

PLANNING / AIRPORT MASTER PLAN ACTION GUIDE (1)
FEB. 2005

STOP PRESS !! 28/3/05 DEADLINE TO INFLUENCE LOCAL DEVELOPMENT SCHEMES – see ‘URGENT ACTION’ on page 4

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INTRODUCTION

This is the first in a series of 2 action guides that we hope will inform, empower and enthuse local airport campaign groups to get involved to influence local planning. It's also available on our website at:- www.foe.co.uk/resource/action_guides/airport_master_plans.pdf
You should expect to receive the second action guide during April or May 2005.

Why work on planning / Airport Master Plans (AMPs)?

The Government's 2003 Air Transport White Paper (ATWP), announced proposals for the massive expansion of airports all over the country. Subsequently, we've also had new laws that reform the planning system through the Planning and Compulsory Purchase Act 2004.

The scale of the Government's expansion plans combined with the 'gung ho' attitude of many local planning authorities represents a big challenge to local campaigners. But we know that many politicians both local and national as well as the public, are beginning to question the wisdom of allowing unchecked growth in aviation. There are battles to win out there!

Airport operators all over the UK are developing or updating their Airport Master Plans (AMPs) to reflect their ambitious and unsustainable expansion plans. They (and the Government) intend that these business led, expansionist plans will strongly influence (or even become embedded in) the new local planning frameworks. The statutory nature of the new planning framework makes it vital that campaigners and communities have their say in the early stages of the process because it will be much harder to influence airport development later at the planning inquiry stage.

Important Note for Campaigners in Wales, Scotland or Northern Ireland...

Airport Master Plans are being produced by most airports throughout the UK but this guide only deals with the planning system in England. Whilst the information we've provided about AMPs is common to all UK airports, the planning systems in Wales, Northern Ireland and Scotland are different and are also changing. See Appendix 1 for sources of advice and information about planning in those countries/regions.

What we've done so far, what's in this pack and what's to follow later

The first stage of our work on AMPs/planning was to publish a briefing to alert local authorities to the AMP/LDF process. Copies of '*Airport Master Plans – the risks and potential pitfalls for local authorities*' have been sent to Chief Planning Officers (CPOs), Council Leaders and Councillors on the planning Committees of every Local Authority that has an airport within its boundary. We've also sent it to the CPO, Leader and Chair of planning at all neighbouring authorities. We've enclosed the latest¹ version which is also on our website at:- http://www.foe.co.uk/resource/briefings/airport_master_plans0.pdf

This first action guide has Local Development Schemes (LDSs) as its main focus, although it includes information and guidance on other actions as well. **If you do just one thing from this action guide we'd ask you to write to or e-mail your Council as soon as possible about their LDS.** Planning authorities have to submit these to the Government by the end of March, so time is tight if we are to influence them. **Go to page 4 to find out how to do this.**

Ideally we'd also like you to do at least 3 other things:-

- Find out the status of your local AMP
- Start to build links with other local campaigners (if any)
- Make contact with officers and members in your local Council

¹February 2005, the flow chart on page 4 has been revised to reflect the terminology now in use as well as a few other minor changes

We've provided tips and information to help you with these actions on pages 3-6.

If you've more time there are further important actions that you can take and we've provided information and guidance on these to help you. We've graded this work under 'if you have more time..' and 'if you have even more time..' categories. You'll find information and tips for these actions on pages 6-9.

Our precise plans around the rest of the planning /AMP work are not set in stone, but we expect to issue the second action guide to you in April or May. This will provide information and guidance on how to influence AMPs and the Local Development Frameworks (LDFs) that they may fit into. Our working idea at the moment is to produce resources that will enable local campaigners to produce their own AMP that will be an alternative blueprint for the sustainable development of the airport that can be used to influence decision makers.

A Disclaimer!

The new Planning system is enormously complicated as well as being untried and untested. The content of this guide reflects our knowledge and experience at the time of writing but no one can say exactly how the new procedures will work in practice. You can use our feedback form to tell us how things have worked in practice for you, but don't be afraid to ask your Council's planning officers if you need clarification.

THE ACTIONS

1) AMPS AND THE PLANNING PROCESS

A diagrammatic representation of the new planning system showing where AMPs fit into it is on page 4 of our briefing for local authorities. If it looks complicated - don't worry! It isn't necessary to understand all of it to influence it.

The various parts are described in the enclosed briefing:- '*A Local Campaigners Guide to the New English Planning System*' also available on our website at:-

http://www.foe.co.uk/resource/guides/a_local_campaigners_guide.pdf

Where the AMP process is up to at your airport and when to have influence

The ATWP required most² airport operators to produce or update their AMPs by the end of 2004, this timetable has slipped somewhat and a new deadline of the end of 2005 has now been set. However, most airports should have produced a 'statement of intent' by the end of 2004. The Department for Transport (DfT) issued guidance on AMPs for airport operators in July 2004, it's available on their website at :-

http://www.dft.gov.uk/stellent/groups/dft_aviation/documents/page/dft_aviation_031530.hcsp

At the time of writing most airports are some way off producing their AMPs, however, we recommend that campaigners check the timetable that your airport operator is working to.



ACTION: Contact your local airport operator and ask them for the timetable they are working to on their AMP

There is more urgent work to do right now on your Council's LDS but you will want to bear in mind the key pressure points in the AMP process where you can have influence. Getting an idea of when these are now will enable you to plan and focus your campaigning work for 2005.

We have enclosed a generic flow chart showing the possible campaign opportunities in the AMP / planning process for your information. (see appendix 2)

² The ATWP requires all airports with at least 20,000 passenger movements per year to produce an AMP. Smaller airports may produce an AMP if they so choose.

2) LDS – WHAT THEY ARE AND HOW TO INFLUENCE THEM

The LDS is one component of the Local Development Framework (LDF), it is your local Council's timetable for developing their LDF – the crucial statutory planning framework for your area which will guide the future development of your local airport. The LDS will identify the planning documents to be included in the LDF and the dates when they are to be produced however it won't include any detailed information about them. We've enclosed our briefing on LDSs:- '*Local Development Schemes – An Overview*' it's also on our website at:- http://www.foe.co.uk/resource/briefings/a_guide_to_local_developme.pdf



URGENT ACTION! INFLUENCE YOUR COUNCIL'S LDS

If you are only able to do one thing from this action guide we'd ask you to take this action as soon as possible. Councils have to submit their LDS to the Government by March 28th 2005 and as the LDS will outline your Council's work on planning policy right up to March 2007 it is vital that we influence it now.

It's possible that you've already been asked via one of our e-mail action networks to take this action in which case thank you! -it isn't necessary for you to do it again.

If you have web access you can take this action at:-

http://www.foe.co.uk/resource/local/planning/press_for_change/local_development_framework/index.html enter your post code and your name on the letter. We'd also recommend that you 'cut and paste' (from the web version of this action guide) the extra question (below) about Area Action Plans (AAPs). For those without web access we've enclosed a copy of the letter for you to send. The reply you get from your local Council will tell you how seriously they are taking their statutory duty³ to guide sustainable development in your area. Some airports are very close to Council boundaries; if you live in a different local authority area to the airport you can't use the e-mail action and will have to send the hard copy letter instead.

Thank you for taking this action; it will help put pressure on your Council to address sustainability issues. It will also provide you with useful information for your ongoing campaign.

Extra Question:-

(to be inserted after the 'habitats' section on the standard web action letter)

'In relation to XXXXXX airport, the development of this facility will have significant impacts on the local community and environment. The airport must therefore be covered by a specific 'Area Action Plan'. Please advise whether you intend to do this or what alternative planning mechanism will cover the airport area.

(See 'Influencing Area Action Plans' section on page 6 for more information on AAPs)

3) BUILDING LINKS WITH OTHER CAMPAIGNERS



ACTION: BUILDING LINKS WITH OTHER LOCAL CAMPAIGNERS

Whether you're a new or established airport campaigner, if you haven't done this yet we would suggest that you do. Coalition campaigning can be a stronger and more effective way of working but at the very least you'll ensure that you don't duplicate effort! To find out if other airport campaigns already exist in your area contact the Aviation Environment Federation (AEF), their contact details are in Appendix 5

³ More information on Council's statutory duties in relation to sustainable development is contained in Planning Policy Statement 12 (PPS12) (see Chapter 3 and Appendices) on the ODPM website at :- http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_030922.pdf

How to do it:-

When you make contact, you could:-

- Find out when the group meets and go along
- Find out what specific areas they are working on in relation to the airport
- Are they working on planning policy?
- If they are working on planning, what have they done?
- Find out where they could use some additional help from you or your group
- If they haven't already signed up to the FOE campaign network you could suggest that they do so, or at least take the LDS action explained above
- Could you share out the tasks in this action guide so that between you more of them get done?

4) BUILDING LINKS WITH YOUR COUNCIL



ACTION: BUILDING LINKS WITH COUNCIL OFFICERS AND MEMBERS

As well as formally writing to your Council about the LDS, it will stand your campaign in better stead if you have actually met with the relevant Council officers and Councillors. These are the people who are going to ultimately make the decisions about what expansion if any is allowed at your airport so it's important to build links with them. But before you do that a bit of research is needed. If you've built links to other campaigners you may have found that they can help you with this information.

- Who is/are the ruling party(ies) on your Council?
- How is your Council disposed towards expansion at your local airport? (in some cases they will own it!) you can check this by looking at your Council's website and by looking at media coverage of the airport
- Who is the planning officer responsible for the airport area?
- Are there Councillors (of any party) opposed to or even questioning expansion of the airport?
- Do any Councillors sit on the Airport Consultative Committee?

At this early stage you'll want to be gathering information and assessing who your potential allies and enemies are. Looking at the minutes of previous Council planning committee meetings that concern the airport, should give you an idea of where the various Councillors and political parties stand on the issue. Your Council's website or your public library will be able to provide this information as well as information about Councillors, including which ward they represent and which political party. You could ask for a meeting with the relevant planning officer who may well be willing to share his/her view on how the various political groupings stand on the issue as well as giving you the Council's own view.

It's probably also worth approaching the Councillor(s) in your ward – they should in theory take issues up on your behalf, and if sympathetic could be useful allies. However the most powerful Councillor in respect of airport development is probably the Leader of the Council. If you are able to approach them directly so much the better but alternatively go through your ward Councillor.

Whoever you are meeting, here is a non exhaustive list of issues you can raise:-

- Your particular concerns about the expansion of the airport (noise, air quality, road access etc.), ask them what they propose to do about these issues
- Draw their attention (take a copy along) to our 'Risks and Pitfalls..' briefing (see page 2) and ask them how they are going to ensure that the Council takes its sustainable development principles seriously
- In many cases they will be supportive of airport development, it's important in this case to ask them for their reasons why. You don't have to counter them immediately but it's a good idea to make a note of them so that you can counter them later either in a follow up letter to them or in your wider campaign strategy against the

development. Jobs and economic benefits assertions are often used and there are powerful counter arguments that we can use against these⁴.

However strongly you disagree with the views of officers or members it should go without saying that you'll need to be polite and courteous in any meeting with them!

IF YOU HAVE MORE TIME....

There's other important things you can be getting on with as well as those listed above:-

- Write to your Council about their LDF issues paper
- Check what your Council is doing about incorporating your local airport into an Area Action Plan (AAP)
- Respond to any airport organised consultation on community compensation schemes for noise or property blight

5) INFLUENCING YOUR COUNCIL'S ISSUES PAPER'

LDFs are the folder in which the various local development documents sit (for more details see our briefing:- '*A Local Campaigners Guide to the New English Planning System*')

The 'issues paper' is one of the first stages in the development of the LDF, it is an opportunity for local residents to have their views on what issues they want to see included in the LDF process.

Different Councils will be operating to different timetables on the preparation of their LDFs, and in some cases the LDF Issues paper consultation may already be over so it will unfortunately be too late to input.



ACTION: Contact the planning department at your local Council to find out what timetable they are working to. If you are still in time, ask them to send you the consultation document, the level of detail in your response to this will be dictated by how much time you have.



ACTION: If you do just one thing, we would suggest that you submit our **standard response on airport development**, this is in Appendix 3 and you can also cut and paste it electronically from the copy of this action guide on our web site. You will probably want to modify it to suit the circumstances at your own local airport. If you don't have web access we can provide you with a hard copy, contact Simon Bowens from our Transport team (see Appendix 4 for his contact details)



ACTION: If you have more time and want to respond on other issues as well as aviation our '*local campaigners planning guide to the new planning system*' gives guidance on how to do this.

6) INFLUENCING AREA ACTION PLANS (AAPs)

AAPs are detailed plans for discreet areas that are going to be developed, these could include town centres or airports (for example). Your objective with this action should be to ensure that the airport is included in an AAP – because if it isn't any future planning inquiry concerning the airport will rely on your Regional Spatial Strategy (RSS) which will have to conform with the Government's expansionist ATWP (see page 8 for how to influence your RSS)

⁴ See Appendix 1 and also 'Economics of Aviation on the North West' – John Whitelegg published by CPRE and on the web at:- http://www.cprenorthwest.org.uk/policy_and_campaigns/aviation.html

Getting the airport in an AAP will provide an early opportunity to critically examine the local authority's plans for the airport. Airport operators will also be seizing this opportunity to get their AMP adopted into the AAP-so beware!

- **ACTION:** The reply to our LDS action (see above) from your Council will reveal whether they intend an AAP for the airport area, if they haven't we'd suggest that you need to take this issue up with them.

7) RESPONDING TO ANY AIRPORT ORGANISED CONSULTATIONS ON COMPENSATION ARRANGEMENTS

Some airports, as a precursor to producing their draft AMP are consulting residents on their proposals for compensation for property blight and impacts like noise. At the time of writing both Birmingham and Stansted Airports are already in the process of doing this.

There are several ways that a campaigning group can engage in consultations of this sort but it's worth being aware of the pitfalls:-

- Acceptance or promotion of a package of compensation measures by a campaigning group can be construed as acceptance of the airport's 'right' to expand and that compensation fully addresses the 'loss'. Many residents who suffer from the constant noise from aircraft would argue that no amount of financial compensation would make amends for their inability to enjoy an undisturbed summer's day in their garden (for example)
- Compensation schemes are notorious for having strict boundaries (such as postcodes) which can divide communities, down the middle of a road (for example) and it is easy to get embroiled in such arguments at the expense of making the more fundamental arguments against airport expansion.

Having said that, there are a number of ways in which your campaigning group can get involved in compensation consultations.

1. You can raise awareness of any alternative, better schemes that are on offer elsewhere in the UK and abroad in order to pressurise the airport operator into improving their proposals
2. You can make your own response to the consultation using any information gleaned in your research into alternative compensation schemes
3. You can use the consultation to raise awareness of the wider issues about the expansion of the airport and its environmental impact

- **ACTION:** If you decide to do (1) the best way to find out about what other compensation schemes offer is to contact the AEF (contact details in Appendix 5). One quick way to publicise the information is to send a letter to your local paper about the issue, why not send your letter in response to an article or another letter about the issue?

- **ACTION:** For (2) you can make a written response to the consultation, you could also use any public meetings that the airport holds to raise issues.

- **ACTION:** For (3) a letter to your local paper raising the wider issues about the impacts of local and national airport/aviation expansion

IF YOU HAVE EVEN MORE TIME....

There are still more important things that you can do!

You can:-

- Get hold of the Sustainability Appraisal (SA) for your Council's LDF
- Work with other Regional Campaigners to influence the content of the RSS

- Make a submission to influence your Council's Statement of Community Intent (SCI)

8) WHAT A SA IS AND HOW TO GET HOLD OF YOUR COUNCIL'S

The SA is the appraisal process that assesses the social, environmental and economic effects of development plan strategies and policies. The process is the UK implementation of the EU Strategic Environmental Assessment (SEA) directive

Different Councils will be at different stages in preparing their SA and some won't have completed them yet. Their response to the LDS action (see page 4) should tell you what stage they are up to.



ACTION: If the LDS response doesn't provide the information contact your Council and ask them where they are up to.

The Government have produced guidelines on how SAs should be done, you can find them and other SEA/SA documents at: -

http://www.odpm.gov.uk/stellent/groups/odpm_control/documents/contentservertemplate/odpm_index.hcst?n=4136&l=2



ACTION: Compare your Council's SA to the guidelines if it doesn't meet them complain to your Council

9) INFLUENCING YOUR RSS

The RSS replaces the old Regional Planning Guidance. It is the legally binding spatial planning framework for a region which local planning decisions will have to be in conformity with. The nine regions of England are all at different stages in the production of their RSS but in any case they will all be revising them in light of the ATWP. We enclose a summary of where each English region is up to in their RSS process in Appendix 6. You can also get information from your Region's Government office or their website.

Unfortunately, the new planning laws don't allow the right of the public to be heard at the Examination in Public (EiP) of the draft RSS. Friends of the Earth's Regional Campaign Coordinators (RCCs) are consultees but they don't necessarily have the right to be heard. RCCs work on numerous campaign areas and working on airports may not necessarily be a priority for them.



ACTION: We suggest you make contact with your RCC (their contact details can be found in Appendix 6) and ask them if they require help with this aspect of their RSS submission In some cases they will already have aviation covered and in others they may well welcome your help on an area that they aren't able to prioritise!

As the RSS has to conform to the ATWP the main focus of any submission that you make through the RCC must be to challenge any proposed airport expansion that is over and above that contained in the ATWP. This is because the Regional Government Office can't produce an RSS that conflicts with the ATWP. Examples might be small airfields subject to 'new' (not contained in the ATWP) expansion proposals like Wolverhampton or Coventry, or existing airports where the airport operator is proposing growth above that proposed in the ATWP. (Newcastle airport for example)

You'll need to work closely with your RCC in preparing your submission, further information on RSSs is contained in our RSS guide and policy briefing, on our website at:-

<http://www.foe.co.uk/resource/local/planning/resource/index.html>.

Our 'AMP-risks and pitfalls' briefing also provides further info. about the issues that RSS's will need to address.

10) INFLUENCING YOUR COUNCIL'S SCI

What a SCI is and why it is important:-

The SCI is the document that lays down how your Council intends to consult the public in plan making and development control.

SCIs are important because active community participation in the planning process is a vital element of truly sustainable development.

The Office of the Deputy Prime Minister (ODPM) has produced guidelines on how SCIs should be produced. They are contained in Chapter 7 of 'Creating Local Development Frameworks: A Companion Guide to PPS12 which is on the web at :-

http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_032593.pdf

What we've done so far:-

We've sent every Council in England a copy of our SCI briefing. You can download a copy from our website at:- http://www.foe.co.uk/resource/guides/sci_local_authority_guide.pdf

How to influence your Council's SCI:-

Councils will be at different stages in the preparation of this document, the reply that you receive from them to our LDS action (see page 4) should tell you where they are up to.



ACTION: (If there's still time in the process) compare your Council's SCI to the ODPM guidelines and to the key principles contained in our briefing. If the SCI breaches either/both guidelines then complain to your Council. In particular section 7.5 of the ODPM guidance lays down a preparation timetable – make sure your Council's SCI process conforms to this.

APPENDICES

APPENDIX 1 – Sources of Information on planning in Wales, Scotland and Northern Ireland

Wales

A Friends of the Earth briefing sheet on the new planning procedures which are still being finalised will be available by the end of 2005.

In the meantime, for information and advice about the planning system in Wales you can contact:-

Naomi Luhde-Thompson
Friends of the Earth Cymru
33 The Castle Arcade Balcony
Cardiff
CF10 2BY

Tel:- 029 2022 9577

Fax:- 029 2022 8775

E-mail:- naomil@foe.co.uk

Scotland

For information and advice about the planning system in Scotland contact:-

Friends of the Earth Scotland
Lamb's House
Burgess Street
Leith
Edinburgh
EH6 6RD

Tel: 0131 554 9977

Fax: 0131 554 8656

Website:- <http://www.foe-scotland.org.uk>

Northern Ireland

For information and advice about the planning system in Northern Ireland contact:-

Lisa Fagan

Friends of the Earth Northern Ireland

7 Donegall Street Place,

BELFAST

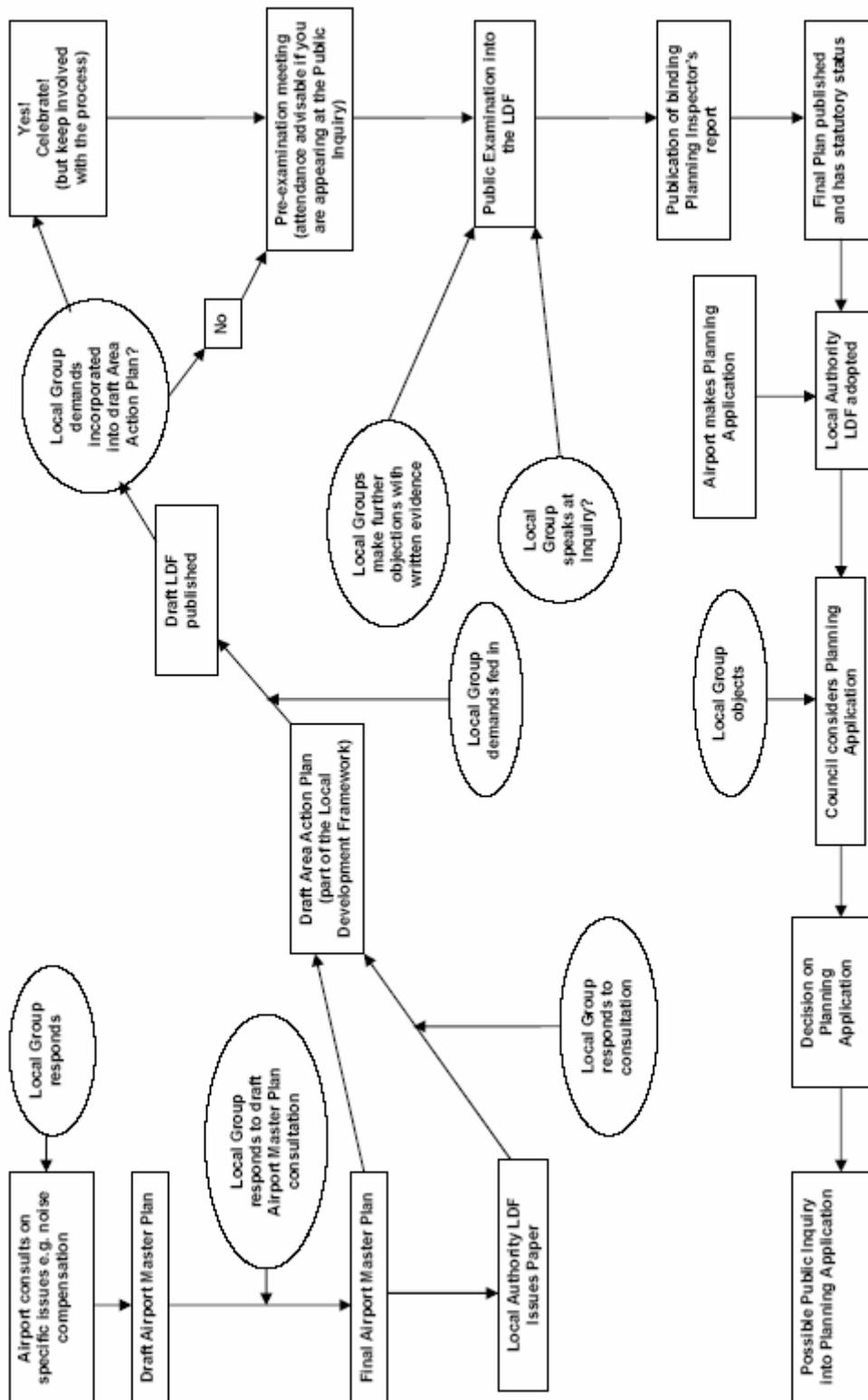
BT1 2FN

Tel: 028 9023 3488

Fax: 028 9024 7556

E-mail:- lisaf@foe.co.uk

APPENDIX 2 – Possible campaign opportunities in the Airport Master Plan/planning process



APPENDIX 3

(Standard response on Airport Development to LDF issues paper consultation:-)

Aviation is a rapidly growing industry that some local authorities have been keen to encourage. Aviation is frequently promoted as an important source of jobs and economic growth. Whilst Friends of the Earth recognises that aviation has a role to play in both commerce and tourism, we believe that airport expansion on the scale currently envisaged (and actively promoted) is unsustainable and that the claimed benefits arising from aviation are frequently overstated and do not justify the huge indirect subsidies that the industry receives through various tax exemptions.

Airport expansion: The other side of the story

Climate change: *aviation is the UK's fastest growing source of carbon dioxide emissions, the all party Environmental Audit Committee has said that the projected growth in aviation emissions will render Government targets to tackle climate change 'meaningless and unachievable'.⁵*

Local pollution: *from both aircraft and airport related surface transport is a serious health problem, BAA estimates that at least 5000 people will breathe air that breaches EU health limits on Nitrogen Oxides as a result of airport expansion.*

Noise: *especially at night is a major health issue and it doesn't only effect people who live near airports, additional flight paths and holding stacks will mean double the number of people subjected to unacceptable levels of noise by 2030, over 600,000 people nationally⁶.*

Economics: *much of the predicted growth in aviation will be in leisure travel, mainly better off people flying more often - even on the budget airlines⁷. In 2003 UK residents spent £17 billion more abroad than tourists from overseas spent here⁸. This is bad for our own tourism industry, particularly in the regions which receive relatively few foreign tourists. Despite this, aviation receives indirect subsidies of over £9billion per year through duty free and exemption from fuel tax and VAT⁹.*

Job creation: *as a result of airport development is frequently exaggerated, e.g Birmingham International Airport claimed in 1994 that 80% more people would be employed by the airport by 2004, in reality there has been a slight decline¹⁰. The low cost airline business model requires the minimising of employment.*

Heritage and Countryside: *the additional land needed for airport expansion nationally threatens at least one hundred ancient woods and 180 listed buildings¹¹.*

A Sustainable Aviation policy – an alternative vision

Friends of the Earth has an alternative vision for aviation

⁵ Pre-Budget 2003: Aviation follow-up, third report of session 2003-4, March 2004

⁶ Flying to Distraction: CPRE 2003

⁷ The top three social classes take more than 75% of all low cost flights:- 'The Sky's the Limit': IPPR 2003

⁸ International Passenger Survey: Office of National Statistics 2003

⁹ The Hidden Cost of Flying: Brendon Sewill 2003

¹⁰ Airport Growth Predictions Prove Wrong – Birmingham Post 9th August 2004

¹¹ Woodland Trust/Society for Protection of Ancient Buildings

National Policies

- *The polluter must pay: aviation must pay for its impacts on people and the local and global environment.*
- *Respect for environmental limits: demand for aviation must be managed within the earth's limits; truly sustainable aviation development should preserve quality of life for current and future generations.*
- *Presumption against airport development: no expansion of airport capacity should be sanctioned until it is demonstrated that best use has been made of existing capacity.*
- *Aviation must contribute to general taxation like other industries.*
- *No new runways: Government modelling has shown that none are necessary if fair taxation measures were applied to the aviation industry¹².*

Regional Policies

- *Local Development Frameworks must conform to Regional Spatial Strategies (RSS) which in turn are supposed to conform to national policy as laid out in Planning Policy Statements and the Air Transport White Paper. Any proposals for airport expansion **not** identified in the White Paper will need to be challenged early by concerned Local Authorities during the preparation of the RSS. 'Airport communities' may well do the same during the LDF process. Equally, local authorities will need to see strong proposals for environmental and social protection, and challenging targets for public transport modal share, incorporated into RSS.*

Local Policies

- *Airports are significant generators of road traffic, ambitious targets should be set for access by public transport modes.*
- *Night flights are a major noise nuisance and cannot be justified on economic grounds, they should be banned.*
- *Planning permission should not be granted for any airport development which will result in breaches of local air quality limits.*
- *Noise impacts on local residents should be minimised through controls on flight paths, aircraft types and through provision of sound proofing for affected residents by the airport operator.*
- *Speculative claims for economic and employment benefits made for airport developments by airport operators should be subject to rigorous independent analysis.*
- *Airports and related infrastructure can take up significant tracts of land, some of which may be designated Greenfield or greenbelt sites.*

¹² 'SPASM' computer model re-run from:- The Hidden Cost of Flying:- Brendon Sewill 2003

The requirements of the new planning system

It is important to recognise that airport master plans have no statutory status in the new land use planning system. The decision to incorporate any of the development proposals of an AMP into an LDF, by incorporating them into an Area Action Plan, needs to be carefully considered before its inclusion in the LDF.

Regardless of any consultation organised for the AMP, local authorities are legally obliged to organise inclusive and widespread participation in the preparation of an action plan in line with the requirements of the local Statement of Community Involvement, national guidance and the SEA directive.

Local planning authorities will need to be aware of the obligations and duties placed upon them by SA and particular SEA which requires clear and detailed identification of environmental impacts likely to arise from policy and also that any policy proposals are produced in an open and democratic way.

Other pitfalls and how to avoid them

Would a commercial development plan by (for example) a steel works (which also has economic and employment benefits) receive the same favourable treatment?

Local planning authorities need to be alert to this ‘conveyor belt’ and need to critically analyse AMPs to ensure that statutory development plans also reflect their obligations to take into account the interests of the community and impacts on the environment. Unavoidably, AMPs will represent the interests of the airport operator which in many cases differ from those of the local community.

In Particular Local Planning Authorities should recognise that:-

- They have Sustainable Development, Noise and Transport policy obligations imposed on them by Planning Policy Statement 1 (PPS1 ‘Creating sustainable development’), Planning Policy Guidance 24 (PPG24 ‘Planning and noise’), and PPG13 (‘Transport’), that may conflict with the proposals put forward by airport operators in AMPs.*
- The analysis of economic, employment and environmental impacts contained in AMPs prepared by the airport operator should be subjected to independent scrutiny / not be accepted at face value.*
- Airports are major sources of pollution and noise and impact negatively on the quality of life of local people.*

Key Tests for Airport Master Plans

Friends of the Earth recommends that planning authorities apply 5 tests to AMPs:-

- Growth forecasts – Local Planning Authorities are under no obligation to accommodate growth not supported by the ATWP; compliant forecasts for 2030 and intermediate years (according to the planning horizon) will be required.*
- Jobs and economic benefit claims should be subject to rigorous independent scrutiny.*

- *Targets for public transport access should be ambitious and the airport operator should pay all the capital/ revenue costs of new facilities/ services attributable to airport traffic, to avoid diversion of scarce public funding from other local priorities.*
- *Action to address community disturbance – flight paths, restrictions on noisy aircraft, compensation packages for residents.*
- *Community participation – the Airport Consultative Committee will not be enough! All affected local residents should be given a right to be heard in a public consultation on expansion proposals contained in AMPs.*

APPENDIX 4

Initial point of contact for the Friends of the Earth Aviation Campaign:-

Simon Bowens
Friends of the Earth
74 Kirkgate
Leeds
LS2 7DJ

Tel: 0113 –2428151
Fax: 0113-
E-mail: simonbw@foe.co.uk

APPENDIX 5

Contact Details for the Aviation Environment Federation (AEF)

AEF
Broken Wharf House
2 Broken Wharf
London
EC4V 3DT

Tel:- 020 7248 2223
Fax:- 020 7329 8160
E-mail:- info@aef.org.uk

APPENDIX 6

STATUS OF RSS IN ENGLISH REGIONS AND CONTACT DETAILS FOR FRIENDS OF THE EARTH REGIONAL CAMPAIGN CO-ORDINATORS

REGION	RSS Dates	Regional Campaign Co-ordinator
North East	Nov 04: pre consultation. Spring 05: public consultation. Jan 06: public hearing.	Frances Aldson Friends of the Earth 14 Great North Road, Jesmond, Newcastle Upon Tyne NE2 4PS Tel:- 0191 221 1786 Fax:- 0191 232 3917 (not confidential – in shared office) E-mail:- francesa@foe.co.uk
North West	Dec 04: RPG partial review + public hearing. Jan 05: RSS Options paper.	Frank Kennedy Friends of the Earth 60 Duke Street LIVERPOOL L1 5AA Tel:- 0151 707 4328 Fax:- 0151 707 4329 E-mail:- frankk@foe.co.uk

REGION	RSS Dates	Regional Campaign Co-ordinator
Yorkshire & the Humber	May 05: public consultation	Carole Zagrovic Friends of the Earth 74 Kirkgate LEEDS, LS2 7DJ Tel:- 0113 242 8150 Fax:- 0113 242 8154 E-mail:- carolez@foe.co.uk
East of England	Dec 04-Mch 05: public consultation. Autumn 05: public hearing.	Mary Edwards Friends of the Earth 4 Glisson Road, Cambridge, CB1 2HD Tel:- 01223 516 551 Fax:- 01223 516 550 E-mail:- maryed@foe.co.uk
East Midlands	RSS completed 03. Spring 05: Milton Keynes & South Midlands sub-regional growth area incorporated.	Callie Lister Friends of the Earth 2nd Floor, 8 Thurland Street, Nottingham, NG1 3DR Tel:- 0115 950 6926 Fax:- 0115 950 6927 E-mail:- calliel@foe.co.uk
West Midlands	RPG for region now adopted as the RSS.	Chris Crean Friends of the Earth 54-57 Allison Street, Digbeth, Birmingham, B5 5TH Tel:- 0121 643 9117 Fax:- 0121 643 8117 E-mail:- chrisc@foe.co.uk
London	Spring 05: Sub regional development frameworks. Late 05: Start review of London Plan.	Jenny Bates Friends of the Earth 26-28 Underwood St London N1 7JQ Tel:- 020 7490 1555 Fax:- 020 7490 0881 E-mail:- jennyb@foe.co.uk
South East	Jan 05: public consultation. Summer 05: public hearing.	Brenda Pollack Friends of the Earth 39-41 Surrey Street, Brighton, BN1 3PB Tel:- 01273 766640 Fax:- 01273 766 678 E-mail:- brendap@foe.co.uk
South West	2004/5: Sub-reg development frameworks being drafted. Summer 05: pub consultation.	Mike Birkin Friends of the Earth 10-12 PICTON STREET, BRISTOL, AVON, BS6 5QA Tel:- 0117 9420128 Tel:- 0117 942 0164 E-mail:- mikeb@foe.co.uk

Updated by Paul de Zylva, February 2005