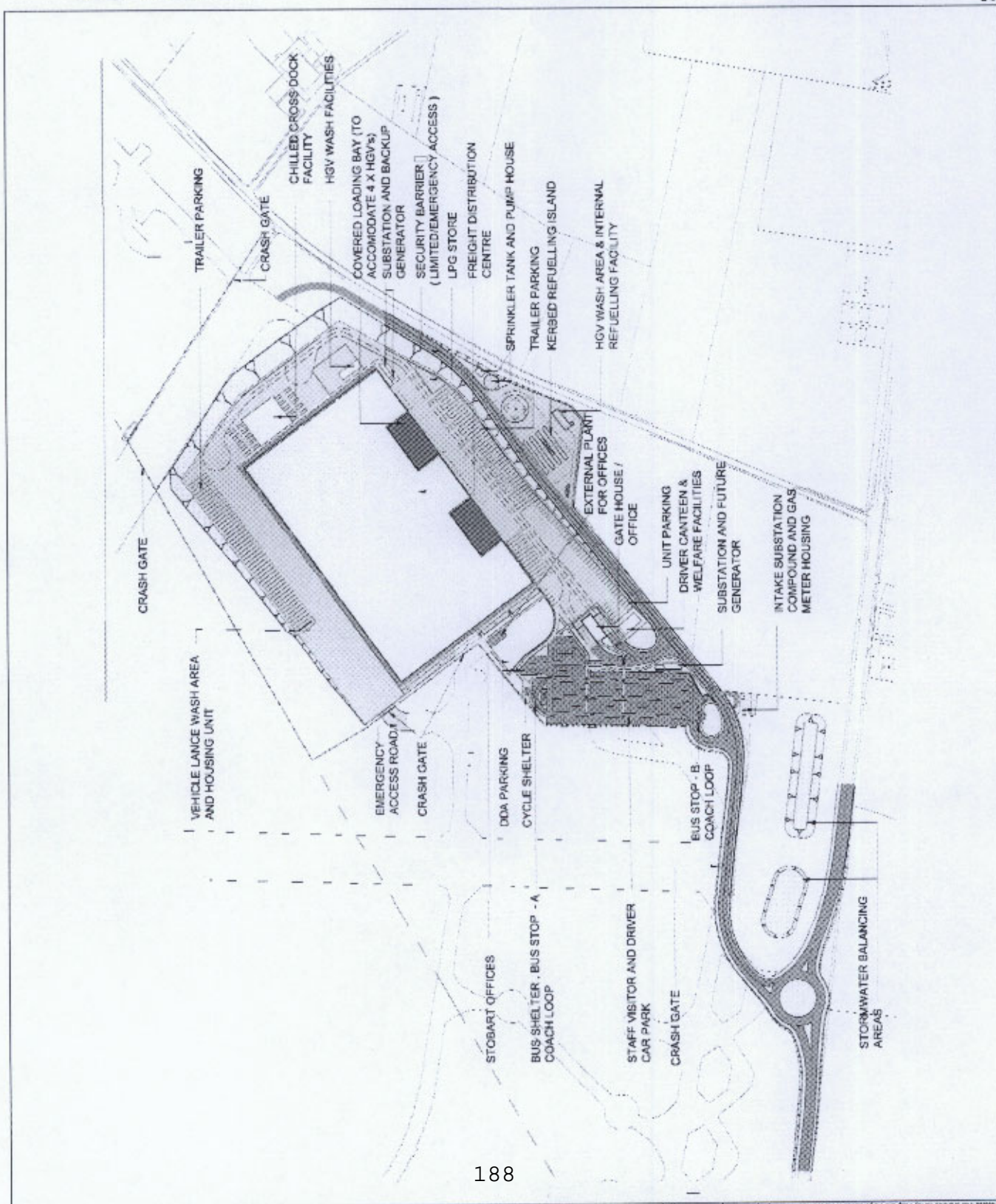
- Key**
- New flexible pavement
 - Proposed new building
 - New concrete hard standing
 - Grassed area
 - Proposed fencing



Proposed Site Development Plan

Figure 2.2

Drawn	Check	Date	Revision
C. Brown	C. Taylor	26.10.08	



Carlisle Lake District Airport

Supplementary Design & Access Statement

Freight Storage and Distribution Facility

October 2008

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Site Description

The area to be developed falls within the boundary of Carlisle Lake District Airport, which lies within the administrative boundary of Carlisle City Council, within the Parish of Irthington. It is located on a low east-west ridge on the northern side of the A689. It is situated approximately 8.5 km north-east of Carlisle city centre and approximately 3.5 km west of the small market town of Brampton. There are a number of small villages surrounding the Airport and a scattering of residential properties.

Existing Facilities.

Site of Proposed
New Building

A689

Land at Carlisle Lake District Airport

1.00 Existing Site

1

1.01 Existing Site - Entrance and Facilities

The Airport itself lies within Hadrian's Wall World Heritage Site Buffer Zone and is designated as a (non statutory) County Wildlife Site. Watchclose Roman Temporary Camp Scheduled Monument is also located within the Airport boundary at the western end of the existing main runway. The Airport is situated approximately 0.4 km to the west of the closest part of the River Irthing which is part of the River Eden Special Area of Conservation (SAC), and the River Eden and Tributaries Site of Special Scientific Interest (SSSI). Whitemoss SSSI is located approximately 0.9 km west of the Airport.

The principal vehicular access to the Airport is via the A689 and the minor road to Irthington which follows the eastern boundary of the Airport. The entrance to the Airport is located on the north side of the site, where the buildings including the passenger terminal, air traffic control tower, café/bar, offices, hangars and museum are located.

The terminal, café/bar, and air traffic control are located in one building. Other buildings, including hangars, within the northern part of the Airport are occupied by a variety of uses including Solway Aviation Museum (run by the Solway Aviation Society, a registered charity), the Airport fire service, aviation training and club uses (including Carlisle Flight Training and Northumbria Helicopters), and private and business aviation-related uses. There are also associated areas of car parking and hardstanding, and a fuel farm for aircraft refuelling.



Site Entrance and Facilities



Hangars and Airport Operations Building



Air Traffic Control Tower



River Eden

Carlisle Lake District Airport - Existing Site Photographs

1.00 Existing Site



Existing Disused Runway



1.01 Existing Site (cont)

Three runways were created when the Airport was originally constructed in 1941 (see below), and two of these runways are still in use. The north-east to south-west runway (07-25) is the main runway for take-off and landing. Landing is undertaken using visual and non-precision instrument navigation aids i.e. NDB and DME. Some smaller aircraft occasionally use the north to south runway (01-19) for take-off and landing, but this runway is mainly used for taxiing of aircraft from the hangars located on the north side of the Airport. The north-west to south-east runway is no longer in use for aircraft but is used for vehicle parking and parking and loading of aircraft.



Control Tower and Ancillary Buildings.



View to the runway from the proposed site.



Hangars

Carlisle Lake District Airport - Existing Runway

1.00 Existing Site

1

2.00 Context

The reasons leading up to the current planning application have been well documented but are particularly relevant in understanding the context of the current proposal. The Council resolved to approve the previous application in April 2008 subject to it being referred to the Secretary of State as a "departure" from the development plan. In June 2008, the Secretary of State recovered the application for her own determination. Given the lengthy timescales involved in arriving at a determination, the applicant elected to withdraw the application and review its proposals.

As a result, a number of revisions to those proposals have been made. First and foremost, it was important to ensure that any changes did not affect the existing and future operation of the Airport. It was also determined that the proposed location remained the optimal location for the storage and distribution facility.

The facility has been reduced and slewed and re-aligned to ensure it does not obstruct the operation of the existing runway. In addition the following items have been removed from the proposal:

- Re-aligned Runway and taxi way
- Apron
- Terminal building and passenger lounges
- Airfreight service and baggage/freight handling area
- ATC tower
- Passenger car parking
- Car Hire parking
- Large passenger coach drop off and collection facility

The proposal also responds positively to a number of matters which were encountered post submission of the previous application and to accommodate the commercial requirements of the applicant, notably:

- An access roundabout is now proposed in place of a priority junction as requested by the County Highways Authority, Carlisle City Council and the Irthington Parish Council.
- The site levels to the yard access fuel area have been changed.
- The Gatehouse and Drivers Canteen has been added as a requirement of the applicant.
- The loading canopy insets have been included as an operational requirement of the applicant.
- The Cross Dock Chilled Unit has been brought forward as a result of the Stobart Group's recent acquisition of Innovate chilled distribution. As such, the proposal incorporates significant benefits in reducing empty LGV road miles.
- The drainage lagoons have been more specifically located to areas that best suit the topography of the site and surface water outfall, with a much reduced capacity requirement.
- Ground investigation works have been undertaken to inform and progress the detailed design of the site

The Stobart Group continues to progress communications with the public and other interested parties in relation to the proposed development. A public brochure is being prepared, and a 3-D model of the proposed development has been constructed which, it is hoped, will be displayed in the entrance to the Civic Centre and other locations where meetings relating to the proposals will be held. As always, the applicant is willing to answer any questions and attend any meetings that may arise during the course of the planning application.

Ultimately, these revised proposals reaffirm the Stobart Group's commitment to consolidate its operations at the Airport, thereby establishing the commercially viable and sustainable revenue to ensure the future viability and sustainability of the Airport. Further details on the background and need for the proposed development are set out in Sections 1.0 and 5.0 of the Planning Policy and Position Statement, Chapter 2 of the Environmental Statement and the Economic Impact Appraisal Report.

2.00 Context

2



Indicative Artistic Impression

3.00 Design

3

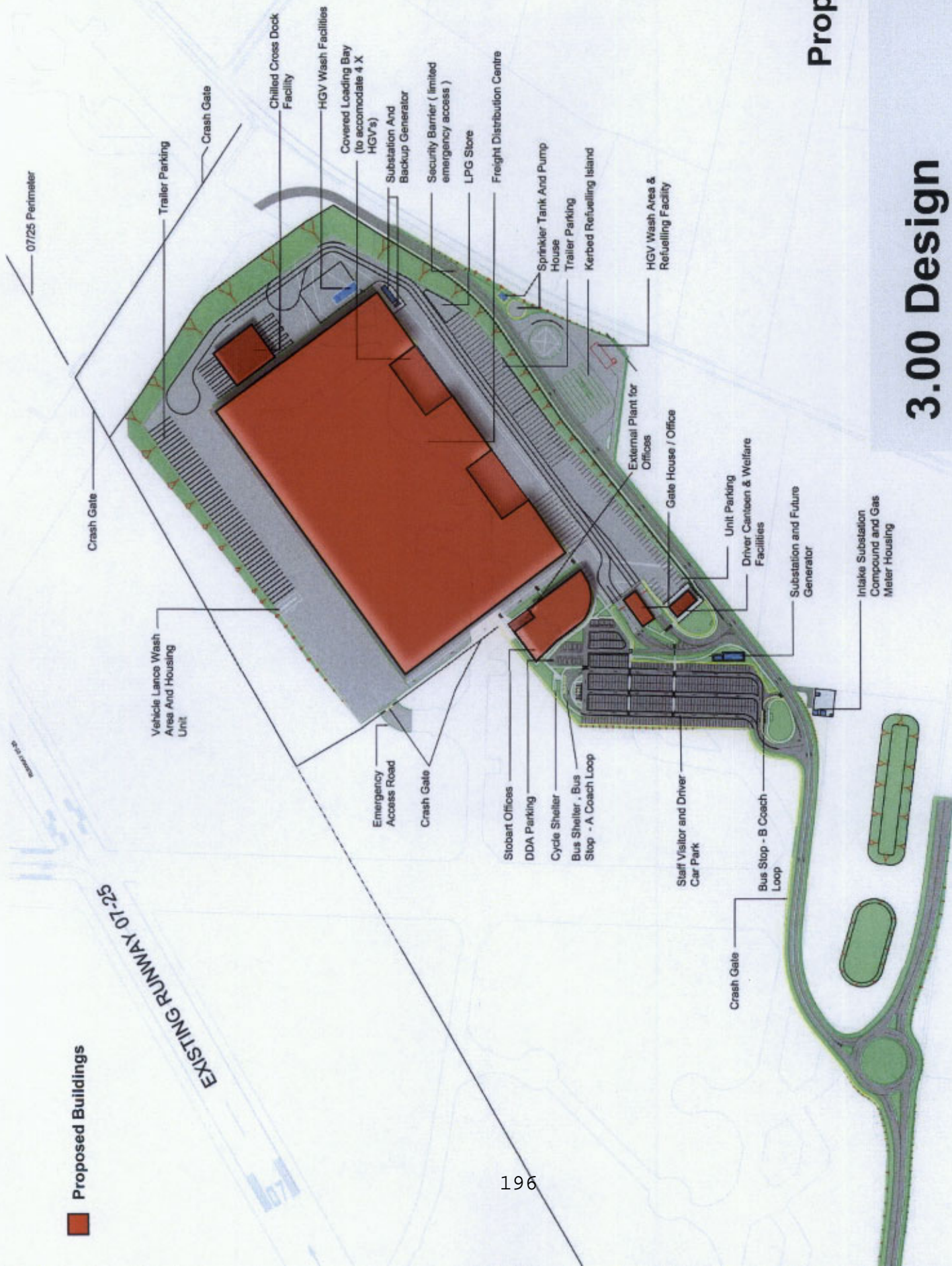
View From the A689 Entrance Roundabout



Proposed Buildings

EXISTING RUNWAY 07-25

07/25 Perimeter



Proposed Site

3

3.00 Design

3.01 Use

The proposal includes the construction of five buildings within the boundary of the existing Airport, providing the following functions and ancillary accommodation:

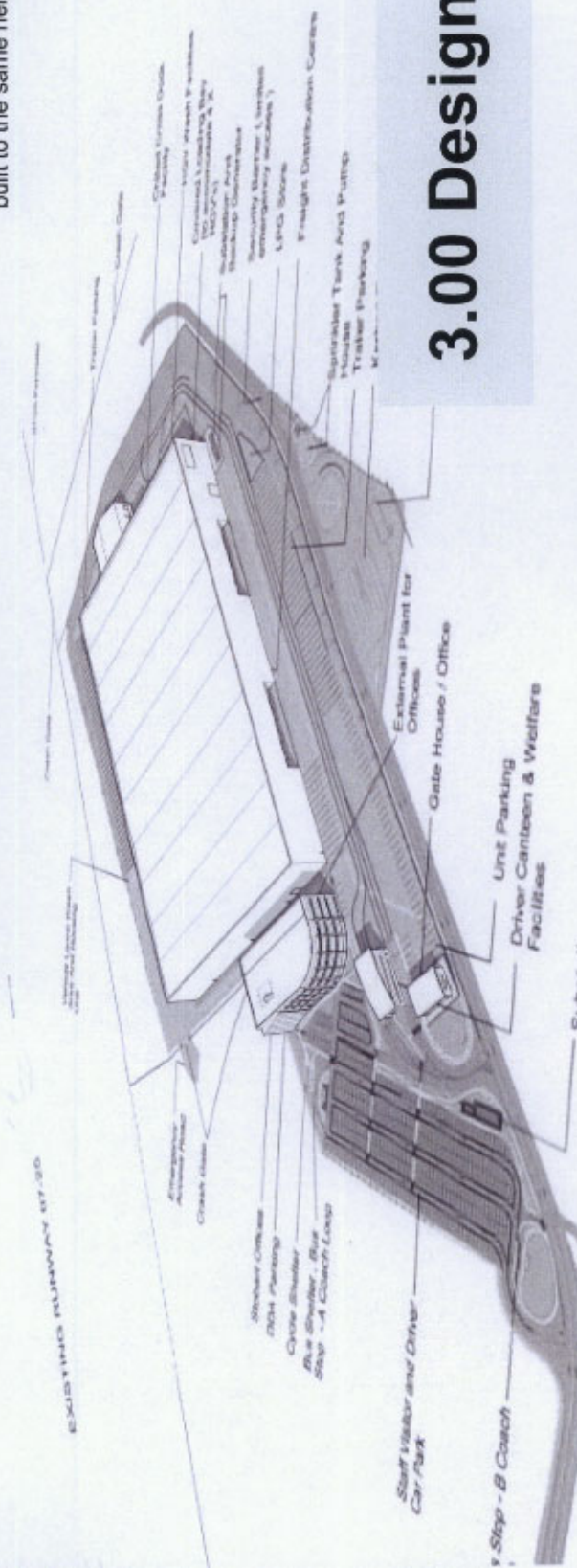
- Freight Storage and distribution centre incorporating an integral rail storage area.
- Office/conference accommodation
- Chilled cross-dock facility
- Gatehouse building
- Driver Canteen and welfare building

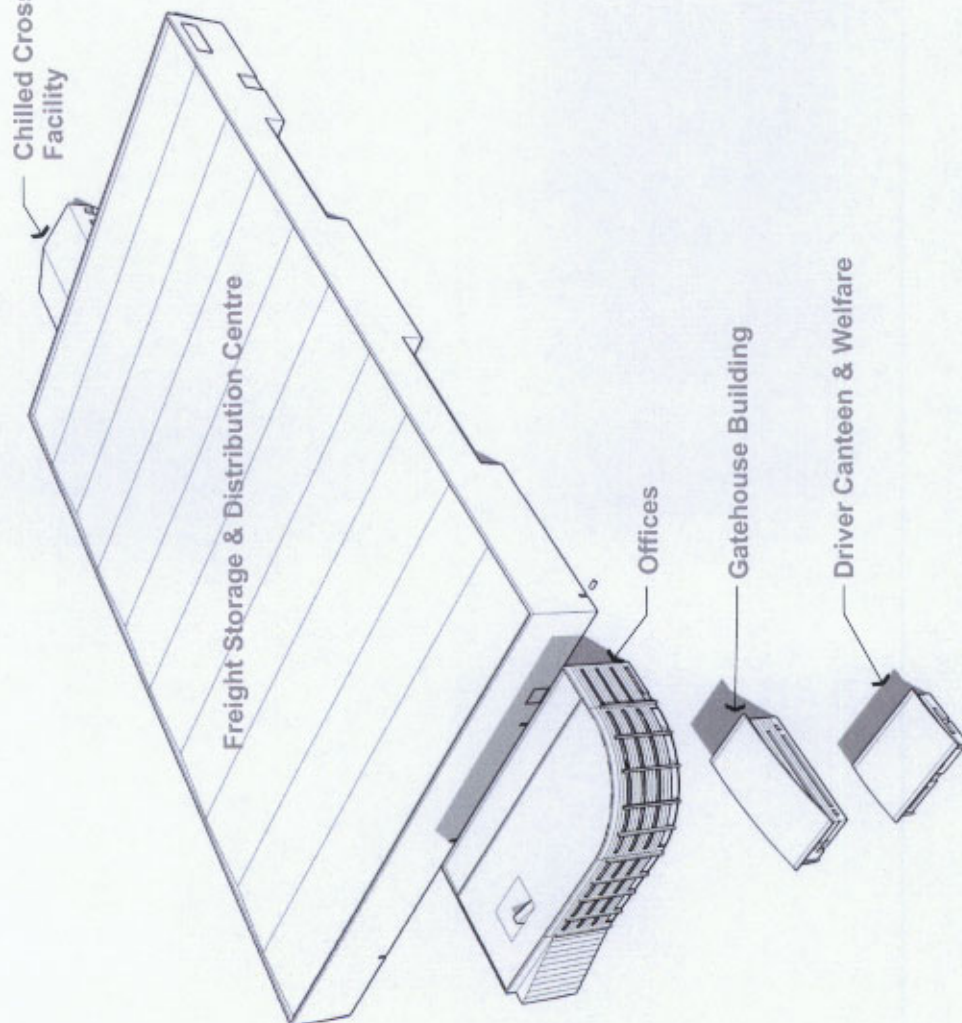
The uses shall be fully integrated. Creating a central hub for the Group will offer considerable operational efficiency savings through economies of scale in relation to canteen and welfare facilities, security, and common group services, including IT, human resources, risk management, accounting, reception, safety management and training. It will also have sustainability advantages, such as eliminating the current need for frequent travel between the Group sites.

The Stobart Group has been in occupation of its existing sites at the Kingstown Industrial Estate since 1980. The buildings are now more than 25 years old and coming to the end of their economic life. The buildings are spread out and of insufficient height, so do not lend themselves to modern operational warehousing procedures.

The floor area of the proposed buildings reflects the aspirations for a facility of this nature set within an Airport, introducing a freight storage and distribution centre with high quality office accommodation and new ancillary driver canteen/welfare and gatehouse buildings as well as other ancillary functions.

The size of the proposal is dictated by the functional requirements of the freight storage and distribution centre, offices and chilled cross-dock facility, together with the ancillary gatehouse and driver canteen/welfare facilities. Overall building heights are subject to restrictions set by the Airport and also take into account the limits imposed by aircraft manoeuvres. The office and freight storage and distribution centre are to be built to the same height.





Freight Storage and Distribution Centre

The internal plan and height dimensions are dictated by the requirements of the warehousing space.

Office/Conference Building

The office space is distributed across four levels.

Chilled Cross-dock Facility

The internal plan and height dimensions are dictated by the requirements of the chilled storage space.

Gatehouse Building

The gatehouse office is distributed over the ground and first floors with meeting rooms and the main washroom facilities on the first floor. Accessible facilities are provided on both floors and a lift is included for access.

Plant is located on a floor level within the roof void and is accessed from an external spiral access stair.

Driver Canteen/Welfare Building

The canteen space is distributed over the ground floor with washroom facilities.

Plant is housed external to the building in a ground level compound.

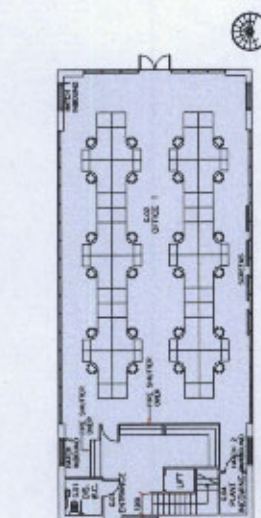
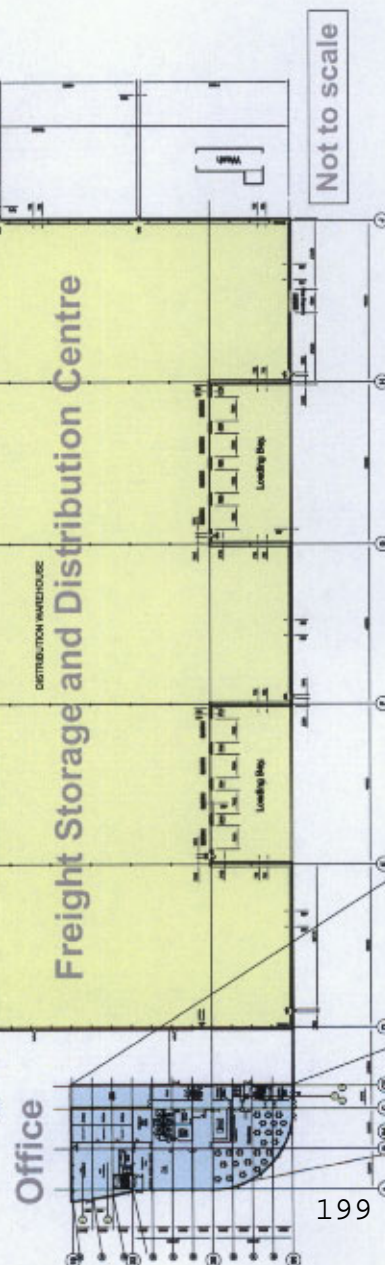
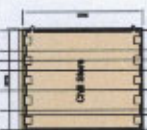
Building	Internal Footprint (m ²)	Height (m)
Freight Storage & Distribution Centre	34,457	17.65m
Chilled Cross Dock Facility	1139	13.50m
Offices	1997	17.65m
Gatehouse	264	5.3m - 9m
Driver Canteen & Welfare	200	3.67m - 4.85m

3.00 Design

The layout of buildings is governed by the existing site plan and proposed new access. The development area has been selected to minimise its impact on the environment and has a number of advantages over alternative locations. Importantly, the development area is of limited ecological value and avoids the loss of extensive grassland, so will have no material effect on ground-nesting birds. In terms of visual impact, the development area is low-lying, so is well screened from Hadrian's Wall and urban settlements by the natural topography and existing woodland. Locating the development on the south side of the Airport maximises the distance to Hadrian's Wall and avoids interference with the context of the World Heritage Site. Further details on environmental constraints are given in the Environmental Statement that accompanies this application.

In respect of the individual buildings: the freight storage and distribution facility faces the existing highway so as to optimise ease of access and circulation; the office accommodation faces the new access road and main parking area; the chilled cross-dock facility is on the north-east elevation of the freight storage and distribution building; the driver canteen/welfare building is adjacent to the new road entrance adjacent to the staff parking area; and the gatehouse is positioned on an island between the incoming and outgoing traffic lanes of the new access road and is set back from the service road to allow for some queuing of vehicles. The design of the layout has been developed to optimise operational efficiencies and ensure an ease of interdependence between the operations.

Chilled Cross Dock Facility



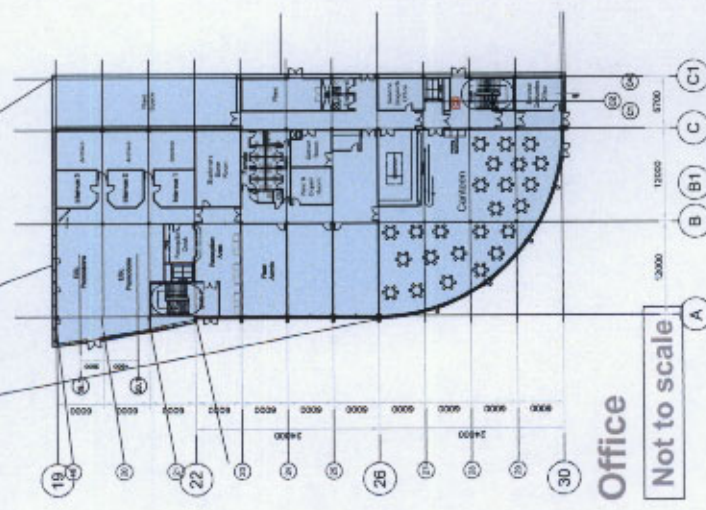
Gatehouse

Not to scale



Driver Canteen & Welfare

Not to scale



3.00 Design

3.06 Appearance

The proposed external materials reflect the nature and function of each element of the proposal.

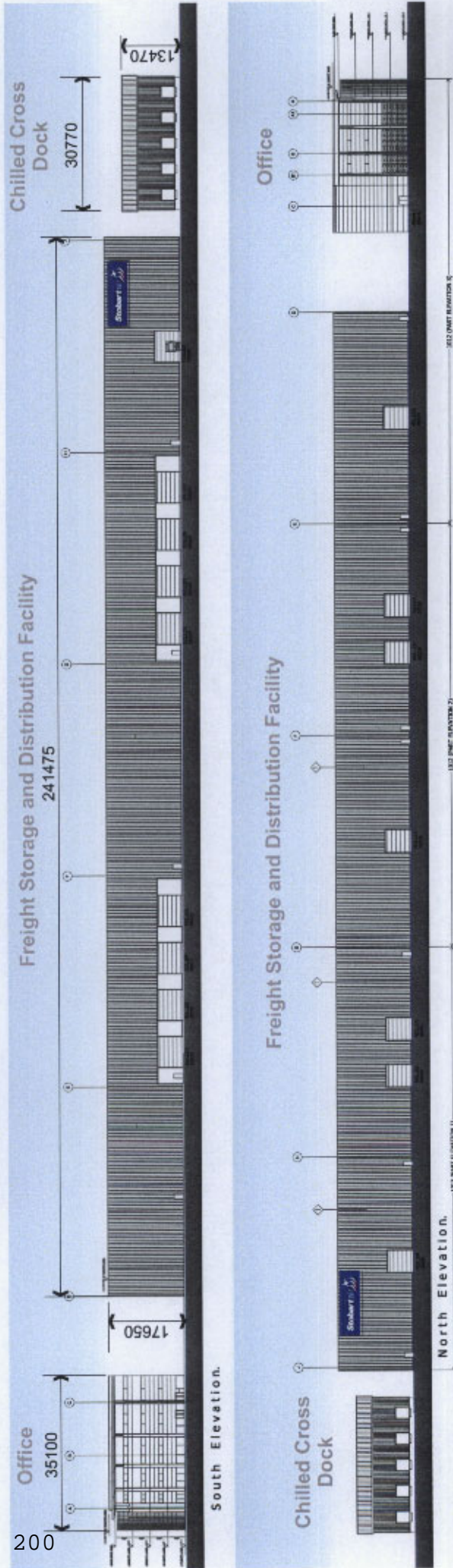
The elevations of the freight storage and distribution facility will be formed from a single skin of profiled, coated steel cladding up to the top of a parapet. The roof will match the cladding in appearance externally, but will utilise an insulated composite panel with flat rooflights covering 10% of the total roof area.

The office accommodation will be expressed differently, employing larger areas of curtain wall glazing and, where required, composite cladding panels which differ from the freight storage and distribution facility.

The chilled cross-dock facility will be formed from composite profiled, coated steel cladding up to a dual pitch roof of the same cladding. This cladding matches that of the main freight storage and distribution facility.

The driver canteen/welfare building will be formed of horizontal, flat, albatross grey composite cladding panels with ribbon windows and a curved low-pitch roof profile with extended overhangs and radiused fascias.

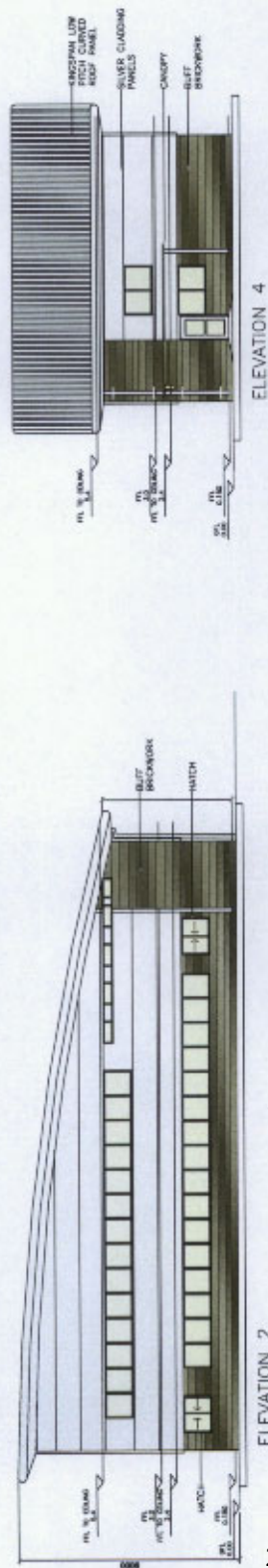
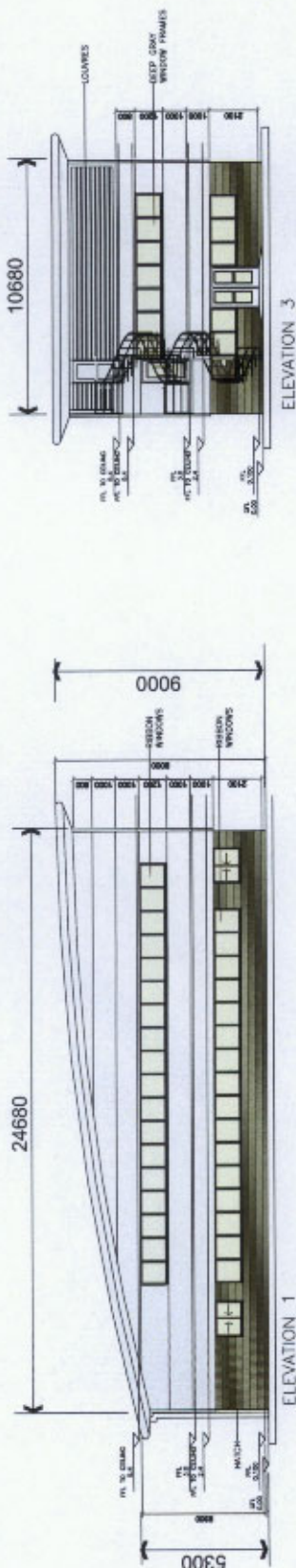
The gatehouse building will have a raised ground storey with brick outer skin stepping to horizontal, flat, albatross grey composite cladding panels with ribbon windows and a curved low-pitch roof profile with extended overhangs and radiused fascias. The entrance to the building will be highlighted by extending the brick outer skin up to the roof overhang. Natural ventilation will be afforded to the roof space plant area via a short elevation of louvres at the upper end of the roof.



3.00 Design

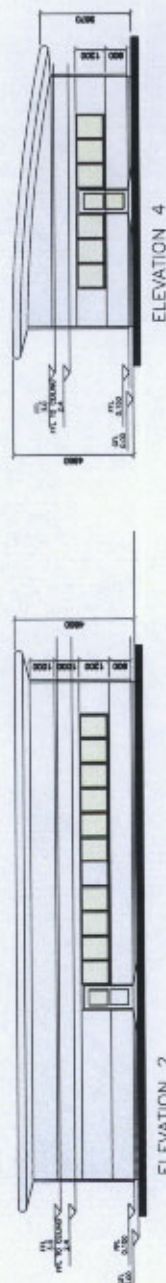
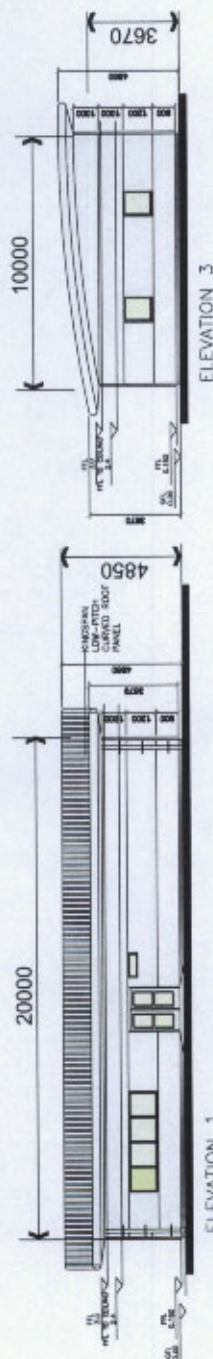
3

3.06 Appearance (cont)



Gatehouse

201



Driver Canteen & Welfare

3.00 Design

3

Carlisle Lake District Airport Colour Finishes

Freight Storage and Distribution Facility:

Colours - Main body of terminal building - Albatross (BS18BS17).
Roof - Kingspan, Low Pitch, Colour - Alaska Grey

Offices:

Colours - Albatross (BS18BS17).

Gatehouse

Brickwork Plinth - Ibsstock Wire Cut Buff Brown
Cladding - Albatross (BS18BS17).
Window frame and doors - RAL 9007 Graualuminium
Pilkinton Suncool HP Neutral
Aluminium roof - Kingspan Low Pitch - Alaska Grey

Cold Store

Brickwork Plinth - Ibsstock Wire Cut Buff Brown
Cladding - Albatross (BS18BS17).
Door frames - Grey RAL 7015
Doors - Painted to Client Spec
Pilkinton Suncool HP Neutral
Aluminium roof - Kingspan Low Pitch - Alaska Grey
Steps - Buff Brown Brick, Grey concrete Steps
Louvers - RAL 9007 Graualuminium

Canteen & Welfare

Brickwork Plinth at bottom 150-200mm of building - Ibsstock Wire Cut Buff Brown
Cladding - Albatross (BS18BS17).
Window frame and doors - RAL 9007 Graualuminium
Pilkinton Suncool HP Neutral
Aluminium roof - Kingspan Low Pitch - Alaska Grey
Louvers - RAL 9007 Graualuminium

Example Window frame and doors
RAL 9007 Graualuminium

Example Buff Brickwork
Ibsstock Wire Cut Buff

3.00 Design

3

3.07 Landscaping

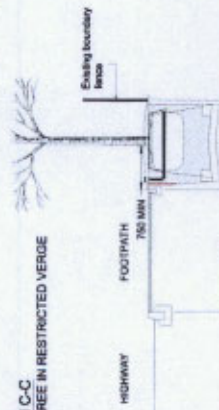
Substantial native woodland and ornamental landscape planting is proposed as part of the planning application. The native tree and shrub and hedgerow planting near to the proposed vehicular access and the north west of the airport site boundary is characteristic of the local Low Farmland Landscape Character Type which includes pasture with patchy woodland, hedgerow and hedgerow trees. The woodland will provide mitigation against potentially adverse views from selected local dwellings, users of the Hadrian's Wall National Trail and users of the A689. The proposed mix for this woodland includes sessile oak, ash, hazel, birch, scots pine and small leaved lime. The hedgerow mix includes beech, hornbeam, field maple and privet. The tree and hedgerow mixes have been influenced by the species found locally within the area.

Avenue tree planting within the development area softens views of the built elements from outside and within the site to create a sense of place and arrival. The avenue trees will be lime and field maple planted within a grassed verge.

SECTION B-B
AVENUE TREE IN OPEN VERGE
Scale 1:50

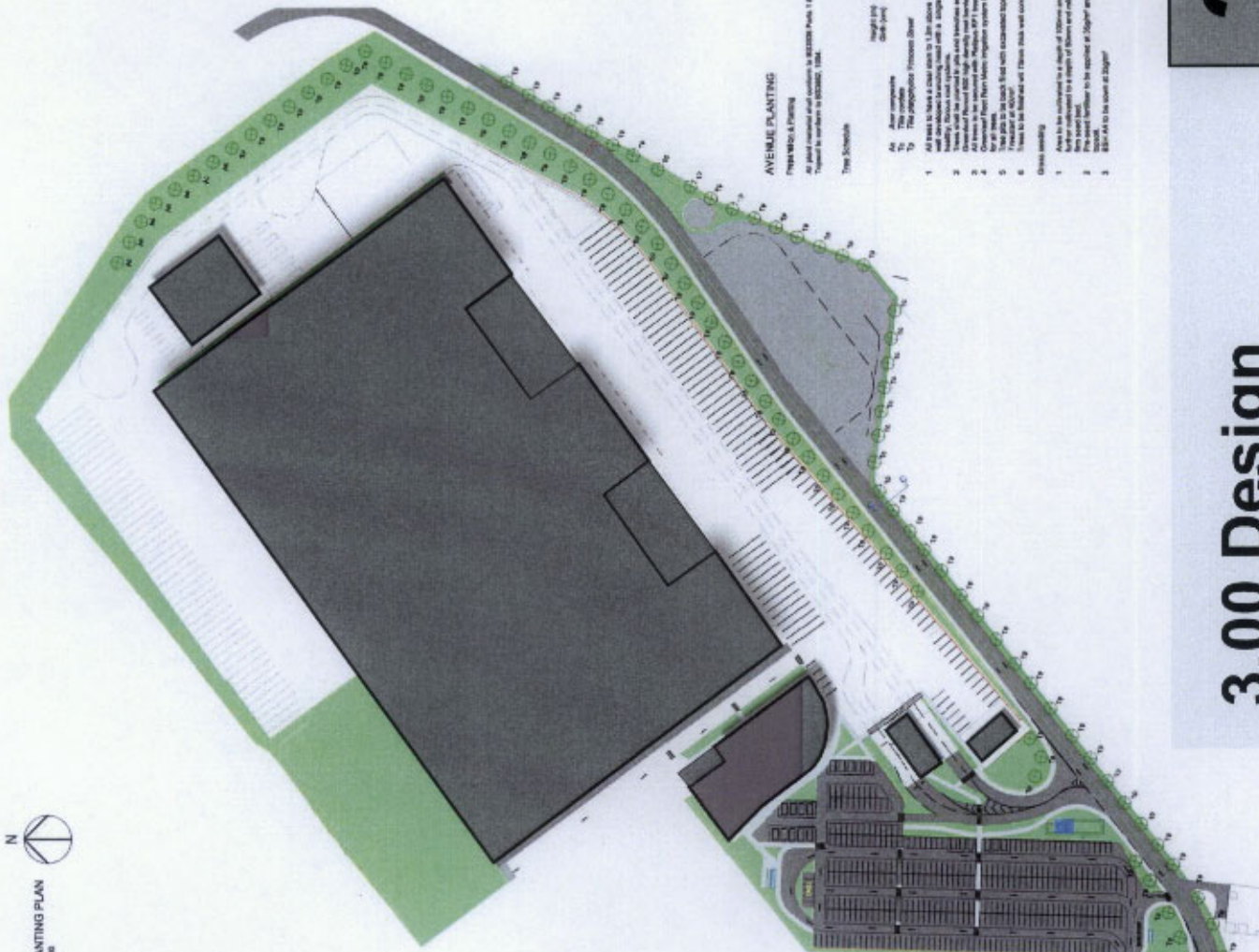


SECTION C-C
AVENUE TREE IN RESTRICTED VERGE
Scale 1:50



SEE INSERT

This proposed landscape scheme is a preliminary design and is subject to change. It is not a final design and is not a guarantee of any particular result. It is a guide only and is not a contract. It is a preliminary design and is subject to change.



AVENUE PLANTING

Proposed planting details

All plant material shall conform to BS2800 Parts 1 & 2 and BS 4320. All plants shall be supplied in 100% bare root.

Tree Schedule

Tree	Height (m)	Spacing (m)	Notes
A6	10-12	10	Plant in open verge
A7	10-12	10	Plant in restricted verge
A8	10-12	10	Plant in open verge
A9	10-12	10	Plant in restricted verge
A10	10-12	10	Plant in open verge
A11	10-12	10	Plant in restricted verge
A12	10-12	10	Plant in open verge
A13	10-12	10	Plant in restricted verge
A14	10-12	10	Plant in open verge
A15	10-12	10	Plant in restricted verge
A16	10-12	10	Plant in open verge
A17	10-12	10	Plant in restricted verge
A18	10-12	10	Plant in open verge
A19	10-12	10	Plant in restricted verge
A20	10-12	10	Plant in open verge
A21	10-12	10	Plant in restricted verge
A22	10-12	10	Plant in open verge
A23	10-12	10	Plant in restricted verge
A24	10-12	10	Plant in open verge
A25	10-12	10	Plant in restricted verge
A26	10-12	10	Plant in open verge
A27	10-12	10	Plant in restricted verge
A28	10-12	10	Plant in open verge
A29	10-12	10	Plant in restricted verge
A30	10-12	10	Plant in open verge
A31	10-12	10	Plant in restricted verge
A32	10-12	10	Plant in open verge
A33	10-12	10	Plant in restricted verge
A34	10-12	10	Plant in open verge
A35	10-12	10	Plant in restricted verge
A36	10-12	10	Plant in open verge
A37	10-12	10	Plant in restricted verge
A38	10-12	10	Plant in open verge
A39	10-12	10	Plant in restricted verge
A40	10-12	10	Plant in open verge
A41	10-12	10	Plant in restricted verge
A42	10-12	10	Plant in open verge
A43	10-12	10	Plant in restricted verge
A44	10-12	10	Plant in open verge
A45	10-12	10	Plant in restricted verge
A46	10-12	10	Plant in open verge
A47	10-12	10	Plant in restricted verge
A48	10-12	10	Plant in open verge
A49	10-12	10	Plant in restricted verge
A50	10-12	10	Plant in open verge
A51	10-12	10	Plant in restricted verge
A52	10-12	10	Plant in open verge
A53	10-12	10	Plant in restricted verge
A54	10-12	10	Plant in open verge
A55	10-12	10	Plant in restricted verge
A56	10-12	10	Plant in open verge
A57	10-12	10	Plant in restricted verge
A58	10-12	10	Plant in open verge
A59	10-12	10	Plant in restricted verge
A60	10-12	10	Plant in open verge
A61	10-12	10	Plant in restricted verge
A62	10-12	10	Plant in open verge
A63	10-12	10	Plant in restricted verge
A64	10-12	10	Plant in open verge
A65	10-12	10	Plant in restricted verge
A66	10-12	10	Plant in open verge
A67	10-12	10	Plant in restricted verge
A68	10-12	10	Plant in open verge
A69	10-12	10	Plant in restricted verge
A70	10-12	10	Plant in open verge
A71	10-12	10	Plant in restricted verge
A72	10-12	10	Plant in open verge
A73	10-12	10	Plant in restricted verge
A74	10-12	10	Plant in open verge
A75	10-12	10	Plant in restricted verge
A76	10-12	10	Plant in open verge
A77	10-12	10	Plant in restricted verge
A78	10-12	10	Plant in open verge
A79	10-12	10	Plant in restricted verge
A80	10-12	10	Plant in open verge
A81	10-12	10	Plant in restricted verge
A82	10-12	10	Plant in open verge
A83	10-12	10	Plant in restricted verge
A84	10-12	10	Plant in open verge
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A90	10-12	10	Plant in open verge
A91	10-12	10	Plant in restricted verge
A92	10-12	10	Plant in open verge
A93	10-12	10	Plant in restricted verge
A94	10-12	10	Plant in open verge
A95	10-12	10	Plant in restricted verge
A96	10-12	10	Plant in open verge
A97	10-12	10	Plant in restricted verge
A98	10-12	10	Plant in open verge
A99	10-12	10	Plant in restricted verge
A100	10-12	10	Plant in open verge

3.00 Design

3

THE PROJECT HAS BEEN APPROVED BY THE LOCAL AUTHORITY FOR THE DEVELOPMENT OF THE SITE.



Woodland belt - see Drawing D121812/LA001

Avenue Tree

Grass

3.07 Landscaping Cent.



Key	Symbol	Description
1	[Symbol]	Proposed Building
2	[Symbol]	Proposed Road
3	[Symbol]	Proposed Footpath
4	[Symbol]	Proposed Cycleway
5	[Symbol]	Proposed Drainage
6	[Symbol]	Proposed Fencing
7	[Symbol]	Proposed Landscaping
8	[Symbol]	Proposed Water Feature
9	[Symbol]	Proposed Tree
10	[Symbol]	Proposed Planting

STOBART AIR
FREIGHT DISTRIBUTION
CENTRE

LANDSCAPE PLANTING

3

3.00 Design

WILSON
Tel: 01132 345 678
Fax: 01132 345 679

D121812/LA002

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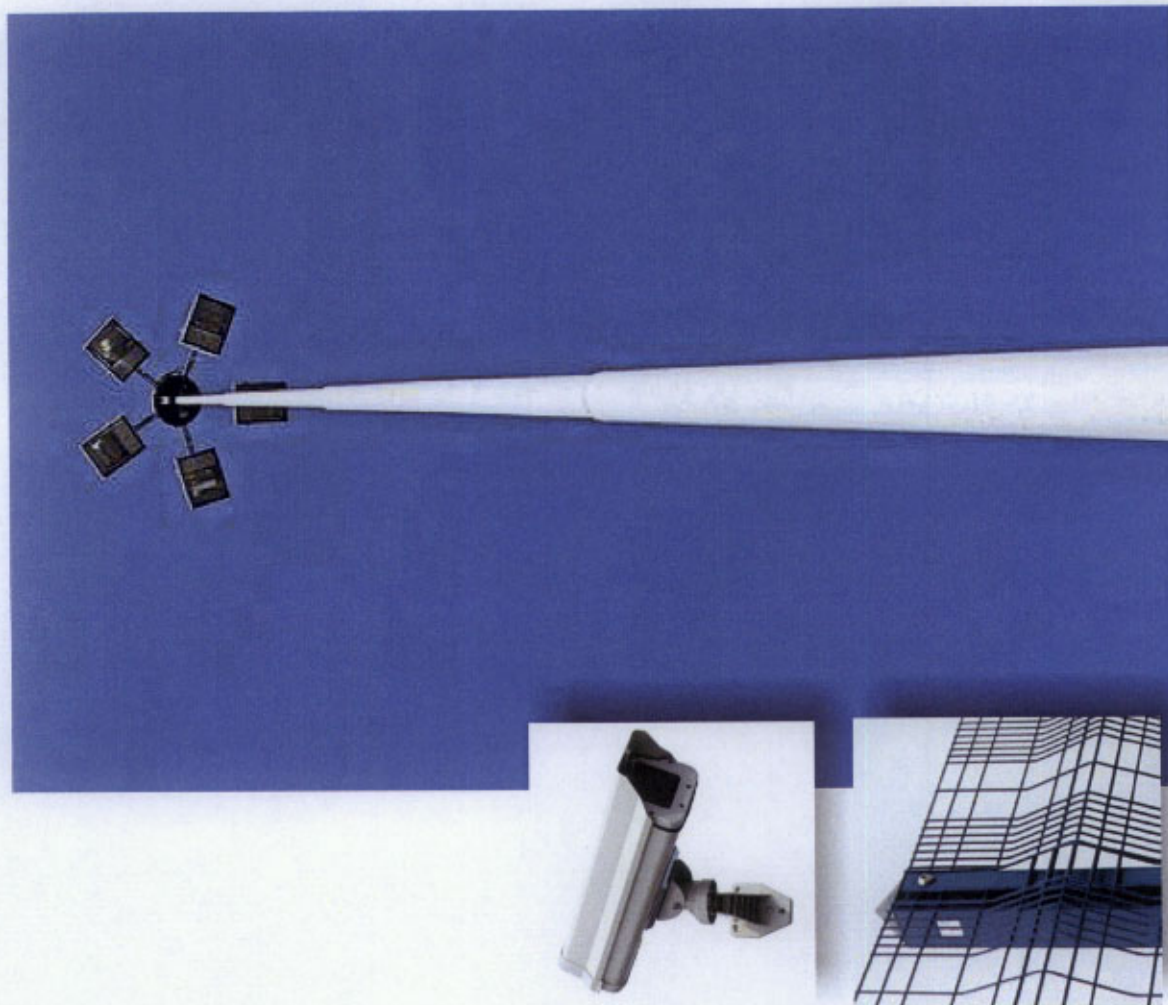
To deter unauthorised access the car park will be secured by a paladin type security fence and the HGV yard and airfield perimeter will be secured by anti-intruder security fence to BS1722 Part 14 and BS1722 Part 10, respectively. The standard of fencing will be as required by TRANSEC, the Department for Transport Security Team, as the statutory authority on airport security, who will be consulted on such matters. Access to the HGV yard will be controlled by barriers adjacent to the gatehouse at the entrance to the service yard. The car park, HGV yard and circulation areas will be well lit by a combination of column or building mounted luminaires.

There will be CCTV coverage of the car park area and service yard through installation of suitably located CCTV cameras. The lighting design will be developed with consideration of the aims and objectives of the proposed CCTV system to ensure there is no conflict to the imaging from the CCTV. This with other issues on the development of the CCTV will be developed with the advice provided by Cumbria Constabulary through the previous consultation.

The perimeter fencing, lighting, alarm systems and CCTV coverage, coupled with the 24/7 operation of the freight distribution centre will contribute to a robust security strategy that will be incorporated into the final scheme.

Dedicated routes will be provided for pedestrians from the car parks to entry points of the various buildings as appropriate. These routes will be lit and CCTV coverage from the car park will be provided.

It is proposed that Cumbria Constabulary will be engaged to consider several initiatives to reduce offences and promote a safer scheme to benefit the operators and visitors on the proposed site. The security strategy that is being developed for the site will be through consultation with relevant parties to ensure that an appropriate and robust security system is incorporated into the final scheme. This will give the required levels of security for the operational procedures and allow the operators to take advantage of cooperation and support from the local police services. Hence improving overall security to the site and a safer environment to work within, with particular emphasis on the fact the freight distribution will be operating 24/7.



3.00 Design

4.01 Vehicular and Transport Links

The current access to the Airport is taken from the north of the site and involves the use of either the Laversdale Road or the Irthington Road to gain access from the A689. To accommodate traffic arising out of the development it is proposed to form a new access off the A689 directly into the proposed freight storage and distribution facility. This has a number of benefits, namely it:

- Provides a distinct destination and a sense of arrival;
- Is conveniently located for the anticipated arrival and departure pattern of staff when compared to the existing site access thus saving vehicle kilometres;
- Is located on a bus route thus optimising accessibility and facilitating alternative means of access;
- Is well located for HGV traffic by providing direct access to high quality local roads and the national trunk road network.

The principle of a new access junction on the A689 has been agreed with the Highways Authority. The junction type as a roundabout has also been agreed with the Highway Authority and the safety benefits associated with a new junction at this location have been recognised.

Discussions have been held and will be progressed with a local bus operator regarding the principle of buses turning into the site to drop off and pick up passengers and there is merit in this. Bus infrastructure has been incorporated into the design to address this.

Parking is to be provided at a rate well below that allowed by local parking standards. The actual requirement for the freight storage and distribution facility has been calculated and then a 15% reduction made to demonstrate a commitment to green travel planning principles. A package of travel plan measures is proposed to encourage access by alternative modes to single occupancy private car trips.

4.00 Access

4

4.02 Inclusive Access

Level Access thresholds.

Ambulant Stairs

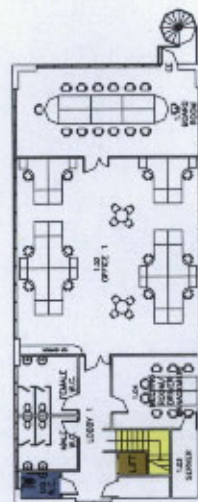
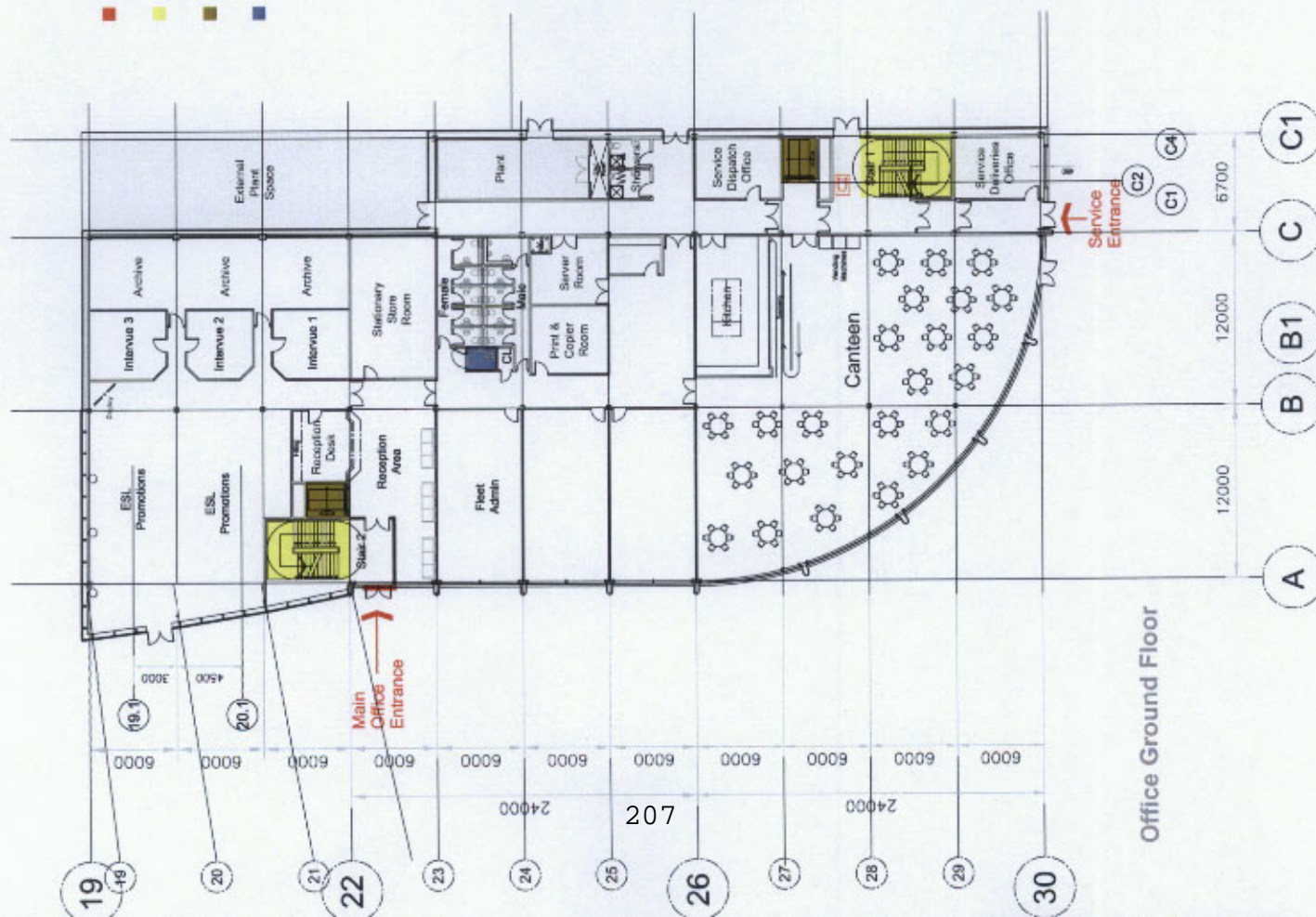
2 No. 8 Person Lifts.

Accessible WCs in all areas.

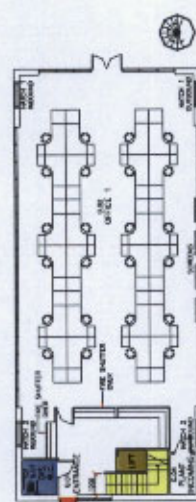
The final internal layout is subject to some further design evolution, but will achieve the following:

The design will allow for persons of reduced mobility to move up and down the building without segregation or detours. The new entrance areas will incorporate level access, ambulant accommodation stairs and lifts suitable for wheelchair users. Internal door openings will be of an appropriate width for wheelchair users and accessible WCs are provided in all areas. The internal decorative finishes (including doors and ironmongery) will achieve the contrasts described in Part M of the Building Regulations.

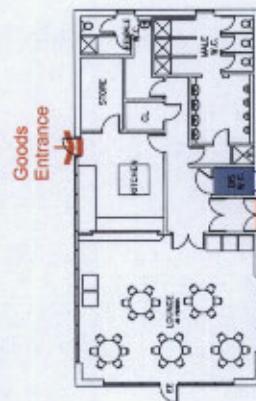
Disabled parking bays will be provided, and located directly adjacent to office building.



Gatehouse First Floor



Gatehouse Ground Floor



Driver Canteen & Welfare

4.00 Access

5.01 Utilities Statement

This section outlines the incoming utility services:

- Gas
- Water
- Electricity
- IT Communications

On 26 June 2007, information regarding the existing services infrastructure was requested from United Utilities (United Utilities, Property Searches, Stephensway, Goosegreen, Wigan WN3 6PJ):

- Inside the demise of the airport.
- Serving the airport.
- In the vicinity of the airport.

A written response was received on 16 July 2007 from Openreach, BT and on email from United Utilities on 11 July 2007. Each identified the existing infrastructure which has been considered within the design.

Subsequently discussion was held with United Utilities Connections on 3 August 2007 regarding the future infrastructure requirements. (David Shaw, UU-Connections, P.O. Box 1093, 3rd Floor, Hartington Road, Preston PR1 8LE). These are under continuing design development, however they can be summarised as follows:

Gas

There is a medium pressure main within the A689 which would appear to have sufficient capacity to serve the development.

Water

There is a large bore main within the A689 which would appear to have sufficient capacity to serve the development.

IT Infrastructure

This is yet to be fully determined, however, there is a fibre network within the A689 which would appear to have sufficient capacity to serve the development.

Electricity

The immediate electrical infrastructure is not sufficient to serve the development. With a formal application and subsequent Network Analysis by United Utilities there would appear to be two options:

- 1 New High Voltage Supply from Brampton (routed along the A689 principally). Current Preferred Option.
- 2 New High Voltage Supply from alternative UU source.

5.00 Utilities

5

The proposed development plans have been tailored to maximise viable sustainable features of its buildings and minimise operational impacts.

To achieve this aspiration, an initial technology appraisal was undertaken to identify potential systems that could be integrated into the design.

Tri-generation energy; Rainwater harvesting; Solar collectors; Photovoltaic cell collectors and Ground source heat pumps were all considered as part of the initial technology feasibility appraisal – aimed at targeting the best solution(s) for Carlisle Airport.

Following detailed discussions, stakeholder negotiations and expert advice the best practicable technologies suited to the development and its local context are considered to be Tri-generation energy harnessing and rainwater collection systems.

The following paragraphs detail the chosen technologies and their sustainability credentials. The introduction of such measures are at inception stage and are yet to be fully incorporated into the design. These technologies with others considered appropriate to the design and operation of the development will be taken forward in consultation with appropriate parties:

As an exemplar sustainability project, the proposed development has been designed to embrace 'tri-generation' (combined generation of heat, power and cooling) as an integral part of the site energy master plan. The tri-generation process involves simultaneous production of mechanical power (which is converted to electricity), heat and/or cooling generated from natural gas; indeed bio-diesels such as rapeseed oil are also suitable. By producing on site electricity, heating and cooling in this most effective and efficient manner, the project reduces its dependency upon depleting fossil fuels; it also maximises the usage of process heat energy within the building's envelope; compared to a remote power station with intrinsic transmission loss and heat absorption to atmosphere through cooling towers.

The integration of a rainwater collection system will allow rain water to be collected from around the site and utilised for vehicle washing, toilet flushing and cleaning. Utilisation of rainwater reduces onsite consumption levels and the requirement to use potable water, further supporting the sustainability credentials of the development.

Alongside Tri-generation and rainwater harvesting, 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 all construction wastes can be reused onsite; lessening the requirement for landfill and natural resources.

The proposals include attenuation-based permeable paving for the car parking areas, whilst the roof and remaining hardstanding areas will drain directly to the stormwater balancing lagoon. Opportunities for inclusion of rainwater harvesting and other sustainable measures will be explored further during detailed design.

Sustainable Drainage Systems (SUDS)

In accordance with PPS25, the proposed development will incorporate sustainable drainage techniques where appropriate. In general surface water will be managed to reduce the impact on downstream property by installing SUDS in accordance with the following hierarchy:

- Preventative measures- including rainwater harvesting and reuse.
- Permeable surfaces- where underlying ground conditions permit surface water is to be infiltrated at source through permeable surfaces.
- Filter strips and swales- these vegetated areas also allow surface water to infiltrate at source.
- Infiltration devices- these are below ground structures that infiltrate surface water directly into the ground either at source or at centralised locations.
- Detention techniques- basins, ponds, wetlands and other structures can be installed to retain surface water and release it at allowable discharge rates.

6.00 Sustainability



Scott Wilson Ltd, Brunel House, 54 Princess Street, Manchester, M1 6HS, United Kingdom
Telephone +44 (0)161 907 3500 - Fax +44 (0)161 907 3501