

Job No 00262820

**London Ashford Airport,
Lydd, Kent
Runway Extension**

Audit of Transport Assessment (1)

**Prepared for Lydd Airport Action Group
(LAAG)**

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Report No. 262820/01

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1 Introduction

- 1.1 Owen Williams Consultants have been commissioned by the Lydd Airport Action Group (LAAG) to undertake an audit of a Transport Assessment (TA) accompanying the planning application Y06/1648/SH for the extension of the existing runway at London Ashford Airport (LAA), Lydd, Kent.
- 1.2 The TA was prepared by Steer Davies Gleave on behalf of London Ashford Airport. The proposed development comprises an extension of some 444 metres to increase the runway facility from 1,505 metres to 1,949 metres.
- 1.3 The TA outlines the history of the airport before stating that in 2004 the airport served more than 3,000 passengers and dealt with 24,400 air traffic movements.
- 1.4 The development proposals are based upon an assumed increase in passenger numbers from the 3,000, recorded in 2004, to 300,000 per year. The TA states that this figure is the maximum number of passengers that the existing terminal facilities can accommodate. The extension to the runway facility would enable each aircraft to carry more passengers and take off and land with full payloads.
- 1.5 The TA, therefore, assesses three separate scenarios; which are:
 - Baseline – Assesses the local highway network and infrastructure with existing levels of passengers using the airport,
 - Do nothing – Assesses the impact on the local highway network and infrastructure of an increase in passenger numbers to 300,000 per year with no runway extension.
 - With Development – Assesses the impact on the local highway network and infrastructure of an increase in passenger numbers to 300,000 per year as a result of the runway extension and a change to the existing flight patterns.

2 Discussion

(a) Development Proposals

- 2.1 The TA states that the runway extension will enable larger aircraft, such as the B737-700 and A319, to take off with full payloads. The airport would therefore be able to support flights to more distant destinations than can currently be catered for.
- 2.2 Further to the extension to the runway facility the development proposals include an expansion of the existing car parking facilities to cater for the additional passengers and staff the proposed runway extension would facilitate.
- 2.3 The existing terminal building, which was originally constructed in the 1950's, is considered to have the capacity for 300,000 passenger movements per year. This has been based upon modern aircraft sizes flight profiles although no evidence is presented within the TA to support this assumption.
- 2.4 The construction period for the proposed extension has been programmed to take four months which would commence in 2007. It has been envisaged that the airport will reach 300,000 passenger movements per year by 2009.

(b) Policy Context

- 2.5 The TA refers to government transport policy, highlighting the government's White Paper 'A New Deal for Transport' (1998). This outlines the government's strategy to promote an integrated approach to transport and also to encourage the growth of regional airports to cater for local and regional demand.
- 2.6 The TA also refers to Planning Policy Guidance note 13 (PPG13) which provides governmental guidance on transportation. The report sets out PPG13's main objectives which seek to achieve more sustainable transport within the UK and to reduce the need to travel, especially by car.
- 2.7 The TA also considers the White Paper 'The Future of Air Transport' published in 2003. The paper suggests that, for economic reasons, the capacity of the UK's airports should be increased; however, these benefits must be considered alongside the potential environmental impacts of any proposal. The paper generally supports the development of regional and local airports and specifically mentions Lydd Airport as having development potential, subject to environmental considerations.
- 2.8 The Regional Transport Strategy relevant to the South East, which supersedes the Regional Planning Guidance for the area (RPG9), is considered. The strategy states that additional runway capacity in the South East is required in order to meet local demand subject to environmental considerations.
- 2.9 The Kent & Medway Structure Plan and the Shepway District Local Plan consider policy relating to the locality. The Structure Plan, in particular, supports the development of Lydd Airport provided that it satisfies certain criteria such as environmental constraints and whether the development can be accommodated within the existing local transport network.
- 2.10 It is our opinion that the report makes a reasonable assessment of the planning policies relating to this development, however, none of the policy documents make specific mention of the current airport having a potential capacity of 300,000 passengers per annum.

(c) Existing Conditions (On-site)

- 2.11 London Ashford Airport operates small-scale passenger services to the French town of Le Touquet. In addition a flying school, Lydd Aero Club, also operates out of the airport.
- 2.12 The report provides a summary of the scheduled flights which currently operate from the airport. The current scheduled flights are flown by Britten Trislander 16-seater aircraft. The exact number of passenger flights in previous years, however, is not provided.
- 2.13 The main terminal building is 2,500sqm in floor area and is comprised of passenger handling area, a bar and restaurant and a viewing area for the public. Other facilities at the airport include two hangars, workshops, air traffic control tower, fire station and fuel farm.
- 2.14 There are currently 68 people employed at the airport an increase of 30 staff since 2004.
- 2.15 It is our opinion that the current airport facilities are minimal and, therefore, the assumption that there is the capacity for 300,000 passengers per annum is questionable.

(d) Existing Conditions (Local Transport Network)

- 2.16 The main access to the airport is via a private access road off the B2075 Romney Road to the north of Lydd. Approximately 3km to the north of the airport access road the B2075 meets the A259 at the Hammonds Corner priority junction. The A259 provides links from the airport to the towns of Hastings and Rye to the West and to Folkestone and Hythe to the East.
- 2.17 To the North East of the airport, adjacent to the village of Brenzett, the A259 meets the A2070 trunk road which provides access from the airport to the town of Ashford and Junction 10 of the M25 to the North.
- 2.18 The Hammonds Corner junction of the A259 and B2075 has been assessed with existing flow data obtained from traffic surveys. The results of the junction assessment, using industry standard software, show that the junction is operating at or near the recommended capacity. **The report does not state why this particular junction, and not others such as A259/A2070 junction at Brenzett, was assessed, or whether this had been agreed with Kent County Council (KCC) as the highway authority.** Also the reports resulting from the junction assessment software have not been included in report and so, therefore, cannot be checked for validity.
- 2.19 The TA then provides a summary of public transport provision to the airport. In terms of the local rail network, the nearest rail station is Appledore which is located 12km to the North West of the airport. Appledore rail station is on the Ashford to Hastings line and has a 14 minute journey time from Ashford Station. The TA then states that passengers travelling by train to the airport must alight the train at Appledore and continue the journey by bus or taxi. No details are given within the report, however, on any connecting bus services or levels of taxi service between Appledore Station and the airport. **Therefore, it is our opinion that, given the existing level of train service and possible connection opportunities at the nearest rail station, it is highly unfeasible that passengers would choose to travel to the airport via rail.**
- 2.20 The local bus network is also considered in this section. There are currently three bus services which serve the town of Lydd. These services provide links from Lydd to the surrounding major towns of Ashford, Folkestone, Dover and Hastings. The nearest bust stop to the airport, however, is at the entrance to the airport access road approximately 1km for the airport terminal. **Therefore, considering the level of existing bus services and their proximity to the airport terminal building itself, it is our opinion that airline passengers would choose not to travel by bus as they would have to walk the last kilometre of their journey laden with luggage.**
- 2.21 At present there is no dedicated taxi rank at the airport terminal building although taxis do currently pick up and drop off passengers in front of the terminal building.

- 2.22 There is currently parking provision at the airport of 143 car parking spaces and 4 disabled spaces. The car park is free for passengers during the day although there is a £3 charge for vehicles parking overnight. The TA states that the car park does not currently operate at full capacity.
- 2.23 The report then considers safety of the local highway network by analysing 5 year personal injury accident history data provided by KCC. The report summarises that there were 95 road traffic accidents within the 5 year period on the surrounding roads. The report does not state however which area was considered within the accident analysis. On average there were 19 accidents per year between 1999 and 2004. This figure suggests that there are no significant safety issues concerning the local highway network surrounding the airport.

(e) Passenger Catchment

- 2.24 This section of the TA identifies the number of people living within a forecast catchment area of the airport. The catchment areas have been derived from passenger surveys conducted by the Civil Aviation Authority (CAA) at airports across the country.
- 2.25 The report then identifies in Figure 6.1 the 60 minute and 90 minute drive time catchments of the airport. Within the 60 minute catchment area there is a population of approximately 780,000 based on the 2001 Census and the area stretches as far as Tonbridge to the North and Dover to the East.
- 2.26 Within the 90 minute drive time catchment area, all residents in the county of Kent and some areas of Essex and East Sussex can all access the airport. The population within this catchment area is in the region of 3,500,000.
- 2.27 Whilst the methodology used to apply the catchment areas appears to be sound, it is unclear what conclusions can be drawn from this exercise. ***What is the actual demand for a local airport within these catchment areas considering the proximity of the major airports of Gatwick and Heathrow?*** Will all of the people within these catchment areas use LAA as opposed to the major airports of Gatwick or Heathrow? Why have 60 minute and 90 minute drive time catchments been chosen? Would no potential passengers living outside the 90 minute catchment area use LAA even if it provided the most suitable flight?

(f) Trip Generation

- 2.28 This chapter of the TA sets out in detail the proposed numbers of trips that would be attracted to the airport, by different modes, were the proposed runway extension and associated increase in passenger numbers go ahead. This 'With Development' scenario is compared within this chapter to the 'Do Nothing' scenario outlined in section 1.5 of this report.
- 2.29 Several assumptions have been made in order to forecast the number of passenger trips generated by the airport with the runway extension in place. The 300,000 passenger movements per annum have been proportioned down by month, day and hour based upon passenger profiles at Leeds Bradford International Airport (LBA). Furthermore, a potential fleet mix of aircraft has been devised by LAA in order to estimate the number of flights necessary to accommodate 300,000 passengers. **Whilst the assumptions made may be appropriate, the TA provides no evidence to support any of them.**
- 2.30 As a result of these assumptions Table 7.3 within the TA shows a daily flight schedule comparing the number of flights required per day to accommodate 300,000 passengers per annum with the 'Do Nothing' and 'With Development' scenarios. The table shows that 'With Development' scenario would result in 4 less flights per day than the 'Do Nothing' scenario.
- 2.31 Further assumptions have been made relating to the patterns of passenger arrival and departure times and also the mode of transport by which passengers will travel to the airport. The forecast passenger mode of travel split is contained in Table 7.5 of the TA. The mode split shows high proportions of passengers using bus and taxis, 10% and 20% respectively, to travel to the airport. **Bus and taxi facilities at the airport are minimal at present. How does the developer expect air passengers to use non-existent facilities or services?**
- 2.32 In order to forecast the future number of staff and their likely trip generation a number of similar assumptions have been made. Once again the number of staff predicted to use the bus to travel to work is high considering the current level of provision and also that most are likely to arrive by car, given the airports isolated location. Further estimates have been provided of future servicing and delivery levels. These assumptions seem to be sound.
- 2.33 Based on the assumptions summarised above and provided in Chapter 7 of the TA, the forecast number of trips for passengers and staff by different modes are given comparing the 'Do Nothing' and 'With Development' scenarios. In each case, the number of trips forecast for each scenario is the same.
- 2.34 The methodologies used to predict the likely numbers of trips generated by the proposed development are sound although the basis of the 'Do Nothing' scenario, against which the impact of the development is being compared, is questionable. In transportation terms it seems unfeasible that the existing airport facility could accommodate 300,000 passengers per annum considering

the existing levels of public transport coupled with inadequate levels of car parking for this number of passengers.

(g) Car Parking Provision

- 2.35 Chapter 8 of the TA considers the levels of car parking provision required to accommodate the forecast number of car trips as a result of the trip generation exercise in Chapter 7. As the number of trips forecast for the 'Do Nothing' and 'With Development' scenarios are the same, the required level of parking is also the same.
- 2.36 The forecast level of parking provision has been calculated based on the number of passenger car trips predicted in the trip generation exercise and also on varying lengths of time the passengers will be leaving their vehicle for. Table 8.1 of the TA provides assumed proportions of passenger length of trip based upon data provided by the CAA.
- 2.37 From this the forecast demand for car parking at the airport has been calculated resulting in a requirement of 510 parking spaces in total comprising 400 long-stay spaces, 40 short-stay spaces and 70 spaces dedicated for staff. The report does not provide the definitions of long-stay and short-stay, however, and also does not provide explanation of how the required level of staff parking was achieved. Has this calculation taken account of the peak demand for staff parking which is likely to be the overlap period between shifts?
- 2.38 The report also states that 4% of the total proposed parking stock plus four spaces will be dedicated for disabled users and will be located as close as possible to the terminal building. This allocation seems to be reasonable and is in line with Disability Discrimination Act (DDA) requirements.

(h) Highway Network

- 2.39 Chapter 9 of the TA outlines how the additional vehicular trips associated with the proposed development will be distributed on the local highway network and examines their impact on the surrounding junctions.
- 2.40 The report states that the additional flows associated with an increase to 300,000 passengers per annum will have no significant impact on any junction beyond the A259/B2075 Hammonds Corner junction. Therefore, this is the only junction that is assessed within the TA. ***The report does not state whether this assessment scope has been agreed with Kent County Council (KCC) as the highway authority.***
- 2.41 The forecast additional trips have been distributed on the highway network based upon the catchment area analysis in Chapter 6 of the TA. The distribution of the additional car trips are shown on Figure 9.1 of the TA. It is our opinion that the additional trips associated with the development have been distributed in a reasonable way.
- 2.42 The report states that the impact upon the surrounding 'C' and unclassified roads, in particular the C24 (Lydd Rd) which stretches from Lydd through Camber to the south west and connects with the A259 to the west, will be minimal. This is due to a proposed signage strategy diverting all airport traffic along the A259 and B2075. (This is discussed further in section 2(j) of this report). It is our opinion that a suitably implemented signage strategy would be appropriate to divert the majority of airport traffic along the designated route, only local residents or passengers with an in-depth knowledge of the local roads would potentially use the C24 as a shortcut to the airport.
- 2.43 The A259/B2075 Hammonds Corner junction has then been assessed using the forecast additional traffic flows associated with an increase to 300,000 passengers per annum in both the 'Do Nothing' and 'With Development' scenarios. The assessment also includes local committed development related flows such as the Lydd Hotel development and the Dungeness 'A' decommissioning programme. In both scenarios the junction is shown to operate above capacity and therefore would be likely to experience congestion and excess queuing.
- 2.44 It is our opinion that methodology used to assess the impact of the additional traffic on the highway network is sound.

(i) Construction Impacts

- 2.45 Chapter 10 of the TA examines the impact of the proposed construction period on the local highway network. It has been programmed that the construction period would last for four months and would commence in 2007.
- 2.46 It has been forecast that the construction of the extended runway would require 500 two-way HGV trips each carrying 20 cubic metres of aggregate. However, the impact on the local highway is stated to be negligible as the overall proportion of HGV's on the surrounding roads does not rise to 10% even during 'worst case' assessment. Although the TA has carried out an assessment of the impact of additional HGV traffic, it is unclear where the existing baseline figures for HGV traffic on the surrounding network have been derived from.
- 2.47 By way of mitigation it is proposed to set up an agreed route for construction vehicles so as to minimise the disruption to the surrounding highway network. This is shown within Figure 10.1 of the TA.

(j) Mitigation Measures

- 2.48 Chapter 11 of the TA sets out proposed mitigation measures to reduce the impact of the additional flows associated with the development proposals on the operation of the local highway network.
- 2.49 The TA proposes that the junction of the B2075 and the Airport Access Road be replaced by a roundabout. It is intended that the implementation of a roundabout would improve safety along the B2075 by reducing vehicle speeds approaching Lydd. The improvement of this junction seems sensible despite there being no significant safety issues along the B2075.
- 2.50 The TA also proposes to implement a signage strategy in order to route all traffic to the airport via the A259 and B2075. The purpose of this is to minimise the impact of the development on the 'C' and unclassified roads surrounding the airport. The signage strategy should encourage the majority of airport traffic to travel by the recommended route, however, any passengers travelling to the airport who know the area may still take the shortest route to the airport on quieter roads.
- 2.51 The A259/B2075 Hammonds Corner junction is likely to handle a significant amount of additional traffic should the development go ahead. It is proposed to improve the capacity of this junction by providing a roundabout at this location. The proposed layout of the roundabout junction is shown in Figure 11.2 within the TA. This proposed layout has also been tested using industry standard roundabout modelling software. The results of the assessment show the proposed roundabout design to operate significantly below capacity on all arms.
- 2.52 The TA also states that an outline Travel Plan has been submitted as part of the Planning Application with the aim of maximising opportunities for travel by alternative modes of transport other than private car for both staff and passengers. No details of the content or aims of the Travel Plan are provided within the TA.
- 2.53 It is our opinion that the mitigation measures proposed within this section of the TA are appropriate, should the runway extension be implemented.

3 Summary and Conclusion

- 3.1 The TA assesses the proposal to extend the existing runway at the London Ashford Airport (LAA) by 444 metres to a total length of 1,949 metres. It is also proposed to provide additional car parking facilities as part of the development. In auditing this report we have drawn the following conclusions:
- 3.2 The fundamental case put forward within the TA is that the existing airport facility could accommodate 300,000 passengers per annum without any planning permission being granted. Using this scenario the TA seeks to compare the impact of the development proposals against that scenario stated above.
- 3.3 Public transport provision in the area and, in particular, that serving the airport is poor. There are no feasible train links and the nearest bus stop is 1km from the terminal building; the terminal building also has no official taxi rank. This lack of alternative forms of transport and the limited number of parking spaces on-site mean that the scenario of 300,000 passengers per annum travelling from the airport with existing facilities seems unattainable.
- 3.4 The methodology used in order to calculate forecast trip generation is sound although certain assumptions are questionable. For example the assumed mode of travel split shows relatively high proportions of passengers travelling by bus and taxi with no statement as to how these would be achieved.
- 3.5 Similarly the methodologies used to forecast required car parking provision and impact of additional traffic on the local highway network are also sound.
- 3.6 The proposed mitigation measures seem appropriate should the development go ahead. It is considered that the A259/B2075 Hammonds Corner junction will require improvement in capacity terms in the near future with or without the development proposals in place.

4 Recommendations

4.1 We believe that there may be benefit in addressing the following issues:

- The core argument of the report is questionable. The 'Do Nothing' scenario which is used to compare the impacts of the proposed development against seems unfeasible for a number of reasons.
- How are 300,000 passengers per year going to travel to the airport when there is currently a distinct lack of public transport provision coupled with insufficient car parking spaces?
- Considering the capacity of the existing fleet of aircraft, in environmental terms could the number of flights per year being increased accordingly in order to serve 300,000 passengers?

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Quality Management System

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