



Lydd Airport Action Group

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Preserving ♦ Protecting ♦ Defending ♦ Romney Marsh

April 26th, 2007

Terry Ellames
Planning Department
Shepway District Council
Civic Centre, Castle Hill Avenue
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Dear Terry

Planning Applications: Y06/1647/SH (new terminal to accommodate up to 500,000ppa) and Y06/1648/SH (runway extension - 294m extension plus 150m starter extension)

LAAG believes the planning applications - Y06/1647/SH and Y06/1648/SH should be rejected. Despite the inadequacy of the information provided in the Environmental Statements, we believe there is sufficient evidence to demonstrate that planning permission for both applications should be refused.

Our comments are set out below. We treat the application as one submission since a great deal of material is common to both applications (ie Y06/1647/SH and Y06/1648/SH) - when this is not the case, each planning application is specifically cited.

Before outlining the reasons for rejecting the planning application we would like to make the following points.

(A): LAAG believes, in the first instance, that Shepway District Council (SDC) should question the magnitude of the passenger numbers supporting the planning application and recommend that the planning application be resubmitted with an Environmental Impact Assessment based on passenger numbers up to 2million passengers per annum (2mppa). The following questions highlight why LAAG believes this is necessary.

- (a) Why has Lydd Airport submitted a planning application which is based on passenger numbers that are clearly well below the level required to achieve a breakeven level of profit?
- (b) Why has Lydd Airport changed the scope of its planning application from that set out in the revised Scoping Opinion published in December 2005 and the revised Parson Brinckerhoff's Scoping Report published in August 2005 which proposed a 294m extension and a 150m starter extensions to the

existing runway, plus the construction of a new terminal in two phases - phase 1 for 500,000 passengers pa and phase 2 for 2million passengers pa. It was further proposed that there would be a detailed planning application for the runway extensions and Phase 1 terminal and an outline application for phase 2 of the terminal building.

- (c) Why has Lydd Airport submitted a planning application based on no more than 500,000 passengers pa when it is clear from: (1) the text of the two individual planning applications (Y06/1647/SH and Y06/1648/SH) (2) the Airport's Master Plan, (3) the Airport's marketing material and (4) the Airport's website, that the true ambition is to grow passenger numbers to 2mppa by 2014/2015.
- (d) Why build a terminal which only increases capacity from 300,000 to 500,000pa, if it is intended to expand to 2mppa, only a few years thereafter.

In any event, it is LAAG's contention that the Airport's Master Plan qualifies as a "plan" under the Habitats Regulations and therefore should be considered in combination with the current planning application when determining the extent and scope of the Appropriate Assessment and **therefore the Appropriate Assessment should be based on the effects of 2 million passengers per annum and not 500,000 as currently proposed.**

(B) The planning application is riddled with errors. In some sections virtually every paragraph can be challenged.

(C) Crucial material has been omitted from the Environmental Impact Assessment (EIAs)/Environmental Statements (ESs) or has been poorly scoped so that the findings are inadequate.

In summary, LAAG believes the planning application should be rejected for the following reasons:

Safety

- (1) There are serious public safety issues associated with locating a regional airport close to a nuclear power complex. LAAG engaged the consulting engineers Large & Associates to examine the accidental crash damage risk associated with Lydd Airport's transition from a local to a regional airport. The consultant found for the expansion to 500,000 passengers per annum (ppa) that the overall risk of a commercial airliner accidentally crashing onto the Dungeness NPP site to be odds of 1 in 689,229 in each year. Should LAA expand to 2,000,000 ppa then the risk of aircraft crash increases to odds of 1 in 409,691 in each year. Both of these risk levels are substantially higher (ie more frequent) than the 1 in 10 million level of acceptable odds or risk of accidental aircraft crash imposed by the Nuclear Installations Inspectorate (NII) in order to maintain the nuclear safety case. In this respect, the risk

generated by Lydd Airport would be unacceptable in terms of the potential radiological consequences to individual members of the public.

- (2) There are other safety issues associated with the airport's location: (a) Lydd Airport is the only civil passenger airport in the UK to have an Instrument Landing System (ILS) with a 5 degree offset. A 5 degree offset is the maximum offset allowed under international rules. This means pilots must make a manual late stage correction to turn aircraft onto the centre line at 900metres from touchdown. This raises the risk of pilot error in the close vicinity of nuclear power stations and the highly active Lydd Military Ranges. (b) The risk of bird strike is high as Lydd Airport is under one of the main migratory bird routes in the South of England.

Development Framework

- (3) The application does not comply with the *Aviation White Paper* as implementation would mean failure to make best use of existing runways in Kent and the effective promotion of a new regional airport in Kent over the existing better equipped Manston Airport (Kent International Airport). Further, Lydd Airport is only operating at 2.4% (~3000ppa) of its 125,000ppa potential in 2030 from its existing runway, as assessed by the government in the supporting evidence to the White Paper, yet the airport is proposing to extend its runway to cater for 500,000ppa. Lydd Airport is therefore failing to make best use of its existing runway. By contrast, the supporting documentation to the White Paper assessed Manston Airport to have potential up to 6mppa from its existing runway, reflecting its larger runway and relatively supportive infrastructure.
- (4) The application does not comply with the *Shepway Local Plan* and the *Kent and Medway Structure Plan*. Although these Plans support development this can only take place if certain stringent conditions are satisfied including demonstrating that development will not adversely affect designated sites and reduce the amenity of local communities. We believe it can be demonstrated that Lydd Airport's proposals will both directly and indirectly damage protected habitats and significantly reduce the quality of life of local residents.
- (5) The application does not comply with the emerging *South East Plan*. The *South East Plan* makes no reference to Lydd Airport as a regional airport, deeming it to be of local significance only. Policy EKA4 lists Manston Airport as the regional growth focus, supporting growth up to 6million passengers per annum.

Damage to Protected Habitats

- (6) The Appropriate Assessment for the *South East Plan* showed that it was not possible to conclude for all three European sites close to the airport - Dungeness Special Area of Conservation (SAC), Dungeness To Pett Level Special Protection Area (SPA) and proposed Dungeness to Pett Level Ramsar Site - that they will experience no adverse effect due to increased effluent discharge and increased water extraction associated with developments under the *South East Plan*, either alone or in combination with other plans or projects. In addition, it was not possible to prove for the SPA that pollution caused by roads would not have an adverse effect and similarly for recreational pressure for the Ramsar site. This analysis did not take into account the aspirations of Lydd Airport so that the increase in effluent discharge, water extraction and road traffic caused by the airport as a result of passengers increasing from less than 3000pa to 500,000 pa will make it even more difficult to conclude that these habitats will experience no adverse effect. This added uncertainty is reason alone to reject this development.

In addition, the proposed expansion of Lydd Airport directly results in a physical reduction in the area of the SAC, at the end and along one side of the runway, due to the runway's extension and the creation of expanded runway safety strips. These changes will also reduce the area of the proposed Dungeness, Romney Marsh and Rye Bay SSSI which surrounds the runway.

Habitat loss, no matter how small, can be detrimental to the survival of some invertebrates since they require a rich mosaic of ground types for their survival. The need to extend the runway strip will result in the filling in of a large pond which was one of the main reasons for designating the SAC, due to the pond's population of great crested newts. The airport's own consultants acknowledge this pond's high nature conservation value for its invertebrates and recommended that the pond and environs are changed as little as possible.

Further, since the Dungeness area is noted for its diverse range of species associated with intrinsically nutrient poor shingle habitats - qualifying feature of the Dungeness SAC and Dungeness, Romney Marsh and Rye Bay SSSI - any artificial input of nitrogen causing eutrophication, particularly when existing nitrogen levels are at critical levels, will reduce the range of unique species present in the area.

Public Amenity

- (7) The noise contours shown in Figure 16.4 of Y06/1647/SH and Figures 16.3 and 16.4 of Y06/1648/SH are incorrect for the fleet mix assumed, and since the fleet mix assumed does not reflect the likely mix of aircraft that will use the airport, the noise contours give a highly misleading impression of the noise implications for local residents. The noise contours should be redrawn showing all passenger aircraft listed - B737, A319, BAE 146, Dash 8, ATR 42-500, SAAB 340 - turning RIGHT on take off as instructed by CAA's,

CAP 032 - not LEFT. This will have particular consequences for the town of Lydd.

Employment

- (8) The airport has exaggerated the employment opportunities created by the development and has failed to take into account the impact the creation of a regional airport will have on: (a) employment in the leisure industry on Romney Marsh and surrounds, and (b) employment at the Dungeness nuclear power complex.

LAAG can demonstrate that a more realistic rule of thumb for direct employment at Lydd Airport is 300 jobs per million passenger throughput, compared to the 600 jobs per million estimate used by the airport.

LAAG estimates that the caravan/chalet parks on Romney Marsh employ 430 people including part time workers and that these jobs would be jeopardised if the airport is developed. Any diminution of this industry would lead to a considerable loss of spending power across Romney Marsh as thousands of people stay in these parks each year. The creation of a regional airport at Lydd would also jeopardise the planning application for Dungeness C, leading to the loss of 600 full time, skilled jobs when the power station is fully operational and 1000 -1500 jobs over the long five to seven year construction phase.

Mitigation

- (9) Many of the proposals put forward lack substance, do not commit the Airport to specific actions within a time frame, and some are derisory - providing secondary glazing to Greatstone Primary School which is 600m from the end of the runway is clearly inadequate.

Recommendations

- (1) Shepway District Council should undertake an Appropriate Assessment (AA) based on 2mppa for the current planning application. Although the ES of this planning application is based on passenger numbers up to 500,000ppa, the Master Plan qualifies as a “plan” under the Habitats Regulations and refers to growth in passenger numbers to 2mppa by 2015 **(Summary, 6.0)**.
- (2) The planning application should be re-submitted based on the plans outlined in the Scoping Opinion, with the outline planning application for phase 2 of the terminal supported by an EIA based on 2mppa **(1.0)**.
- (3) The airport should base all comparisons on the exiting conditions scenario – not the future assessment conditions scenario, and provide a “do nothing scenario” **(1.0)**.
- (4) Lydd Airport should provide its own analysis as to why passenger numbers have been consistently lower than 5000 ppa for the last 10 years and why it needs to extend the runway when it is still only operating today at less than 1% of its current terminal capacity of 300,000ppa and less than 2.5% of the Aviation White Paper’s assessment of its likely projected operating capacity of 125,000 in 2030 **(1.0 & 5.0)**.
- (5) Provide accurate information about the airport today, including accurate information about passenger numbers, aircraft movements, the location of nuclear power stations in relation to the airport, the nature of restricted flight zones and an analysis of the types of aircraft that can operate from the existing runway and why they have not done so **(2.0)**.
- (6) Provide detailed flight path information **(2.0 & 3.0)**.
- (7) Provide an accurate description of the proposed development **(3.0)**.
- (8) Provide a more realistic assessment of the fleet mix likely to use the airport after runway extension **(3.0)**.
- (9) Provide an assessment of the seasonality of the business **(3.0)**.
- (10) Provide an analysis of the wind characteristics of the area and how this will affect the operating efficiency of the airport. Adverse weather conditions and the physical limitations of the airport will necessitate diversions in bad weather. It is essential to understand what proportion of flights will be diverted as this highlights an operational deficiency of this airport which needs to be understood in the light of the debate about Lydd versus Manston airports and the need to expand airport capacity generally **(3.0)**.
- (11) Provide an analysis of how increased operations at Lydd will fit into en route airspace - i.e. how traffic integrates with that from other airports **(3.0)**;
- (12) Provide an analysis of how Lydd Airport’s new facilities, flight infrastructure and use of runways compares with other regional airports **(3.0)**

- (13)** Indicate the new location of the ILS aerals after the runway has been extended and location of an on-site sewage treatment plant if needed **(6.0)**.
- (14)** Do a comprehensive invertebrate survey covering a wide range of habitats over at least the area of the airport, but preferably a wider area. In order to capture all species, surveying should be carried out in mid May, early and late June, early July and early to mid September. A separate moth survey should also be conducted - four surveys starting in late April/early May, continuing in early June, followed by late June and mid to end September **(7.0 & Appendix 7)**;
- (15)** Survey a wider area of ponds and ditches for medicinal leech **(7.0 & Appendix 7)**.
- (16)** Reassess mitigation strategies for invertebrates. Mitigation for the brown carder bee and the medicinal leech are priorities **(7.0 & Appendix 7)**.
- (17)** Provide a comprehensive assessment of all the conservation aspects associated with the in-filling of the pond beside the runway **(7.0 & Appendix 7)**.
- (18)** Undertake radar based migratory bird studies as this is the only definitive way in which to gauge the scale of bird migration at Dungeness **(8.0)**.
- (19)** Do a comprehensive study of the behavioural characteristics of migratory birds in the Dungeness area **(8.0)**;
- (20)** Analyse the impact of changing aircraft types on bird strike rates as aircraft speed significantly increases the risk of bird strike, and jet aircraft are more vulnerable to damage **(8.0)**.
- (21)** Provide an assessment of the safety consequences of bird strikes **(8.0)**.
- (22)** Provide an analysis of the likely breakdown of direct employment on site to justify the employment “rule of thumb” of 600 jobs per million passengers per annum throughput, and the prorated figure of 300 people per 500,000ppa and 180 people per 300,000ppa **(11.0)**.
- (23)** Provide a complete reassessment of the noise contours which are incorrect since the flight paths of the aircraft making up the fleet mix assumed are incorrect. The noise contours should be redrawn and based on all passenger aircraft listed - B737, A319, BAE 146, Dash 8, ATR 42-500, SAAB 340 – using the ILS and turning right on take off, NOT LEFT **(12.0)**.
- (24)** Re-examine pollution profile maps in the light of the comments about the aircraft flight paths in (23) above, **(12.0)**.
- (25)** Provide NDB approach noise contours **(12.0)**
- (26)** Include a new nuclear power station at Dungeness when assessing cumulative impacts **(13.0)**.

1.0: Application's Scope and Methodology

LAAG believes the application is flawed and should have been undertaken on the basis outlined in the Scoping Opinion published in December 2005. This stated that the Airport was intending to submit a detailed planning application for a 444m runway extension (294m extension plus a 150m starter extension) and Phase 1 terminal building (up to 500,000 passengers per annum) and an outline application for Phase 2 of the terminal (up to 2million passengers per annum).

An application on this basis together with its accompanying Environmental Impact Assessment (EIA) would more accurately depict Lydd Airport's intentions and the medium term consequences of the development. The application would also be in keeping with the airport's master plan, its website, its marketing programme as the airport's literature refers widely to its ambition to become a regional airport with 2million passengers per annum (2mpppa) while the ambition to reach 2mppa by 2015 is widely quoted in the planning applications submitted in December 2006 (Y06/1637/SH & Y06/1648/SH).

The Scoping Opinion recommended that: *“As the proposals are separated into 2 phases, with phase 2 being outline only, the assessment of the impacts related to phase 2 should not just be predicted against a predicted future baseline assuming that phase 1 is granted planning permission. Impacts should also be assessed against the current baseline, this will ensure that the full impact of an airport serving 2 million passengers per annum is assessed.”*

1.0.1: Passenger Numbers in the ES are too Low

Runways dictate airport capacity - terminals are either extended or added, to accommodate the runway capacity. Lydd Airport is proposing a 444m extension to the runway comprising a 294m runway extension and 150m starter extension to facilitate take off. This runway extension very substantially increases the capacity of the airport as it will allow large jets such as the Boeing 737 and Airbus 319/320 to operate commercially (fully loaded) from the airport.

The extended runway will in theory comfortably facilitate the airport's ambition to grow to 2mppa by 2015 and 6mpppa by 2021. Hence, undertaking Environmental Impact Assessments (EIAs) based on 300,000ppa when the same runway could physically cater for far greater numbers of passengers suggests that that the lower number has been chosen to deflect from the impact the airport's true ambition would have on the local environment.

Further, evidence that the EIA's are based on too few passenger numbers can be drawn from the breakeven point of Manston Airport (Kent International Airport). This airport was acquired by the New Zealand company, Infratil in August 2005. Infratil stated on page 36 of its annual Report & Accounts (March 2006): *“At the time of the acquisition, Infratil stated that it expected to spend approximately £20m*

over three years before achieving estimated breakeven levels of 700,000 passengers and 50,000 tonnes of freight per annum.”

LAAG believes the breakeven passenger numbers at Lydd Airport would be higher than 700,000 passengers per annum due to the lower efficiency of Lydd Airport (see later) coupled with the fact it is unlikely to be a favoured freight location as long haul capability is generally required to make freight viable - Lydd Airport will not be able to operate long haul flights even after the proposed runway extension. The break even position figure is likely to be at least 1 million passengers per annum.

Why submit a planning application which caters for passenger numbers that are well below the breakeven point? This is further evidence that the airport has used lower numbers in its Environmental Impact Assessments (EIAs) in order to deflect from the long term adverse consequences of its desired ambition which is to grow passenger numbers to 2mppa – a level of throughput which is more likely to guarantee profitability.

1.0.2: Baseline and Permitted Development

In the current applications (Y06/1637/SH & Y06/1648/SH) the airport insists on the use of Future Assessment Conditions Scenario which is based on 300,000 passengers per annum. A future baseline has no relevance as a concept unless outline planning permission for Phase 2 of the terminal development is included. All modelling scenarios and mitigation strategies should be rated against an Existing Conditions baseline. The Future Assessment Conditions Scenario should be ignored.

The base line should take into account the fact that this airport is principally used by light aircraft from the local flying club and that the only passenger service is a seasonal daily service to Le Touquet operated by Lyddair using two, 18 seater Trislanders which are over 30 years old. The service had less than 3000 passengers in 2006. Taking the airport from the current level of operation to 300,000 ppa without the runway extension, will necessitate the use of larger aircraft and represent a major change of use, and should in itself, require an Environmental Impact Assessment, given the airport's location and the consequences of development.

1.0.3 Current Economics and the “Do Nothing” Scenario

The Scoping Opinion pointed out the need to examine alternatives and consider the “do nothing” scenario.

Although an analysis of alternative sites is given in the Terminal Building ES and alternative runway strategies have been considered in the Runway Extension ES, no attempt has been made to examine the “do nothing” scenario in either of the Environmental Statements.

Examination of the “do nothing” scenario is highly relevant as this is an airport which (1) remains substantially underutilised and (b) is located in an unsuitable area for a regional airport, being surrounded by protected habitat, located close to a

nuclear power station complex and military ranges and under the principal migratory bird route in the south of England.

At the very least the airport should justify why it cannot expand within the confines of its existing 1505m runway. The airport is very substantially underutilised being primarily used by the local flying club and its passenger service to Le Touquet carried less than 3000 passengers in 2005 and 2006 and no more than 4000 passengers per annum over the last decade (see table below), yet it has a license to operate 24 hours per day, 7 days a week and passengers numbers are only limited by current terminal capacity of 300,000ppa.

Lydd Airport has the same sized runway as London City Airport - 1505m compared to 1508m at London City although City Airport's operational area is smaller than the 1508m paved area - 1200m for take off and 1400m for landing. London City faces the same aircraft type constraints as Lydd Airport – the airport cannot commercially support larger jet aircraft such as the Boeing 737s and Airbus A319s/320s, but it can, like Lydd Airport, support smaller commercial aircraft such as the BAE 146, Dash 8, ATR 42-500, SAAB 340 (Table 3.3, page 32, Y06/1647/SH). Despite these physical constraints (including a 5.5 degree descent approach compared to 3.5 degree at Lydd) London City Airport has grown passenger numbers from 186,000 in 1992 to 2.4million passengers in 2006 (Source CAA). Over the same period Lydd Airport's passenger numbers have fallen from 5,000 in 1992 to less than 3000 in 2006.

Demand at Lydd Airport is unlikely to match City Airport levels since London City has an excellent catchment area and is heavily patronised by business travellers whose premium fares make this fleet mix viable.

Lydd Airport uses the excuse that the new Instrument Landing System (ILS) was only signed off by the CAA in early April 2006 and became operational in early June 2006 and that the lack of the ILS has deterred demand. This is not sufficient explanation, as the airport was aggressively marketing to airlines throughout 2005 and 2006 before the ILS was signed off by the CAA in April 2006. Deals can always be done, conditional on certain equipment being available.

Lydd Airport also carried out an aggressive marketing campaign after the ILS was signed off in April 2006, targeting airlines such as Flybe, bmi regional, Aer Arran, Air Southwest, Scotairways and Skybus that operate aircraft that can fly from the existing runway. This marketing exercise was not successful. This fleet mix is not commercial at an airport such as Lydd since there is little demand for premium business passengers – needed to make this class of aircraft viable. Indeed LAAG believes a high proportion of the 25 redundancies at Lydd Airport made on April 17th, reflected the inability to attract these airlines and the need to reduce costs as the airport had geared up its facilities in anticipation of success. Lack of demand also affected the business jet operation that Lydd Airport started in 2005. This failure is reflected in the six (of the 25) jobs lost at FAL Holdings. Why would business men fly to Lydd when there is adequate capacity at airports closer to London such as Northholt, Biggin Hill and Farnborough?

Leaving aside all issues of the site's suitability, under the "do nothing" scenario, Lydd Airport has the option to wait until demand for airport capacity in the UK is sufficiently high to lead to a build up in demand for marginal airports and the possibility that premium prices can be charged which will improve the economics of the operators owning smaller aircraft that can operate on the existing runway at Lydd.

Lydd Airport should provide its own analysis as to why passenger numbers have been consistently less than 5000 ppa for the last 10 years and why it needs to extend the runway when it is still only operating today at less than 1% of its current terminal capacity of 300,000ppa.

Table 1.0 below clearly shows the profile of Lydd, London City and Manston airports. As the table shows, there is little demand for the services of the two Kent Airports despite Manston airport's superior infrastructure (see later).

Table 1.0: Terminal Passengers 1992-2006 *

	London City	Lydd Airport	Manston Airport
Year	No.	No.	No.
1992	186,000	5,000	
1993	244,000	1,000	
1994	478,000	-	
1995	554,000	-	
1996	724,000	-	
1997	1,159,000	2,000	
1998	1,356,000	2,000	
1999	1,384,000	3,000	
2000	1,581,000	1,000	6,000
2001	1,619,000	-	6,000
2002	1,602,000	3,000	-
2003	1,471,000	4,000	3,000
2004	1,675,000	4,000	101,000
2005	1,996,000	3,000	207,000
2006	2,358,000	3,000	10,000

Source: CAA * (figures are rounded to the nearest thousand)

Note: Manston Airport (Kent International Airport) was granted a full Civil Aviation Authority Licence on August 31st 1999 - in addition to a freight licence

1.0.4 Other Issues

Although issues of financial viability have no relevance in planning law, we believe it is essential that a full understanding of Lydd Airport's strengths and weaknesses (see later) are appreciated as the environmental consequences of development are extremely high – at this cost, a dysfunctional airport should not be supported.

In the light of the airport's failure to attract operators who can use the existing runway, Lydd Airport now maintains that it is essential to have a longer runway so that it can commercially operate Boeing 737s and Airbus A319s/320s, the work horses of the low cost operators. There is no doubt that the economies of scale associated with operating these larger aircraft improve airline economics but one has to question why airlines which have witnessed the demise of EUjet and the proposed flights to the US at Manston (Kent International Airport) would commit to large scale route development at Lydd Airport without a "toe in the water" exercise which could be easily carried out on the current runway using smaller aircraft than the B737 - even allowing for the fact that the smaller aircraft may not be the most profitable.

Further, Lydd Airport has a number of operational deficiencies which put the airport at a competitive disadvantage generally, for example, a high proportion of aircraft will be diverted to other airports (see explanation later) when compared to the experience of neighbouring airports. This makes the airport less attractive to the superior operators in the low cost field such as Ryanair which require fast turnaround and minimal disruption in order to maximise the use of their aircraft so that they can maintain a cheap fare policy on a profitable basis.

2.0: Lydd Airport

The description of the airport (Chapter 3 of both applications) is wholly inadequate and gives a misleading impression of the airport's status today.

Virtually every paragraph can be challenged. The main points based on the Runway Extension ES are listed below with the comments referring to the numbering of the paragraphs in the ES.

3.1.5: The airport claims it has invested £20m to upgrade airport facilities and that this has resulted in a significant increase in general aviation activity and increased employment. The significant increase in general aviation activity is not borne out by CAA statistics. The number of passengers in the single route service to Le Touquet was marginally down at 2754 compared to 2817 in 2005 and the number of movements overall for the airport declined from 22,044 in 2005 to 20,236 in 2006, a decline of 8%. Had it not been for the diversion of traffic from airports such as London City Airport in December, the underlying figures for passenger numbers at Lydd would have been well down on the 2005 level. The January to November figures for 2006 were 12% below the corresponding period of 2005, as were the figures from June to November - the period after the official publication of the ILS and NDB flight paths (June 8th, 2006).

3.2.2: The Dungeness power station complex restricted flying area is not located approximately 3.5km to the south of the airport. There are two restriction zones - the standard 2nm restriction zone with a height restriction of 2000ft and a 1.5nm restriction zone with a 2000 ft height restriction. The boundary of the standard 2nm restricted area is only 1.1km from the Aerodrome Reference Point (ARP - centre of the runway) and immediately adjacent to the airfield boundary, whereas the boundary of the 1.5nm restriction area is 2.1km from the ARP. The ES then goes on to say that the restricted flying zone prohibits all aerial activity for a 1.5nm radius from the facility to a height of 2000ft. This is not correct. Aircraft generally are banned within 2nm, but aircraft landing and taking off from Lydd Airport have special dispensation to fly within 1.5nm. Reference is made to Figure 3.3 but this shows the restricted zone incorrectly. It appears to have the correct radius but the centre point is clearly in the sea approximately 1km south of the correct location.

The claim that general aviation is forced to go left as a result of this restriction is illogical as they would be forced to turn right. General aviation (in this case small planes) goes left possibly because of noise abatement reasons – ie to avoid Lydd.

3.2.3: The airport states that the military ranges have co-operated to ensure the airport can operate without any significant restrictions. This is not true - particularly in relation to the airport's aspiration to become a regional airport which will mean more traffic and larger aircraft. The height restrictions over the military ranges will constrain the operation of the airport (see details later) - for example, due to the location of the Lydd Military Ranges (D044) there is no landing on runway 03 as aircraft cannot fly through the 4000ft height restriction over these ranges while there

is a difficult take-off procedure on runway 21 (towards Lydd) as larger aircraft must make a sharp right hand turn to avoid these (Lydd) ranges. This procedure will be challenging for fully loaded passenger aircraft because of the requirement to simultaneously meet Lydd Airport's noise abatement procedures and conform to International/UK flight rules when avoiding the Lydd Military Ranges.

Further, although the new Instrument Landing System (ILS) flight path procedure was published in June 2006, it took Lydd Airport 3 years to agree the ILS flight path with the MOD. From information gained as a result of a Freedom of Information requests served on the MOD, it is obvious that the granting of a small height concession at the Hythe Military Ranges (D141) by the MOD that allowed the ILS to operate, was highly contentious. Certain factions within the MOD were not happy about accommodating the airport, taking the view that at some stage in the future a new generation of weapons may necessitate increasing the 3200ft height restriction. Since this is a local agreement, it demonstrates that the airport is vulnerable to the internal demands of the MOD.

The ES claims the flight paths and the location of the restricted areas are shown in Figures 3.3-3.5. Figure 3.3 is incorrect (refer to 3.2.2 above) while Figures 3.4 and 3.5 show two official CAA approach procedures (landing flight paths) published in June 2006. Figure 3.4 is a Non Directional Beacon (NDB) approach - used when an ILS is out of action or an ILS is not present, while Figure 3.5 shows an Instrument Landing System (ILS) approach which will be used by all commercial aircraft (see Appendix 1 which shows the ILS and NDBs approach superimposed on a map for greater clarity).

The planning application fails to show Instrument Flight Rules (IFR) take off flight paths or comprehensive missed approach flight paths and possible holding patterns (see Appendix 2). The airport also fails to show the official NATS Standard Route Document (Appendix 3) which sets out recommended routes for IFR (Instrument Flight Rules) flights between two points in UK airspace. This map and the ILS landing flight path clearly show how flights from Lydd Airport will pass directly over many towns - Lydd, Greatstone, Littlestone, Hythe, Folkestone, Lyminge, Camber and Rye.

Since Lydd Airport failed over the last few years to provide detailed flight path information to enable local residents to assess the impact of the airport's development, LAAG prepared flight path guidance which is shown in Appendix 4 (ILS landing and takeoff from Runway 21).

3.3.8: An Instrument Landing System (ILS) was designed to allow aircraft to land in poor weather conditions but is now used extensively by all commercial aircraft in all weathers to improve efficiency and reduce risk. It is automatically built into flight schedules.

3.3.10: The location of the ILS is only shown in Figure 3.5. Figure 3.4 depicts the Non Directional Beacon (NDB) approach

3.3.11: The statement is incorrect as it states that “During busy periods aircraft will be directed to the” hold””. In fact every IFR arrival must fly initially to ROMTI (the fix for the HOLD) since Lydd has no radar to direct pilots. Use of the hold area is mandatory for every Instrument Flight Rules (IFR) arrival. It is therefore incorrect to say “use of the hold area will be minimal”.

3.3.12: This point infers that the airport uses the Lydd VOR (VHF Omnidirectional Radio). This is incorrect. The Lydd VOR is not owned or operated by Lydd Airport and the airport has no control over it. It forms NO part of any of the instrument arrival procedures for Lydd. VFR pilots may use it for track guidance towards the airport, but not IFR pilots.

Distance Measuring Equipment (DME) "works alongside the VOR". This is also incorrect. The Lydd Airport DME is entirely separate from the Lydd VOR/DME and has no relationship to it whatsoever.

3.5.2: See 3.15 – the CAA record the total number of commercial and non-commercial movements including military as 22,044 in 2005 - not 22,400 plus 1200 or 23,600.

3.5.3: see also 3.1.5 - The investment at the airport including the new ILS has not led to an increase in traffic - indeed numbers of passengers and aircraft movements declined in 2006 which suggests there are other factors at play in reducing the attraction of this airport.

3.5.5: Table 3.1 repeats the figure in 3.5.2 which does not match the CAA figure of 22,044. The table appears to ignore the commercial Trislander service to Le Touquet.

3.5.6: Refers to the desire to increase “passenger use of the airport to the currently permitted level of 300,000 passengers per annum” There is no permitted level – this is the capacity of the terminal.

3.5.7: Since charter and training are two entirely different activities using different types of helicopter, encouraging a "Heli-Charter" would not "double the number of training helicopters".

In referring to other activities, no mention is made of the efforts being made by Lydd Airport to encourage airlines and flying schools to carry out instrument approach training at Lydd. This would involve more frequent use of the ILS and NDB approaches and regular use of the missed approaches.

3.0: Project Description - Runway Extension

The project's description is inadequate and should be upgraded and re-submitted. The following comments relate to Chapter 4 of the Runway Extension ES.

3.0.1: Military Ranges and their Adverse Consequences

In 4.3.3 the ES points out that runway 21 is the only one with an ILS at present, inferring that it might have one on the other runway in future. This will never be the case due to the height restriction to the Lydd Military Ranges. **Indeed the height restrictions above the Lydd and Hythe military ranges (Lydd Ranges at 4000ft and Hythe Ranges at 3200ft) have three important consequences which reduce the efficiency of this airport and have safety implications as the more difficult flight procedures required at this airport raise the risk of pilot error in the close vicinity of nuclear power stations.**

- (1) An instrument landing system (ILS) only operates on Runway 21 (landings from the East – over Littlestone & Greatstone) which means that aircraft can only land in one direction (see Appendices 1&2). (Note other airports have an ILS at one end but have a different type of instrument procedure available for landing on the other runway. Lydd can never have this due to the Lydd Ranges). Aircraft cannot land from the Lydd end of the runway since they would infringe the 4000ft restricted flight zone of the Lydd Military Range. Aircraft can still land from an easterly direction with a tail wind using the ILS but when the tail wind is above 10 knots, it will be necessary to divert aircraft to other airfields. LAAG estimates that this will be between 4-5% of the time. These diversions will increase the costs of the airlines using the airport. Neither of the Environmental Statements gives a full analysis of the wind characteristics of the airport or an indication of how often aircraft will be diverted over a year
- (2) The presence of the restricted area over the Hythe Range which extends out to sea and the inability of Lydd Airport to win appropriate concessions from the MOD, means the Instrument Landing System (ILS) is 5 degrees offset from the centre line of the runway. This means pilots must make a manual late stage correction to turn aircraft on to the centre line at 900metres from touchdown. (Standard ILSs bring aircraft to 200ft above the centre line of the runway.) **This means Lydd Airport will have a more difficult landing procedure and this makes a missed approach more likely. Lydd Airport is the only civil passenger airport in the UK to have a landing procedure with a 5 degree offset. A 5 degree offset is the maximum offset allowed under international rules.**
- (3) All commercial jet aircraft taking off from runway 21 (towards Lydd) will be required to make a sharp right hand turn to avoid the Lydd Ranges and will pass over Lydd before beginning their on-ward routings. This procedure will

be challenging for fully loaded passenger aircraft because of the requirement to simultaneously meet Lydd Airport's noise abatement procedures and conform to International/UK flight rules when avoiding the Lydd Ranges.

3.0.2: Impact of Nuclear Power Stations and Military Ranges on Flight Paths

The maps in Appendices 3 & 4 show the restrictions around the military ranges and the Dungeness power stations. The two exclusion zones around the Lydd Military Ranges and the Dungeness Power stations overlap so that it is not possible to takeoff straight out to sea between the Lydd Military Ranges and the Dungeness Nuclear power stations - unlike the Silver City era when this was possible. Instead aircraft taking off from runway 21 must turn hard right as described above.

3.0.3: The Creation of Runway Strips

Lydd Airport is a category "3C" airport and it will remain in this category if the runway is extended as airports in this category have runway lengths of 1200m-to 1800ms.(Lydd Airport's current runway length is 1505m and it is proposing to add a 294m extension which brings the runway length to 1799m. The 150m starter extension, which is only used for take off, does not qualify as an extension.)

Until recently Lydd Airport's runway was under VRF (visual flight rules) which meant it required a 75m cleared strip extending either side of the centre line of the runway. Since introducing the ILS and NDB in June 2006 the airport is now required to extend this strip either side of the centre line to 150m which will mean the large pond that falls into the European SAC designation (Special Area of Conservation) will need to be filled in. Since the airport continues to be primarily used by light aircraft using visual flight rules, there has not been the pressure to create the 150m strips, but if larger aircraft become a feature, the 150m strip will be required.

3.0.4: The Fleet Mix

The fleet mix projections given in the Environmental Statement are unrealistic which has implications for the analysis of noise and air pollution.

Although a new airport cannot accurately determine the future fleet mix that will operate from its runway(s) as this will be determined by the airlines that choose to operate from the airport, it can make a realistic appraisal based on the catchment areas surrounding the airport and the physical constraints of the airport itself. Lydd Airport's assessment is not credible.

Table 3.3, Chapter 3, Page 36 (Y06/1648/SH – the Runway Extension ES) gives a table showing the fleet mix without a runway extension assuming the airport is operating at 300,000ppa (the table is repeated in the New Terminal ES- Y06/1647/SH, Page 32). The fleet mix comprises the following aircraft types –BAE 146, Dash 8, ATR42-500 and

SAAB 340. ALL THESE AIRCRAFT TYPES CAN SAFELY USE THE AIRPORT NOW BUT NOT ONE CUSTOMER OPERATING THESE AIRCRAFT TYPES HAS ADOPTED LYDD AIRPORT. The fleet mix shown in table 3.3 is generally only commercial in airports such as London City Airport which is used by premium business customers. There is no demand for this type of service at Lydd Airport.

Table 4.2, page 43 (Y06/1648/SH) shows the fleet mix for 300,000 passengers after runway extension – it shows 4 movements by the larger jets B737s and A319s and the other 8 out of 12 movements catered for by the same mix of aircraft shown in table 3.3 (BAE146, Dash 8, ATR42-500 and SAAB 340). **These aircraft can safely operate from the existing runway. Why should they be interested in operating out of LYDD on an extended runway?**

Similarly the terminal application (Y06/1647/SH) shows a fleet mix for 500,000ppa (page 45, Chapter 4, table 4.2) showing 8 of the 18 movements operated by B737s and A319s and the remaining 10 movements by BAE146, Dash 8, ATR42-500 and SAAB 340 - the aircraft types that can already safely use the existing runway. **Again, why should these aircraft be attracted to the extended runway when they can already safely operate on the existing runway and choose not to do so?**

The BAE146, Dash 8, ATR42-500 and SAAB 340 are unlikely to successfully operate out of Lydd Airport as there is currently no demand for the class of passenger that makes them viable.

The fleet mix for both the 300,000ppa and 500,000ppa scenarios should be comprised of larger aircraft or at least a higher proportion of B737s and Airbus A319s. At the very least, the airport should present a range of more realistic fleet mix options as a basis for analysis. As noted in 1.0.4, there is no guarantee that low cost operators using larger aircraft such as B737/A319 will use Lydd Airport, as they will be unable to maximise the utilisation of their aircraft due to the shortcomings of the airport.

3.0.5: Seasonality

In the project description, no independent analysis is made of the seasonality of flights. Lydd Airport is most likely to be attractive to low cost operators which mean there will be a high proportion of outbound holiday passengers and the strong possibility of marked seasonality.

Business travellers require regular services but low cost scheduled services tend to be reduced in “off” periods. The outbound nature of the passenger profile is acknowledged by the airport – see 3.6.2 on page 36 of the Runway Extension ES which highlights the parking requirements for 300,000 passengers per annum - 40 short stay (used by day travellers - generally businessmen) - and 400 long stay car parks (used generally by holiday makers). Analysing seasonality is important since the passenger variability during the year has consequences for roads, parking, noise and air pollution and most probably for water as the highest concentration of passengers is likely to be in summer.

The basis of seasonality used in the Transport Assessment is not representative, being based on Leeds Bradford Airport (see later) which is the leading regional airport in Yorkshire with a good catchment area for business travellers.

3.0.6 Other Specific Factors:

4.3.1: Runway extension **will** affect the size of the aircraft and the flight paths used. Unlike small aircraft, commercial aircraft will not be able to turn left on departure from runway 21. Further, the ES intimates that B737s and B319s can currently operate commercially from the airport to relatively nearby destinations. This is not the case. A B737 can land and depart with a minimal payload – witness the noise trial – but they cannot operate commercially from Lydd. There is no airport in the UK with B737s or A319s operators, using a runway as short as 1505m. The only passenger operation at Lydd is the 18 seater, Trislander service to Le Touquet.

4.4.7: The claim the “LAA is outside the Holding Stack Areas and therefore has clear skies between the runway and cruise levels” is nonsense, a fact that was highlighted at the Little Cheyne Walk wind farm inquiry. The airport has not provided an analysis of how increased operations at Lydd will fit into en route airspace. All Lydd departures to the continent will need to be accommodated within a complex structure of Gatwick/Heathrow climbing and descending traffic over the Channel. Northbound departures would have an even greater problem. The difficulties faced by EUJet operations out of Manston getting clearance into the en route airspace are an indication of the problems operators out of Lydd would face.

Table 4.5: Shows Brighton & Hove, Lewes, Maidstone, Royal Tunbridge Wells and Tonbridge & Malling as "surrounding LAA", but these are all much closer to Gatwick.

4.4.13: The advantages of Lydd Airport over other airports listed are incorrect. The ES states “as the runway lies across the peninsula, noise nuisance is relatively low”. This is not correct. As Appendices 1-4 show the runway orientation guarantees noise disturbance in all the coastal towns to the north and also in Lydd because of the need for the right turn on departure 21.

Secondly, "the airport is positioned under the core of the major UK air traffic flow, (which goes to the southeast)". This is also completely wrong. Virtually all the air routes over/close to Lydd are one-way routes northwest-wards.

Thirdly, the ES claims "engine emissions are mostly out to sea". How do they come to this conclusion given that the airport is 1300 metres from the sea and none of the arrival or departure routes are over the sea?

4.4.14: The ES claims "aircraft are able to reach optimum fuel burn cruising altitude more quickly at LAA". No evidence is provided for this assertion, no analysis of the existing air routes and how Lydd traffic would avoid/integrate with them.

3.0.7: Project Description - New Terminal

The following issues need to be addressed.

- 1) There does not appear to be any statement of the IATA 'Standards of Service' provided for the passengers in this new development. This covers the maximum length of queues and timing at check in, baggage reclaim, security plus border control for differing service levels that the airport operator declares he will provide. This information is needed to determine whether the proposals comply?
- 2) There does not appear to be any statement about the security strategy for hold baggage screening or group/cruise ship check in/departure and baggage screening. Is this available? The drawings seem to indicate a screening layout that will not work. There is no indication of passengers remaining 'airside' when taken via a secure bus to cruise ports so that the passenger does not 'land' in the UK. Are customs and border control in agreement with any such arrangement?
- 3) The space allocated for passport control for inbound passengers appears small for 300,000 passengers per annum. All inbound passengers, other than domestic, whether from the European Union or other international destinations are required to pass through border control. Can the developer confirm what the expected passenger flow rate will be through these areas?
- 4) The baggage reclaim belt system appears to disregard current thoughts on security and drug trafficking by using a continuous belt from landside to airside and back again as opposed to a feeder belt from airside to landside only and then to a collection carousel. Can the developer confirm that they comply with security, customs and airline guidelines?

Recommendation: *The airport should present a range of more realistic fleet mix options as a basis for analysis for both the 300,000ppa and 500,000ppa scenarios*

Recommendation: *A full analysis of possible seasonality of aircraft activity should be made as this has consequences for roads, noise and air pollution and possibly water.*

Recommendation: *Full analysis of the wind characteristics in the area is required and how this will impact on the operating capacity and efficiency of the airport. The estimated annual percentage of total flights that will be diverted needs to be clearly stated as this highlights an operational deficiency of this airport which needs to be understood in the light of the debate about Lydd versus Manston and the need to expand airport capacity generally.*

Recommendation: *The airport should provide an analysis of how increased operations at Lydd will fit into en route airspace – ie how it integrates with traffic from other airports.*

Recommendation: *The airport should provide a more detailed assessment of the ergonomics of the terminal and confirm that the design complies with security, customs and airline guidelines.*

4.0: Planning Policy Framework

4.0.1: Shepway Local Plan

11.40 of the local plan states: *“Combined with the importance of surrounding areas for nature conservation, these factors make the site unsuitable for use as a new airport for London.”*

Lydd Airport is named London Ashford Airport and is planning to become a regional airport seeking to attract passengers from London as well as other areas in the south of England. No analysis is provided in either planning application as to where the passengers for Lydd Airport will be sourced. However, an analysis is given in Appendix 5 - *Evidence to the Little Cheyne Court Wind Farm Public Inquiry, January 10th 2005*. The Map in this documentation clearly shows that the catchment area covers London. The airport is being established as a support airport for London and the South East.

11.40 goes on to state that: *The County Council supports the growth of services at Lydd Airport and consider it could support increased aviation activity on a scale of 1 to 2 million passengers per year*. This is clearly incorrect as it refers to the old Kent and Medway Structure Plan. The current plan (TP25) makes no reference to passenger numbers.

Policy TR14 clearly states that expansion will be allowed *provided there would be no significant impact upon the internationally important wildlife communities in the Lydd/Dungeness Area. Regard will also be given to the likely effect of proposals on other special features in the area, particularly the power station*. We show elsewhere that the current proposals clearly have an adverse impact on the nature conservation areas surrounding the airport and the nuclear power stations.

4.0.2: Kent & Medway Structure Plan

Although Policy TP 25 supports development of Lydd Airport, this development is conditional on the following relevant points:

- *development being directly related to the operation of the airport unless otherwise forming part of a proposal in a Local Development Document; and*
- *no material harm on internationally or nationally designated environmental areas; and*
- *no significant detrimental impact on locally designated environmental areas; and*
- *no significant adverse impact on the amenity of local communities which cannot be satisfactorily mitigated; and*
- *appropriate measures being secured to mitigate, and where appropriate compensate for, the impact of development including noise control, air*

pollution, light pollution, water pollution, sewerage disposal, landscape, species and habitat management ; and

- *the requirements for surface access being adequately accommodated within the capacity of the existing or committed local transport network; and*
- *measures being identified and secured to improve access by public transport modes.*

We believe we can demonstrate in the following sections that the majority of the above conditions cannot be met on the basis of development up to 500,000ppa.

4.0.3: South East of England's Regional Assembly's (SEERA's) Draft South East Plan

LAAG believes Shepway District Council must be mindful of the draft South East Plan which makes no reference to Lydd Airport as a regional airport, deeming it to be of local significance only. EKA4 lists Manston Airport as the regional growth focus, supporting growth up to 6million passengers per annum.

Kent County Council (KCC) drafted the policies for Section E3 (East Kent and Ashford Sub-region) and agreed to the reference to 2mppa target being deleted from EKA4 after the original public consultation for the South East Plan in April 2005. In the Examination in Public (EIP) for the South East Plan in February 2007, Kent County Council changed its stance and argued that a policy along the lines of TP25 in the Kent & Medway Structure plan, **including the 2mpppa target**, should be adopted for the SEERA South East Plan. Given that Kent County Council over-ruled the advice of the Inspector to EXCLUDE the 2mppa target in TP25 in the Kent & Medway Structure Plan, and failed to give adequate explanation for its change of stance at the SEERA, EIP in February 2007, we believe the Inspector is unlikely to rule in KCC's favour and Lydd Airport will be continue to be rated of local significance.

5.0: Aviation Policy: The Aviation White Paper

The proposed development of Lydd Airport does not accord with the government's White Paper on aviation (*The Future of Air Transport, December 2003*) as implementation would mean failure to make best use of existing runways in Kent and the effective promotion of a new regional airport in Kent over the existing better equipped Manston Airport. Both airports have plans for growing passenger numbers from low bases in 2006 - Manston 10,200 passengers and Lydd, 2800 (source:CAA). Manston Airport is capable of fulfilling its growth ambitions **WITHOUT THE EXTENSION OF THE EXISTING RUNWAY** as it already has one of the longest runways in the UK - 2750m and is wider at 60m (compared to 32m at Lydd). Even with the extension of the runway from 1505m to 1944m at Lydd, the runway will not support long haul operators in contrast to Manston which can support both short haul and long haul operators. Lydd will thus be establishing a new regional airport in Kent when there is already an established regional airport, which is significantly underutilised.

Research into the capacity of UK airports outlined in the consultation documents (*The Future Development of Air Transport in the United Kingdom: South East Consultation Document, page 92 & 93*) which backed the White Paper, examined the passenger potential of secondary airports in 2030 assuming maximum use of existing runways and no new runway capacity in the South East. The assessment took into account constraints which affected passenger demand such as infrastructure and catchment areas. The maximum potential of Lydd Airport in 2030 was determined to be 125,000 passengers per annum, with the constraints deemed as the immediate catchment population and poor surface access.

Lydd Airport today is only operating at 2.4% (~3000ppa) of its 125,000 passenger potential in 2030, yet the airport is proposing to extend its runway to cater for 500,000ppa. Lydd Airport is failing to make best use of its existing runway.

By contrast, the upper limit at Manston assessed by the government was 3mppa which was later raised to 4-6mppa (also cited in 8.57 Kent & Medway Structure Plan, P182) which reflects Manston's long runway and relatively supportive infrastructure. The airport's key constraints were deemed to be its geographic position in relation to the major sources of demand and noise impacts over Ramsgate. Manston Airport can therefore grow to 6mppa which is also the ceiling cited in the Kent & Medway Structure Plan (TP24) - based on its existing runway. Manston Airport is in a better position than Lydd to satisfy its growth ambitions using its current infrastructure.

11.98, Page 132 of the White Paper states: *The operators of Southend, Lydd and Manston argue that their airports could grow substantially and each has plans for development*. This is a statement of fact not a policy to support airport growth.

5.0.1: The future of Air Transport, December 2003 - Relevant Extracts

Our starting point is that we must make best use of existing airport capacity (Page 7)

The first priority is to make best use of existing runways, including the remaining capacity of Stansted and Luton.(Page 13)

Our first priority is to make the best use of the existing runways at the major South East airports. (Page 110)

The balanced and measured approach we have taken to decisions about airport capacity summarised in Chapter 2 includes minimising the need for airport development in new locations by making best use of existing capacity where possible. (Pages, 133&134)

6.0: Protected Habitat Legislation and Adverse Impacts

Sites of Special Scientific Interest (SSSIs) form the largest expanse of protected habitat on Romney Marsh and are designated under UK legislation - *The Wildlife and Countryside Act 1981*. In the vicinity of the airport Natural England has designated a new enlarged Site of Special Scientific Interest (SSSI) called The Dungeness, Romney Marsh and Rye Bay SSSI. This designation (see Appendix: 6) has been created by consolidating eight existing Sites of Special Scientific Interest (SSSIs) and by extending boundaries in a number of important areas including Lydd Airport. **The new SSSI now surrounds the runway at Lydd Airport and is** nationally important for a wide variety of features including, coastal geomorphology, sand dunes, vegetated shingle, plant communities, water vole and invertebrate populations including an “endemic pool” of species and sub species that are not known from any other sites in the world, great crested newts, invertebrates, and breeding, passage and wintering bird assemblages.

Due to the high conservation value of much of the land on the Dungeness peninsular, a large proportion of land designated as SSSI in the vicinity of the airport is also designated under European law via the Birds and Habitat Directives. The Dungeness Special Area of Conservation (SAC) runs along side the seaward side of the runway (see Appendix:6).

6.0.1: Habitats Directive

Lydd Airport is located beside a Special Area of Conservation (SAC) called the Dungeness Special Area of Conservation which is classified under the Habitats Directive and close to a Special Protection Area (SPA) called the Dungeness to Pett Level Special Protection Area which is classified under the Bird Directive, but in law is subject to the provisions of Article 6 (2), (3) and (4) of the Habitats Directive. This SPA was designated for its breeding seabirds and for its wintering Bewick’s Swan and Shoveler while the SAC was designated for its vegetated shingle habitat and for its Great Crested Newt Population.

In addition Dungeness to Pett Level has been proposed as a Ramsay site under the Convention of Wetlands of International Importance but is not yet designated. In the UK the same protection at a policy level is granted to listed Ramsar sites in respect of new development as that afforded to sites which have been designated under the EC Birds and Habitats Directives. The Ramsar site will be designated for its bird populations, plus its wetland plant and invertebrates communities including Medicinal leech.

Under the Habitats Directive member states must make provision for the avoidance of habitat deterioration or significant species disturbance (Article 6(2)) and plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question.

Article 6 (4) provides that if there is damage caused by plans or projects they may be permitted if there are no alternative to them and there are imperative reasons of overriding public interest as to why they should go ahead. In such cases compensatory measures are required.

Under Article 6(3) an Appropriate Assessment (AA) must be carried out in order to ascertain whether or not site integrity will be affected by any plan or project not directly connected with or necessary to the management of the site. The competent authority must consider the effects of the airport's plans both alone and in combination with other plans and projects. Shepway District Council as the competent authority is undertaking an appropriate assessment based on 500,000 passengers per annum.

6.0.2: Appropriate Assessment must be based on 2mppa

LAAG believes the proposed development will have an adverse impact on the European designations in the area - Dungeness SAC and Pett Level SPA and therefore under the Habitats Regulations an Appropriate Assessment (AA) will be required for each European Site. We believe that this AA must be carried out on the basis of 2mppa, not 500,000ppa as 500,000 is a stepping stone to the real objective of the airport which is to achieve 2mppa by 2015. This objective is clearly outlined in the airport's Master Plan, in the two planning applications, on the airport's website and in its marketing material.

To assess whether there will be any adverse effects, the proposed plan/project in question must be looked at alone and/or in combination with other plans or projects. This means the competent authority must take an overview of projects likely to affect a site, including those:

- Outstanding plans, projects or permissions authorised by other competent authorities, including plans and projects currently being considered, but for which permission has not yet been granted.
- Plans and projects that are not yet submitted, but for which sufficient detail exists upon which to make a judgement.

It is LAAG's contention that the Airport's Master Plan qualifies as a "plan" under the Habitats Regulations and therefore should be considered in combination with both the planning applications when determining the extent and scope of the appropriate assessment and therefore the appropriate assessment should be based on the effects of 2 million passengers per annum and not 500,000 as currently proposed.

As a result of the case C-6/04 Commission v UK the courts have been willing to accept that UK's development plans qualify as land-use plans and should be appropriately assessed. Despite the Master Plan's official position sitting behind development plans, it is clear that given their content that they could not be ignored when considering other local planning applications and would be thus treated as a

material consideration. This in turn means that they will have direct legal effects for the use of land and cannot therefore be ignored when considering the scope of an appropriate assessment pursuant to the in combination test contained in Regulation 48(1)(a).

6.0.3: Adverse Impact on European Sites

LAAG's starting point is the Appropriate Assessment (AA) for the Draft South East Plan which clearly shows that the European protected habitats at Dungeness will be affected by the proposed scale of development advocated by the South East Plan. This AA does not take into account the proposed growth of Lydd Airport. The in-combination test considers the Aviation White Paper but since Lydd Airport is not an airport designated as a growth focus in this policy document, its current growth ambitions will not be accounted for in this AA.

The table below shows European Sites close to Lydd Airport and the variables for which it is not possible to conclude no adverse effect due to developments under the South East Plan, either alone or in combination with other plans or projects

	Dungeness Special Area of Conservation (SAC)	Dungeness To Pett Level Special Protection Area (SPA)	Dungeness to Pett Level Ramsar Site
Increased Water Abstraction	<i>Not possible</i>	<i>Not possible</i>	<i>Not possible</i>
Increased Effluent Discharge	<i>Not possible</i>	<i>Not possible</i>	<i>Not possible</i>
Reduced Air Quality due to Roads*		<i>Not possible**</i>	
Increased Recreational Pressure			<i>Not possible</i>

**Major roads within 200m ** Lies close to the A259*

Source: Appropriate Assessment of the Draft South East Plan, Final Report 31st October, 2006.

The table above shows that it is not possible to conclude that all three European sites will experience no adverse effect due to increased effluent discharge and increased water extraction associated with developments under the South East Plan, either

alone or in combination with other plans or projects. In addition, the Dungeness to Pett Level Ramsar site is believed to be also affected by increased recreational pressure associated with developments under the South East Plan (mainly housing and roads) either alone or in combination with other plans while the Dungeness to Pett Level SPA is also vulnerable to reduced air quality associated with development.

The large scale development of Lydd Airport will exacerbate the above situation and create additional adverse impacts.

6.0.4: Direct Impact of the Airport's Development on the SAC & SSSI

The expansion of Lydd Airport directly results in a physical reduction in the area of the SAC which runs long side one side of the runway and across the end where the extension is proposed (see Appendix:6) by:

- (1) Reducing the area at the end of the runway (Dunes Road end) due to the 444m extension of the runway itself. In addition the CAA requires a cleared and graded area called a Runway End Safety Area or RESA. The RESA extends 300m from the end of the runway threshold and is 93.5m in width.
- (2) Reducing the area of the SAC on the sea side of the runway due to the requirement under CAA regulation CAP 168 to clear a safety margin 150m on either side of the centre line of the runway. This strip also extends 60m beyond the end of the runway. The creation of this strip will necessitate the in-filling of a large pond. The amphibian population of great crested newt in this pond was one of the principal reasons for the designation of this SAC (also the SSSI).

The newly designated SSSI now surrounds the runway and extends to the edges of the runway which means there will be a higher proportion of land directly affected by the airport's development due to the above factors (see Appendix 6).

6.0.5: Conservation Needs of Invertebrates

The report by the entomological consultants John and Barbara Ismay commissioned by LAAG (see later and Appendix:7) highlights how fragmentation and erosion of habitats would destroy the conservation value of the sites at Dungeness.

- Most of the invertebrate species have annual life cycles and therefore need continuity of habitat.
- Many species need a combination of habitats – a rich mosaic of habitats rather than a large uniform area.
- Fragmentation of habitats can lead to species becoming extinct.
- Removing small parts of a large site can destroy its conservation value even if a large area of suitable habitat remains.
- Species have different dispersal powers – some are able to colonise suitable habitat quickly while others (often the rarer ones) have very poor power of dispersal.

- Some species require sparsely vegetated shingle or grassland where the lack of vegetation leads to higher daytime temperatures. These species could not survive the cooler condition associated with denser vegetation cover associated with nitrogen deposition (see later).

The brown carder bee could be affected by the planned cutting of the runway verges and the rough grassland/arable land that is proposed for development as the runway extension as this habitat may be needed for part of their life cycle. This may also apply to the amphibians – the great crested newt.

Another example of the adverse impact caused by altering habitat can be illustrated via the medicinal leech. They have a strong preference for water bodies with high cover of submerged vegetation. As the ditches on site are planned to be used as drainage ditches they need to be maintained with a low amount of submerged vegetation which will affect their survival.

Finally, habitats will lose critical mass if a succession of developers over time is allowed to whittle away the boundaries. Vegetated shingle which is one of the features of the SAC cannot be replaced quickly once lost. This shingle supports limited flora but a high diversity of invertebrates. The SAC has been designated to protect what is left of a scarce resource which is difficult, if not impossible to replace. Therefore mitigation is not possible. There cannot be any claim of overriding public interest as the people of Kent are not disadvantaged by the lack of airport capacity.

6.0.6: Other Possible Adverse Direct Impacts on the SAC and the SSSI

- (1) The airport fails to point out the need to relocate the ILS aeriels when they extend the runway. The airport needs to do this otherwise the aircraft will be guided to the current runway threshold, not the new one, thus negating the reason for extending the runway for landing traffic.
- (2) Possible need to build an on-site sewage treatment plant as it seems incredulous that a regional airport will be trucking away sewage.

6.0.7: Indirect Impacts

6.0.7.1 Nitrogen Deposition

Indirect impacts on the European sites include air, noise and light pollution. LAAG again takes the simplistic view that the Dungeness area is noted for its diverse range of species associated with intrinsically nutrient poor shingle habitats – one of the features behind the designation if the Dungeness SAC and the Dungeness, Romney Marsh and Rye Bay SSSI - and that any artificial input of nitrogen causing eutrophication will reduce the range of unique species present in the area. The position is particularly acute since the background nitrogen levels are already at critical levels – ie the amount of nitrogen being deposited at Dungeness is already well above the lowest estimated level at which damage is likely to be caused to the

plant communities for which sites are designated. Lichens are particularly sensitive to atmospheric pollution and the deposition of nitrogen.

The flora of the vegetated shingle and the fauna associated with it are dependent on low nutritional inputs. This stresses the plants and the low level of cover allows the microclimate to attain higher temperatures than denser vegetation would allow. More dense vegetation from higher nitrogen deposition would destroy this community, causing extinction of the invertebrates dependent on high temperatures (thermophilic species). This loss would be permanent, as this is the only site in Britain for some of these species (see Appendix:7).

6.0.7.2: Light pollution – Impact on Moths

According to Ismay (Appendix:7), Dungeness is important for migrating birds and also for migrating moths. The light pollution from a large airport and a significant increase in car traffic at night would attract migrating moths and prevent them from continuing on their travels. This could have a significant impact on the moth populations not just on site but also in the wider surroundings. This could impact on moth species of various conservation status recorded from Dungeness including one species, the Sussex emerald moth, included in Schedule 5 of the Wildlife and Countryside Act 1981 as amended.

7.0: Ecology and Nature Conservation

LAAG has concentrated on invertebrates as a proxy for the species diversity in the Dungeness area and commissioned the entomological consultant, Dr John Ismay and Barbara Ismay to: (1) assess the invertebrate survey undertaken by the airport and (2) to investigate the importance of Dungeness as a habitat for invertebrates and the consequences of development on invertebrate populations.

Lydd Airport commissioned its own survey of invertebrates (by Andy Godfrey, September 2005) but this was inadequate as it only examined invertebrates in the pond adjacent to the runway that needed to be filled in to conform to CAA regulations, and the time frame over which the survey was conducted was too short. Nevertheless, it is interesting to note that Godfrey acknowledged this pond's high nature conservation value for its invertebrates and recommended that **“the pond and environs are changed as little as possible”**.

Base line data on the invertebrates of the area through a desk study was not undertaken initially to help identify the scope of the field study. A wide range of literature and data are available on the invertebrates of Dungeness and this would have provided an indication of the species that reside on the airport site and the timing of surveys.

7.0.1: Dungeness Invertebrates

The Ismay's detailed report is in Appendix:7, and is referred to in the previous section in relation to damage to protected habitats

The consultants highlight that Dungeness is one of the best sites in the UK for invertebrates and is of international importance. In total they identified 2834 invertebrate species in the Dungeness area and 421 species of conservation concern. **Some invertebrate species are found only in Dungeness, within the UK or in the world.** These include:

Aphrodes duffieldi – this leafhopper (BAP and RDBK) is endemic to Dungeness (found nowhere else in the world).

Eilema pygmaeola pallifrons – this pygmy footman moth subspecies (RDB1) is endemic to Dungeness (found nowhere else in the world).

Lasiocampa trifolii flava – this grass egg moth subspecies (RDB1) is endemic to Dungeness (found nowhere else in the world).

Thalera fimbrialis – the Sussex Emerald Moth (RDB1, Schedule 5 (Wildlife and Countryside Act 1981)) is only known from Dungeness in the UK.

Coleophora otitae – this case bearing moth is only known from Dungeness in the UK.

Polyodaspis sulcicollis – this grassfly (RDB1) is only known from Dungeness in the UK.

The report highlights the conservation value of the Dungeness area including the airport site (see earlier) and illustrates how habitat loss could damage its conservation value and lead to the extinction of rare species. The report makes specific reference to Medicinal Leech and the need to further survey for this species on the airport's site due to the likely impact of unsympathetic ditch management as a result of the airport's development. The report also highlights the adverse impact of light and air pollution and the inadequacy of mitigation proposals. There are NO concrete measures for mitigation that commit the airport to specific actions within a time scale.

The report makes these recommendations which are summarised below:

- (1) The invertebrate survey is inadequate and should be repeated based on a full brief of the planned development
- (2) English Nature required the inclusion of two Malaise traps in the survey. This material and also large amounts of the remaining material were not identified at all (see summary of survey report by A. Godfrey – included in both planning applications). This material must be identified before attempting to assess the impact of the planned development on invertebrates.
- (3) All habitats important for invertebrates, on and preferably around the airport, affected by increased nitrogen deposition need to be surveyed for invertebrates. The area surveyed should at least be the area of the airport but preferably a wider area.
- (4) One of the major threats to the medicinal leech is eutrophication of its habitat – ponds and ditches. All ditches and ponds that might be affected by the development (including increased nitrogen deposition) need to be surveyed to assess the impact on this species.
- (5) The survey must be carried out over a wider time frame to catch the peak occurrences of many species of conservation concern in this area.
- (6) A specific moth survey must be undertaken.
- (7) The impact of pollutants on plants and hence the invertebrates dependent on these plants, needs to be assessed.
- (8) Supply robust mitigation proposals. Mitigation for the brown carder bee which will be affected by the planned cutting of the runway verges, is a priority, as is the mitigation for medicinal leech

The conclusion to the Ismays' report is reproduced below:

As stated above, this area is of international importance for invertebrates and we believe that the proposed development (including further expansions of passenger numbers) will have a negative significant impact on the large number of rare and scarce species found in the area. Some of the designations of the protected sites affected by this development include invertebrates, while others include them in their general description.

In our opinion the whole invertebrate survey was based on the wrong assumptions and is therefore invalid. A decision should not be made without a comprehensive

survey being conducted, i.e. with at least four visits during the season, starting in mid May, using all the trapping methods already employed, identifying all samples, a minimum of four moth trapping sessions during the season and separate surveys for medicinal leeches in all ditches on site or connected with it and all other water bodies. It is important that all habitat types known to support rare and / or protected species in the area are surveyed, but also that light pollution and changes in flora due to increased nitrogen inputs are taken into account (see section 9). Without this data the precautionary approach recommended by the IEEM needs to be used, i.e. an impact of high magnitude on the invertebrates including the presence of protected species needs to be assumed.

Given the extreme sensitivity and importance for Nature Conservation of the Dungeness / Romney Marsh system and taking our comments into account, we consider that the precautionary principle should be applied and the application rejected.

8.0: Bird Conservation & Hazard Management

Dungeness is an area in which the conservation of birds is promoted under the umbrella of protected habitats so that any expansion of the airport is in direct conflict with this objective due to the need to minimise bird activity and should be stopped.

Bird habitation in the Dungeness region can be divided into two groups – residents and migratory. The latter's numbers and behavioural patterns have not been assessed in sufficient detail. An effective bird hazard management programme cannot be instituted without this knowledge.

Dungeness is one of the principal migratory bird routes in the South of England. Large flocks of birds pass over this area en route to other destinations. Often they are exhausted and in need of food when they reach Dungeness. Exhausted birds desperate for food will touch down whatever the nature of the ground cover - crop, pasture, or grasses - which in itself has implications for bird hazard management.

Further, although bird migration takes place all year round there are extended seasonal peaks in Spring and Autumn. Much, if not all migration, takes place at night as birds need the daylight hours in which to feed to fuel the next part of their journey. Since this airport has a 24 hour licence and there will be pressure from low cost operators to exploit the extended hours of operation to ensure financial viability, these patterns of behaviour in the area need to be fully understood, and there is no evidence that is the case from the ESs.

LAAG believes a more accurate assessment of the magnitude of migratory bird movements must be established in the first place, and this can only be achieved via a radar based migratory bird study and this has not been undertaken.

The bird strike figure mentioned of 16 recorded (11.4.45) in the period 1990-2005 represents the situation for the light aircraft which almost exclusively used the airport over this period. There seems to have been no assessment of the impact of changing the types of aircraft operating from the airport to larger commercial airliners up to the B737. Aircraft speed significantly increases the risk of bird strike, and jet engines are more vulnerable to damage because of the large intake area and high rotation speeds.

Further, there is no assessment whatsoever of the safety consequences of bird strikes. An aircraft suffering an engine failure/shutdown immediately after take-off due to a bird strike could render it unable to carry out a turn, left or right, forcing it to fly through the Lydd Range while firing is taking place.

9.0: Safety

Lydd Airport makes passing reference to nuclear safety in a small section on safety buried in the appendices. LAAG believes that regional airports should not be built close to nuclear power stations due to the obvious safety implications. LAAG engaged the nuclear expert, John Large of consulting Engineers, Large & Associates to undertake a review of the crash damage safety risk at the Dungeness Nuclear Power Stations. John Large's conclusions are shown below. The full report is in Appendix: 8.

9.0.1 Summary of the Conclusions of John Large's Nuclear Safety Report

I have considered this matter in terms of any change to the risk of aircraft crash onto the Dungeness nuclear power plants (NPPs); the severity of damage to the NPPs that that could arise from aircraft crash; the radiological hazards at those plants; and if and how these hazards might result in radiological consequences to the public communities nearby and afar from Dungeness.

In these respects:

- i) I am of the opinion that the proposed development of the airfield at Lydd would introduce an increased level risk of accidental aircraft crash onto the existing Dungeness NPPs.*

For the expansion to 500,000 passengers per annum (ppa) I predict that the overall risk of a commercial airliner accidentally crashing onto the Dungeness NPP site to be 1.4507E-06 per year, that is odds of 1 in 689,229 in each year. Should LAA expand to 2,000,000 ppa then the risk of aircraft crash increases to 2.9099E-06 per year or the odds of 1 in 409,691 in each year.

Both of these risk levels are substantially higher (ie more frequent) than the 1 in 10 million level of acceptable odds or risk of accidental aircraft crash imposed by the Nuclear Installations Inspectorate (NII) in order to maintain the nuclear safety case. In this respect, the LAA generated risk would be unacceptable in terms of the potential radiological consequences to individual members of the public and, in societal terms, generally as a whole.

I refer to and agree with the previous statement of the NII (see para 53 of main text) that any development in air traffic at Lydd airport beyond its last periodic safety review of 1995/97 will require reconsideration of the nuclear safety case. The present proposals to redevelopment LAA are substantially and materially different from 1995/97, involving both increased numbers of air traffic movements and larger aircraft, so much so that it would be prudent for the nuclear safety cases for both Dungeness B (operational) and Dungeness A (decommissioning) to be comprehensively re-evaluated and published prior to the present planning application moving forward to the final decision stage.

Put simply, past and present air traffic operations at LAA have comprised mainly light aircraft which do not pose, in terms of damage potential, a crash threat on the Dungeness NPPs, and the movements of heavier commercial aircraft to and from the airport are presently so infrequent so as not to represent a threat to the NPPs. In contrast, the proposed expansion of LAA introduces commercial airliners, the majority of which are over 20 tonnes take-off weight, so the threat to the Dungeness NPPs is rendered credible in terms of damage severity and frequency of occurrence. In other words, the expansion of LAA introduces credible and novel accident scenarios that were not included in the original engineering designs and safety cases of the Dungeness A and B NPPs.

- ii) I show that the legislation and regulatory framework determining an acceptable level of nuclear safety to be complex, extending beyond the engineering systems and on-site management of the NPPs alone.*

For example, given that it is not possible to prove the existing Dungeness NPPs against aircraft crash by back-fitting, then it has to be acknowledged that a severely damaging credible aircraft crash accident could progress to an off-site radiological incident that can only be countered in the emergency response domain. The introduction of the new aircraft crash accident scenario and its novel radiological outcome would require substantial re-evaluation of the state of preparedness and resources allocated by the local authority in its off-site emergency planning; the pre-prepared countermeasures emergency zone might require expansion and redefinition, public evacuation and sheltering distances might have to be redefined,; and so on.

These and other changes in the decommissioning procedures for currently Dungeness A and later Dungeness B, together with justification of the nuclear and radiological process underway at the Dungeness site will also need to be reviewed for amendment should the proposed LAA development proceed.

- iii) I have similar reservations about the risks and potential radiological consequences relating to aircraft crash on the completely unprotected railhead for loading irradiated fuel flasks and for the rail dispatch of these flasks over a track that passes close by the southern end of the LAA runway. Again, I consider it prudent for the railhead and transportation safety cases be reviewed. Included in these reviews should be consideration of the very large volumes of radioactive wastes that will arise during decommissioning of, first, Dungeness A and then Dungeness B.*
- iv) I have briefly considered the influence that commercial operations at LAA may have on future development of nuclear power generation on the Dungeness site. Since it is most unlikely that the NII will make an exception of the Dungeness site and relax the 1 in 10,000,000 per year screening limit of aircraft crash frequency, any new NPP will have to demonstrate absolute surety of its containment and reliability of its nuclear and safety systems*

when subject by the very high forces of the impact, fire and possible aviation fuel deflagration brought about by the crashing of a commercial airliner.

In my judgement it is not possible to proof a NPP against aircraft crash so the event must be ruled out by other means by, first, limiting the gross size (weight and fuel capacity) of the aircraft and, second, by setting a limit to the predicted frequency of crash. The proposed development at Lydd does neither: it raises the size of the aircraft using the airport and it increases the number of air traffic movements. Thus, granting the LAA development would place a prohibition on any future development of the Dungeness nuclear site with it losing favour as the leading candidate site for future nuclear generation capacity in the South-East.

My understanding is that in considering the LAA development application, the planning authority has a duty to identify and take into account all material considerations, including public health and safety. Since the airport site, air traffic approaches and departures are within close proximity to the Dungeness A and B nuclear power plants, any potential change in the nuclear safety of these plants will be a material consideration. I am of the opinion that the planning authority should give full consideration of development of LAA resulting in a reduction in the nuclear safety of the Dungeness nuclear plants, thereby placing the public at greater risk of being subject to intolerable levels of radiological consequence.

Accordingly, I am of the opinion that the Application to develop LAA should not be granted.

Finally, I have refrained from commenting in detail on the potential opportunities that further development of LAA would provide for terrorist and other malevolent acts that might be targeted at the Dungeness NPP site. That said, I have no doubt in my mind that commercial operations at LAA would provide openings for such acts to be perpetrated.

9.0.2: Other Safety Issues

Lydd Airport has more difficult flying procedures than many other airports due to the impact of the restricted airspace around the airport - notably the 4000 ft and 3200 ft height restriction over the Lydd and Hythe military ranges respectively, the 2000ft height restriction over the Dungeness nuclear power station complex and the 1.5 and 2.0 nm exclusion zones around the power stations. As explained earlier the location of the ranges mean Lydd Airport is the only civil airport in the UK with a 5 degree offset ILS. This more difficult landing procedure (pilot must make a manual adjustment to get to the centre of the runway) raises the probability of pilot error in the vicinity of a nuclear power station. There is no analysis of the safety consequences of pilot error in the vicinity of the nuclear power stations or the military ranges.

The risk of bird strike is also high in the area, but there is no analysis of the safety consequences of bird strike.

10.0: Traffic and Transport

LAAG commissioned the consultants Owen Williams to audit the Transport Assessments (TAs) prepared by Steer Davies Gleave for the airport. In general terms, Owen Williams found the methodology used in both the transport assessments was robust (runway extension and new terminal) and that any shortfalls in these reports were mainly derived from questionable background assumptions made by the airport. For example, in the runway extension TA, an irrelevant base level of 300,000 passengers with no runway extension is assumed. In the summary of the TA (para 64), it is claimed “The runway extension scheme that is the subject of this application has no material impact on transport provision or requirements.” This is nonsense – this conclusion is drawn because the base level used is 300,000ppa without the runway extension, not the current 3000 passengers per year.

Further, the use of Leeds Bradford to provide an indication of passenger seasonality through out the year and peaks and troughs during the day is misleading. Leeds Bradford is a busy regional airport, and the centre of the business community for Leeds and Bradford which means the daily flight requirements and the seasonality of the business throughout the year will be less pronounced than a remote airport catering mainly for outbound tourists.

Owen Williams report is shown in Appendix: 9

11.0: Socio-Economic Issues

11.0.1: Population and Profile

As the 2001 census shows (highlighted on page 333 of the Terminal ES) the population of Shepway is ageing. No specific analysis is given for the population of Romney Marsh. Anecdotal evidence suggests that Romney Marsh is becoming a retirement centre since people are attracted by the area's tranquillity and the relatively low cost of housing. The housing stock on Romney Marsh has improved and living standards generally - the transformation of parts of Greatstone over the last decade is testimony to the rise in grey power. This trend means that there is no justification for pursuing an employment at any cost strategy for Romney Marsh as the pressure to create new sources of local employment is reduced by the changing profile of the people residing in the area. More information is required about the socio economic background of the people living on Romney Marsh so that informed judgements can be made about employment.

11.0.2: Employment

The employment aspects of the airport's development have been exaggerated:

- (1) The estimate of employment generated by the airport is too high,
- (2) No attempt has been made to outline the makeup of the jobs created on site at the airport.
- (2) There is no estimate of the lost employment in the leisure industry caused by the operation of a regional airport.
- (3) There is no assessment of possible consequences for employment in the nuclear power industry.

Lydd Airport widely marketed the view over the last few years that its proposed development would generate direct employment of 1100 jobs per million passenger throughput and although the airport has settled on a more realistic number of 600 passengers per million passengers in its planning application, the numbers are still too high.

Numbers employed at regional airports generally are falling in the wake of the rise in low cost operators such as Ryanair and Easyjet and advances in technology. These operators are colonising short haul routes, taking over from the full service short haul routes operated by flag carriers such as British Airways. The scale of the decline in the numbers employed on site at airports (direct employment) is graphically shown in the table 11.0 below. This table shows the decline in numbers at Stansted Airport which is heavily dependent on low cost operators such as Ryanair. The number employed per million passenger throughput has fallen from 1173 people to 526 between 1998 and 2005 - a decline of 55%. The table also shows that employment is expected to continue to fall.

Table 11.0: Stansted Airport - Direct Employment

Year	Employees (Number)	Passengers (Millions)	No of Employees per Million Passenger Throughput
1998	7,977	6.8	1,173
2003	10,600	18.7	567
2005	11,684	22.0	526
2014 (est)*	16,800	35.0	480
2014 (est)**	11551	35.0	330

Source: Stansted Generation 1, Environmental Statement, Volume 6: Employment Effects (Table 17), Stansted Airport Interim Master Plan, May 2006

* Stansted Airport projection - assumes productivity growth of 1.5% over the period 2003 to 2014- the recorded productivity growth across the UK as a whole over the period 1998-2003. (This is considerably lower than the productivity at Stansted Airport over the same period - 1998-2003 - of 15.8% per annum)

** LAAG estimate based on productivity growth of 5% per annum over the period 2003 -2014.

Airport employment characteristics mirror the airlines that use them. Table 11.1 below shows the employment characteristics of airlines ranging from a full service long haul operator such as British Airways which employed 1402 staff per million carried in 2006, to an airline such as Aerlingus which operated full schedule and low cost services, employing 419 staff per million passengers carried to the low cost operators such as Easyjet and Ryanair. The latter, which is the most aggressive of the low cost operators, only employed 88 staff per million passengers carried. Ryanair therefore, only employs 6% of the staff carried by a full service long haul operator such as British Airways. This table also shows that the trend in employment is down.

**Table 11.1: Airline Employment
Number of staff Employed per Million Passengers Carried***

	2004	2005	2006
British Airways	1439	1409	1402
Aerlingus	561	432	419
Easyjet	151	131	132
Ryanair	99	94	88

*Latest Report & Accounts & Securities & Exchange Commission Form 2-F (Ryanair). Year ends: Ryanair, Mar 2006, Easyjet, Sept, 2006, British Airways Mar 06 and Aer Lingus Dec 06. Note: the figures represent average total employment over the year

Low cost operators, not full service operators, will use Lydd Airport. The planning application itself backs up this belief, as the car parking configuration reflects the needs of low cost operators – the proportion of short stay parking which would be used by business men is low. Table 14.26 (page 262, Terminal Building ES) shows 60 of the 860 total car park spaces (7%) are for short stay needs.

11.0.3: Lydd Airport – Employment Comparisons

Direct employment on the airport itself (numbers employed by the airport and other companies based on site) is easily measurable, unlike the measurement of indirect and induced employment which is an art rather than a science. We therefore focus our discussions on direct employment.

Table 11.3 below compares direct employment at major regional airports in 2005. The figures are derived from airport master plans except for Infratil which is still in the process of preparing a master plan, the source being the company itself.

**Table 11.3: Direct Employment
Numbers of Employees on Site per Million Passengers Actual - 2005**

Prestwick	Bristol	Southampton	Leeds*	Stansted
250 - 300	510	652	595	526

Source: Infratil, Stansted Airport Master Plan, Southampton Airport Master Plan, Bristol International Airport Master Plan, Leeds Bradford International Airport Master Plan. Note: *The Leeds figure has been derived by taking the full time equivalent level of employment in 2005 given in the Master Plan and multiplying it by a factor of 1.16 – the ratio of actual to full time equivalents for Bristol International Airport.

Table 11.4: Number of Passengers in Millions - 2005

Prestwick	Bristol	Southampton	Leeds	Stansted
2.4	5.2	1.84	2.6	22.0

Source: CAA, Note: The figures are terminal passenger numbers

Cardiff International airport (~2million passengers) which was the airport visited by Shepway District Councillors on their fact finding tour, has not been included in the analysis, as this airport is heavily reliant on activities outside carrying passengers - the airports is the main maintenance base for British Airways so that the number of employees per million passenger throughput is disproportionately high.

There are a number of relevant observations. First, although the figures in table 11.3 are the latest available, they are based on 2005 statistics which means they are out of date and will overstate the current and future employment numbers, given the declining employment trends at airports. Secondly, many of the airports have a high component of business travellers due to their location. Southampton which employed 652 passengers per million passenger throughput in 2005, has a high business travel component (39% according to the airport's Master Plan) reflecting

the airport's location and the fact that the airport is the principal link to the tax havens of the Channel Islands, Alderney and the Isle of Man. The planes serving these Islands are smaller and therefore the ratio of staff to passengers is higher. The high business component generally means higher service levels and a higher labour content. A number of airlines have bases on site which also raises the labour component.

Bristol Airport also has a relatively high proportion of business travellers at 20% (Airport's Master Plan) and therefore higher service requirements and thus higher labour content. Even in 2005 the airport had less than 600 staff per million passengers carried (510). The Terminal Building ES (p331) states that Bristol Airport employs 584 persons per million passengers as opposed to 510. The figure for employment has been exaggerated since the 2005 employment figure has been divided by 2004 passenger numbers.

Lydd Airport will not support a high business component due to its remote location and competition from Eurostar which is a more suitable mode of transport for business men to places such as Paris and Brussels as it takes users to the centre of the cities. The fact that Eurostar is reducing its services to Brussels and Paris from Ashford also indicates that there is limited demand for passengers in general and business passengers in particular

Leeds Airport is owned by five councils and therefore is unlikely to be as efficient as airports operating in the private sector. Even allowing for this factor, the airport had around 600 staff per million passengers carried in 2005. Assuming Lydd achieves its 2mppa target in 2015, and given the declining trends in airport employment, even basing Lydd on the Leeds model it seems unlikely that the airport will be employing 600 people per million passengers in 8 years time. Further, Lydd is effectively starting a new regional airport which means it will not have legacy problems and can embrace the very latest technology which should mean it will operate with less staff than airports with older facilities.

Prestwick Airport (Glasgow Prestwick Airport) is the most reliable guide to the employment characteristics at Lydd. The airport is owned by Infratil the New Zealand Company that owns Manston Airport. This airport which is dominated by Ryanair had around 600 employees on site in 2005 (roughly 70% employed by Infratil itself), had a throughput of 2.4 million passengers and operated a material freight component (40,000 tons). This equates to 250 passengers per million passengers throughput. Since we do not have official Master plan figures for employment we have rounded the numbers up to 300 passengers per million passenger throughput. Assuming Infratil operated the same fleet mix out of Manston, the employment characteristics on site would be similar. This means at the 2mppa level, Lydd Airport overall would be operating at a 600 manpower or £9m annual cost disadvantage (600*£15,000) to its neighbour Manston Airport and assuming Lydd Airport's own employment represents 70% of the total on site, Lydd Airport as a company would be at an annual cost disadvantage of £6m. Lydd Airport would not survive. At best Lydd Airport would employ 300 passengers per

million passengers were it operating at the 2mppa level today, and the figures will be less than this if it achieves these numbers in 2015.

11.0.4: Lost Employment

The airport contends (page 350, Terminal Building ES) that there will be no negative impacts on recreational facilities in close proximity to the airport. This is clearly incorrect.

The creation of a regional airport to the level of 500,000 passengers per annum will have adverse consequences for the tourist industry on Romney Marsh and its surrounds. The ES of both applications highlights the importance of this sector and its growth since 1995 – 36.4% compared to the national average of 18%. One of the most vulnerable sectors will be the caravan park industry.

Parks under the Instrument Landing System (ILS) flight path are particularly vulnerable as they will experience noise and pollution from all in coming flights – Hythe, Dymchurch, St Mary's Bay, Littlestone and Greatstone will be the most affected. Caravan Parks outside these areas will be indirectly affected as the creation of a regional airport will lead to the urbanisation of Romney Marsh - expanded roads, new roundabouts, industrial buildings to serve the airport and more traffic. The change in character of the Marsh will alienate many owners, as the peace and tranquillity of Romney Marsh, one of the principal reasons for coming to the area, will be lost.

LAAG conducted a survey of caravan parks on Romney Marsh. Employment statistics from a sample of caravan parks (from large parks to one man operators) were obtained and these statistics were used as a guide to estimate the total employment in caravan parks on Romney Marsh given broad knowledge of the size of the individual parks. LAAG estimated that there are 27 parks on Romney Marsh used for caravans and chalets.

In total LAAG believes that caravan parks on Romney Marsh employ 160 permanent jobs (including owner operators) and 270 people in the summer. In addition to the direct employment created by these parks it is important to take into account the multiplier impact on the local economy. People who stay in caravan parks spend in local towns, support local pubs, restaurants and visitor attractions. Larger parks cater for thousands of holiday makers each year. All these businesses will be affected if this industry contracts. One of the largest leisure employers in this area is Pontins in Camber and this has not been included in this survey.

Summary of Caravan Park Employment on Romney Marsh

27 caravan parks on Romney Marsh

Estimated full time employment created: 160 people
Estimated part time summer employment: 270 people
Total employment: 430 people

Source: LAAG

Other leisure industries that will be affected by the airport include Littlestone Golf Club which is directly under the in-coming flight path and employs 24 people. This golf club will lose country members. Why should Londoners for example, come to Littlestone when there are many other golf courses in Kent? The Romney Hythe and Dymchurch Railway which employs some 50 people (plus a pool of volunteers) would be particularly affected by any contraction in the caravan industry. Dungeness and the RSPB visitor centre also attract people to the area. The RSPB visitor centre is manned by voluntary labour but its 28,400 visitors (2005/2006) (largely ABC1 visitors) spend on Romney Marsh.

Finally, the airport claims that inbound tourism will have a beneficial impact on the local economy (17.6.17 – 17.6.22, page 350 and 351 of the Terminal Building ES). This will not be the case as the airport is likely to be patronised by low cost operators which mean traffic is predominantly out bound.

11.0.5: Implication for Dungeness

The creation of a regional airport will jeopardise the planning application for a third power station at Dungeness - Dungeness C and thus a source of high quality employment on Romney Marsh. Regulations supervised by the Nuclear Installations Inspectorate discourage large movements of people close to nuclear power stations. Further, as the John Large report indicates (Appendix 8) the crash damage safety case would fail.

The ES of the Terminal Building ES dismisses the employment at the Dungeness site (page 340) but fails to take into account the jobs created by decommissioning (Dungeness A & B) and a new nuclear power station.

On the decommissioning of Dungeness A, the ES rightly points out that employment at Dungeness A will fall from 475 at end December 2006 to zero at the end of the care & maintenance period (2021) but fails to point out the phasing of the employment decline over this period and that the drop will be partly offset by the addition of up to 300 contract personnel to help with decommissioning (see Environmental Statement, Dungeness A Nuclear Power Station, Part 2 Section 16 - 16.40 to 16.55).

In addition to Dungeness A, there will be the decommissioning of Dungeness B from 2018 which will create its own employment profile and on top of this the impact of a third nuclear power station at Dungeness - Dungeness C.

The government has acknowledged the need for a new nuclear power build programme subject to the Energy White Paper and changes to the planning regime. Dungeness is one of the top 5 sites for a new nuclear power station - it is the only site in the South East of England and has established grid connections. (British Energy believes the flooding issue can be overcome.) The government has also acknowledged the primacy of existing sites.

Dungeness C would be a third generation nuclear power station, having a capacity of over 2000MW (more output than Dungeness A and B combined) and a life expectancy of 60 years. During an estimated seven year construction phase, local employment would be in the range 1000 to 1500 people. Once in operation the permanent long term employment level is expected to be around 600 highly skilled jobs. These jobs will not be created if Lydd Airport's expansion programme is approved. The following table shows the employment characteristics of the Dungeness site.

**Table 11.5
Numbers Employed at Dungeness Nuclear Power Complex**

	2006	2008	2017	2020	2025
Dungeness A					
Permanent	475	330	195	170	0
Temporary Contract (a)		300	150	5	0
Total Dungeness A	475	630	345	175	0
Dungeness B					
Permanent (b)	633	633	633	430	280
Temporary Contract (c)				300	275
Total Dungeness B	633	633	633	730	555
Dungeness C (d)					
Construction			1250	200	0
Permanent				600	600
Total Dungeness C			1250	800	600
Total Dungeness	1108	1263	2228	1705	1155

(a) Rate of decline estimated

(b) Rate of labour decline after decommissioning is estimated

(c) Based on numbers for Dungeness A

(d) Assumed construction starts 2013/2014 - LAAG estimate

Takes no account of employment increases caused by outages

Source: British Energy, Environmental Statement, Dungeness A Nuclear Power Station, and LAAG estimates

The table below summarises the employment position at the airport based on 500,000ppa and 2million passengers per annum. At 500,000ppa the airport believes it will generate 300 jobs, based on its rule of thumb of 600 jobs created per million passenger throughput. Based on the more realistic figure of 300 jobs per million throughput, and allowing for the diseconomies of scale due to throughput being below one million passengers, then the number is expected to be in the region of 175 people per 500,000ppa.

Since an airport operating at 500,000pp would still jeopardise Dungeness C (See John Large Report, Appendix 8), the table shows that 600 high quality jobs will be lost to the local economy and replaced with 175 jobs of which a high proportion will be seasonal and part time. If the airport achieves the 2mppa passenger level the employment characteristics would be similar, but an operation employing a high proportion of seasonal, low quality jobs will be replacing the high quality permanent employment at Dungeness. The spending power created by the high quality permanent employment at Dungeness will have a more pronounced impact on the local economy than that created by the airport's employment. Dungeness has the added advantage of producing clean energy so that its impact on the local environment will be minimal.

Employment Comparisons - Dungeness C (fully Operational) versus Lydd Airport

- Lydd Airport at 500,000ppa
 - ~175 people
 - High % of low skilled jobs
 - Highly seasonal jobs
 - Net jobs lower - loss of leisure jobs and jobs in the nuclear industry

- Lydd Airport at 2mppa
 - ~600 people
 - High % of low skilled jobs
 - Highly seasonal jobs
 - Net jobs lower - loss of leisure jobs and jobs in the nuclear industry

- Dungeness C
 - ~600 highly skilled jobs
 - Operates 365 days/year
 - Gross equals net - no loss of jobs elsewhere

11.0.6: Other Socio Economic Aspects

There are 7 large nursing homes/ centres for people with learning difficulties under the flight path in Littlestone alone. Since residents have no control over their destiny, homes will continue to operate despite the noise and pollution. Historically the presence of large houses and a pool of low skilled labour have enabled these

nursing homes to survive. There will be indirect consequences for the operators of these homes as the airport will provide competition for low skilled labour (Nursing homes lost staff to Sainsbury when it started in New Romney). Nursing home operators already have difficulty with employment particularly over holiday periods and many people will opt for easier jobs at the airport. The resulting increase in labour costs could make some of these nursing homes unprofitable and lead to their closure.

The ES makes cursory mention of the schools in terms of the airports impact on school capacity and ignores the adverse impact the proximity of Greatstone Primary School (see Appendix:6) to the runway will have on the education of local children. On page 335 of the Terminal ES it is claimed Greatstone Primary School is approximately 2miles from the airport. This school is only 600m from the extended runway which has adverse consequences for school children and cannot be rectified with double glazing advocated on page 383 of the Runway Extension ES (Chapter 19, Operational Mitigation Tables).

11.07: Summary

- 1) Employment projections for Lydd Airport are too high. Direct Employment at Lydd Airport will be in the region of 300 passengers per million passenger throughput, not the figure of 600 quoted by the airport.
- 2) The creation of a regional airport will lead to job losses in the leisure industry on Romney Marsh.
- 3) An airport running to the capacity of 500,000ppa would jeopardise the planning application for Dungeness C, leading to the loss of the opportunity to create 600 high quality jobs at Dungeness in exchange for 175 jobs at Lydd Airport of which a high proportion will be seasonal and low skilled.
- 4) The airport will create problems for employers such as nursing homes by competing for low skilled labour which could lead to some closures.

12.0: Noise and Vibration

This section is deeply flawed and needs to be redone. The noise contours are incorrect for the fleet mix assumed (Figures 16.3 and 16.4), and since the fleet mix itself is not representative of the likely aircraft mix that will fly from Lydd Airport, this section gives a totally misleading impression of the noise consequences for residents of this development. All comments relate to the Runway Extension ES.

Figure 16.3 shows the contours for 300,000 passengers without the runway extension. The text makes no reference to the aircraft assumed, other than to say “of the type already using the aircraft on a regular basis” (16.5.3 on page 331). It would appear that the contours are based on the aircraft mix shown in Table 3.3 on page 36. This table shows the following aircraft - BAE 146, Dash 8, ATR42-500 and SAAB 340. However, none of these types are regular users of the airport. In fact some of these have probably never visited Lydd. The model should show these aircraft using the ILS system and turning right on take off. None of these assumptions has been used in figure 16.3. Instead, it is assumed aircraft do not use the ILS approach (they fly manually) and that they turn left on take off - WHICH IS INCORRECT. (16.5.2 – 16.5.4 page 331)

Aircraft such as the BAE 146, Dash 8, ATR42-500 and SAAB 340 (and B737/A319) will turn right on take off and use the ILS on landing. CAP 032, the official UK Aeronautical Publication produced by the CAA which gives information on facilities, services, rules, regulations and restrictions in UK airspace, says in its entry for Lydd Airport that circuit direction (= direction of turn after take off) for runway 21 for all aircraft with a maximum take off weight greater than 5700kg - is right hand. The Trislander used in the service to Le Touquet can fly left on take off since it weighs 4536kg. It is also slow and has the manoeuvrability to stay outside the 1.5nm radius of the power station. The Trislanders fly to Le Touquet at low altitude, outside controlled airspace.

In assessing the noise impact after the runway extension has been built (Figure 16.4) the airport continues to assume that all aircraft types up to BAE 146 size (BAE 146, Dash 8, ATR42-500 and SAAB 340) continue to fly VFR (visual flight rules, i.e. manually) in and out of Lydd, turning left on take off - although the map does appear to correctly assume that B737/A319 use the ILS for landing and turn sharply right on takeoff from runway 21. THIS MAP IS ALSO INCORRECT since all commercial aircraft will use the same flight paths – i.e. they will turn right on takeoff and use the ILS when landing.

The Terminal Extension ES makes the same assumptions – Figure 16.4 which is also incorrect shows the B737/319 turning right on takeoff and using the ILS but the other aircraft (BAE 146, Dash 8, ATR42-500 and SAAB 340) turning left and landing visually.

REVISED NOISE CONTOURS WILL SHOW THAT LYDD TOWN WILL BE ADVERSELY AFFECTED BY NOISE FROM THE AIRPORT.

Other mistakes are listed below.

16.3.18: ILS "tracks a steady Northerly descent into Lydd airport" – this should be southerly. The list of towns over flown omits Lyminge. No noise analysis has been done at all for the NDB approach which is a different flight path. Although it will not be often used, its noise characteristics should be known.

16.3.19: The ES states "The runway at LAA subtends a 30 degree angle to magnetic North. It should be - 31 degree angle.

16.4.3: Noise monitoring took place when airport activity at a seasonal low.

16.4.4: No baseline noise monitoring at the north end of Lydd town, which would be significantly affected by any aircraft carrying out a go-around from runway 21. Also, nothing in centre or western parts of Lydd which would be affected by aircraft taking off from runway 21 and turning right to avoid D044 (Lydd Ranges).

16.5.10: The ES states "As there will not be any new aircraft introduced to the fleetmix, the subjective character of the noise produced will not change significantly." Except that the *actual* current noise environment contains none of these aircraft types, therefore the "subjective character" is purely theoretical, it is not experienced by anyone currently living around Lydd.

16.5.11: The ES states "ground operations associated with this scenario will not include the introduction of larger aircraft carrying APU's (sic) or requiring GPU's (sic)." First, if an aircraft does not have an APU then it must rely on a GPU for power when on the ground. Second, the "fleetmix" for this scenario includes at least two types – BAE 146 and Dash 8 – which do have APUs. Consequently there will be GPU and APU noise.

16.7.12: There is no analysis to back up the airport's claim that aircraft will be at 1000 feet over Lydd. It may not be too far out but it will be extremely critical in terms of how low the aircraft can be when it starts the turn. The later they start the turn the greater the risk of infringing D044 (Lydd Ranges). The earlier they start the turn, the lower they will be over Lydd. Since they must turn right they will have difficulty in meeting the current noise abatement procedure which states "Climb straight ahead to at least 500 ft or until passing upwind end of the runway, whichever is later, before turning left or right as instructed by ATC."

16.7.15: The ES states "pass-by duration of 20 seconds can again be assumed". But landing aircraft are significantly slower than departing aircraft so this assumption is not valid.

Table 16.10: Dunes Road is less than 1250 metres from the touchdown point of the extended runway so noise figures not valid.

16.7.20: The ES suggests combinations of acceptable departures/arrivals which includes an A319 arrival from the south. But an A319 will never be able to arrive from the south unless the Lydd Military Range is closed and the MOD allows flights.

16.7.21: In discussions on night noise, it would be simple for the airport to commit to banning jet movements between 2300 and 0700, but they don't.

16.7.26: The "large aircraft" they use for their figures is an HS125. This is a small business jet, completely unrepresentative of airliners.

16.7.33: No changes in noise climate despite adding B737 and A319 etc to the fleet mix - this is completely counter-intuitive and appears to have no data to back it up

16.9.2: There is no mention of other standard noise abatement procedures e.g. continuous descent approaches, restrictions on takeoff paths and climb profiles, aircraft type bans etc. There is also no mention of the fact that they will be forced to abandon their existing noise abatement procedure for departure on runway 21.

16.11.4: The ES states: "the existing runway will allow aircraft such as the Boeing 737 with limited take of [sic] weight to use the airport". So why is this aircraft not included in the baseline noise environment?

13.0: Cumulative Impacts

The section fails to take into account the possibility of a new nuclear power station at Dungeness. The government has given its backing to a new nuclear power station build programme - White Paper in May - and Dungeness is one of the top 5 sites for a new power station given the demand for power in the south east, it's relatively remote location, presence of deep water and established grid connections. (British Energy also believes it is possible to defend the site from flooding.) Dungeness C is likely to be built by a consortium with British Energy providing the site and operational management.

Yours Sincerely

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