

November 15th, 2007

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Dear Terry

Supplementary Information - 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. The supplementary information does not change our view and we stand by the comments made in our original response.

The supplementary Environmental Information (SEI) only includes a proportion of the additional information requested by LAAG in April 2007 and a high proportion of the key fundamental information that is provided in the SEI is either incorrect or inadequate.

The main points are summarised below:

Incorrect Flight Paths, Baseline Scenarios and Implications

- (1) Most of the flight path information is incorrect.
- (2) The baseline current conditions scenario for the Airport is incorrect. The current number of aircraft movements has been inflated, and regular, commercial service use of the airport is claimed, by aircraft types which rarely, if ever, use the airport.
- (3) The incorrect flight paths combined with the inflated “current conditions” scenario invalidates all the noise contour maps presented in the SEI and the analysis of the impact of aircraft noise on bird species of conservation interest. This incorrect information also casts doubt on the validity of the air quality analysis, the analysis of the predicted impacts of bird hazard control programmes on bird species of conservation interest, the analysis of the negative impacts of the airports development on tourism and the quality of the information used in the Appropriate Assessment

Flight Paths, Modal Split and Other Operational Issues

(4) Assumptions about the proportionate use of each runway, ie the modal split, are not backed by wind frequency data and do not appear to take account of airspace and operational constraints in runway usage caused by the airports proximity to the Lydd and Hythe Military Ranges and the Dungeness Nuclear Power Stations.

(5) Assumed flight paths for departures from Lydd Airport are based on an incorrect account of the orientation of en route airways.

(6) There are no provisions for missed approach manoeuvres in the flight path assumptions or noise assessments.

(7) No account is given of how retaining the Instrument Landing System (ILS) aerials in their current location will impact on the feasibility and regularity of commercial air operations into Lydd.

(8) LAA assumes that some proportion of inbound and outbound flight paths will fly through the Lydd Range airspace, but no figures are provided on how many flights will be permitted to do this.

(9) No explanation is given as to how Boeing 737/A319 services will be maintained when the aircraft are incapable of landing on runway 03 ie coming from over the Lydd Range.

(10) The SEI and ES wrongly assume that airliners up to BAe146 size will approach visually, not using the ILS; will be capable of landing on runway 03; and will be capable of turning left on departure from runway 21 (towards Lydd) without infringing the Dungeness nuclear power station restricted area.

(11) Height assumptions used in the Boeing 737 flight trial noise assessment are invalid

Comparisons with Other Airports and Socio Economic Issues

(12) The attempt to compare Lydd Airport with Bournemouth Airport to give the development proposal credence is misleading. Bournemouth Airport is backed by the Aviation White Paper, is within a heavily populated area, has good road infrastructure, an ILS on both runways, radar and unrestricted airspace - unlike Lydd Airport that has none of these features, and is never likely to have them, given its location.

(13) The analysis of the additional visitors to the Kent/Romney Marsh area as a result of the expanded Lydd Airport is incorrect since the metrics which are based on those for Bristol Airport have not been correctly applied. When this analysis is undertaken correctly it proves the point made in LAAG's original submission that foreign inbound visitors will be minimal.

(14) LAAG estimates that passenger levels of 500,000ppa (250,000ppa inbound) will yield less than 1000 inbound foreign visitors to Kent annually and less than 200 to

Romney Marsh. The revenue yielded by the visitors to Romney Marsh will not be sufficient to support one full time equivalent job on Romney Marsh. Most of the inbound passengers to Lydd Airport are likely to be returning British nationals, and of the few foreign inbound tourists, only a small proportion will remain in the immediate vicinity of the airport.

(15) The assessment of the potentially negative impacts of the airport's expansion on tourism fails to take into account the correct flight paths and modal split, the total number of movements per day including light aircraft, the likely seasonality of the business and the fact that people's behaviour is driven by expectations – an individual will make a decision to (say) buy or sell a caravan in advance of the point at which the noise/air pollution/urbanisation becomes intolerable.

(16) Lydd Airport and Manston Airport will compete for airline customers and for capital to grow their businesses.

Invertebrate Survey

(17) The invertebrate survey was far too restricted in area, habitats and species groups. The survey was only conducted for aquatic invertebrates and for Medicinal leech in drainage ditches on the footprint of the proposed runway extension and for terrestrial invertebrates on a transect on part of the proposed runway extension.

(18) A large proportion of the material surveyed has not been identified.

(19) No moth survey was conducted. This is vital as many rare moth species are known from the area affected by the development, including one species only known from Dungeness.

(20) There has been no attempt to specifically examine the impact of pollutants, including nitrogen on flora and hence the impact on the invertebrates dependent on these plants.

(21) The mitigation measures suggested for invertebrates remain inadequate, and ignore earlier proposals. There are no concrete measures for mitigation that commit the developers to specific actions within a timescale.

(22) No evidence of consultation between all land-owners and statutory bodies to agree the sympathetic management of invertebrates in interconnected ditches.

RECOMMENDATIONS

Shepway District Council should either:

- (1) Reject the planning Application outright on the basis of Lydd Airport's persistent reluctance to provide factual information on which to make the determination, or**
- (2) Recommend that Lydd Airport provide the following information before proceeding with a normal determination of the planning application.**

- (1) Re-submit the planning application 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.
- (2) Provide a "do nothing scenario".
- (3) Provide accurate, comprehensive flight path information for both commercial and light aircraft.
- (4) Provide an analysis of the wind characteristics of the area, and how the operation of the Military Ranges will affect the modal split of runway usage.
- (5) Provide accurate baseline information about the airport today, including accurate statistics for aircraft movements, the nature of the current aircraft mix, and the location and description of restricted flight zones over and around the Dungeness nuclear power stations and the Lydd and Hythe Military Ranges.
- (6) Reassess all information dependent on flight paths and the correct baselines - noise contours, the impact of noise on birds of conservation interest, bird hazard control, socio economic impacts, light and air pollutant analyses and the impact of light and air pollution on invertebrates.
- (7) 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. This is essential for the understanding of flight paths for commercial passenger carrying aircraft.
- (8) Provide an environmental assessment of the impact of the removal and re-installation of the ILS aerials, or if it is intended for the aerials to remain in the current location, outline how the airport intends to fully utilise the extended runway without breaching International Civil Aviation Organisation (ICAO) and CAA guidelines.

- (9) Assess the impact of the seasonality of the business on pollutants at the receptors.
- (10) Provide an 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.
- (11) Provide an analysis of how Lydd Airport's new facilities, flight infrastructure and use of runways compares with other regional airports.
- (12) Undertaken a radar based migratory bird studies as this is the only definitive way in which to gauge the scale of bird migration at Dungeness.
- (13) Undertake a comprehensive aquatic and terrestrial invertebrate survey covering a wide range of habitats over at least the area of the airport, but preferably a wider area. Habitats includes vegetated shingle, wetlands, dry grassland, ephemeral vegetation, scrub, swamp, margins of standing water, marshy grassland, semi-improved and unimproved, but managed grassland and bare shingle. All historic data must be taken into account and at least four visits during the season made, starting in mid May and using all the trapping methods already employed
- (14) Undertake a separate moth survey - a minimum of four moth trapping sessions during the season.
- (15) Survey for medicinal leeches in all ditches on site or connected with them and all other water bodies.
- (16) Assess the impact of light pollution on invertebrates and changes in flora due to increased nitrogen inputs since vegetation changes will adversely affect rare invertebrates in the area.
- (17) Ensure adequate mitigation proposals are in place, that the Airport commits to these, and that provision is made for monitoring in the future to assess the efficacy of the mitigation undertaken.
- (18) Include the impact of a new nuclear power station at Dungeness and the impact of proposed new housing in the Romney Marsh vicinity - particularly the Ashford growth area - when assessing cumulative impacts for the Appropriate Assessment.

1.0: Relevant Benchmarks since the Initial Consultation

1.1 South East Plan

The Report of the Panel of independent inspectors appointed by the government to examine the efficacy of SEERA's South East Plan concluded that Lydd Airport should not be supported as a strategic growth focus by the South East Plan. There is therefore no mention of Lydd Airport in the South East Plan. The Draft South East Plan supports Kent's existing regional airport - Manston Airport (Kent International Airport) - as its regional growth focus up to a level of 6 million passengers per annum, provided proposals satisfy policy criteria for the environment, transport, and amenity.

1.2 Environmental Audit by the United Nations

In September 2007 the United Nations updated its environmental audit and the findings were published in a book called *Global Environment Outlook: Environment for Development (GEO4)*. The review is backed by the peer reviewed material of 400 scientists from around the world and highlights the urgent need for measures to protect biodiversity given the rate of species loss and the adverse impact this will have on human and other forms of life.

Dungeness is one of the UK's most concentrated sources of biodiversity and includes species that are only found within its confines worldwide. The creation of a regional airport at Lydd will severely compromise this biodiversity through the impact of urbanisation, noise, air and light pollution. Shepway's privileged position in having this site within its boundaries means it should be proactively embracing the need to preserve these valuable sites on and around Dungeness, not supporting a development which will damage them.

2.0: Policy Context and Update

2.1 Regional and Strategic Planning Policy Guidance: (2.8 - 2.1)

See 1.1 above - the fact that the Airport disagrees with the Inspectors' conclusions is irrelevant

2.2 Comparison with Bournemouth Airport Development: (2.26 -2.42)

Bournemouth International Airport was granted planning permission to expand in June 2007 (up to 3mppa from 0.9mppa currently) and Lydd Airport's advisors have attempted to draw a parallel between this airport and Lydd. The comparison is highly misleading for the following reasons (see Spaven Consulting – Appendix 1, 2.2 & 2.3)

- Bournemouth is unequivocally supported by the Aviation White Paper unlike Lydd. The Airport was identified as a Major Airport where specific government support was given to an expansion of terminal capacity.
- Bournemouth already has a runway long enough to accommodate all likely jet types. Lydd cannot accommodate B737 and A319s commercially on the existing runway
- Bournemouth has a significantly larger catchment area population
- Bournemouth has two dual carriageway roads within 5km
- Bournemouth has unrestricted approaches to both runways, and ILS and NDB approaches available to both runways. Lydd only has (will have) these approaches to one runway.
- Bournemouth already has controlled airspace, radar and standard instrument arrival/departure routes, unlike Lydd
- Bournemouth does not have a permanently active danger area blocking all instrument approaches to one end of its main runway and forcing departures to carry out non-standard and operationally challenging turns on takeoff
- Bournemouth does not have a permanently active danger area immediately abutting the ILS approach at the other end, requiring the ILS to be offset by the maximum amount allowed by the CAA
- Bournemouth does not have a nuclear power station restricted area which precludes airliner departures turning left on takeoff
- Bournemouth Airport has been experiencing rapid growth with passenger numbers increasing from 271,000ppa in 2000 to current level of 920,000. Lydd Airport's passenger numbers have oscillated between 1000 and 5000ppa since 1992, with the figure in 2006 being below 3000ppa. This is despite the current airport having the capacity to grow passengers to 300,000ppa. This suggests that there is little demand for services at Lydd, in contrast to the high demand at Bournemouth.

3.0: Statutory and Non-Statutory Key Consultees

The requests for further information made by LAAG have largely been dismissed. This includes the need for an appropriate assessment under the Habitats legislation based on 2mppa, rather than 500,000ppa, and the need to resubmit the planning application based on the original scoping opinion which was also based on an outline planning application for phase 2 (up to 2mppa).

On the latter, we believe Lydd Airport cannot cherry pick from the Scoping Opinion. On the one hand the Airport opposes LAAG's request for a separate moth survey, justifying the decision on the basis that a recommendation for a moth survey was not included in the Scoping Opinion, yet the Airport fails to submit key information about the scope of the EIA which is prescribed in the Scoping Opinion.

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.”*

Other recommendations which that have been dismissed without justification are tabulated below.

LAAGs Recommendation	LAAG's response to LAA's Comments
<p>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.</p>	<p><i>LAA claims it has covered this aspect in the EA.</i> This is not the case. Although issues of profitability do not count in planning law, given the wider issues associated with this airport due to its location – damage to highly sensitive habitats, proximity to nuclear power stations – a full understanding of the airports past is required to ascertain whether the downsides associated with the proposed development can be justified by overriding public interest</p>
<p>Provide a “do nothing” scenario</p>	<p><i>No comment from LAA</i> “do nothing” scenario requested in Scoping Opinion 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 which carried less than 3000 passengers in 2005 and 2006 and no more than 4000 passengers per annum over the last decade, yet it has a license to operate 24 hours per day, 7 days a week and passengers numbers are only limited by the current terminal capacity of 300,000ppa.</p>
<p>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.</p>	<p><i>LAA - CAA data for 2005 states that the Airport handled approximately 3000 passengers.</i> How can a planning application be assessed when basic information about the airport today is incorrect. None of the issues raised here has been addressed – The existing flight paths, the number of existing aircraft movements and nature of</p>

	<p>the aircraft mix are not correct – see sections 4.0 & 5.0 & 6.0 below and Spaven Consulting, Appendix 1.</p>
<p>Provide detailed flight path information</p>	<p><i>LAA Claim supplementary flight path mapping is contained with the community noise impact reports at Appendices 15.1 & 15.2.</i></p> <p>Flight paths maps have been provided in his section but they are incorrect - See 4.0 & 5.0 & 6.0 below and Spaven Consulting, Appendix 1, 4.1- 4.11.</p>
<p>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.</p>	<p><i>LAA claims that the probability of diversion from Lydd Airport is very low and that not a single aircraft has been diverted since the introduction of the ILS. Says operating efficiency will not ordinarily be impacted upon by weather conditions in this location. The prevailing wind condition is such that runway 21 is active 70% of the time. Therefore giving a modal split of 70% south and 30% north.</i></p> <p>An accurate wind analysis is not provided. All 737s must land towards Lydd using runway 21 and the ILS. There is no ILS on runway 03 due to the military range. When tail winds exceed 12knots the aircraft will be required to divert. Not a single aircraft has been diverted since the introduction of the ILS because there has been minimal commercial traffic.</p> <p>Further, other factors in addition to wind determine the modal split – See Spaven Consulting: Appendix 1, 3.9-3.10. Accurate modal split required for determination of noise and other environmental impacts.</p>
<p>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.</p>	<p><i>LAA claims an analysis of how increased operations will fit into en route airspace is not necessary for the assessment of the planning applications.</i></p> <p>An analysis is essential as it helps explain flight paths. For example, the airport incorrectly shows a Boeing 737 departing from runway 21 – turning right and flying</p>

	<p>directly out to sea towards France (figures 12 & 14 – Appendix 15.1). An analysis of en route flight paths would demonstrate that the B737 would turn right and then route towards Dover, or South West to a point off Hastings. See Spaven Consulting: Appendix 1, 3.11</p>
<p>Provide an analysis of how Lydd Airport’s new facilities, flight infrastructure and use of runways compares with other regional airports</p>	<p><i>LAA claims this is not relevant to the planning application.</i></p> <p>Absolutely essential as it will throw light on the inadequacy of the services provided (even after expansion) given the amount of restricted airspace in the region and the constraints this imposes on the airport. The airport’s shortfalls are graphically illustrated by the comparison with Bournemouth Airport (see 2.2 above). Is it not in the public interest to support an inefficient airport that will damage surrounding fragile natural habitats and pose safety concerns due to its proximity to the Dungeness nuclear power stations when there are clearly other airports with better facilities?</p>
<p>Indicate the new location of the ILS aerials after the runway has been extended</p>	<p><i>LAA maintains the ILS will remain in its current location</i></p> <p>If this is the case, then the ILS will no longer meet ICAO & CAA standards for the minimum distance between the point where the offset ILS localiser beam crosses the extended runway centreline, and the runway threshold. Either, the airport will not be able to fully utilise the runway extension or will use the extension and breach ICAO/CAA standards. There is no analysis of this in the ES. See Spaven Consulting: Appendix 1, 3.12.</p>
<p>Undertake a comprehensive invertebrate survey covering a wide range of habitats over at least the area of the airport, but preferably a wider area</p>	<p><i>LAA - Supplementary invertebrate survey included in Appendix 5.</i></p> <p>Additional survey undertaken but still inadequate. See Drs Ismays Appendix 2</p> <ul style="list-style-type: none"> - Aquatic invertebrates sampled by appropriate methods but not all of the specimens were identified. - Survey confined to aquatic invertebrates

	<p>and medicinal leeches in ditches - survey footprint too small for these species.</p> <ul style="list-style-type: none"> - Need to survey terrestrial invertebrates as well -over appropriate footprint and using appropriate methods -Sweep netting in mid July for terrestrial invertebrates over small catchment area is inadequate - Input of pollutants not assessed - Mitigation methods inadequate – need concrete measures and commitment to specific actions within defined time span.
Undertake a separate moth survey	<p><i>LAA claims not required because not in Scoping Opinion</i></p> <ul style="list-style-type: none"> - Overlooking the need for a moth survey in a Scoping Opinion is not grounds for not undertaking one, if it subsequently comes to light that it is needed (see EIA guidelines). There are rare moths at Dungeness including one only known in this area. See Ismays Appendix 2
Survey a wider area of ponds and ditches for medicinal leech	<p><i>LAA – Additional medicinal leech surveys were undertaken in May & August 2007. No medicinal leech found</i></p> <p>See Ismays Appendix 2 and above. Only part of the extension of the runway included in additional survey – all other ditches and most ponds not surveyed. Medicinal leech found in earlier surveys – also found in earlier survey for EIA</p>
Undertake a migratory bird study	<p><i>LAA – The survey methodology for bird studies and the impact of the proposed development on the birds did not include radar based migratory studies. Claims studies undertaken are sufficient to determine the development’s impact on birds.</i></p> <p>LAAG believes radar based migratory bird study is the only objective way in which to assess scale of migration and movement of bird populations across Dungeness</p>
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	<p><i>LAA – Refer to Appendices 3.1 and 3.2 – Bird Hazard Control Programme</i></p> <p>No analysis undertaken</p>

<p>Provide an assessment of the safety consequences of bird strike</p>	<p><i>LAA – Refer to Appendices 3.1 and 3.2 – Bird Hazard Control Programme</i></p> <p>No analysis undertaken</p>
<p>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</p>	<p><i>LAA – Refer to Supplementary information on Socio-economic impacts</i></p> <p>No analysis given although acknowledged lower employment numbers possible - 350 jobs per million ppa as opposed to 600 jobs per million ppa. No explanation given for the 350 jobs per million ppa rule of thumb. LAAG stands by 300 jobs per million ppa – see full analysis in LAAG’s initial response to the planning application</p>
<p>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.</p>	<p><i>LAA claims fleet mix and flight paths are realistic and refers to Appendices 15.1 & 15.2</i></p> <p>See below - flight paths of commercial aircraft remain inaccurate so noise profiles need re-doing – see analysis below and Spaven Consulting: Appendix 1</p>
<p>Re-examined pollution profile maps in the light of the comments about the aircraft flight paths</p>	<p><i>LAA claims not required as pollution levels are well within statutory air quality limits</i></p>
<p>Provide NDB approach noise contours</p>	<p><i>LAA claims already provided. Not the case</i></p> <p>See Spaven: Appendix 1, 3.14 - None of the noise contours in the ES or in the SEI for arrivals from the north shows any aircraft following the NDB flight path. All flight paths shown equate to the ILS flight path.</p>
<p>Include a new nuclear power station at Dungeness when assessing cumulative impacts.</p>	<p><i>LAA claims not necessary</i></p> <p>Government about to announce new nuclear build programme. Dungeness is one of the top 5 sites. Since April 07 Panel report of South East Plan indicates final scale of housing in the Romney Marsh vicinity particularly Ashford growth centre. Impact of increased population on SAC & SPA should also be assessed in AA.</p>

4.0: Flight Paths and Modal Split

4.1 Flight Paths

Lydd airport has submitted flight path information in the supplementary information for the assessment of Community Noise Impacts at 300,000ppa and 500,000ppa. The flight paths underlying the noise profiles are shown in Appendices 7. These flight paths are incorrect (See Spaven Consulting, Appendix 1). This has wide implications as the flight paths have been used as a basis for assessing the impact of noise on residents (Appendices 15.1 & 15.2) and the impact of noise on birds of conservation interest (Appendices 6.1 and 6.2). They are also form the basis of a key part of the data set for the Appropriate Assessment for the Dungeness SAC and Dungeness to Pett Level SPA; have influenced the modelling of air quality (Appendices 4.1 & 4.2.) and are relevant when assessing the impact of the development on the local tourist industry.

A full analysis of the flight path shortcomings is given by Spaven Consulting in Appendix 1. LAAG puts some of the main points into context here.

Note, for clarification runway 21 refers to aircraft landing towards Lydd (from the North with commercial aircraft mostly using the Instrument Landing System (ILS)) and taking off towards Lydd. Runway 03 refers to aircraft taking off towards Greatstone (towards the North) and landing towards Greatstone (from the South).

A composite flight path is shown in Appendices 7 within Appendices 15.1 & 15.2. Separate flight paths should have been shown for both commercial and light (general Aviation) aircraft to reflect the different constraints under which they operate. These maps should accurately show the flight restrictions in the area – the 2000ft height restrictions over the nuclear power stations, the 1.5nm and 2nm exclusion zones surrounding the nuclear complex and the 4000ft and 3200ft height restrictions over the Lydd and Hythe military ranges.

For commercial aircraft, which will be the type of aircraft underpinning the growth in the airport, the flight path map is totally inaccurate. While the South scenario correctly acknowledges that B737/A319 will always land from the North (towards Lydd along the Instrument Landing System - ILS), it is implied that the rest of the commercial aircraft (BAe I46, Dash 8, ATR42 and SAAB 340 will land from the South over the Lydd Range using a visual approach (no ILS) without infringing the 4000ft height restriction. This appears highly improbable.

There is no ILS on runway 03 – ie landing from over the Lydd Military Range due to the presence of the military range. Since commercial passenger carrying aircraft require an ILS to land it is doubtful whether these aircraft types will land on Runway 03 (over the Lydd Range) even when the military range is shut.

4.2 Modal Split

The modal split scenarios assumed in the noise analysis – 70% South and 30% North, all South and all North bears no relation to reality. In addition to wind speed the modal split must take into account the constraints in the area afforded by restricted

airspace over the Hythe and Lydd Military Ranges (3200ft and 4000ft respectively), the Dungeness nuclear complex (2000ft) and the no fly zones within 2nm and 1.5nm of the nuclear power complex. The description should also detail Lydd Airport's special dispensation to fly within 1.5nm of the nuclear power complex rather than the standard 2nm.

The Lydd Military Range is used for at least 300 days of the year. Firing takes place between 8.30am and 11pm at night but the range must be cleared by 7am in the morning, so the true use time is 7am to 11pm. There is a two week "down time" period over Christmas and a one week period over the summer for general maintenance. The remainder of the "down time" days occur intermittently making planning difficult. Firing notices are posted locally to instruct on the ranges firing programme - in the small print it is highlighted that firing times within a day cannot be accurately programmed.

5.0: Other Relevant Misrepresentations

Lydd Airport has misrepresented the nature of the current fleet mix and the daily and annual movements. Appendices 4 of Appendix 15.1 & 15.2 *Supplementary Environmental Information – Community Noise Impacts and 300,000ppa and 500,000ppa* - shows the existing fleet mix and the number of daily movements from which the annual figure can be determined. .

5.1 Total Existing Aircraft Movements – The Baseline

The figures in Appendices 4 for the total existing aircraft movements per day are incorrect. Indeed the figures have been fabricated. The table shows 70.095 movements per day implying 25,585 movements per annum, yet the annual figures given by the CAA for 2004, 2005 and 2006 are substantially below these numbers.

2004	2005	2006
24,268	22044	20236

Source: CAA

Further, the total existing movement figure used in Appendices 4 conflicts with the current movement figure used in the background information for the appropriate assessment; *Statement to Inform on the Predicted Impacts from a Proposed New Terminal Building at London Ashford Airport, Lydd, on the Dungeness to Pett Level Special Protection Area*.

On page 9, Table 2.2.4 - *Breakdown of current movements at LAA in 2005* - shows a breakdown of current movements in 2005 and total annual movements of 22,400. The CAA figure for 2005 is 22044 and it appears that the airport has "updated" the number to include small executive jets at a rate of 1 per day or 365 per year to reflect the new business jet service introduced since 2005. However, the airport has exaggerated the number executive jet movements - See Spaven Consulting Appendix 1, 6.1. **The baseline number in Appendices 4 is the figure used as a basis for analysis in the supplementary information, not the figure in Table 2.2.4.**

5.2 Existing Fleet Mix

The majority of aircraft currently operating from Lydd Airport are: light aircraft used by the local flying club; Lydd Airport's small Trislander aircraft used for the scheduled service to Le Touquet and a few business jets. Yet, *Appendices 4 of Appendix 15.1 & 15.2* show the existing fleet mix at Lydd Airport to be the following commercial aircraft - BAe-146, Dash 8, ATR42-500 and Saab 340/SF340B. In total these aircraft allegedly operate at the rate of 1.1 movements per day or 400 per year. This means that one of these aircraft types visits broadly every second day of the year. This is incorrect. These aircraft rarely if ever use Lydd Airport as Spaven's analysis of official CAA figures (Appendix 1, 3.2-3.6) attests. **This analysis shows that in the period January 2001 to August 2007 99.7% of the Air Transport Movements (ATMs) at Lydd Airport were by LyddAir's Trislanders, not the aircraft mentioned above. Lydd Air's Trislanders are not even recognised as an aircraft type in the existing conditions scenario.**

Table 2.2.4- Breakdown of current movements at LAA in 2005 (appropriate assessment) gives a more realistic assessment of the aircraft types currently operating at Lydd Airport, although it fails to highlight the Trislanders in the multi piston aircraft category (see Spaven Consulting Appendix 1, 6.1). **The baseline fleet mix in Appendices 4 is used as a basis for analysis in the supplementary information, not the fleet mix in Table 2.2.4.**

5.3 Why is the Lydd Airport Inflating the Fleet Mix Base?

. Lydd Airport is attempting to raise the base line by suggesting that the airport is already operating regular services using aircraft types that are common to bigger airports in the UK to minimise the difference between the baseline and the proposal. This will make it appear that the development proposed is not a step jump with all the consequences for local people and the environment, rather, a modest up scaling that local residents will habituate to.

6.0: Flight Paths and Noise Modelling

The noise analysis (Appendices 15.1 & 15.2) graphically illustrates the consequences of the inaccuracy of the flight path information (see also Spaven Consulting: Appendix, 4.1- 4.11 and 5.1-5.4).

Appendix 15.1 - Community Noise Impacts at 300,000ppa

Figure 1: INM Model for Original baseline, Average Annual – All North.
Aircraft mix is incorrect. BAe-146, Dash 8, ATR42-500 and Saab 340/SF340B do not currently fly from this airport, or if they do it is a rare occurrence. The flight paths should represent that of a fleet mix including Trislanders used for the Le Touquet service, light aircraft such as the Cessna 152 and Cessna 172 and the odd business jet.

Figure 2: INM Model for Original baseline. Annual Average – All South
Incorrect aircraft mix- As above.

Figure 3: INM Model for 300,000PAX, Upper Parameter Average (no extension) – 70/30 split

Modal split is questionable (see Spaven). Flight paths incorrect - still shows commercial aircraft departing left rather than right and infringing the no fly zone around the nuclear power station. Departures to the north show aircraft flying straight ahead whereas they will fan out to destinations to the SW, W and NW

Figure 4: INM Model for 300,000 PAX, Upper Parameter Daily (no extension) - All North

Shows departure flights only flying straight ahead - in reality some will go to destinations in the SW, W and NW. Departure flights appear to follow inbound ILS track. Outbound flights will generally climb straight ahead initially – 5 degrees to the east of the inbound ILS track

Figure 5: INM Model for 300,000PAX, Upper Parameter Daily (no extension) - All South

Incorrect flight paths - BAE I46, Dash 8, ATR42 and SAAB 340 will not land over the Lydd Range as no ILS and they will infringe 4000ft height restriction. Commercial aircraft still turning left on departure, rather than right, which means they will infringe 1.5nm no fly zone around the nuclear power station.

Figure 6: INM Model for 300,000PAX with runway extension – Upper Parameter Average – 70/30 Split

Modal split questionable. B737s and A319s able to operate commercially with runway extension – Map acknowledges that B737 and A319 will always land from the North using the ILS approach and when taking off to the South will turn right. However, still shows remaining commercial aircraft turning left rather than right on departure and landing over the range. Departures to the north show aircraft flying straight ahead whereas they will fan out to destinations to the SW, W and NW.

Figure 7: INM Model for 300,000PAX with runway extension -Upper Parameter Daily - All North

Shows departure flights only flying straight ahead - in reality some will go to destinations in the SW, W and NW. Departure flights appear to follow inbound ILS track. Outbound flights will generally climb straight ahead initially – 5 degrees to the east of the inbound ILS track

Figure 8: INM Model for 300,000PAX with runway extension -Upper Parameter Daily - All South

With the runway extension, B737s and A319s can operate commercially. Shows B737s and A319s landing from North along the ILS approach (exception given in all south scenario for B737s/A319s) and turning right on departure. This is correct. However, still shows BAe I46, Dash 8, ATR42 and SAAB 340 turning left on departure and landing over the Lydd military range which is incorrect.

Figure 9: INM Model for LAmx BAE 146 Single Movement – North Departure
Landings correct. Shows departure flight only flying straight ahead - in reality will go to destinations in the SW, W and NW. Departure flight appears to follow inbound ILS track. Outbound flight will generally climb straight ahead initially – 5 degrees to the east of the inbound ILS track.

Figure 10: INM Model for LAmax BAE 146 Single Movement – South Departure
Incorrectly shows BAE 146 turning left on departure (rather than right) and infringing the 1.5nm no fly zone.

Figures 11& 13: INM Model for LA Max and LA eq5mins Boeing 737 Single Movement – North Departure

Incorrectly shows aircraft climbing straight ahead but destinations likely to be to the South West, West and North West. Departure flight appears to follow inbound ILS track. Outbound flight will generally climb straight ahead initially – 5 degrees to the east of the inbound ILS track

Figure 12&14: INM Model for LAmax &LA eq,5mins Boeing 737 Single Movement – South Departure

Correctly shows aircraft turning right but B737 will NOT continue in a semi-circle out to sea towards France – rather route north east towards the Dover beacon or south west towards a point off Hastings. INCORRECT

The same comments apply for the corresponding maps in the section on Community Impacts for 500,000ppa

7.0 Application of Incorrect Baseline Information

7.1 Appendix 6.1 & 6.2 – The Predicted Impacts of Aircraft Noise at 300,000ppa and 500,000ppa on bird species of Conservation Importance near to London Ashford Airport (Lydd)

These sections use four maps showing flight paths for North and South departures for two aircraft types - a BAE-146 and a Boeing 737. The maps are Figures 9 & 10 above for a BAE-146 and Figures 11 and 12 above for the Boeing 737. All four maps are incorrect in varying degrees and the modal split itself is questionable. The Northerly departures for the BAe-146 and the Boeing 737 show the aircraft climbing straight ahead only, whereas some will be going to destinations to the South West, West and North West and they will be flying east of the inbound ILS path.

The Southerly departure maps show the Boeing 737 turning right but it will NOT continue in a semi-circle out to sea towards France – rather route north east towards the Dover beacon or south west towards a point off Hastings while the BAE-146 departures shows the aircraft turning left (rather than right) out to sea and infringing the 1.5nm no fly zone..

7.1.1 BAe146 Incorrect Baseline

Apart from the flight paths being incorrect, it is totally inappropriate to use the BAe146 aircraft for the baseline scenario for the impact of noise on birds. The BAe146 rarely, if ever visits Lydd Airport (see 5.2 above). The baseline should be the noise profiles for the airport's Trislander and aircraft such as the Cessna 152/172.

The B737 is an appropriate aircraft to use for the development scenario but the comparison should be made against a baseline noise profile for the Trislander/Cessna 152/772.

7.1.2 Daily Frequency of Single Event Levels

The airport's analysis is incorrect. At 300,000 ppa they argue that there will be 4 extra movements per day of the larger B737 aircraft (see Executive Summary). From the bird perspective there will; be an average of 12 extra movements per day as the BAe I46, Dash 8, ATR42 and SAAB 340 do not operate currently from the airport. Further, after taking into account the seasonal factor there will be 16 extra movements per day (see Appendix 4 – Appendix 15.1).

Similarly at 500,000ppa it is claimed in the Executive Summary that there will be 8 extra movements, whereas the true figure will be an average of 18 additional movements per day and 22 additional movements taking into account the seasonal upswing (see Appendix 4 – Appendix 15.2).

7.2 The predicted Impacts of a Bird Hazard Control Programme for 300,000ppp & 500,000ppa on Bird Species of Conservation Importance Near to LAA

The airport claims (4.2) that methods likely to be employed at 300,000ppa and 500,000ppa will not substantially differ from those used as today's baseline. This cannot be the case as the baseline has been inflated. Given the low level of activity at the airport today – the increased frequency of patrol and use of dispersal methods will be at a much greater rate than that suggested by the difference in activity levels between the airport's inflated baseline and that at 300,000ppa and 500,000ppa.

In 4.5 LAA propose the following initiatives as part of the habitat management programme:

- The practice of “putting down” game birds and the use of land adjacent to the airport for game shooting should cease;
- Where possible, and in combination with local landowners and farmers, agricultural practices including choice of crop: ploughing cultivating and harvesting methods; and grazing practices should seek to reduce the attractiveness to risk species.

Many local farmers are hostile to the development and will not programme their cropping/ ploughing programmes in order to maximise the profits of the airport. Even if compensation were to be offered, there is no guarantee that it would be accepted. Further, the well capitalised local shoot which includes many local farmers and businessmen will put up a strong fight to remain in business.

7.3 Appendices 4.1 & 4.2 - Air Quality Impact Assessment - Runway Extension and Terminal Building

It is not entirely clear from the text how dispersion modelling takes into account flight path information, or indeed whether it does at all. Intuitively concentrations of pollutants at receptor sites resulting from aircraft should take into account the type of aircraft, flight paths, frequency of operation and the height at which the aircraft is flying as well as other factors such as wind speed. Since the flight path information is incorrect it suggests that the results of the modelling for pollutants at the receptors is also incorrect

Further, there is no evidence that the seasonality of the business has been discounted in the pollutant calculations. Appendices 5 of Appendix 15.1 & 15.2 *Supplementary Environmental Information – Community Noise Impacts and 300,000ppa and 500,000ppa* - gives the airports assessment of seasonality. Taking the 500,000ppa scenario, the average movements per day for commercial aircraft are expected to be 18 whereas the upper parameter figure which takes into account the seasonal summer bias is 22 movements per day. LAAG believes the pollutant concentration in the summer period will be more pronounced. It is not clear whether this aspect has been taken into account in the pollutant assessment.

7.4 Volume 4: Statement to inform - Background to the Appropriate Assessments for the SPA and SAC

This section summarises all the information provided in the ESs and the supplementary information in order to determine whether the development will have an adverse impact on the Dungeness SAC and the Dungeness to Pett Level SPA. This includes the impact of noise, air and light pollution as well land take and physical disturbance on the plant, invertebrate and bird life of Dungeness. The correct representation of the base case scenario and flight paths is key to the understanding of most of these impacts. Since these variables have been misrepresented, the information used in the Appropriate Assessments is inadequate and cannot be used as a basis for their determination.

Point 2.2.4 refers to *Table 2.2.4 Breakdown of current movements at LAA in 2005* mentioned above in 5.1 and 5.2. Although this table gives a more realistic interpretation of baseline movements and the fleet mix, it has clearly not been used in any of the base analysis.

8.0 Supplementary Information on Socio Economic Impacts

8.1 Potentially Positive Impacts on Tourism

The additional visitor analysis in 5.6-5.11 is incorrect. When the metrics used for Bristol Airport are correctly applied it proves the point LAAG made in our original submission - inbound passengers will be minimal and will have an equally small impact on local tourism.

Data from Bristol International Airport shows that only 8% (5.5% on leisure trips and 2.5% business) of inbound passengers were foreign travellers (5.9) in 2004. Further,

only 7% of the total inbound passengers at Bristol used the South West Region as their final destination in the UK.

The South West Region is a large area and it is logical to assume that tourists do not spend time close to Bristol Airport due to noise, busy roads and the unattractive urban area in the immediate vicinity. For the same reasons we can assume that the inbound tourists that will come to Kent via Lydd Airport will quickly disperse in pursuit of more tranquil surroundings elsewhere in the Kent region. One therefore must question the benefits of the Airport's development to Romney Marsh itself when there are likely to be few inbound passengers for a start and only a small percentage of these remaining in the immediate vicinity of the airport. This is borne out by the analysis below by applying the metrics for Bristol Airport to Lydd Airport.

Using the consultant's assumption that 5% of passengers are expected to be inbound leisure tourists (5.11) then at 300,000 ppa (150,000ppa inbound) this yields 7500 tourists per annum and at 500,000ppp (250,000ppa inbound) the yield is 12500 tourists. Their analysis fails to apply the metric for Bristol that only 7% of the inbound traffic use the region as their final destination in the UK. If we assume the same figure (7%) for Lydd then the tourist figures for the South East/Kent region drop to 525 tourists at 300,000 and 875 tourists at 500,000ppa. Further, most inbound tourists, although staying in the region, are likely to disperse from the airport as quickly as possible so this number must be again reduced for Romney Marsh. We generously assume that 20% will stay on Romney Marsh bringing the numbers down to 105 and 175 tourists. The table below summarises the situation.

5.12 goes on to say that each inbound passenger is worth £242 to the South West economy. Applying this metric to the South East/Kent to the tourist numbers estimated for Romney Marsh, then the 300,000ppa scenario will yield £25,410 in tourist revenue for Romney Marsh and at 500,000ppa the tourists will yield £42,350.

The figures given for the region of £1.815m in tourist revenue based on 7500 tourists (300,000ppa) and £3.025m tourist revenue for 12500 tourists (500,000ppa) are incorrect. The figures for the South East/Kent region as a whole as opposed to Romney Marsh should be £127,050 ($525 * £242$) and £211,750 ($875 * £242$).

5.13 states that around £55,000 worth of visitor spending supports one full time equivalent in the tourist industry. Based on the visitor spending figures for Romney Marsh (see table below) it can be shown that inbound tourism will not even generate one full time job in tourism on Romney Marsh for both the 300,000ppa and 500,000ppa scenarios. For the whole region (South East/Kent) the numbers will be broadly 2 jobs at 300,000ppa ($£127,050 / £55,000$) and at 500,000ppa 4 jobs ($£211,750 / £55,000$)

	300,000ppa	500,000ppa
Inbound Passengers	150,000	250,000
% Passengers Inbound Leisure	5%	5%
No of Inbound passengers	7500	12500
% of Inbound Passengers Remaining in the Region	7%	7%
No of Passengers Remaining in Region	525	875
% of Passengers Remaining on Romney Marsh	20%	20%
No of passengers Remaining on Romney Marsh	105	175
Visitor Value to South West Economy	£242	£242
Estimated Annual Value of Inbound Tourist Revenue to Romney Marsh	£25,410	£42,350
Visitor Revenue for One Full Time Job	£55,000	£55,000
No of Direct Jobs Generated on Romney Marsh	0.5	0.8
No of Direct Jobs Generated in Region	2.3	3.9

In the points in 5.18 it is stated “we have assumed a conservative estimate of 5% [inbound passengers] but the available evidence for other airports suggests that this proportion could well be higher”. This is unlikely. Lydd Airport is a remote airport and will be patronised by low cost operators catering for British holiday makers so that inbound passengers will be British tourists returning from holiday. The 5% proportion is likely to be too high rather than too low.

8.2 Potentially Negative Impacts on Tourism

The analysis in 5.19 - 5.25 dismisses the negative impact on tourism by stating that the locals will adjust to the noise as the flight frequency over the 16 hour daytime between 7am to 11pm will be low.

This totally dismissive analysis fails to take note of the following:

- (a) Much of the flight path information is incorrect as is the modal split.
- (b) All commercial passenger plane arrivals will be from the North (via the ILS towards Lydd) passing over the coastal towns of Hythe, Dymchurch, St Mary’s Bay, Littlestone and Greatstone while a high proportion of the departures could be to the North ie towards Hythe due to the difficulties in carrying out the right turn on departure 21 (towards Lydd). This means the greatest concentration of flights will be over the main coastal tourist towns.
- (c) 5.22 points out that the 500,000ppa scenario will generate on average 18 scheduled commercial movements per day which is equivalent to one aircraft every 53 minutes over the 16 hour reputed daytime flying hours of 7am to 11pm. The analysis fails to point out that there will be 108 light aircraft movements as well, bringing the total aircraft movement to 123 per day or 7.7

movements per hour – an aircraft movement approximately every 8 minutes. Small aircraft noise can also be intrusive and this combined with the larger aircraft will not be conducive to tourism.

- (d) The report fails to take into account the seasonal bias of the business towards the summer months. The airport predicts (see Appendix 5, Appendix 15.2) that there will be 22 rather than 18 commercial flights daily in the summer months – 1.4 flights per hour over the 16 hour period (7am to 11pm) or one flight every 44 minutes. There is a high probability that the seasonal bias will be higher than this so the frequency will be correspondingly higher. No seasonal bias is assumed in the table for the non commercial aircraft giving 127 total movements per day which implies 7.9 movements per hour over the 16 hour period or a movement every 7.6 minutes. If one built the seasonal bias into the non-commercial aircraft mix, then rather than the 105 non-commercial movements there will be 128 non commercial movements and 150 movements in total. This implies more than 9 aircraft movements per hour and one movement every 6 minutes.
- (e) The report fails to appreciate that people are driven by expectations. They are not stupid. A caravan owner might tolerate the noise based on movements commensurate with the airport operating at 300,000ppa but will be uncomfortable about what is looming ie the upwards trend in growth - and will make a decision to (say) sell a caravan in advance of the point at which the noise/air pollution/urbanisation becomes intolerable.

8.3 Relationship with Kent International Airport (Manston)

The analysis of Lydd versus Manston Airport (6.10-6.15) displays an ignorance of commercial realities.

Manston and Lydd will compete for passengers. Manston has long haul capability whereas Lydd will not have this capability even after the extension of the runway. Manston has attempted to attract scheduled services by both short haul and long operators and has failed. The charter operators are the only ones willing to use the airport at this point in time. To say that Lydd will attract premium schedule services over Manston which is a superior airport and that Manston will continue to support charter operators is fatuous to the extreme.

Further, in terms of funding, Infratil's capacity to raise funds in the equity and debt markets, will be adversely affected by the prospect of more robust competition from another regional airport. When the former owner Planestation raised £30m in the UK equity markets in December 2004 (before the company went into liquidation) the market was unaware of Lydd's intentions. It was a difficult fund raising and had the City been aware of Lydd's intentions, Manston would not have raised £30m, or alternatively, only raised a proportion of the final sum. In this case Planestation would have gone into receivership earlier – in more normal circumstances (ie had the group been viable) it would have reduced its capacity to invest and thus employ staff.

9.0: Invertebrate Surveys of Drainage Ditches and Runway Extension Footprint

The submission by the entomological consultants Dr John and Barbara Ismay (Appendix 2) clearly demonstrates that the additional work on invertebrates carried out by the airport's consultants remains both inadequate in scope and depth.

Full details are given in their in Appendix 2. In summary, insufficient time and resources were given to the consultant to fully identify the material collected while the scope of the survey fell short of that required to make an accurate assessment of the airport's impact on the local invertebrate population – both aquatic and terrestrial.

The recommendations made by the Ismays in order to appropriately assess the impact of the development on invertebrates have largely been ignored. In particular, the survey area was too small – terrestrial and aquatic habitats covering at least the airport's catchment should have been surveyed. There were no moth surveys at all - essential as there are rare moths in the area affected by the development and the additional survey of medicinal leeches took no account of interconnected ditches and other ponds.

As the Ismays highlight Dungeness is one of the best sites in the UK for invertebrates and is of international importance. Internationally important species on site include the medicinal leech and the leafhopper *Aphrodes duffieldi*. Furthermore, the area supports several endemic species or subspecies, i.e. species that occur worldwide only at Dungeness - *Aphrodes duffieldi* and subspecies of the pygmy footman moth *Eilema pygmaeola pallifrons* and grass egg moth *Lasiocampa trifolii flava*.

10.0 Additional Comments - Volume 4: Statement to inform - Background to the Appropriate Assessments for the SPA and SAC

We believe the proposed development of housing over the next 20 years in the areas surrounding Romney Marsh, and particularly the scale of housing development in the Ashford growth area, where much of the growth will be on the Romney Marsh side of Ashford, should be taken into account when assessing cumulative impacts for the appropriate assessments. The build up in population will lead to more cars on Romney Marsh, more pollution, more dogs and more recreational damage particularly on the Dungeness SAC.

- (1) 30,600 new homes are expected to be constructed in the period 2006-2026 in Shepway, Ashford and the Romney Marsh side of Rother, producing a 73,440 increase in population.
- (2) This population increase is equivalent to 74% of the total current population of Shepway District, or putting it in terms of towns, the increase represents the current populations of Folkestone, Hythe, New Romney, Lydd and two thirds of the population of Saltwood.
- (3) The Panel Report for the South East Plan makes clear that the projected housing numbers should not be treated as ceilings “nor should there be any

attempt to ration planning permissions to avoid outperforming the RSS”. Therefore, there is a strong possibility over the next 20 years that these housing targets will be exceeded.

The major concern rests with eutrophication caused by dog faeces and urine, damage caused by visitors including fisherman walking on the shingle. In addition there will be more damage caused by quad bikes, 4X4s and by fly-tipping. The area most at risk is the area of the SAC on the Dungeness Estate - particularly the areas surrounding the “dead end” road leading to the Dungeness Nuclear Power stations.

Total Number of Dwellings & Population – 2006-2026

	Av. No	Total	Occupancy	Population
	Dwells.	Dwellings	per dwell.	
	per annum			
	2006-26	2006-26	Number	Number
Ashford	1135	22700	2.4	54480
Shepway	255	5100	2.4	12240
50% Rother	140	2800	2.4	6720
Total	1530	30600	2.4	73440

Note: KCC has estimated that the total population of Shepway in 2005 was 99,400.

Appendix 1

SPAVEN CONSULTING

LONDON ASHFORD AIRPORT (LYDD): RESPONSE TO CONSULTATION, SUPPLEMENTARY ENVIRONMENTAL INFORMATION AND STATEMENTS TO INFORM (October 2007)

COMMENTS ON AVIATION OPERATIONAL ASPECTS

November 2007

Appendix 2

**FURTHER COMMENTS ON THE
PLANNING APPLICATIONS (Y06/1647/SH
AND Y06/1648/SH) AND SUPPLEMENTARY
ENVIRONMENTAL INFORMATION FOR
LYDD AIRPORT**

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