

South Staffordshire Council

SA/SEA of South Staffordshire LDF

Sustainability Appraisal of Wolverhampton
Airport Policy Area DPD Issues and Options
Paper (January 2007)

January 2007

Entec UK Limited

Report for

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1. Background and approach

1.1 Background

This report summarises the key sustainability matters arising from the Wolverhampton Airport Policy Area (WAPA) Development Plan Document (DPD) Issues and Options Paper (January 2007) produced for the South Staffordshire Local Development Framework (LDF). This analysis forms part of the Sustainability Appraisal (SA) of the LDF as a whole. There is no formal requirement to prepare an initial sustainability appraisal report at this stage. However, in order to aid the development of the issues and options surrounding the topic, it was felt helpful to appraise the WAPA DPD Issues and Options Paper, an analysis which in turn will be used in the preparation of the Preferred Options Document.

The appraisal complements the Sustainability Appraisal Scoping Report¹ which informed the preparation of the Issues and Options Paper. The full Sustainability Appraisal of the WAPA DPD will include an evaluation of the significance of the effects of the preferred options against baseline conditions, an appraisal of the degree of likelihood/certainty that they will occur, the positive or negative nature, and the reversibility and timescale of the effects. Any potential cumulative, secondary or synergistic effects will also be considered, and mitigation measures proposed where appropriate. The analysis will reflect in more detail than is possible here on the likely impacts of changes in flight numbers and patterns as well as land use change that options for development might bring. At some point in this process, the views of other regulatory bodies such as the Civil Aviation Authority will have to be taken into account.

Part of the role of the SA at this stage is to help address the issues which are most significant for the Plan area, recognising that matters of detail can be dealt with following the appraisal of the strategic approach. This early debate on options and approaches is part of the good practice associated with the 'front-loading' of the plan process, and in turn contributes to the soundness of the plan which will be explored at Independent Examination. The matters raised in this Report should therefore be considered as part of a wider process by which the sustainability 'performance' of the LDF is judged and progressively refined, including through further public participation.

1.2 The SA Scoping Report and method of appraisal

The analysis uses the SA Scoping Report as a reference point for the appraisal of the emerging issues and options, through the SA objectives and a suite of appraisal criteria related to those objectives (**Appendix A**). The broad intention is to provide a steer on the extent to which the objectives, issues and options presented meet the spirit of the promotion of sustainability in spatial planning. The resultant analysis should therefore be treated as indicative and giving an impression of the overall performance of the WAPA DPD.

¹ Entec & South Staffordshire Council (September 2006) **SA/SEA of South Staffordshire LDF: Scoping Report**

The analysis uses the following notation in the appraisal of the issues and options presented in the WAPA DPD. The notation is intended, at this stage, to provide a broad steer on the way in which the options and approaches presented match up against the sustainability objectives set.

Alignment	Description	Symbol
Major Positive Impact	The proposed policy or approach contributes significantly to the achievement of the objective.	++
Minor Positive Impact	The proposed policy or approach contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed policy or approach does not have any effect on the achievement of the objective	0
Minor Negative Impact	The proposed policy or approach detracts from the achievement of the objective but not significantly.	-
Major Negative Impact	The proposed policy or approach detracts significantly from the achievement of the objective.	--
No Relationship	There is no clear relationship between the proposed policy or approach and the achievement of the objective or the relationship is negligible.	~
Uncertain	The proposed policy or approach has an uncertain relationship to the objective or the relationship is dependant on the way in which the aspect is managed. In addition, insufficient information may be available to enable an assessment to be made.	?

In terms of scoring the various options and approaches, there has been a professional assessment of the ‘performance’ of the proposals. Typically the judgement involves weighing a range of potential factors (as reflected in the appraisal criteria set out in **Appendix A**), although the true importance or effect of which won’t be fully appreciated until specific policies or development proposals come forward. Thus, at this stage, an impression of the relative merits of the options and approaches is offered, which can subsequently be added to from different perspectives than sustainability (such as the implementation of the South Staffordshire Community Strategy). The analysis in this Report is therefore a contribution to the wider debate on the Issues and Options Paper.

2. Appraisal of the WAPA DPD Issues and Options Paper

2.1 Context: the District's spatial vision and spatial planning objectives

The broad approach to managing development within South Staffordshire is being established through the Core Strategy DPD which is the subject of a separate initial Sustainability Appraisal². The Core Strategy Issues and Options Paper sets out the proposed vision for South Staffordshire which has been developed in accordance with the emerging Community Strategy. The overall aspiration is that: *“We will strive to make South Staffordshire a safe and healthy place to live, with prosperous villages and thriving communities, where everyone can develop their abilities to the full, and pass on to future generations a better environment”*.

It is proposed that the Core Strategy DPD will set out a suite of spatial planning objectives which guide the development and implementation of the LDF. These draft objectives are as follows, with reference to which the WAPA DPD must be developed.

1. To protect South Staffordshire's Green Belt from inappropriate development and enhance its attractiveness and amenity value.
2. To protect the character and quality of the countryside and the villages it contains from inappropriate development.
3. To improve the quality of life of the District by maintaining and promoting thriving, balanced, inclusive and sustainable communities with access to community delivered facilities and services.
4. To ensure that villages contain an adequate, or where necessary, improved range of facilities and services to meet the needs of local communities, particularly in rural areas, and that access to local services is available to all.
5. To ensure that new housing proposals make adequate provision for transport, education, healthcare, open space and social and community facilities.
6. To meet the overall development requirements for the District, consistent with the Regional Spatial Strategy.
7. To ensure the delivery of decent homes for all members of the community including the provision of affordable housing to meet local needs and the creation of well-designed and safe residential environments.
8. To protect the character and quality of existing residential environments and ensure that new development is well designed and respects local distinctiveness.
9. To create a vibrant and sustainable local economy through the provision and maintenance of a portfolio of employment sites, encouraging new employment opportunities, retaining and supporting local businesses, and positive support for sustainable rural diversification.
10. To promote South Staffordshire as a tourist destination and the improvement and provision of tourist facilities.

² Entec & South Staffordshire District (September 2006) **SA/SEA of South Staffordshire LDF: Sustainability Appraisal of Core Strategy Issues and Options Paper**

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11. To sustain, improve and enhance the vitality and viability of village centres and encourage the provision of retail opportunities.
 12. To protect, conserve and enhance the natural environment of the District and the character and quality of the landscape, safeguarding designated sites and sites supporting protected species and improve and enhance biodiversity through habitat management and the creation of new wildlife habitats.
 13. To avoid or reduce the effects of climate change through the location and design of new development, reducing the need to travel, avoiding areas at risk of flooding and protect natural resources.
 14. To promote the efficient use of resources and encourage the development and use of renewable energy resources.
 15. To protect, conserve and enhance the historic environment of the District, historic buildings, conservation or areas and areas of historic, archaeological and landscape importance.
 16. To reduce the need to travel, encourage sustainable forms of transport, and secure improvements to public transport infrastructure and services to meet the needs of local communities and the provision of facilities for walking and cycling.
 17. To improve the District's leisure, recreation and cultural facilities and ensure that each community has access to areas of good quality green space.
 18. To ensure a high quality, sustainable built environment through good design and construction leading to a more prudent use of environmental resources and taking into account the need for improved community safety.

2.2 Key issues and options

Wolverhampton Airport is an important issue for South Staffordshire. There is an extensive planning history associated with the site, and there has been considerable local opposition to recent proposals to expand operations at the airport through the introduction of passenger jet aircraft and the construction of a new runway. Key planning issues relating to the airport policy area are as follows:

- The expansion of Wolverhampton Airport
- The role of Wolverhampton Airport
- Permitted aviation uses
- New development
- Existing buildings and support uses
- The future use of the airport
- Wartime heritage

Each issue is considered below in respect of the options and questions appraised against the SA Objectives and appraisal criteria developed as part of the Scoping Report for the LDF (**Appendix A**). The commentary is based on the analysis of key issues presented in **Appendix B**. Sustainability issues associated with airport use and expansion are wide-ranging, and precise impacts depend upon the nature of the facility in question and proposals forthcoming. However, typical environmental considerations include: land use change associated with passenger terminals, car parking and ancillary development, landscape and visual impacts, noise generation (from various operations including flights, engine testing and general surface activity), local road infrastructure issues associated with airport activity, and water, air quality

and ground pollution issues. Economic considerations include job creation and investment, whilst social considerations include community development and local service provision.

2.2.1 The expansion of Wolverhampton Airport

Proposals for the expansion of Wolverhampton Airport will demand the greatest scrutiny in sustainability terms. The analysis of potential sustainability impacts suggests that there are complex and often conflicting implications associated with all three options presented. In terms of the multi-dimensional character of sustainability, there is a balance to be struck, with (in this case) the benefits derived from job creation and economic growth set against impacts on receptors such as local amenity, air quality and countryside protection. The analysis overall sets a cautious tone to the implications of airport expansion, particularly in respect of the limited transport infrastructure associated with the site (as noted in the Issues and Options Paper) and the rural character of the airport's setting.

An increase in the level of car traffic (an inevitable by-product of airport expansion in such a rural location) would place a significant burden on the capacity of the local road network, as well as contributing to climate change. Noise, air quality and visual impacts, associated with both construction and operation, could be of particular concern, impinging to a significant degree on the tranquillity of this area and the amenity of residents and visitors.

From an economic point of view, emerging regional policy favours concentration of the bulk of economic investment for jobs in the Major Urban Areas to assist with meeting regeneration objectives. The creation of significant employment opportunities at the airport through expansion could compromise the fulfilment of this aspiration.

Clearly, there would need to be a detailed appraisal of development proposals against specific environmental, economic and social criteria in order to help to form balanced conclusions on likely impacts.

2.2.2 The role of Wolverhampton Airport

The approach set out in the Issues and Options Paper proposes a continuation of the Airport's current role. Continuation of present uses is likely to have a neutral or uncertain impact. There are potentially uncertain impacts on the level and type of current employment in and around the airport, although the current position would have to be analysed in detail to gain a full picture of the likely implications of either continuation, or changes, of use. For example, how important is business aviation, and other activity at this airport, to the local and regional economies?

2.2.3 Permitted aviation uses

This issue is covered by the analysis presented in 2.2.1 and 2.2.2 above, and the consultation questions set out do not hold further implications for this appraisal. However, there is a wider point of potential conflict between options for the role of the airport (e.g. potential support for business aviation) and the type of aircraft permitted to use the airport.

2.2.4 New development

Potential new development is strongly associated both with airport expansion along with being an issue in its own right, given the significant history of non-airport uses at the site. The sustainability 'scores' for this issue are positive, on balance, with all three options encouraging

the sustainable use of existing resources, either as part of highly restricted new development associated with the operation of the airport, or wider development within the airport boundary. Potential issues such as the visual impact of the consolidation/replacement of airport buildings, for example, might need to be addressed, as would issues such as traffic generation.

2.2.5 Existing buildings and support uses

Related to the issue of new development, the likely sustainability impacts associated with the options presented are characterised by 'no relationship' or 'uncertainty'. Again the nature of the proposals forthcoming is critical to determining the precise impacts, although in principle the change of use of existing non-aviation buildings to aviation uses could have an influence on employment opportunities (for better or worse), traffic levels and local amenity.

2.2.6 The future use of the airport

Appraisal of the options associated with this issue once again reveals a mixed picture, with a range of impacts encompassing neutral, uncertain and positive impacts. Potential positive impacts are primarily associated with the creation of employment opportunities, where these are appropriate to existing uses and the Green Belt in general, although these are countered by potential impacts on natural resources and amenity, notably associated with traffic generation.

2.2.7 Wartime heritage

The potential sustainability impacts associated with this issue are judged to be relatively benign in nature, the options presented being readily negotiated and managed within an appropriate framework. Further information on the exact details of any proposals would of course have to be carefully considered in the light of aspirations for the protection of cultural heritage. A detailed assessment of the qualities of the existing assets might be required, particularly where a formal management framework is considered to be the most appropriate course of action.

2.2.8 Overview/Conclusions

There are a broad range of positive and negative considerations to be appraised, along with frequent occurrence of uncertain impacts. The detail associated with specific proposals is clearly critical in determining the precise sustainability impacts of development, or indeed no development. In principle, however, proposals for development could induce negative environmental impacts (associated with noise, visual amenity and traffic, for example - notwithstanding any mitigation measures which might be proposed) and positive economic impacts. Social and community impacts lie somewhere in-between, with potential disturbance to local community cohesion (through differing views on the impact of the airport) and potential benefits (through increased service provision, for example). The tone of the issues and options presented in the WAPA DPD offers the opportunity to begin to appraise the range of likely impacts associated with continuity and change at the airport.

This initial SA Report is the starting point for the further refinement of spatial options associated with the preparation of the Preferred Options Document. In response to this latter document, there will be a much fuller consideration of the relative sustainability merits of proposed approaches to the Airport and its environs. This report seeks to apply the sustainability objectives and means of appraisal, which are set out in the Scoping Report, to the first stage spatial planning document: the Issues and Options Paper. In doing so, a complementary

perspective to the evaluation of policies and proposals against other reference points such as local economic health and the promotion of specific community interests is provided.

2.3 Consultation

Consultation is an integral part of the sustainability appraisal process and helps to ensure that the appraisal is sufficiently robust to support the DPDs during full public consultation. We would welcome your views on this Appraisal Report. The consultation period will run for 6 weeks from the 29th January 2007 to the 12th March 2007.

Please provide comments by 5 p.m. on the 12th March 2007. Comments should be sent to:
Robert Deanwood, Entec UK Ltd, Gables House, Kenilworth Road, Leamington Spa CV32 6JX
Email: deanr@entecuk.co.uk Telephone: 01926 439078

Appendix A

Sustainability objectives for South Staffordshire and appraisal criteria

3 Pages

SA Theme	SA Objective	Appraisal Criteria. Will the policy or proposal help to ...
A. SUSTAINABLE CONSUMPTION AND PRODUCTION		
Sustainable Design	Objective 1: Promote high quality design of new developments, the efficient use of resources and opportunities to design out crime	Improve design, in terms of quality and sustainability, of new developments using standards such as Ecohomes and BREEAM?
		Create opportunities to design out crime?
Waste Generation and Management	Objective 2: To reduce the amount of waste generated and encourage sustainable waste management	Reduce the volume of domestic and commercial waste produced?
		Reduce the volume of waste disposed of in landfill?
		Increase the number and accessibility of waste recycling facilities?
B. CLIMATE CHANGE AND ENERGY EFFICIENCY		
Enhancing Energy Efficiency and Promoting Renewable Energy	Objective 3: To reduce energy use by improving energy efficiency and encourage the production and use of renewable energy	Increase the proportion of energy both purchased and generated from renewable and sustainable resources?
		Reduce the demand and need for energy?
		Promote and improve energy efficiency?
C. RESOURCE MANAGEMENT		
Environmental Protection and Enhancement	Objective 4: To protect and enhance biodiversity	Conserve, enhance and provide for the long term management of natural habitats and species on designated sites and more generally?
		Achieve Local Biodiversity Action Plan targets?
		Improve access to, and contact with, the natural world?
	Objective 5: To protect and enhance historic buildings, conservation areas and other features of historic, archaeological or landscape importance	Raise awareness and respect for biodiversity resources and promote their prudent management?
		Protect and enhance landscapes, sites and features of historical, archaeological and cultural value and/or potential?
		Objective 6: To reduce all pollution, including noise, light, air, water and soil
		Reduce pollution from all sources?
Objective 7: To maintain and improve air and water quality and the efficient use of water resources	Promote the more efficient use of resources to help avoid pollution and waste?	
	Improve air and water quality?	
		Encourage the more efficient use of water resources?

SA Theme	SA Objective	Appraisal Criteria. Will the policy or proposal help to ...
Land Use Planning	Objective 8: To promote local stewardship of natural resources	Promote greater local concern for, and involvement in, community management of local environments? Encourage farming practices that are sensitive to the character of the countryside?
	Objective 9: To promote sustainable forms of development and the efficient use of land	Promote sustainable forms of development such as avoiding areas of floodrisk, and mitigating the effects of flooding? Reduce the number of vacant and derelict buildings? Promote the use of land that has been previously developed? Encourage the more efficient use of resources such as the re-use of buildings?
D. SUSTAINABLE COMMUNITIES		
Crime Reduction	Objective 10: To reduce crime, fear of crime and anti-social behaviour and make South Staffordshire safer	Reduce levels of crime and antisocial behaviour? Reduce fear of crime?
Health Improvement	Objective 11: To improve the health and well-being of the people of South Staffordshire	Reduce health inequalities? Improve access to high quality health facilities? Protect and enhance open spaces of amenity and recreational value?
Access to Housing	Objective 12: To ensure that everyone has the opportunity of a decent and affordable home	Reduce homelessness? Reduce the number of unfit homes and overcrowding? Increase the range and affordability of housing (taking into account different requirements and preferences of size, location, type and tenure)? Improve the quality of housing? Provide housing that encourages a sense of community and enhances the amenity value of the community?
Equality of Access	Objective 13: To improve access for all to services and facilities including education and lifelong learning, health, employment and leisure opportunities	Promote more equal access to key local services and facilities? Provide additional services and facilities were needed?
Prudent Transport Use	Objective 14: To reduce the need to travel, encourage walking and cycling and the use of public transport	Encourage a modal shift to more sustainable forms of travel? Reduce the need for people to travel by improving their access to services, jobs, leisure and amenities in the places in which they live?
Economic Growth and Employment Creation	Objective 15: To create a more vibrant and sustainable local economy, encourage rural diversification and support rural communities	Improve business development and its resilience? Encourage business start-ups, support their growth and prevent the loss of indigenous businesses? Encourage inward investment, innovation and help to diversify the economy?

SA Theme	SA Objective	Appraisal Criteria. Will the policy or proposal help to ...
	Objective 16: To sustain and enhance the vitality and viability of village centres	Encourage more shops and better services in accessible locations? Encourage a feeling of greater community spirit?
	Objective 17: To encourage the provision of employment opportunities to meet the skills and needs of the local population, encourage the development of skills and support local enterprise	Assist with matching skills and aptitudes with appropriate employment opportunities? Contribute to enhancing skills and meeting skill shortages?
Participation in Culture and Recreation	Objective 18: To encourage increased participation in cultural and recreational activities for all sectors of the community and ensure access to local greenspace	Promote social cohesion and encourage engagement in community activities? Promote community spirit and encourage community networks? Increase the quantity and quality of public open space?
Participation in Decision Making	Objective 19: To provide opportunities for all sections of the community to participate in decision making	Increase the ability of people to influence decisions? Support civic engagement and encourage the involvement and participation of a diverse range of stakeholders?
Poverty Reduction	Objective 20: To reduce poverty and social exclusion and close the gap between the most and least disadvantaged communities	Reduce poverty and social exclusion in those areas and communities most affected?

Appendix B

Appraisal by key issue

4 Pages

Appraisal key

-- Major Negative Impact	- Minor Negative Impact	0 Neutral	+ Minor Positive Impact	++ Major Positive Impact	~ No Relationship	? Uncertain
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Key Issue: The Expansion of Wolverhampton Airport

SA Objective	Option 1: Allow the airport to expand	Option 2: Allow only very limited expansion of the airport	Option 3: Firmly resist any proposals for the expansion of the airport
Sustainable Consumption and Production	?	?	~
Climate Change and Energy Efficiency	-	?	~
Resource Management	-	?	~
Sustainable Communities	?	?	~
<i>Commentary</i>	<p><i>Airport expansion potentially brings both positive and negative impacts.</i></p> <p><i>Land-take or biodiversity disturbance can be balanced by mitigation measures such as biodiversity enhancement. However, landscape impacts are harder to mitigate and the impacts of increases in traffic on limited rural infrastructure are likely to be very significant. Increases in aircraft and surface activity will significant contribute to problems of noise and air pollution.</i></p> <p><i>The precise nature of impacts depends on the scale and character of the proposals put forward. Commitments to the sustainable design and operation of the airport could, <u>in principle</u>, balance the negative impacts associated with development.</i></p> <p><i>More widely, creation of new employment opportunities to undermine the aspirations of the emerging Regional Spatial Strategy to concentrate investment and regeneration activity in the Major Urban Areas.</i></p>	<p><i>Impacts are dependent upon the nature and scale of proposals.</i></p>	<p><i>Impacts remain as current, although under this option, opportunities to seek environmental or wider sustainability improvements could be lost.</i></p>

Key Issue: The Role of Wolverhampton Airport

Topic	Proposed Approach	Assessment	
The role of Wolverhampton Airport	We wish to see Wolverhampton Airport continue in its present role as a general aviation airport. We consider that the role of the airport should be to provide for: <ul style="list-style-type: none"> • Business aviation • Recreational (private) flying • Flying training 	Sustainable Consumption and Production	~
		Climate Change and Energy Efficiency	?
		Resource Management	?
		Sustainable Communities	?
Commentary	<i>Continuation of present uses is likely to have an uncertain impact because understanding of the precise impacts of aviation on climate change is evolving, along with aircraft and other technologies which could mitigate adverse effects. There are potentially uncertain impacts on the level and type of current employment in and around the airport, although (as with resource management) the current position would have to be analysed to gain a full picture of the likely implications of either continuation, or changes, of use. For example, how important is business aviation to the local and regional economies?</i>		

Key Issue: Permitted Aviation Uses

No options or approaches are proposed in the Issues and Options Paper.

Key Issue: New Development

SA Objective	Option 1: Only permit aviation related development that can be justified as being necessary to meet the operational and safety needs of the airport	Option 2: Require that priority is given wherever possible to the reuse and conversion of existing buildings in preference to new built development	Option 3: Require that new development is located within the airport boundary e.g. on previously developed land within the group of existing airport buildings
Sustainable Consumption and Production	~	+/?	+/?
Climate Change and Energy Efficiency	?	?	?
Resource Management	?	+/?	+/?
Sustainable Communities	?	?	?
Commentary	<i>Impacts are largely uncertain, being dependent upon the nature of the proposals.</i>	<i>Where there are development proposals, under this approach, there are likely to be marginally positive impacts overall. These effects are strongly dependent upon the nature of the proposals, however. Proposals for sustainable buildings, for example, could score highly. There is uncertainty over local community impacts.</i>	<i>Where there are development proposals under this approach, there are likely to be marginally positive impacts through imposing modern construction standards. These effects are strongly dependent upon the nature of the proposals, however. There is uncertainty over local community impacts.</i>

Key Issue: Existing Buildings and Support Uses

SA Objective	Option 1: Continue to allow the use of certain existing buildings for non-aviation purposes on a temporary basis	Option 2: Ensure that existing buildings used for non-aviation purposes are returned to aviation use as soon as it is practicable	Option 3: Require that all airport buildings should be used for aviation purposes only related to the operational needs of the airport arising from its role as a general aviation airport
Sustainable Consumption and Production	~	~	~
Climate Change and Energy Efficiency	~	?	?
Resource Management	?	?	?
Sustainable Communities	?	- / ?	?
<i>Commentary</i>	<i>The precise sustainability implications associated with this option will depend upon the nature of the proposals. However, continuation of the existing uses is unlikely to have significant effects.</i>	<i>Impacts are dependent upon the nature of the proposals, but in principle there could be beneficial impacts in respect of local employment opportunities, for example.</i>	<i>Impacts are dependent upon the nature of the proposals.</i>

Key Issue: The Future Use of the Airport

SA Objective	Option 1: Maintain existing planning policy to ensure that the land and buildings are returned to agriculture or other beneficial use	Option 2: Allow the existing airport buildings to be retained for appropriate employment use	Option 3: Allow the site to be used for other compatible Green Belt uses and those appropriate to a rural area such as leisure, recreation and tourism
Sustainable Consumption and Production	~	~	~
Climate Change and Energy Efficiency	~	?	?
Resource Management	?	?	?
Sustainable Communities	?	+	+
<i>Commentary</i>	<i>The effects of proposals associated with this option are likely to be benign.</i>	<i>Positive impacts are likely to relate primarily the creation of employment opportunities. Other impacts are less clear at this stage. Potential traffic impacts, for example, would have to be examined particularly carefully.</i>	<i>There are likely to be net benefits associated with this option, principally associated with the creation of employment opportunities. Potential traffic impacts would have to be examined particularly carefully.</i>

Key Issue: Wartime Heritage

SA Objective	Option 1: Protect all existing wartime buildings and structures as heritage assets	Option 2: Allow some or all of the existing wartime buildings and structures to be demolished after they have been recorded	Option 3: Seek the restoration/preservation of some of the existing wartime buildings and structures
Sustainable Consumption and Production	~	~	~
Climate Change and Energy Efficiency	~	~	~
Resource Management	+	-	+
Sustainable Communities	+	?	+
<i>Commentary</i>	<i>A net positive impact because of the protection of heritage assets.</i>	<i>Overall, an uncertain impact but could be positive if appropriate end uses are found.</i>	<i>A net positive impact because of the protection of heritage assets, although there is less opportunity for higher levels of environmental performance where these buildings are restored for use.</i>