

Policy 21

Id No Respondent

Policy 21

141 Brethren's Gospel Trusts

We support the sustainable growth and expansion of the two principle airports within the region, which are considered to be essential to the ongoing sustainable economic development of the region and to provide the key gateways into the region.

428 Campaign To Protect Rural England

Air travel is the least sustainable transport mode. Whilst air travel is seen primarily as an economic driver, it cannot take its appropriate place within balanced, integrated transport provision.

Within the 'hierarchy of appropriate modes of transport', air travel is considered appropriate for journeys of 1000 KM and more, with high-speed rail links being appropriate for inter-regional travel.

In addition, evidence from the insurance industry suggests that the economic costs of climate change (to which aviation is a significant contributor) will outweigh any perceived direct economic benefits of air travel within the one or two times the lifespan of the RSS.

This policy and section should be deleted.

102 Durham Tees Valley Airport

DTVA welcomes RSSs support for the expansion of the Airport, the positive statements at the beginning of paragraph 3.33 and, with one qualification, (see below) supports the wording of Policy 21.

The qualification relates to the reference in Policy 21e) to “currently allocated land”. The expansion of DTVA to meet forecast growth may require land for operational requirements and airport related development, which is not currently allocated within a development plan. The current planning application identifies the land required to meet growth to 2015. Longer term land requirements will be set out in the Airport Master Plan which is currently being prepared and which will need to be taken into account in the Development Plan. The present wording pre-judges the consideration of this Master Plan. DTVA therefore objects to this wording and requests deletion of the words “within currently allocated land” from Policy 21e).

DTVA also objects to references to a list of “airport related” uses in paragraph 3.33. In including this list, the RSS refers to the Northern Way Growth Strategy. This strategy has not been the subject of consultation and indeed the inclusion of a work stream to consider this issue and to introduce greater flexibility is not a sound basis for claiming justification for an even more restrictive policy wording. This work is yet to be carried out and the direction it is likely to take has been misinterpreted. Northern Way is about releasing potential not denying it. The Air Transport White Paper recognizes the positive role of airports in regeneration and that they are a focus for new employment development:-

“Airports are an important focus for the development of local and regional economies. They attract business and generate employment and open up wide markets. They can provide an important impetus for regeneration and a focus for new commercial and industrial development. And they are increasingly important transport hubs, especially for the logistics industry”.

“Many airports increasingly act as a focal point for ‘clusters’ of business development. By offering the potential for rapid delivery of products by air freight and convenient access to international markets through the availability of flights for business travel, they can attract inward investment to the region.”

Similarly The Northern Way under the sub heading “Airports attract jobs” noted:

“There is substantial evidence to show that airports attract jobs. Companies who wish to locate on, or near, airports include direct suppliers of services to airport users, high value industries (such as electronic component distributors) – that are part of ‘just in time’ logistics networks heavily reliant on air freight services – and knowledge service industries (such as ICT companies) whose staff make frequent journeys by air to customers and suppliers. Elsewhere, planning policies include a wider definition of ‘airport related uses’”.

“Across the north, there are significant opportunities for new office, industrial and warehouse developments in close proximity to airports. Currently, in accordance with Department for Transport requirements, Airport Area Master Plans are being prepared for each of the North’s airports and adjacent areas in conjunction with the preparation of each Regional Spatial Strategy. It is essential that these plans clearly identify opportunities for a wide range of companies, with due regard to wider regional and city regional objectives.” (emphasis added).

Indeed the evidence can be seen at many airports with business and distribution parks close to them. Liverpool International Business Park on the old Northern Airfield at Liverpool John Lennon Airport has planning permission for 3.3 million square feet (c.310,000 sq m) of unrestricted B1, B2, B8 development. There, a major inward investment has been secured recently for the Bertelsmann printing works, which will deliver over 1,000 new jobs. The airport was an important factor in the decision by the company but the jobs are not themselves directly airport related in the terms set out in draft RSS1. Other airports, for example, Manchester and Nottingham East Midlands have similar business parks which attract not only direct airport related jobs but also those from the types of occupiers who make a great use of aviation services and therefore wish to cluster at airport sites.

The type of uses envisaged by the Air Transport White Paper and the Northern Way are unlikely to fall within the categories of the list included at paragraph 3.33 of the RSS.

In this context DTVA objects to the inclusion of a detailed list of uses appropriate on a particular site as this is not properly a matter for an RSS. We are not aware of any other RSS which adopts such a prescriptive approach to this matter. This level of detail is usually (and more appropriately) addressed in the context of individual planning applications. We suspect that this may well be its origin rather than any strategic requirement.

Notwithstanding this the definition of airport related use found at 3.33 is too restrictive and misses out many types of activities which are aviation related. Much of it is airport infrastructure itself such as aprons, fuel storage and internal highways. It also conversely includes activities which would not be acceptable within some aviation related schemes. For example, an apron or fuel facility would not be appropriate within a prestigious airport B1 office development.

Id No Respondent

Policy 21

The Northern Way states on page 42 that it is intended to agree a new definition of ‘airport related uses’ with the Office of the Deputy Prime Minister within the context of the PSA target for regional economic performance and bridging regional disparities. We feel that it would be sensible to await the results of this work and thus obviate the need to make changes later to RSS. It would be unwise to finalize the issue now in a way which leaves the North East at a relative disadvantage to other regions. In these circumstances the RSS should refer generally to aviation related uses as set out in the wording of Policy 21. DTVA therefore objects to the list of specific uses in paragraph 3.33 and requests that it be omitted.

95 English Nature,

Proposed add new paragraph to end of policy:

“The development of both airports should protect and enhance natural, built and historic environmental assets by ensuring that significant adverse environmental impacts are avoided, mitigated for or, in certain circumstances, provision is made for compensatory measures.”

Reason: to reflect importance of protecting and enhancing natural, built and environmental assets as an integral part of airport development; for consistency with other economic development policies and to counter some of the potential problems highlighted in the Sustainability Appraisal.

Propose inclusion of explicit statement about limitations to the environmental impacts of air transport, including the extent of the noise footprint that will be allowed from any expanded operations incorporated in policy 21

Reason: The growth in number of passengers using Durham tees Valley Airport by 2016 is anticipated to be 3 million per annum. This will exacerbate environmental impacts of air travel on the region. Main concerns are landscape changes, greenhouse gas emissions, biodiversity losses with additional impacts of increased noise levels. The RSS’s approach to expansion is “predict & supply”. This approach has been abandoned in the UK in the roads sector and is no more appropriate in aviation

200 Environment Agency

3.33 –3.36

Much of the development associated with airports could potentially be detrimental to the environment (e.g. groundwater, surface waters and air quality) and so a statement on protection needs including.

3.33

There is conflict in this paragraph. It states that “sustainable growth is supported” but also that “potential expansion should be encouraged to assist economic prosperity”. It appears that growth of airports will be encouraged for purely economic reasons - if social and environmental considerations are disregarded, the growth is not sustainable.

3.35

“..international air service links are maintained with London Heathrow Airport and improved to other airports..” - Which ‘other airports’ does this refer to. We think short haul flights to UK mainland should be discouraged.

“ensure... that there is sufficient land to enable their expansion of airport related activity..” This looks like ‘predict and provide’. See main comments, and those referring to policy 6.

3.36

We are pleased that “no further green belt deletions should be made round Newcastle International Airport”.

Policy 21

This policy is ‘predict and provide’, unsustainable and in conflict with the sustainable development objectives of the RSS (see main comments).

“b) maintaining frequent services to London Heathrow Airport” - What does this mean? How frequent?

“f) ensuring that the needs and preferences of tourists, including both leisure and business visitors are taken into account” – What is a business tourist?. If “..of tourists, including..” was removed, the sentence would make better sense. See also comments for policy 22. g) and h) - There is no mention of sustainably developing the land already allocated.

“g) there is a robust business case for locating at an airport rather than any other location in the region” - This is not precise enough. Does it just relate to economic reasons?

We note that within the ports section (Policy 22, h) Sustainable Environmental Assessment is required. Although we are not sure exactly what is required here (Strategic Environmental Assessment; Environmental Impact Assessment; the Sustainability Statement required by Policy 2; or something else) we support the sentiment and the requirement should also apply to this policy.

163 Friends of the Earth North East

The continued expansion of the region’s two airports is wholly incompatible with sustainable development due to the major impact that aviation has on climate change. Aeroplanes release greenhouse gases directly into the upper atmosphere, which means the impact is much greater than the gases released by surface transport. The aviation industry is among the fastest-growing source of greenhouse gas emissions in this country and worldwide. If we are to avoid inflicting an environmental, social and economic catastrophe on future generations both in the UK and around the world, it is imperative that urgent action is taken to reduce emissions of greenhouse gases. This means that while airports will continue to have a role in the transport system, further expansion cannot be supported. We particularly object to the use of the word ‘sustainable’ in Policy 21, as this is to misrepresent its true meaning.

Paragraph 24 of Annex B of PPS 11 states that “Future reviews of the RSS will need to be consistent with the conclusions of the White Paper.” Paragraph (a) of this policy should be withdrawn because the growth forecasts supported at both airports by 2016 are not consistent with those of the White Paper: in the case of Newcastle airport, they are effectively double the White Paper forecast - “around 10mppa by 2030” ATWP para.8.26; in the case of Teesside international airport, they are effectively quadruple the White Paper forecast – “by 2030 forecasts suggest that passenger traffic could be double current levels [0.7mppa], and perhaps more” 8.31

In addition, paragraph 12.9 of the White Paper states that “These documents [RSS] should in turn take account of airport master plans when they are revised”. In the case of Newcastle airport, the AMP which was revised in 2004 was prepared on the basis of forecasts produced before the White Paper was published; in the case of Teesside airport no AMP has been produced.

Consequently, it cannot even be argued that RSS is simply following Government policy by supporting the growth levels anticipated by the ‘Future of Air Transport’ White Paper. Moreover, the South East Regional Assembly has recently taken the decision to reject the assumptions in the White Paper and to take a different policy stance from the Government. The Assembly conducted its own research into what the impact of the proposed aviation growth would mean for the South East, and concluded that:

‘...such scale of development would imply levels of emissions and other impacts that would be unacceptable with the Government’s own national Sustainable Development Strategy, and its energy and transport policies. The Assembly therefore does not consider that at the present time it would be appropriate to include proposals for further expansion at either Heathrow or Gatwick in the plan....’

We recommend that the North East RSS adopts a similar approach so that its airport policy sits within the Strategy’s overarching sustainable development framework, and is consistent with the vision of ensuring a sustainable, high quality of life for future generations.

We would like to see Policy 21 substantially revised as follows:

Point a) should be deleted as it is not consistent with the Air Transport White Paper.

Points b) and c) should be deleted as it is not appropriate for the RSS to address these issues.

Point d) should set challenging targets for improvements to sustainable transport access to both airports. Please see our comments on policy 49.

Point e) should not be included until the airport master plans required under the Air Transport White Paper have demonstrated a need for such expansion and land allocations, which are then independently assessed as necessary and without adverse environmental or social impacts.

Point f) should be deleted because (i) it is ill-founded: the proposed expansion of capacity at the two airports is not required to meet the needs of these two identified sectors; and (ii) it ignores the dis-benefits to regional economic activity of expanding airport capacity to meet the needs of outbound leisure traffic (see the comments on policy 49).

Safeguarded land allocations at Newcastle and Teesside airports: We do not support this until the Airport Master Plans required under the Air Transport White Paper have demonstrated a need for such land allocations, which are then independently assessed to be necessary and without adverse environmental or social impacts

Proposals for alternative non-airport related uses on allocated undeveloped land: we support g) – k)

Id No Respondent**Policy 21**

329 Friends of the Earth South Tyneside

The continued expansion of the region's two airports is wholly incompatible with sustainable development due to the major impact that aviation has on climate change. Aeroplanes release greenhouse gases directly into the upper atmosphere, which means the impact is much greater than the gases released by surface transport. The aviation industry is the fastest-growing source of greenhouse gas emissions in this country. If we are to avoid inflicting an environmental, social and economic catastrophe on future generations both in the UK and around the world, it is imperative that urgent action is taken to reduce emissions of greenhouse gases. This means that while airports will continue to have an important role to play in the transport system, further expansion cannot be supported. We particularly object to the use of the word 'sustainable' in Policy 21, as this is to misrepresent its true meaning.

The argument is frequently made that the RSS is simply following Government policy by supporting the growth levels anticipated by the 'Future of Air Transport' White Paper. However, the South East Regional Assembly has recently taken the decision to reject the assumptions in the White Paper and to take a different policy stance from the Government. The Assembly conducted its own research into what the impact of the proposed aviation growth would mean for the South East, and concluded that:

'...such scale of development would imply levels of emissions and other impacts that would be unacceptable with the Government's own national Sustainable Development Strategy, and its energy and transport policies. The Assembly therefore does not consider that at the present time it would be appropriate to include proposals for further expansion at either Heathrow or Gatwick in the plan....'

We recommend that the North East RSS adopts a similar approach so that its airport policy sits within the Strategy's overarching sustainable development framework, and is consistent with the vision of ensuring a high quality of life for future generations.

We would like to see Policy 21 substantially rewritten to focus solely on increasing public transport accessibility to both airports, to encourage a far greater proportion of journeys to and from the airport to be made by sustainable means.

The land currently allocated for airport-related uses should only be developed if there is a demonstrable need within the current operating levels of the airport. Any development should not be to increase the capacity of the airport. We support the caveats in the policy aimed at preventing this land being developed for non-airport related uses.

Further, if the current levels of effective subsidy enjoyed by the air industry is removed, say as a result of climate change levies as proposed by the EU, and airlines are forced to pay the cost of their carbon emissions, then the economic viability of many airlines, and the government's own air transport projections, will be in serious question.

4 Friends of the Earth Tyne Bridge

We strongly oppose this policy. Immediately, the notion of "sustainable" growth and expansion of Newcastle International Airport and Durham Tees Valley Airport must be questioned and clarified. This is defined in your glossary as meeting the requirements of the UK Sustainable Development Strategy. Quoting from it, emphasis added:

"We need to significantly reduce our greenhouse gas emissions – at home, at work and when traveling, so that we can change the course of climate change."

1. Policy 21 (Airports) essentially adopts all recommendations of the Newcastle International Airport Masterplan and the draft Durham-Tees Valley version, i.e. it supports a huge increase in passenger numbers (and therefore a huge increase in either flights or size of aeroplanes). Para 3.35 even insists on the importance of promoting links with London Heathrow, even though total journey times centre to centre by train are comparable. UK aviation emits 30 million tonnes of CO2 every year and is the fastest growing source of climate-changing gases, so this

Id No Respondent

Policy 21

expansion has to be incompatible with RSS Connectivity Key Objective 5 (Paragraph 3.180). It is also incompatible with Paragraph 3.183 which seems to tie all planning and policy into reducing carbon emissions by 60% by 2050. These costs must be acknowledged. We would like to see the content of Paragraphs 3.180 and 3.183 included in the actual policy (Policy 21).

of

2. Recent work (Decarbonising the UK, 2005) from the world renowned Tyndall Centre for Climate Research has demonstrated how the current DfT White Paper 2003 predictions for the aviation industry mean that by 2050 it will account for the very nearly entirety of the UK carbon budget. We do not believe that the rest of the RSS will ensure zero emissions equivalent (accounting for the additional radioactive forcing

emissions at altitude) from all other sectors. Therefore there rate of growth of emissions that can be regarded as “sustainable”, in the sense of meeting the needs of the present without compromising those of the future, can at most be regarded as that which is saved from all other sectors and will avert “dangerous climate change”. This is currently thought to be an atmospheric CO₂ concentration of 400ppm (Avoiding Dangerous Climate Change Steering Committee Report, 2005) requiring UK cuts of at around 90% by 2050 (iPPR, Setting a Long Term Climate Objective 2005). Without a specific climate change policy, regional audit of emissions and sectoral targets this will be impossible to judge. Consequently untrammled growth of the airports cannot be accepted.

3. Policy 21 is also incompatible with several other documents quoted in the RSS. The Government’s Transport White Paper “Better for Everyone” quoted in the Transport Technical Paper condemns “predict and provide” policies and insists that people’s transport choices cause less environmental damage, while the Air Transport White Paper of 2004 says that the impact of airports should be minimized and that the aviation industry should pay for the cost of its activities on the rest of us. Sustaine’s IRF of 2004 insists on sustainable development (Transport Technical Paper, Paras 2.30– 2.32), while the RSS’s Connectivity Introduction Para 3.170 says all transport decisions must be taken “within the principles of sustainable development”. Tyne Bridge Friends of the Earth believe that targets must be set for the aviation sector to reduce its emissions to 8 per cent below 1990 levels by 2010 and to 15-30 per cent below 1990 levels by 2020. These targets can either be met by direct cuts in the sector’s emissions or by paying for emission reductions in other sectors through any future emissions trading scheme. Newcastle International Airport could offset all emissions from flights via the Carbon Neutral Newcastle Scheme, or adopt Friends of the Earth’s Alternative Airport Masterplan. Just as demand management measures are proposed for road transport (Key Challenges, para 1.27, p12) recognizing the negative economic, social and environmental costs of increased congestion and traffic growth, FoE Tyne Bridge proposes the same for aviation; moderate, managed growth of aviation sector with emissions more than offset by other sectors. Our proposals have been submitted to Newcastle City Council as an alternative AMP.

4. Policy 21 on airport expansion seems to be informed by the Northern Way Growth Strategy however there are several economic arguments against airport expansion that are not addressed:

- the aviation industry also enjoys a privileged tax-free status through duty free on flights outside the EU and exemption from tax on aviation fuel and VAT. These exemptions add up to about £10 billion per year for the UK alone of which less than £1 billion is recovered through Air Passenger Duty. For the North East they amount to £393 million per year. This needs to be factored in when the economic and employment benefits of the airport are assessed, i.e. £393 million is effectively lost from the regional economy each year. This money could be used to provide better public transport or public services like schools and hospitals.

- Tourism: tourists leaving the region spend 5 times as much abroad as their foreign counterparts here in the North East: how does having lots of flights out of the region help local investment? We currently have a huge tourism deficit of £762 million per annum. Anticipated growth in inbound receipts is highly unlikely to address the current £761m annual deficit. The regional tourist industry is estimated to account for 10% of the region’s workforce (NE England Tourism Strategy 2005-2010) the majority of which are domestic travellers. The RSS should not undermine

Id No Respondent**Policy 21**

this vital industry which brings valuable income to rural areas by encouraging the flight of capital from the economy. The National Trust estimates that 38,000 jobs in the region are dependant upon the high quality of the environment whilst the Newcastle International AMP estimates that only 4580 jobs, direct, indirect and induced are associated with the airport. Given that the UK has a stronger economy than many other parts of Europe, in the short to medium term the growth in inbound tourists is unlikely to match the growth in outbound tourists (estimated at 1.8% and 5% respectively since 1995) and hence this policy must be recognized as a significant threat to the regional tourist industry.

- the low-cost airline business model driving much of the current growth requires minimization of employment through adopting practices like web-based booking. Therefore airports' job growth forecasts have turned out to be over optimistic. This is demonstrated by comparing direct, indirect and induced employment figures at Newcastle International in 1999 (4,580 jobs) with the present (only 3,000 jobs). It is hard, therefore, to see how the airport will employ 10,000 people in 2016 as they are predicting.

5. The safe guarding of land allocated for airport related uses should be qualified to recognize the transport and accessibility implications of expansion on an out of town site. An additional clause 1) should be inserted:
 "there will be a consequential reduction in the number of journeys by private car and any movement increases will be accounted for by modal shift to public transport, walking and cycling in support of Policy 51"

215 Government Office For The North

The safeguarding of 80 hectares of land at Durham-Tees Valley Airport and 55 hectares of land at Newcastle International Airport for airport-related uses requires more detailed justification. Brief references within Technical Papers 2 and 10 are insufficient. How does the RSS influence services to Heathrow and why?

195 Grainger Trust

The need for the development of two major airports in the region is recognized. However, the expansion of airport facilities can impact upon future development potential within the flight path.

New developments within the flight path can be significantly constrained by additional noise mitigation requirements and Health and Safety issues. The impact of these issues needs to be considered during planning phases of airport extensions.

The supporting text in paragraphs 3.33 to 3.36 needs to be altered to take these factors into account.

160 Highways Agency

Support the growth of the 2 regional airports at Newcastle and Durham Tees valley airports, which have in addition 55ha and 80ha of development land respectively at each. They are targeted to expand significantly by 2016, local plans should reflect and support this and the need to improve surface access links

667 Member of Public

Oppose enlargement of existing airports on following grounds:
 it is based on assumption that passenger numbers will increase to 10 million at Newcastle Airport and to 3 million at Durham Tees valley by 2016. Instead of allowing this growth steps should be taken to see that it does not occur.
 Any increase will be add to the already dangerous level of pollution
 It will be an additional drain on oil resources
 It will mean more land coming under concrete/tarmac/buildings for no good purpose

Id No	Respondent	Policy 21
550	Member of Public	<p>I oppose this policy.</p> <p>The expansion of the regions airports will cause a significant rise in Green House Gas emissions. We should be seeking to reduce GHG's in line with National and International targets and should not be planning activities which will lead to increases. If we as a Nation have to decrease our GHG emissions by 20% by 2020, how can we allow increased airport traffic without first developing a comprehensive strategy to mitigate these increases elsewhere? How will we offset the increase from the air traffic? Will we increase our targets for generation of renewable electricity, or decrease the target emissions from private car traffic? If emissions in one sector go up then emissions somewhere else must go down, but nowhere in the RSS do you pull together these different contributing sources and show how they will all fit into the jigsaw.</p>
432	Member of Public	<p>To summaries – airport expansion should not be allowed to go ahead unless the subsequent increase in GHG's is fully offset elsewhere.</p> <p>I oppose the inclusion of this policy on the basis that air transport is inherently unsustainable, making point a) absolute nonsense:- “supporting the sustainable expansion of facilities at the region’s airports to accommodate and cater for the anticipated growth in passenger numbers” Aviation has a major impact on climate change, and is the fastest-growing source of greenhouse gas emissions. Further, it is artificially supported by an effective government subsidy of up to £7bn through tax-free fuel and duty free sales. This is fuelling the recent growth surge in cut-price airlines. If the subsidy is removed and airlines are forced to pay the cost of their carbon emissions, then the economic viability of many of these airlines, and the government’s own air transport predictions, will be in question. Policy 21 should be rewritten to focus on: increasing public transport accessibility to both airports, to encourage a far greater proportion of journeys to and in from the airport to be made by sustainable means. increasing and supporting the use of rail travel for UK and near Europe destinations</p>
471	Member of Public	<p>Any significant expansion of facilities at the region’s airports cannot be sustainable. The environmental impact (including greenhouse gases and noise) is not justifiable, and furthermore, development of airport sites may pull investment away from established urban centres. The main component of projected increases in passenger traffic is acknowledged to be travel from the North East to foreign tourist destinations. As the impact of climate change becomes more apparent, this will become less acceptable and is not likely to be an established feature of our lifestyles in the longer term.</p>
453	Member of Public	<p>Agree with FoE response. Expansion of airports is incompatible with sustainable development due to impact aviation has on climate change The North East Assembly should adopt a similar approach to that of the South East regional assembly which rejected the Government's policy</p> <p>The policy should be rewritten to focus solely on increasing public transport accessibility to both airports</p> <p>land currently allocated for airport use should only be developed if their is need within the current operating levels of the airport and not to increase the capacity</p> <p>support caveats preventing this land being used for non airport uses</p>

Id No		Respondent	Policy 21
760	Member of Public		<p>supports the expansion of Newcastle International and Durham - Tees Valley Airports , despite the fact that aviation is a massive contributor of greenhouse gas emissions. Expanding airports and increasing flights leads to climate change, and is totally incompatible with the UKs Kyoto commitments. The RSS itself insists that transport plans must seek to reduce climate change, and para 3.183 says carbon emissions should decrease.</p> <p>Expanding airports is also contrary to the 2004 Air Transport White Paper, which said that the impact of airports should be minimized and that the industry should pay for its damage.</p>
449	National Trust North East		<p>The Trust attaches evidence to this response by way of the “Blue Skies Report” which was undertaken by the Trust to show how aviation can be an economic cost to the local economy. This report was sent in earlier with initial responses but no reference has been made to the environmental and economic costs of airport expansion.</p> <p>There is no such thing as “sustainable expansion of airports” – it is an oxymoron!</p> <p>The Policy is contrary to the principle of sustainable development, which now has to be at the heart of the planning system.</p> <p>It is contrary to the Regional Sustainability Objectives as identified in the IRF: It is contrary to:</p> <p>Objective 5: To ensure good local air quality for all Objective 7: To reduce the causes and impacts of climate change Objective 8: To protect and enhance the region’s biodiversity Objective 17: To reduce adverse impacts on global communities.</p> <p>It is also contrary to the requirements set out in the Government’s own Energy White Paper on reducing CO2 emissions, and associated targets. It is also contrary to the UK Sustainable Development Strategy, and all the provisions contained within that document, particularly in Chapter 4 on Climate Change.</p> <p>It is contrary to the requirements of PPS1, for Regional Planning Bodies to recognize the importance of Climate Change in planning.</p> <p>It is contrary to S37 of the Planning Act, where it is a requirement that sustainable development should guide planning.</p> <p>In fact the ONLY document that supports this policy, is the Air Transport White Paper, which has long since been superseded by other documents outlined here and elsewhere in our comments on the RSS.</p> <p>The Policy should be deleted.</p>

Id No Respondent**Policy 21**

94 Nectar

Paragraph 3.35

No evidence has been provided in the Regional Spatial Strategy or in the Technical Background Paper No.10: Transport to support the claims for air transport which are made in Paragraph 3.35; NECTAR urges that this paragraph be re-written to reflect reality or deleted altogether. It is noted that surface access issues are considered in Policy 49.

Policy 21 is opposed by NECTAR.

Policy 21 is out of context and its content, revised, should be transferred to Section 3D where it is already considered under Policy 49. Alternatively, new Policies should be included in this Section of the Strategy to set out the economic importance of rail and road for passengers and freight into and out of the region. The expansion of airports is unsustainable and incompatible with the need to contain and reduce CO2 and other emissions; developments at the airports should be designed to improve the sustainability of the overall operation; further land grab should not be supported.

The role of air travel should be presented in perspective; the East Coast Mainline Railway stations bring a comparable if not greater number of people into the Region and the roads perhaps more. The land grab proposed for the airports, is based on unbridled predict and provide forecasts and is unsustainable. The Technical Background Paper No.10: Transport gives a very partial statement on the economic impact of an airport which relies largely on circumstances elsewhere and does not address the key factors of the net outflow of tourists (cost nationally £17billionpa), the aviation fuel and VAT exemptions (cost nationally £10billionpa) or the environmental costs and consequences related to aircraft CO2 and other emissions. The figures quoted in the Technical Background Paper No.10: Transport serve to show how small the volume of business is nationally at around 10% of the passengers carried by the rail and 5% of those carried by the bus industry.

No evidence has been provided for the claimed relevance of London Heathrow airport (Policy 21 b); London destinations can be reached as quickly by rail now and an even quicker option will be available by the high speed rail link being studied by the DfT (High Speed Line Study, Atkins for DfT, 2005). Rail links are a more sustainable option generating far less CO2 and other emissions than air services; Policy 21b should be amended to reflect these points. Air service development should be restricted to journeys of 1 000 Km or more.

341 Newcastle City Council

Policy 21 seeks to support development of the two airports in the regions, but also to control development to an extent. The Council supports the joint Tyne and Wear response on this policy and reiterates the view expressed there that the use of land currently allocated for airport related development should be for that purpose and that there should not be a general expectation that it might be released for other purposes. The Council notes policy 21 as currently worded contains a set of tests against which such proposed release might be judged. The Council believes that the tests are sensible and workable. However on balance the Council believes that the tests should not be in the policy as such, as this gives the impression rightly or wrongly that RSS is in some way supportive of non airport related uses on the land, but in the text. The Council knows that Newcastle International Airport requires by far the larger part of the 55ha referred to in policy 21 for airport related development. The Council is not so sure that Durham Tees Valley Airport's allocation of 80ha is required to the same degree. It may be that the policy should be reworded to differentiate between the position of the two airports and their allocations.

Id No Respondent**Policy 21**

241 Newcastle International Airport

Airports

3.33 The sustainable growth and expansion of Newcastle International Airport and Durham-Tees Valley Airport for airport-related development is supported. The airports are important drivers of the region's economy, acting as key Gateways into the region for business, tourism and leisure purposes. The airports play an essential role in maintaining and attracting new development and investment in the region and are significant sources of employment in their own right. It is important to safeguard land for expansion at the region's airports as it is a finite asset and potential expansion of the airports should be encouraged to assist economic prosperity. The Northern Way Growth Strategy advocates reviewing the definition of airport-related uses at airports. In view of this the RSS definition of appropriate airport related development includes:

- Aircraft apron
 - Aircraft maintenance
 - Airline sales, reservations and booking office
 - Airline training centres
 - Aviation and vehicle fuel storage facilities
 - Avionics maintenance and supply
 - Car hire operations and parking
 - Petrol filling station
 - Flight packaging, provisions and supply units
 - Hotel, conference and ancillary activities
- In-flight and terminal catering preparation and storage facilities
- Internal highways and infrastructure
 - Offices for ancillary and supporting functions
 - Service vehicle maintenance and valeting operations and
 - Warehousing and offices for air freight forwarders and agents

The policy for the sustainable growth and expansion of Newcastle International is supported. The list of appropriate airport related development needs to be expanded to include:

- The support and supply activities associated with aircraft maintenance
- Short, medium, long stay and staff parking
- Offices for companies requiring an Airport location
- Operational infrastructure and facilities including runway, taxiways and control tower
- Passenger terminal including retail and catering activities
- Ancillary convenience store / catering associated with a petrol filling store

3.34 However, it may be acceptable to allow other appropriate uses if a valid business case for location at the airport rather than other locations in the region is presented and it can be demonstrated that there will be no adverse impacts on the delivery of the wider RSS objectives, particularly in relation to town and city centres, regional brownfield mixed use development sites, prestige employment sites and other employment land.

The proactive approach outlined above is welcomed by NIAL. The airport masterplan document sets out justification to this change in policy in Sections 2 and 5. By allowing a broader range of commercial development at the Airport, in line with national and regional policy objectives, the Airport will retain its ability to act as a key regional centre of employment growth as well as a transport hub.

3.35 The 'Air Services White Paper: the Future of Air Transport' sets out the anticipated growth rates at both airports. The key to their continued growth will be to ensure that national and international air services links are maintained with London Heathrow Airport and improved to other airports, and that there is sufficient land to enable their expansion of airport related activity. Improving public transport surface access to both airports will also be important to contribute to wider RSS objectives including encouraging modal change. Specific surface access issues are set out in policy 49

NIAL supports the 'Air Services White Paper: the Future of Air Transport' and the anticipated growth at the Airport.

3.36 The Guidance on Preparation of Airport Masterplan's produced by the Department for Transport states that proposals for mitigation measures, for example, emission controls and measures to address landscape and biodiversity impacts should be a major component of airport Masterplans. Although such Masterplans are produced by airports themselves and do not have planning status as such, they will perform a useful complementary function to this RSS and emerging Local Development Frameworks. Significant land is allocated for airport-related uses at both airports. No further greenbelt deletions should be made around Newcastle International Airport.

NIAL have produced a draft Masterplan in line with these requirements. This draft document will be adopted by the airport later in the year in line with Government Guidance.

Policy 21 Airports

Strategies, plans and programmes 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) improving service access links by all modes, particularly by public transport;
- e) allowing for the expansion of operational facilities and airport-related development within currently allocated land; and
- f) ensuring that the needs and preferences of tourists, including both leisure and business visitors are taken into account.

Id NoRespondent

Policy 21

Relevant Local Development Frameworks should safeguard land currently allocated for airport-related uses but not yet developed (80 hectares at Durham Tees Valley Airport and 55 hectares of land at Newcastle International Airport for airport related uses. Any proposals for alternative non-airport related uses on allocated undeveloped land or on land already in active operational use should demonstrate that:

- g) there is a robust business case for locating at an airport rather than any other location in the region;
- h) there would not be a negative impact on the vitality and viability of city and town centres;
- i) the development could not be accommodated on a Regional Brownfield Mixed Use development site or a Prestige Employment Site;
- j) the development would not detract from the development of allocated employment sites; and
- k) the development would not lead to demands for further airport-related land allocations, or Green Belt deletions in the case of Newcastle International Airport, within the lifetime of the RSS

NIAL supports the above policy and the need for a sequential test for development. NIAL would require a widening of the airport related development policy as in Section 3.33

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|-----|------------------------------------|--|
| 217 | Northumberland & Newcastle Society | remain oppose to expansion of Newcastle airport on grounds of impact on climate change |
| 338 | Northumberland Tyne & Wear NHS | Economic benefits but issues over sustainability, pollution and other health effects. |
| 339 | Ponteland Parish Council | Support policy of airport expansion within current allocated land but would object to expansion into the greenbelt. The Council also has concerns regarding increased noise and reduction in air quality associated with increased air travel and traffic |
| | | |
| 66 | Railfuture | <p>Paragraph 3.35</p> <p>No evidence has been provided in the Regional Spatial Strategy or in the Technical Background Paper No.10: Transport to support the claims for air transport which are made in Paragraph 3.35; Railfuture northeast urges that this paragraph be re-written to reflect reality or deleted altogether. It is noted that surface access issues are considered in Policy 49.</p> |

POLICY 21: AIRPORTS

Policy 21 is opposed by Railfuture northeast.

Policy 21 is out of context and its content, revised, should be transferred to Section 3D where it is already considered under Policy 49. Alternatively, new Policies should be included in this Section of the Strategy to set out the economic importance of rail and road for passengers and freight into and out of the region. The expansion of airports is unsustainable and incompatible with the need to contain and reduce CO2 and other emissions; developments at the airports should be designed to improve the sustainability of the overall operation; further land grab should not be supported.

The role of air travel should be presented in perspective; the East Coast Mainline Railway stations bring a comparable if not greater number of people into the Region and the roads perhaps more. The land grab proposed for the airports, is based on unbridled predict and provide forecasts

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Policy 21

and is unsustainable. The Technical Background Paper No.10: Transport gives a very partial statement on the economic impact of an airport which relies largely on circumstances elsewhere and does not address the key factors of the net outflow of tourists (cost nationally £17billionpa), the aviation fuel and VAT exemptions (cost nationally £10billionpa) or the environmental costs and consequences related to aircraft CO2 and other emissions. The figures quoted in the Technical Background Paper No.10: Transport serve to show how small the volume of business is nationally at around 10% of the passengers carried by the rail and 5% of those carried by the bus industry.

No evidence has been provided for the claimed relevance of London Heathrow airport (Policy 21 b); London destinations can be reached as quickly by rail now and an even quicker option will be available by the high speed rail link being studied by the DfT (High Speed Line Study, Atkins for DfT, 2005). Rail links are a more sustainable option generating far less CO2 and other emissions than air services; Policy 21b should be amended to reflect these points. Air service development should be restricted to journeys of 1 000 Km or more.

190 Sedgefield Borough Council

The support given to the sustainable growth and expansion of Newcastle International and Durham-Tees Valley Airports for airport-related development is welcomed. However, it is important that the potential arbitrary restrictions placed on the growth of Durham-Tees Valley airport in terms of passenger numbers in the Consultation Draft RSS have been removed as they could have unduly hampered the employment and economic potential of the Tees Valley City Region. The Region requires dynamic airports able to respond to opportunities. Policy 21 is therefore supported. It is however important that the growth in demand and economic activity associated with the airport is managed effectively in terms of the environmental and transportation impacts. There is a need for the Regional Transport Strategy and Local Transport Plans' to provide an integrated transport framework that enables the airport's economic growth potential to be realized in a manner that enables the employment opportunities created to be accessed across the City Region area.

The Borough welcomes the importance given to provide an effective regional transport network that ensures that the benefits offered by good transport links are secured by all socio-economic groups through accessibility to jobs, learning and other key public services. It is also important that the RSS encourages the delivery of goods from the South East of England by means other than heavy goods vehicles, such as by air, sea and rail. This could have a significant impact on the congestion levels experienced on the Region's motorways. It is important that the RSS provides a policy framework to enable this change in delivery pattern to occur. To some extent, the Submission Draft RSS achieves this aim through the policies supporting development at the Region's airports and seaports. However, the RSS continues to be weak on rail issues and it is therefore important that the RSS recognizes the benefits offered by, and commits to the proposed TurSDale Road-Rail Freight Interchange, close to Durham City and to the north of the Borough.

Sedgefield Borough Council supports the sustainable growth and expansion of Newcastle and Durham-Tees Valley Airports' but that this expansion should be managed by reference to environmental and transport impacts.

In order to provide a balanced transport network, the Borough seeks the allocation of the proposed TurSDale Road-Rail Freight Interchange in the RSS rather than rely purely on air and port freight facilities in the Region.

228 Stockton Borough Council

Support is given to the sustainable expansion of facilities at Durham-Tees Valley Airport at Policy 21 through the safeguarding of some 80 hectares of land for airport related uses. This Council had previously objected to the restriction to "airport-related" uses. Whilst this restriction

02 January 2006

Page 15 of 17

Id No Respondent**Policy 21**

is still retained, Policy 21 now includes additional criterion to consider proposals which fall outwith this definition. Policy 21 is to be broadly welcomed, although a corresponding reference to include the employment opportunities of the Airport should be identified at Policy 12 (see earlier representation) .

151 Sunderland ARC

Airports is supported

72 Sven Investments Ltd

Expansion of the Durham –Tees Valley airport (Policy 21) is welcomed along with the commitment to Long Newton Interchange (Table 3) as this will clearly improve the connectivity of the sub-region. However this very expansion will inevitably cause additional traffic to use the strategic road network (A66/A19) across the Tees Valley. It is not clear that the consequences which flow from greater traffic using the A66 and A19 have been fully considered -particularly in terms of the potential impact on other employment objectives.

Given the acknowledged deficiencies which exist within the Tees Valley strategic highway network, it is considered that the RSS should consider more fully the consequential impacts of traffic growth and indicate specifically what capacity improvements are necessary to ensure that airport expansion does not prevent other RSS housing and employment objectives from being implemented within the plan period.

148 Tees Valley Regeneration

TVR support the expansion of Durham Tees-Valley airport and object to the restriction of the undeveloped 80 hectares of land at Durham-Tees Valley Airport to “airport-related uses” only (as defined on page 76). This restriction would serve to stifle the economic benefits that are unique to airport situations and therefore result in the reduced competitiveness of the North East’s airports compared with other international airports in other regions within the UK. There are uses that do not fit within the tightly defined concept of “airport-related uses” that would still benefit from an airport proximate location. TVR therefore propose the expansion of this policy to include other uses where it can be shown that an airport proximate location is beneficial to the operation of that use.

We acknowledge that RANE has attempted to introduce the ability to explore this at the local level, but when combined the alternative proposals tests at (g) to (k) are tantamount to an outright ban on other uses at the airport.

11 Tyne & Wear Authorities (Jointly)

The Tyne and Wear Authorities are extremely concerned about the changing policy emphasis of Policy 21 for Airports and its potential impact on the Prestige Employment Sites in the Tyne-Wear City Region. The allowance in the policy for the possibility of non-airport related development, even with the apparently stringent criteria as set out in the policy, is considered to be inappropriate. There would be strong concerns about such development undermining the economic renaissance of Tyne-Wear and the ability to assist in reversing the out-migration and out-commuting, which are major strategic drivers in the Regional Spatial Strategy. The airports, particularly Durham Tees Valley are not the most sustainable locations for general employment related development. Also any substantial development could prejudice the development of other more appropriate employment sites allocated under Policies 18 and 19 of RSS. It is the opinion of the Tyne and Wear authorities that such development should be directed to the Prestige and other employment sites, except where it can be clearly shown that it is ancillary and subsidiary to other airport related employment. It is understood that the 55 hectares of safeguarded land at Newcastle Airport is expected to be

Id No Respondent**Policy 21**

taken up by airport related development. However no assurance is available for the much larger area of 80 hectares at Durham Tees Valley Airport.

It is requested that Policy 21 is amended to delete reference to non-airport related use except where it can be demonstrated that it is genuinely ancillary and subsidiary to the main airport related uses. It is also requested that the 80 hectares of land reserved at Durham Tees Valley Airport is genuinely needed for airport related expansion.

105 Tynedale Council

The policy on airports supports “the sustainable expansion of facilities at the region’s airports to accommodate and cater for the anticipated growth in passenger numbers to 10 million per annum at Newcastle International Airport by 2016”. This appears to be an acceptance of the figures set out in the recent White Paper. However, while it refers to “sustainable expansion”, this could be interpreted to refer simply to the geographical extent of the airport itself. There ought to be reference to the need to avoid adverse environmental effects of the increased flights involved on the wider environment, energy use etc.

411 VONNE

The plans for massive increases in air travel are extremely hard to reconcile with the commitment the RSS makes to promoting sustainable development. The authors of the strategy have not made a convincing economic case for this policy and do not seem to recognize that as well as creating employment, airports can contribute to money flowing out of the region by making it easier for those living in the North East to spend their money abroad. There is also an obvious issue of atmospheric and noise pollution associated with such development.

We also question the two major international airports in the North East and feel that much could be gained from improved public transport links to Leeds/Bradford and Edinburgh airports. From a UK perspective, sustainable development should not mean half empty planes traveling to the same or nearby destinations from Edinburgh, Newcastle, Durham Tees Valley and Leeds/Bradford.

Connecting the region to other parts of the UK would reduce the need for air travel. Investment in rail links that would drastically reduce journey times from the region to major UK cities would promote sustainable transport and reduce the demand for air travel within the UK which is unsustainable and frankly unnecessary in what is essentially a small country.

The RSS should be more focused on developing a sustainable role for the regions airports rather than promoting their rapid expansion. This is clearly not compatible with promoting sustainable development and as such this policy should be reviewed.

161 World Wild Life Fund UK

Worryingly the comment "sustainable expansion of the regions airports" remains. WWF cannot see any expansion of airports as sustainable. In fact the exact opposite is true with more flights meaning more business and holiday spending leaving the region.