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Date: 5 March 2008

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Hythe & Romney Marsh
Shepway District Council



Sean McGrath
Indigo Planning Ltd
Swan Court
Worple Road
LONDON
SW19 4JS

Dear Mr McGrath

Proposed runway extension and terminal - London Ashford Airport, Lydd, Kent

I refer to my letter of 28 January 2008 which advised that the Council did not have sufficient information to enable it to determine the applications.

Having regard to your supplementary submission, the supplementary EIA review by Bureau Veritas (BV) and representations from statutory organisations and the public, I can now set out in detail the information and points for clarification remaining to enable the Council to complete its assessment of these applications, including the Appropriate Assessment (AA). Some amendments to the application are also requested. For convenience I have grouped the outstanding issues under the following headings.

1 Ecology, bird conservation / management and designated areas

- Please see the attached table setting out the issues, designated areas affected and requests for information/ clarification.
- It should be clear how your response relates to each of the designated areas separately, including the potential extension of the SPA and the proposed RAMSAR site. It is essential that you clarify in each instance if measures are mitigation or compensation and whether the mitigation or compensation, as the case may be, remains within the same designation.
- Leaving aside various other policy considerations, in relation to European sites the Council must be satisfied that there will be no adverse effect on their integrity beyond all reasonable scientific doubt.
- If the Council concludes that the proposals might have an adverse impact on the integrity of either of the designated sites, or even has doubts about this, the legal presumption is that planning permission should be refused. If you consider that I have misinterpreted the legislative provisions please let me know.

- The only exception to the above paragraph would be if your plans needed to be carried out for “imperative reasons of overriding public interest”. Please confirm that you are not suggesting that the Council adopts such a position and that your case is based solely on the proposals having no adverse impact on the integrity of the European designated sites.

2 Noise

- The noise models need to be revisited to the agreed set of assumptions for the following scenarios in average annual, southerly and northerly modes of operation - existing operations, 300,000 ppa with no runway extension, 300,000 ppa with runway extension, 500,000 ppa with runway extension and terminal, upper parameter 300,000 ppa with no runway extension, upper parameter 300,000 ppa with runway extension, upper parameter 500,000 ppa with runway extension and terminal.
- The area and property counts need to be revisited in light of the above and presented cumulatively in tables. Any changes need to be compared to the tables provided in the appendices of the supplementary information, so it is clear where changed noise impact has occurred as a result of the new modeling scenarios.
- Further clarification is required of the ground noise calculations. It is not clear if the ‘peak noise’ figures used in calculations have included so-called Start of Roll (SOR) noise, which should be included in air noise and not ground noise. If SOR noise was included, it is not clear where it appears in the calculations, but this possibly may have been associated with taxiing noise.
- Notwithstanding your submission, helicopter noise must be addressed and given further consideration, since from the ES (paragraph 3.5.7) there appears to be an intention by LAA to encourage a Heli-Charter to be based at the airport.
- Prior to undertaking this work (and that related to air quality), further confirmation is required that the existing number and mix of aircraft movements per day that you have provided us with are consistent with figures from the CAA. In addition, the flight path assumptions should show clearly which aircraft turn in which direction from both runway 03 and runway 21, and that they are correct for aircraft regularly weighing more than 5700kg.
- In resubmitting this information please make clear how this has been remodelled in terms of the assumptions agreed between BV and Parsons Brinckerhoff Ltd. Your response needs to make clear how assumptions have changed and if any new areas are affected by increased or decreased noise levels.

3 Air quality

- In order to be able to assess the impact, it is necessary for a future baseline computer modelling exercise to be carried out. The scenario required is for the year 2014, with no development, and then with development of runway extension and 500,000 ppa (the year 2014 relates to the masterplan that is referred to in the introduction of the ES and the planning statement).

Information provided through the Project for Sustainable Development at Heathrow on the correction to engine emission data resulting from engine deterioration should be taken into account.

- The modelled data needs to be verified against monitored data that is available from the Kent and Medway Air Quality Partnership or from the Council. The results obtained from the modeling, along with the results data presented in the supplementary environmental information, needs to be fully discussed and the conclusions drawn and linked back to the original ES. The figures provided in the original ES will need updating to reflect the results of the revised modelling scenarios. Please provide the results for NO_x and NO₂ presented separately for each of the sources (eg road traffic, background, aircraft related sources etc). This would identify the greatest contributor of emissions and provides a clearer picture of what is happening with, and without, development scenarios.
- The impacts table (Table 1.7 in Appendix 4.1 and 4.2 of the supplementary information) shows different results to the impacts table in Appendix 4.4 of the supplementary information. This anomaly needs to be rectified.

4 Traffic and transport

- You need to respond to the holding objections from Kent Highways and the Highways Agency.
- In connection with the A259/B2075 Hammonds Corner junction you need to provide growth factor assumptions, flow diagrams and junction assessments using an agreed impact year, passenger and staff trips in the worst case scenario. This work should lead to a proposal for a revised trigger for the provision of a roundabout or other junction improvement. Likewise, for the B2075/airport access road junction you need to provide the same information using an agreed impact year, passenger trips and staff trips in the worst case scenario, plus a monitoring strategy.
- More information is required in connection with the proposals for parking at the airport. A parking demand assessment is needed using yet to be agreed (with Kent Highways and ourselves) details of passenger and staff trips, so as to identify and agree demand for long stay, short stay, taxis and buses.
- There should be a discussion between all relevant parties regarding a robust Travel Plan, particularly as targets, monitoring and enforcement linked to financial incentives will need to be agreed. The Car Park Management Plan will need to be discussed and agreed at the same time and may need to form part of the Travel Plan.
- In relation to the impacts on the A259, A2070 and M20, the Highways Agency has requested further information that you need to provide. Specifically mentioned are trip generations, distribution and assignment (including car occupancy, variation in modal split, flight profile, staff trips and number of employees), all of which affect the impact assessment.

- With regard to East Sussex County Council's comments there is a suggestion of a connecting bus service between Appledore station and the airport. Please could you comment on this further as this potentially could be considered as part of the Travel Plan.

5 Design, landscaping and lighting

- CABE commented at the outset to the effect that in its view the design of the proposed terminal building was a missed opportunity and that it did not respond positively to its special surroundings. The site is, of course, very visible. My advice is that at the very least you should be submitting coloured perspectives and other illustrative material that seeks to rebut CABE's analysis and convince members of the Council that the design of the building is of merit and suited to its location. Personally I do not find it an entirely convincing argument that the terminal building should take its lead from surrounding utilitarian buildings already on the site, as you have suggested, rather than from the surrounding natural environment. Even at this late stage you may want to consider adapting the design of the building in response to the concerns raised by CABE.
- If you decide to remain with your existing design then our advice is that the full length ventilators are considered to have a negative impact on the appearance of the curved rooflines of the terminal building, and that the flue vents are particularly unfortunate. The design of the building should be amended to reposition or minimise the impact of these features.
- It is not accepted that planting in the car park area is inappropriate. The Council believes it necessary to provide some sort of structural landscape screening to the car parking areas to interrupt distant views of the mass of cars potentially shining in the landscape. There are local examples of gorse and various wind stunted trees such as pine. A landscape strategy, including a landscape characterisation study, is required for the airport generally, with particular reference to car parking areas, roads and areas around the proposed terminal building. This is to mitigate effects of the parking and road areas and improve the overall quality of the proposals.
- A lighting assessment is required. Impacts of lighting from the car parking areas and roads are of particular concern, though lighting effects from the terminal building itself should also be taken in to account. This should include consideration of light spill, sensitive receptors and mitigation.

6 CO² emissions and sustainable development

- The Council welcomes proposals for a carbon management plan, but further information is required for both applications of CO² emissions, relating this to potential mitigation and management.
- The Council welcomes the intention to meet the highest standards possible in terms of sustainable building design. Reference is made in the documentation to aspirations to achieve BREEAM 'very good', best practice and BRE guidance (Green Guide to Specification), including particular features that will be addressed as part of the proposals. However, it would be appropriate to have a condition on any planning consent to ensure a high standard is achieved in the detailed design and implementation.

Further discussions leading to a commitment to actually achieve these aspirations are required.

7 Sewerage

- The accuracy of the figures provided in the ES for sewage disposal is questioned. The baseline shows the airport currently has 2 x 25m³ tankers removing sewage from the site weekly. This figure is based on 3,000 passengers per annum and 68 staff. With the airport operating at 300,000 passengers per annum and 180 staff, it is predicted that it will require 8 x 25 m³ tanker removals per week. With 500,000 passengers per annum it will require 13 x 25m³ tanker removals per week. On closer examination of these figures it is believed the ES has grossly underestimated the amount of sewage that will be produced.

At present, on average, the airport disposes of 0.35 m³ sewage per person per week. Figures for 300,000 and 500,000 passengers and staff suggest they will only produce 0.03m³ per person per week of sewage. If the baseline figure is used of 0.35m³ then the number of tanker removals increases to 83 per week (12 per day) at 300,000 passengers per annum, and 139 tankers per week (20 per day) at 500,000 passengers per annum. These figures take no account of people who will be using facilities at the airport when they are dropping off / picking up friends and relatives. They have also been based on averages. It is more than likely the airport will operate more flights during the summer months than the winter months and so there is potential that the situation might be more critical at that time of year. The airport will also need to dispose of sewage taken off aircraft.

- The cesspit system is not considered to be sustainable as overflow is likely, thus increasing the risk of contamination to ground water systems and public health in general. Alternative methods of disposal need to be considered (this might require some involvement from the Environment Agency and Southern Water).

8 Health and Safety Executive

- You need to respond to the issues raised in the representation from the HSE and, in particular, make sure that your response is consistent with the aviation and flight path assumptions used in noise and air quality modeling scenarios.

9 ES assumptions and conditions / S106

- The Council's position has always been that any planning permission should be framed as much as possible within the context of the ES assumptions. These assumptions should include reference to all infrastructure that might reasonably be expected to be provided as part of an expansion to 300,000-500,000 ppa (with or without permitted development rights). Please confirm that this principle is agreed.
- In relation to controlling noise impact, for example, we would look to impose restrictions relating to the following:
 - a limit on the total annual movements at the airport, covering all departures, arrivals, training touch downs and maybe even training go arounds;
 - a restriction on the types of aircraft that can use the airport;

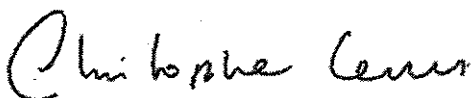
- limits on the area enclosed by particular noise contour (this could be in terms of average mode or single mode contours);
 - as part of the night noise management plan being proposed, a restriction on flights by the noisier aircraft between 2300 and 0700 hours;
 - the establishment of permanent noise monitors, as suggested, and an associated track keeping system so that a departure noise infringement system can be established;
 - confirmation and control of the assumed constraints of the aircraft types that can use the various departure tracks and arrival routes.
- The aim of all these conditions would be to provide certainty to those affected of the nature and extent of the air noise impact. If you have a fundamental concern about complying with these key requirements, then please can you advise me accordingly.

Once you are able to assess the implications of this letter in terms of timescales we can then review the overall programme for reporting the applications to Council. Some additional consultations on the response you provide as well as a period for assessment and report preparation will need to be factored in. It may also be necessary to allow time for any further discussions about a potential planning agreement and conditions.

This letter sets out the information and clarification that we consider to be needed for the Council to determine the applications. Further information may be required in the light of your responses and comments of third parties.

I look forward to receiving a comprehensive response to all the issues raised in this letter, rather than a piecemeal reply. In the meantime, please let me know if you have any queries.

Yours sincerely



Chris Lewis
Planning Manager

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Issue	Designated site (plus potential and intended)	Request/clarification
1. Runway extension and designated sites	SAC, SSSI	<ul style="list-style-type: none"> i. Provide information that explains how the length of ditch and grassland/arable land designated as SAC within the proposed runway extension area would affect that designation and any features. ii. Provide calculations that show: (i) the area of the SSSI that will become paved runway; (ii) the area of the SSSI that will become runway strip¹; (iii) the area of the SAC that will become paved runway; and (iv) the area of the SAC that will become runway strip. iii. Provide a plan of the proposed runway extension (at 1:500 scale) that shows the proposed development together with designated site boundaries, existing ditches, proposed ditches and habitat types (e.g. arable land, rough grassland, short grazed grassland, etc). iv. Please confirm the proposed runway strip will be unimproved grassland not cultivated farm land.
2. Nitrogen deposition ² and 'perennial vegetation of stony banks'	SAC, SSSI	<ul style="list-style-type: none"> i. Following consultation with Natural England, provide a clear and concise definition of 'perennial vegetation of stony banks', including clarification of whether this includes unvegetated shingle and which NVC communities comprise this feature within the SAC. ii. Clarify what background total N deposition figure has been used from the APIS website in the N deposition modelling and assess the likely accuracy of this estimate based upon a review of relevant local information. iii. Clarify what increase in N deposition would likely have a significant adverse effect on 'perennial vegetation of stony banks'. iv. Clarify what future trend in background N deposition has been used in the N deposition modelling and assess the likely accuracy of this estimate based upon a review of relevant local information. v. Clarify what area of 'perennial vegetation of stony banks' within the SAC would be significantly adversely affected under four scenarios: (i) an increase to 500,000 ppa and no change in the current background N deposition rate; (ii) an increase to 300,000 ppa and no change in the current background N deposition rate; (iii) an increase to 500,000 ppa and the most likely trend in background N deposition; and (iv) an increase to 300,000 ppa and the most likely trend in background N deposition. These estimates should be accompanied by maps to show the affected areas of 'perennial vegetation of stony banks' and the boundary of the SAC and SSSI. NB: the distribution of 'vegetated shingle' shown in the N deposition mapping that has been submitted appears to be substantially inaccurate and any future calculations and maps should be based upon correct distribution data on this designated feature, for example utilising Natural England NVC data.

¹The 'runway strip' is here defined as the 'clear and graded' or 'clear' areas around the paved runway

² NB: Natural England intend to make a response very soon about the submitted nitrogen deposition assessment and hence further requests or clarifications may be necessary under this topic

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		<ul style="list-style-type: none"> vi. Clarify what area of 'perennial vegetation of stony banks' occurs within the entire SAC. vii. Clarify what mitigation or compensation is proposed for any significant negative effects on 'perennial vegetation of stony banks', to the degree that there is no reasonable scientific doubt that the measures are adequate, feasible and deliverable. In addition, assess whether any such measures are 'compensation' or 'mitigation' in the context of the Habitats Directive.
3. Ozone and 'perennial vegetation of stony banks'	SAC, SSSI	<ul style="list-style-type: none"> i. Provide an assessment of the effects of the proposed developments on 'perennial vegetation of stony banks' via any changes in ozone levels caused by the proposed developments.
4. Great Crested Newt terrestrial habitat	SAC, SSSI, Ramsar Site (intended)	<ul style="list-style-type: none"> i. Under the precautionary assumption that GCNs are present within the ditches of the runway extension area, clarify the area of potential terrestrial GCN habitat (i.e. rough grassland) within the proposed runway extension, both within and outside the SAC, SSSI and intended Ramsar Site. ii. Clarify what mitigation or compensation measures will be implemented for the loss of potential terrestrial GCN habitat, to the degree that there is no reasonable scientific doubt that the measures are adequate, feasible and deliverable. In addition, assess whether any such measures are 'compensation' or 'mitigation' in the context of the Habitats Directive.
5. Runway extension and construction activities	SAC, SSSI, Ramsar Site (intended)	<ul style="list-style-type: none"> i. Clarify the area of land that will be affected by construction activities as part of the runway extension (i.e. including any areas needed for the storage of materials, vehicle movement, etc) and clarify what measures will be taken to ensure that construction impacts are contained to the areas identified.
6. Current runway strip	SAC, SSSI, Ramsar Site (intended)	<ul style="list-style-type: none"> i. Provide evidence from the CAA that there is no reasonable likelihood that the GCN pond located within the current runway strip would need to be wholly or partly in-filled if the type and frequency of aircraft movements changed to the levels envisaged in the development proposals. ii. Clarify with the CAA the necessity, or otherwise, to widen the current runway strip in order to accommodate the type and frequency of aircraft movements envisaged under the development proposals. iii. Clarify the necessity, or otherwise, of any works required as a result of the proposed developments within the current runway strip. iv. If widening of the runway strip, works within it or in-filling of the GCN pond are reasonably foreseeable, clarify what effect this may have upon designated features of the SAC, SSSI and intended Ramsar Site, such as GCN, Medicinal Leech and 'perennial vegetation of stony banks' (making use of NVC data from Natural England as necessary).

Issue	Designated site (plus potential and intended)	Request/clarification
		Where significant adverse effects are reasonably foreseeable, clarify what mitigation or compensation measures will be implemented (in consultation with Natural England), to the degree that there is no reasonable scientific doubt that the measures are adequate, feasible and deliverable. In addition, assess whether any such measures are 'compensation' or 'mitigation' in the context of the Habitats Directive.
7. Plant-insect interactions	SSSI, SAC	i. In consultation with Kent Wildlife Trust, clarify the need, or otherwise, to consider for the purposes of the EIA Regs possible changes to plant-insect interactions as a result of continued/increased nitrogen deposition and consequent possible effects upon endemic species or subspecies. If this proves to be reasonably necessary, undertake an assessment and submit the results.
8. Infrastructure works or ancillary facilities	To be confirmed	i. Clarify details of any infrastructure works or ancillary facilities that are a reasonably foreseeable result of the proposed developments and which have not been considered fully within the submitted material to date. In addition, assess the ecological impacts that such infrastructure works or ancillary facilities may have, including proposed mitigation to offset any significant effects as necessary, and specify the designated intended and potential site(s) concerned.
9. Terrestrial invertebrates	SSSI	i. In consultation with Kent Wildlife Trust, clarify the need, or otherwise, to undertake terrestrial invertebrate surveys for the purposes of the EIA Regs. If this proves to be reasonably necessary, undertake the surveys, assess impacts, propose mitigation (as necessary) and submit the results.
10. Rare and threatened plant species	SSSI, SAC	i. In consultation with Kent Wildlife Trust, clarify the need, or otherwise, to consider for the purposes of the EIA Regs possible damage to populations of rare and threatened plant species (including s74 species), as a result of community changes arising from continued/increased nitrogen deposition. If this proves to be reasonably necessary, undertake the surveys, assess impacts, propose mitigation (as necessary) and submit the results.
11. Highway improvements to Hammonds corner	SSSI	i. Following consultation with the Highways Agency, assess whether the proposed highway improvements to Hammonds Corner will likely affect the SSSI. If they will, undertake ecological surveys as necessary, assess impacts, propose mitigation and submit the results.
12. Excess ground material	SAC, SSSI, Ramsar Site (intended)	i. Clarify the amount of excess ground material that will be generated by the proposed developments, where it will come from and where it will go to.
13. Ditches within and around the proposed runway extension	SAC, SSSI, Ramsar Site (intended)	i. Clarify how a significant reduction in water quality within the ditches in the area of the proposed runway extension will be avoided as a result of the runway extension, to the degree that there is no reasonable scientific doubt that the proposed measures are adequate, feasible and deliverable.

Issue	Designated site (plus potential and intended)	Request/clarification
		<ul style="list-style-type: none"> ii. Clarify what mitigation or compensation measures will be implemented for the loss of ditches, to the degree that there is no reasonable scientific doubt that the measures are adequate, feasible and deliverable. In addition, assess whether any such measures are 'compensation' or 'mitigation' in the context of the Habitats Directive.
14. Definition of 'waterbirds'	SPA (potential revision) and Ramsar Site (intended)	<ul style="list-style-type: none"> i. Clarify with Natural England which species within the SPA would be part of the designated feature "waterbirds" under the intended revision of the SPA designation, taking into account Ramsar guidance.
15. Ramsar Site boundary	Ramsar Site (intended)	<ul style="list-style-type: none"> i. Clarify with Natural England the likely boundary of the Ramsar Site, especially within the proposed runway extension area and existing runway strip.
16. Bird control	SPA (plus potential revision), SSSI, Ramsar Site (intended)	<ul style="list-style-type: none"> i. Clarify the information used to derive the estimate of a current bird-strike rate at LAA of "approximately one per year", as stated in the draft Bird Control Plan. In addition, if available, provide data to show the annual bird-strike rate at LAA during the past ten years (including the species involved), together with an assessment of the completeness of those data. ii. Clarify how a "buffer zone of several hundred metres wide around the [airport] perimeter", as stated in the draft Bird Control Plan, would be created and maintained, and clarify the spatial extent of the buffer zone. iii. Clarify how bird-scaring activity will change inside and outside the LAA boundary between current conditions and the proposed development scenarios so that any changes to the type, frequency and spatial extent of such activities are clear and well-substantiated. iv. In consultation with RSPB and Natural England, assess the need for conducting radar and/or manual vantage point surveys of birds for the purpose of the EIA and AA. v. Clarify what, if any, information on bird flight-lines relevant to the proposed developments can be generated from existing bird survey data and assess how this may be used to inform activities aimed at reducing bird-strike risk under the proposed development scenarios. vi. Clarify how and where the management of agricultural land outside the LAA will likely change as a result of the proposed developments, as indicated in the draft Bird Control Plan. vii. Provide a copy of the current Local Safeguarding Policy and that which would be implemented under the proposed development scenarios. viii. Clarify how local safeguarding in relation to bird-strike risk management has been implemented at LAA over the past five years. ix. Clarify how local safeguarding in relation to bird-strike risk management will change between current conditions and the proposed development scenarios, and clarify how this will reduce the bird-strike risk.

Issue	Designated site (plus potential and intended)	Request/clarification
		<p>x. In consultation with the RSPB and Natural England, clarify how any changes in the Local Safeguarding Policy may affect the SPA (plus intended revision), intended Ramsar Site and SSSI, particularly with regard to the maintenance or enhancement of wetlands.</p> <p>xi. In light of the above and in consultation with RSPB and Natural England, revise and resubmit the Bird Control Plan as a finalised document, ensuring that it is compliant with the CAAs guidance on Bird Control Management Plans. The revised plan should clearly consider all bird species that are a bird-strike hazard and methods that will be used to reduce that hazard to an acceptable level.</p>
17. Aircraft movements and noise	SPA (plus potential revision), SSSI, Ramsar Site (intended)	<p>i. Provide data that shows: (i) the number of aircraft movements per month during 2003 to 2007; and (ii) the projected number of aircraft movements per month under the proposed development scenarios. These data should be broken down by aircraft type (helicopter or aeroplane) and size (small, medium and large) for each month, and an assessment made of the data accuracy.</p> <p>ii. Provide a series of LAmox noise contour maps that show all of the reasonably foreseeable departure and arrival routes when travelled by aircrafts of different size (small, medium and large). Each map must show: (i) the current SPA boundary; (ii) the intended extension to the SPA boundary; and (iii) a robust estimate of how often the route is travelled currently and under the proposed development scenarios. These maps should be accompanied by an assessment of noise contour accuracy.</p>
18. Aircrafts and visual disturbance of birds	SPA (plus potential revision), SSSI, Ramsar Site (intended)	<p>i. In consultation with Natural England and RSPB, clarify the need, or otherwise, to consider within the EIA and AA the visual disturbance that aircrafts may have upon birds. If the need is reasonably necessary, undertake an assessment and submit the results.</p>
19. <i>Bagous</i> invertebrate samples	To be confirmed	<p>i. Clarify with Natural England the need, or otherwise, for the purposes of the EIA Regs to identify to species-level the <i>Bagous</i> samples previously taken, and if this proves to be reasonably necessary conduct the work and submit the results, and specify the intended and potential designated site(s) concerned.</p>
20. Water quality analysis of GCN pond	SAC, SSSI, Ramsar Site (intended)	<p>i. Clarify with Natural England the need, or otherwise, for a chemical survey of the GCN pond adjacent to the current runway strip. If this proves to be reasonably necessary, conduct the work and submit the results.</p>
21. Effects on bird populations	SPA (plus potential revision), SSSI, Ramsar Site (intended)	<p>i. Based upon the bird survey data collected for the EIA and WeBS data, and in consultation with the RSPB and Natural England, provide a series of maps that shows the location of observations and counts of designated bird species of the SPA (plus intended revision), SSSI and intended Ramsar Site, noting the intention to include all 'waterbirds' in the SPA and Ramsar Site.</p>

Issue	Designated site (plus potential and intended)	Request/clarification
		<p>These maps should show the following boundaries: (i) LAA; (ii) the current SPA boundary; (iii) the intended extension to the SPA boundary; (iv) the SSSI boundary; (v) the intended Ramsar Site boundary; and (vi) boundaries of bird census surveys.</p> <p>ii. In consultation with the RSPB and Natural England, clarify what areas of the SPA (plus intended revision), SSSI and intended Ramsar Site would be significantly negatively affected by increased noise disturbance arising from changes in bird-scaring activities and aircraft movements under the proposed development scenarios.</p> <p>iii. In consultation with the RSPB and Natural England, clarify what proportion of the populations of designated bird species (including those that are intended to become designated features) would be negatively affected by changes in bird-scaring activities, agricultural land management, local safeguarding and aircraft movements as a result of the proposed developments.</p>
22. Geomorphology	SSSI	<p>i. Following consultation with Natural England, confirm the effects of the proposed developments on the geological designated feature of the SSSI and clarify what mitigation or compensation measures will be implemented for any significant adverse effects, to the degree that there is no reasonable scientific doubt that the measures are adequate, feasible and deliverable.</p>
23. PPS9 Key Principle 1(ii)	SPA (plus potential revision), SSSI, Ramsar Site (intended), SAC	<p>i. Provide a summary list of measures that will be implemented under the proposed developments to maintain, and enhance, restore or add to biodiversity and geological conservation interests.</p>