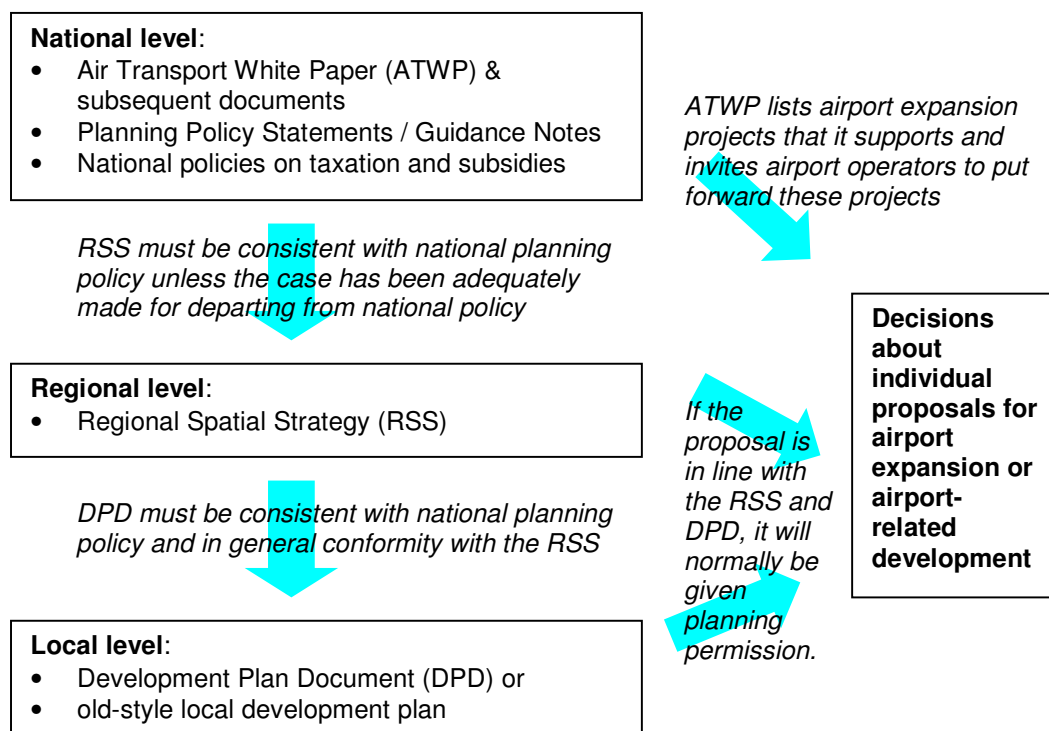# 3. HOW ARE AIRPORTS PLANNED?

3.1 Introduction

This section explains how airports and airport-related developments are planned in England. There are three levels of planning in England: national, regional and local. Scotland, Wales and Northern Ireland have different systems with only two levels: country / devolved administration and local. Box 3.1 provides web-links to background information on the devolved administrations' planning systems.

In England, airport planning is driven by the national level, which is strongly in favour of airport expansion. Regional-level plans are expected to be consistent with national-level ones, and local-level plans with regional ones, unless there are exceptional circumstances for why they shouldn't (see Figure 3.1). So although some local authorities may be opposed to airport expansion, their planning policies aren't allowed to be because of the top-down form of airport planning. ***Because of this, it is at least as important to be involved in national-level as in local-level airport policy***.

Policy related to airport planning at all levels of government is changing very rapidly at the moment. This section was correct as of January 2008, but may well have changed since then.

Figure 3.1 Planning airport-related development

National level:
- Air Transport White Paper (ATWP) & subsequent documents
- Planning Policy Statements / Guidance Notes
- National policies on taxation and subsidies

ATWP lists airport expansion projects that it supports and invites airport operators to put forward these projects

RSS must be consistent with national planning policy unless the case has been adequately made for departing from national policy

Regional level:
- Regional Spatial Strategy (RSS)

DPD must be consistent with national planning policy and in general conformity with the RSS

If the proposal is in line with the RSS and DPD, it will normally be given planning permission.

Decisions about individual proposals for airport expansion or airport-related development

Local level:
- Development Plan Document (DPD) or
- old-style local development plan

> **Box 3.1 Sources of information on planning in England, Wales, Scotland and Northern Ireland**
>
> Planning agencies (with variably helpful websites):
> - England: Communities and Local Government, http://www.communities.gov.uk/planningandbuilding/
> - Northern Ireland: The Planning Service (Northern Ireland): national planning agency, http://www.planningni.gov.uk/.
> - Wales: Welsh Assembly Government, http://wales.gov.uk/topics/planning/?lang=en
> - Scotland: The Scottish Government Planning and Building, http://www.scotland.gov.uk/Topics/Planning
>
> Information about planning systems:
> - England and Wales: http://www.planningportal.gov.uk/
> - Northern Ireland: http://www.planningni.gov.uk/Devel_Control/Planning_System/DCE.htm
> - Scotland: http://www.scotland.gov.uk/Topics/Planning/AdviceGuidance/planning-guides/2482
>
> Planning Aid – free help on planning issues for people and organisations who cannot afford to hire a planning consultant, http://www.planningaid.rtpi.org.uk/

3.2 National level airport planning

National government influences the development of airports in three main ways:
- White Papers and legislation on topics such as air transport and climate change. These are discussed at Section 3.2.1;
- Planning Policy Guidance notes and Planning Policy Statements, which are summarised at Section 3.2.2; and
- Taxation and subsidies, which are summarised at Section 3.2.3.

Government policy is at times inconsistent, no more so than in its approach to airport expansion and climate change. This is discussed at Section 3.2.4.

3.2.1 The Air Transport White Paper, progress report and National Policy Statements

The key national level planning document on airports is currently the Air Transport White Paper (ATWP) of 2003, and its progress report of 2006, which set out a framework for the development of airport capacity in the UK to 2030. Although the ATWP is only a guidance document, in practice it has had significant influence on airport planning, and will continue to do so. As a result of the Planning Bill, it is likely to form the basis for a new National Policy Statement on airports, which will have greater statutory weight. ***Commenting on the Planning Bill is currently the most effective way of influencing this aspect of national policy***.

The Department of Transport published the Air Transport White Paper, 'The Future of Air Transport', in 2003. The ATWP is a blueprint for airport expansion in the UK to 2030: it predicts that demand for air travel will more than double between 2003 and 2030, and responds to this by proposing the increased use and/or extension of more than 30 UK airports and their associated infrastructure.

The ATWP strongly supports airport expansion, whilst aiming to limit and mitigate its impacts on the environment and local residents. Its very first sentences are:

> *"Air travel is essential to the United Kingdom's economy and to our continued prosperity. In the last 30 years there has been a five-fold increase in air travel. And it has opened up opportunities that for many simply did not exist before."*

The tempering note that it adds shortly afterwards – "*The challenge we face is to deal with the pressures caused by the increasing need to travel whilst at the same time meeting our commitment to protect the environment*" – is typical of the 'measured and balanced approach' that it puts forward. Essentially, this 'balance':

- "*recognises the importance of air travel for national and economic prosperity, and that not providing additional capacity would significantly damage the economy and national prosperity;*
- *reflects people's desire to travel further and more often by air, and to take advantage of the affordability of air travel and the opportunities this brings;*
- *seeks to reduce and minimise the impacts of airports on those who live nearby, and on the natural environment;*
- *ensures that, over time, aviation pays the external costs its activities impose on society at large – in other words, that the price of air travel reflects its environmental and social impacts;*
- *minimises the need for airport development in new locations by making best use of existing airports where possible;*
- *respects the rights and interests of those affected by airport development;*
- *provides greater certainty for all concerned in the planning of future airport capacity, but at the same time is sufficiently flexible to recognise and adapt to the uncertainties inherent in long-term planning.*"

Many critics claim that the ATWP is based on a technique called 'predict and provide': This is very different to other forms of infrastructure planning, which use the 'plan – monitor – manage' approach (see Box 3.2).

Box 3.2 'Predict and provide' versus 'plan – monitor – manage'

For many years, the UK planning system used the 'predict and provide' approach: planners predicted the type and amount of development that would be demanded in the future based on past trends, and then aimed to provide the land and planning framework to accommodate that development.

However about 15 years ago, planning underwent a fundamental shift, due in part to the realisation that development will never be able to meet all future demand. Government research had shown that new roads don't just help to spread out existing traffic, but actually spawn traffic, so we cannot build our way out of congestion (SACTRA, 1994); and people's demand for water and electricity were continually increasing. The Government's new approach, 'plan, monitor, manage', no longer aims to provide for predicted demand, but instead emphasises reduced demand, and flexible plan-making whose effectiveness is monitored, and which is adjusted if necessary.

The major exception to this evolution towards 'plan, monitor, manage' is the ATWP. The ATWP predicts future demand for air travel and caters for it. It uses the terms 'need' and 'demand' interchangeably, although demand for air travel will always be greater than the actual need for it: for instance, it aims to "take a view of the long-term demand for... airport capacity" (para. 1.6), and provide for the "airport capacity needed over the next 30 years" (para. 4.1). It makes no attempt to reduce people's demand for air travel.

Appendix A summarises the ATWP's main conclusions for individual airports. The ATWP encourages airport operators to bring forward plans for increased airport capacity in the light of the ATWP, and to prepare masterplans for the future development of their airports as soon as possible.

In 2006, the Department for Transport published the Future of Air Transport Progress Report, which "demonstrates the progress... made in delivering a sustainable future for aviation". It responds to some of the themes raised in the Stern (2006) review on the costs of climate change and the Eddington (2006) study into transport and economic competitiveness. It reports on the Government's work towards including aviation emissions in the European emissions trading scheme, and provides information on changes at airports since the publication of the ATWP (DfT, 2006).

The Planning Bill of November 2007 aims to speed up and centralise the planning of nationally significant infrastructure. It was proposed in part because of the length of the public inquiry into Heathrow Terminal 5, which lasted nearly four years. It would, if enacted, lead to two major changes in airport planning:
1. the ATWP would be turned into a National Policy Statement, and
2. decisions on some major airport developments would be taken by a national infrastructure commission.

In theory, before a National Policy Statement can be designated, it must be subject to sustainability appraisal and public consultation. However, some of the current proposals in the Planning Bill suggest that these requirements might be bypassed for the National Policy Statement on airports. In particular, clause 11 puts forward retroactive provisions which might mean that the ATWP could be converted into a National Policy Statement without a new round of sustainability appraisal and public consultation. Box 3.3 cites key sections of the Planning Bill.

Box 3.3 Extracts from the Planning Bill (House of Commons, 2007)

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5 National policy statements

(1) The Secretary of State may designate a statement as a national policy statement for the purposes of this Act if the statement – (a) is issued by the Secretary of State, and (b) sets out national policy in relation to one or more specified descriptions of development....

(3) Before designating a statement as a national policy statement for the purposes of this Act the Secretary of State must carry out an appraisal of the sustainability of the policy set out in the statement.

(4) A statement may be designated as a national policy statement for the purposes of this Act only if the consultation and publicity requirements set out in section 7 have been complied with in relation to it.

(5) The policy set out in a national policy statement may in particular –
    (a) set out, in relation to a specified description of development, the amount, type or size of development of that description which is appropriate nationally or for a specified area;
    (b) set out criteria to be applied in deciding whether a location is suitable (or potentially suitable) for a specified description of development;
    (d) identify one or more locations as suitable (or potentially suitable) or unsuitable for a specified description of development;...

> **11 Pre-commencement statements of policy, consultation etc.**
>
> (1) The Secretary of State may designate a statement as a national policy statement for the purposes of this Act even if – (a) the statement has been issued by the Secretary of State before the commencement day, or (b) the statement sets out national policy by reference to one or more statements issued by the Secretary of State before the commencement day.
> (2) If an appraisal of the sustainability of the policy set out in a statement is carried out before the commencement day, the Secretary of State may treat the appraisal as meeting the requirements of section 5(3).
>
> (3) The Secretary of State may take account of consultation carried out, and publicity arranged, before the commencement day for the purpose of complying with the requirements of section 7.
>
> (4) "The commencement day" means the day on which section 5 comes fully into force.

In addition, under the Planning Bill, instead of the current system of local authority planning decisions, an independent Infrastructure Planning Commission would make decisions on a limited number of major projects. For airports, these would be:

- The construction of airports in England which provide for at least 10 million passengers per year (mppa), and
- Airport extensions in England involving the construction or extension of a runway or airport building which will increase the airport's capacity by at least 10mppa.

Although these high thresholds mean that relatively few airports would be affected – Birmingham, Manchester, Heathrow and Stansted being the most likely – the proposals raise concerns about local democracy and predetermined decisions.

3.2.2 Planning Policy Guidance Notes (PPG) and Planning Policy Statements (PPS)

The (Department of) Communities and Local Government publishes PPGs and PPSs (PPGs are being slowly phased out) which explain how the planning system should operate with respect to topics such as housing and biodiversity. Local authorities must take PPG/PPSs into account in preparing their development plans and deciding on planning applications and appeals.

***PPG/PPSs provide good, reasonable advice, which can be quoted when commenting on other forms of airport and aviation policy**. Other national government policy sometimes does not follow PPG/PPSs: this is discussed at section Section 3.2.4. There are no specific PPG/PPSs on airports, but related ones are:

PPS1 *Delivering Sustainable Development* sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system. It notes that planning should promote sustainable development by:
- making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life;
- contributing to sustainable economic development;
- protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities;
- ensuring high quality development; and

- ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.

It also notes that regional and local planning authorities should address the causes and potential impacts of climate change through policies which reduce energy use and emissions.

PPS11 *Regional Spatial Strategies* sets out the procedural policy on Regional Spatial Strategies (RSSs) and on how they should be revised. It specifies that national policy will apply unless a regional justification for not doing so is accepted by the Secretary of State. It also lists twelve tests of RSS 'soundness'.

PPS12 *Local Development Frameworks* sets out the Government's policy on the preparation of local development documents which will comprise the local development framework. It specifies that LDDs should be in general conformity with the regional spatial strategy; and lists nine tests of plan 'soundness'.

PPS23 *Planning and Pollution Control* clarifies that air, water or land pollution can be a material planning consideration; and that the planning system has a key role in ensuring that sources of pollution do not affect other uses and developments.

PPS25 *Development and Flood Risk* aims to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk.

PPG13 Transport aims to promote more sustainable transport choices both for carrying people and for moving freight. It suggests that small airports and airfields are likely to become increasingly important in providing the air transport needs of business, recreation, training and emergency services. It states that local authorities should avoid development near airports/airfields if it is incompatible with existing or potential aviation operations; should identify and protect sites and routes that could 'enhance aviation infrastructure'; should 'take account' of the economic, environmental, and social impacts of aviation on local and regional economies; and should, where possible, identify in the development plan conditions needed to limit the environmental impacts of aviation.

PPG 24 *Planning and Noise* guides local authorities on how they can minimise the adverse impact of noise. It outlines the considerations to be taken into account in determining planning applications both for noise-sensitive developments and for those activities which generate noise. It explains the concept of noise exposure categories for residential development and recommends appropriate levels for exposure to different sources of noise. Annex 3 provides specific advice on noise from aircraft, military aerodromes and heliports.

3.2.3 Taxation and subsidies

Government taxes air travel differently – and much less - than other forms of travel. It does not charge tax on aviation fuel. It does not charge VAT on the aviation industry. It allows airport operators to effectively subsidise air travellers through duty free allowances. It does charge air passenger duty (to be levied on aircraft rather than

passengers from 2010 to encourage operators to maximize the use of seats), but this does not make up for these other tax breaks.

It would be difficult to change some of these things. If tax on aviation fuel was imposed unilaterally in the UK, then aircraft would probably fill up in other countries where tax was not charged. A worldwide agreement on tax is difficult to achieve, as exemption from taxation is included in over 2,000 bilateral air service agreements globally. The European Commission, which now has the competence to negotiate new bilaterals on behalf of EU member states, is committed to ending these exemptions. However, it accepts that this is a long-term goal.

Similarly, airline tickets can be bought in any country, so tax on tickets can be evaded. However, all European Union countries impose VAT, so it should be possible to impose VAT on a European basis, if tickets purchased outside the EU were made subject to VAT when used at EU airports.

3.2.4 Conflicting national government policy

Some aspects of national government clearly conflict with each other. The most obvious are:

Airport expansion in ATWP v. PPS1's requirement to deliver sustainable development. One of the key principles of PPS1 is that '*development plans contribute to global sustainability by addressing the causes and potential impacts of climate change – through policies which reduce energy use, reduce emissions*'. However the ATWP clearly goes against ensuring this by promoting the expansion of UK airports that would lead to increased capacity, consequently increased emissions and a significant impact on climate change.

Paragraph 19 of PPS1 also states that '*Significant adverse impacts on the environment should be avoided and alternative options which might reduce or eliminate those impacts pursued*' except where it is '*unavoidable*'. The expansion of most airports directly conflicts with this as there are alternative means of transport that could be used for short-haul flight services, the need for business trips could be reduced through virtual communication, and UK destinations could be better promoted as an alternative to short holidays. Therefore the adverse effects caused by aviation could be said to be "avoidable". True sustainability, rather than create the need to mitigate impacts, would reduce the need for air travel by making it travel less appealing.

Airport expansion in ATWP v. government's climate change targets. The Climate Change Bill of 2007 would put in place a statutory goal of at least a 60% reduction in CO_2 emissions by 2050, with 'real progress' by 2020. However the bill would not include emissions from international aviation at the outset due to difficulties in allocating responsibility for such emissions to different countries. It does make provision to include these emissions when an international agreement on allocation can be found, but there is little prospect of this happening in the short-term as negotiations are currently on hold. If aviation continues to grow at the present rate, it could take up the entire emissions budget for all sectors of the UK economy by 2037, and all sectors of the EU economy by 2040. This clearly conflicts with the primary aim of the bill which is to achieve a reduction in greenhouse gases, of which the aviation sector is a chief source.

3.3 Regional level airport planning

There are eight regions in England, plus London. The key regional-level planning documents currently affecting airport planning are Regional Spatial Strategies (RSS) which are replacing Regional Planning Guidance, and the London Plan. RSSs aim to provide a broad development strategy for the region for 15 to 20 years, although they are reviewed much more often than this.

Draft RSSs are prepared by Regional Assemblies in consultation with stakeholders; are considered by inspectors at an Examination in Public; are rewritten and published in their final form by the Government Office for the region, taking into account the inspectors' Panel Report; and are then implemented, monitored and reviewed by the Regional Assembly.

http://www.autoindustry.co.uk

As part of this process, they are subject to sustainability appraisal / strategic environmental assessment and Habitats Regulations Assessment.
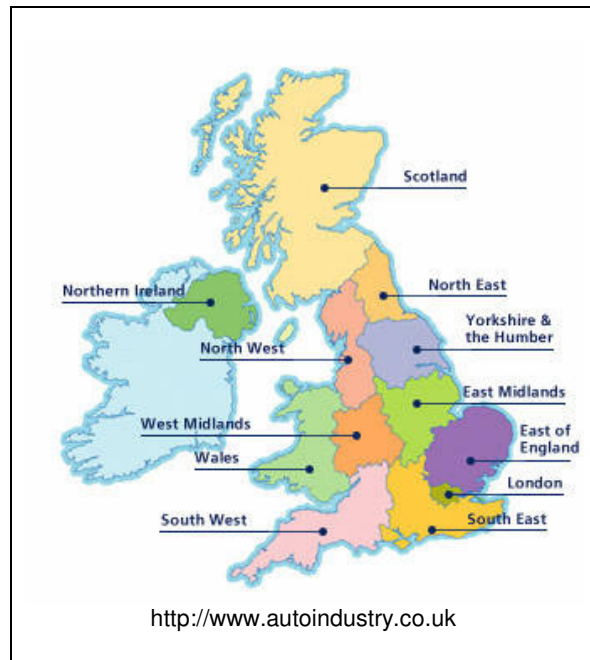
By early 2008, the first round of RSSs was nearing completion. Table 3.1 gives web-links to the January 2008 versions of RSSs: they are still evolving, so are likely to change rapidly.

Table 3.1 Status of, and links to, RSSs

Region	Status in Jan. 2008	web-link to RSS, Jan. 2008
East of England	Further proposed changes published 10.07	http://www.gos.gov.uk/goeast/planning/regional_planning/
East Midlands	Panel report expected early 2008	http://www.gos.gov.uk/goem/psc/suscom/rss/
London	London Plan published 2.04; daughter documents at various stages of development	http://www.london.gov.uk/mayor/strategies/sds/london_plan_download.jsp
North East	Panel Report submitted 8.07; final RSS expected spring 2008	http://www.gos.gov.uk/gone/planning/regional_planning/?a=42496
North West	Panel report submitted 5.07; Proposed Changes expected 1.08	http://www.gos.gov.uk/gonw/Planning/RegionalPlanning/
South East	Panel Report submitted 8.07	http://www.go-se.gov.uk/gose/planning/regionalPlanning/southEastPlan/?a=42496
South West	Panel Report expected early 2008	http://www.gos.gov.uk/gosw/planninghome/regplanning/
West Midlands	RSS published 6.04. Three revisions ongoing	http://www.wmra.gov.uk/page.asp?id=54
Yorkshire & Humber	Proposed Changes published 9.07, final RSS expected 3.07	http://www.gos.gov.uk/goyh/plan/regplan/

In July 2007, Government announced that Regional Assemblies will be abolished in 2010; Regional Spatial Strategies will be integrated within single regional strategies prepared by the Regional Development Agencies (with a clearer economic focus); and local authorities will be given a greater role in scrutiny at the regional level (HM Treasury et al., 2007; CLG/BERR, 2007).

***The most obvious stage at which you can comment on an RSS or its appraisals is during a formal consultation stage which takes place before the Examination in Public; and, in the future, during the development of single regional strategies*.** .

Planning Policy Statement 11 (ODPM, 2004) lists a range of requirements for RSSs, including that they should 'contribute to the achievement of sustainable development' (para. 1.7). It also states that RSSs should plans should be 'sound', and lists 12 tests of 'soundness' including:

> (iii) it is consistent with national planning policy and if not the case has been adequately made for departing from national policy;

> (iv) it is consistent with other relevant regional strategies for the region (e.g. the Regional Economic Strategy), and with RSSs for neighbouring regions where relevant;

> (v) the policies in it are consistent with one another;

> (vi) it is founded on a robust and credible evidence base;

> (viii) it is realistic, including about the availability of resources, and is able to be implemented without compromising its objectives;

> (ix) it is robust and able to deal with changing circumstances;

> (x) it has been subject to a satisfactory sustainability appraisal and alternative options were correctly ruled out taking account of the sustainability appraisal findings (para. 2.49).

These tests of soundness form a good structure for commenting on RSSs.

In part because of the constraints of tests iii) and iv), the main airport-related policies in RSSs tend to support the airport expansion proposals laid out in the Air Transport White Paper (generally more enthusiastically in the north, less so in the south); promote public transport to and from airports; and support the economic development generated by airports, including identification of airport-related employment sites. Box 3.4 shows examples of airport-related RSS policies, with some comments on these policies.

However, it may not be possible for a RSS to meet all of the tests of soundness, particularly if it is consistent with the Air Transport White Paper (as implied by test iii):
- RSS policies may be inconsistent with each other, for instance airport expansion policies with policies on climate change or biodiversity, and so not meet test v). Box 3.5 shows an example of this;
- The RSS may not be able to deal with changing circumstances. For instance a heavy reliance on air transport as a basis for a region's economy would make that economy vulnerable if air transport becomes significantly more expensive or becomes subject to more terrorist attacks. The RSS may thus not meet test vi);

None of the sustainability appraisals for the RSSs state that airport growth is sustainable. As such, alternative options may not be 'correctly' ruled out (as required by test x); and the RSSs may, in part at least, not contribute to the achievement of sustainable development (as required by para. 1.7).

Box 3.4 Examples of airport-related RSS policies (Jan. 2008)

East Midlands

Comments

Policy 15. Development in the Three Cities Sub-Area. ... Development associated with Nottingham East Midlands Airport should be focussed where possible in surrounding urban areas, in particular the Principal Urban Areas of Derby, Leicester and Nottingham and the Sub-Regional Centre of Loughborough.

Policy 55. Development at Nottingham East Midlands Airport. Development Plans, future Local Development Frameworks and Local Transport Plans should:

- provide for the further operational expansion of NEMA within its boundaries subject to rigorous assessment of the full range of its impacts;
- consider the surface access needs of NEMA as part of the wider transport strategy for the area, paying particular regard to the role of public transport, cycling and walking;...

> These are very typical policies on airport expansion, airport-related development and surface access to airports

London

Policy 3C.6 Airport development. The Mayor supports the development of a sustainable and balanced London area airport system, and recognises that further runway capacity in the South East will be required to meet London's needs. This should include substantial new capacity that will support the regeneration of the Thames Gateway as well as servicing the needs of London and its economy as a whole. This policy will be reviewed in the light of the outcome of the current national review of airport capacity.

> Note the potential conflict between regions: runway capacity for London is to be provided by the South East region

Policy 3C.5 London's international, national and regional transport links. The mayor will work with strategic partners to... seek improved access to airports, ports and international rail termini by public transport...

North East

> This is a particularly pro-airport expansion RSS

Policy 21 – Airports. Strategies, plans and programmes and planning proposals should support the development of both North East airports by:
a) supporting the sustainable expansion of facilities at the Region's airports to accommodate and cater for the anticipated growth in passenger numbers to 10 million passengers per annum at Newcastle International Airport and 3 million passengers per annum at Durham-Tees Valley Airport by 2016;
b) maintaining frequent services to London Heathrow Airport;
c) increasing the range of direct European and other international destinations;
d) maintaining efficient surface access links by all modes, particularly by public transport;
e) allowing for the expansion of operational facilities and airport-related development – as set out in Table 2 – within currently allocated land; and
f) ensuring that the needs and preferences of tourists, including both leisure and business visitors are taken into account.

> Just what is 'sustainable expansion'? It is not explained here, and the two words conflict with each other

> Improved train services between Newcastle and London are a much more sustainable alternative

Box 3.5 Example of potentially inconsistent RSS policies

It is difficult to see how Policy 21 of the North East RSS which strongly promotes airport growth (see Box 3.4) squares with Policy 2A on climate change, which states:

> "*All strategies, plans and programmes in the Region shall contribute to mitigating climate change... by: 1a) Helping the Region meet the targets set out in the 2004 Integrated Regional Framework to reduce greenhouse gas emissions to at least 12.5% below 1990 levels by 2010, and carbon dioxide levels to at least 20% below 1990 levels by 2010, by including policies and proposals that... vii) integrate climate change considerations into all spatial planning concerns, including transport...*"

3.4 Local level airport planning

'Old-style' local development plans and unitary plans took a long time to prepare and were perceived as being unable to respond quickly to changing circumstances. The Planning and Compulsory Purchase Act 2004 aims to deal with these problems. It requires local planning authorities to prepare Development Plan Frameworks composed of Development Plan Documents (DPDs) including a Core Strategy; Supplementary Planning Documents (SPDs); a Statement of Community Involvement; a Local Development Scheme which says when DPDs and SPDs will be produced; and Annual Monitoring Reports. Figure 3.2 shows this.

This form of 'portfolio' plan is expected to be faster and more flexible than old-style local development plans and unitary plans, which are being phased out as the new plans are developed. As of early 2008, several dozen local authorities have had DPDs adopted, and most authorities are working on developing DPDs and SPDs.

Figure 3.2 Local Development Framework (ODPM, 2004a)
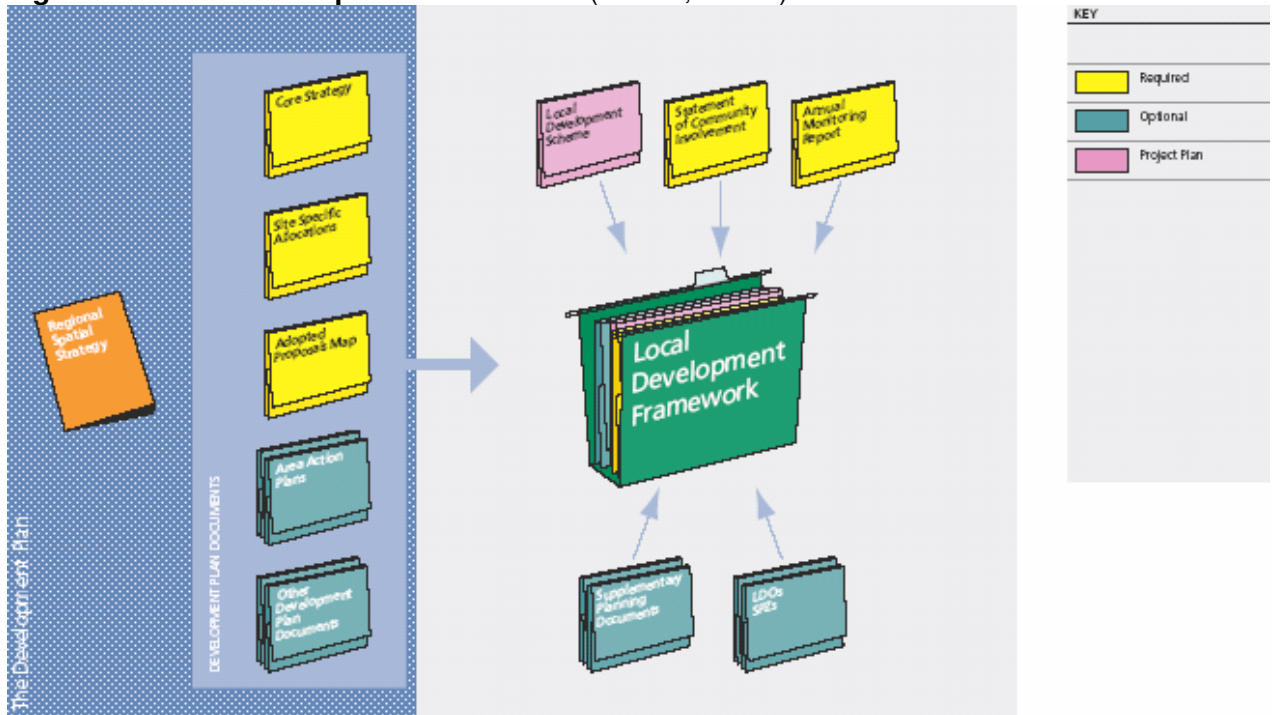
The key local planning document on airport and airport-related development is typically the Core Strategy. DPDs (including Core Strategies) and SPDs are subject to public consultation, in line with the Statement of Community Involvement. **The most obvious time to comment on a DPD is during the formal public consultation period**. However you can also contact your local authority to see whether you can be involved in other ways if you want, for instance in sustainability appraisal workshops.

Airport-related DPD policies generally identify land that will be safeguarded for future airport development and offshoot employment/economic development, promote public transport access to airports, and suggest what 'material considerations' will be taken into account when the planning authority decides whether to permit development or not. Box 3.6 shows examples of airport-related DPD policies.

Comments

Box 3.6 Examples of airport-related Local Plan and DPD policies (Jan. 2008)

Carlisle Local Plan (Carlisle City Council, 2006)
   Policy DP3 Carlisle Airport. Proposals for development at Carlisle Airport will be supported where they are related to airport activities and in scale with the existing infrastructure and minimise any adverse impact on the surrounding environment. Proposals for larger scale redevelopment to facilitate an improved commercial operation will have to take into account the impact of development on uses outside the perimeter of the airport including nature conservation interests, the historic environment including Hadrian's Wall World Heritage Site, the existing highway network and road safety. A strategic employment site has been allocated in Proposal EC20.

> This sets out 'material considerations' that will be taken into account when considering airport proposals: impact on infrastructure, other development uses etc.

Crawley Core Strategy (Crawley Borough Council, 2007)
   G1. Within the [Gatwick] airport boundary as set out on the proposals map, the Council will support the development of facilities which contribute to the safe and efficient operation of the airport as a single runway, two terminal airport subject to satisfactory environmental safeguards being in place. In assessing whether or not particular uses are appropriate within the airport the Council will have regard to the advice in PPG13 (Annex B).

> Note the invisible warning: the council would oppose proposals for a second runway or third terminal

Newcastle Core Strategy (Newcastle City Council, 2007)
   Policy CS1: Spatial strategy. The main spatial elements of the strategy for Newcastle over the plan period are illustrated on the Key Diagram and are as follows... h) the City Centre will further develop as a transport hub and interchange for rail, Metro and bus services and improved links will be provided to the key regional gateways of Newcastle International Airport (within the city) and Port of Tyne facilities (in neighbouring districts).

> Newcastle is clearly treating its airport as a key driver of economic growth for the area.

   Policy CS9: Employment land. Employment land of at least 224 ha will be allocated for development, in accordance with the requirements set out in RSS with the principal locations as follows... f) 55 ha at Newcastle International Airport, for airport related uses.

Planning Policy Statement 12 (ODPM, 2004a) lists nine tests of soundness for DPDs and (indirectly) for SPDs. These are similar to those for RSSs and include:

> iii. the plan and its policies have been subjected to sustainability appraisal;
>
> iv. it is a spatial plan which is consistent with national planning policy and in general conformity with the regional spatial strategy, and it has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas;
>
> vi. the strategies/policies/allocations in the plan are coherent and consistent within and between development plan documents prepared by the authority and by neighbouring authorities;
>
> vii. the strategies/policies/allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base;
>
> ix. the plan is reasonably flexible to enable it to deal with changing circumstances (para. 4.24).

Again, **these tests of soundness form a good structure for commenting on DPDs**, and similar arguments can be made about the difficulty of meeting all of these tests if the plan promotes air port expansion.

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