

CPRE Kent response to planning applications Y06/1647/SH and Y06/1648/SH to extend the runway and construct a new terminal building at London Ashford Airport, Lydd, Kent.

CPRE Kent opposes the above planning applications for the following reasons:

Planned growth levels of London Ashford Airport, Lydd (LAA)

The introduction to the runway extension planning statement describes how ‘*the new terminal building will provide facilities for processing up to 500,000 ppa [passengers per annum]. However,*’ it continues, ‘*it is LAA’s medium-term aspiration to achieve 2 mppa. Further expansion work will be required to accommodate this number of passengers. It is intended that these works will be the subject of further planning applications in the future.*’

CPRE Kent considers it vital that the longer-term growth targets of LAA are assessed now, and that the current planning applications are considered against those growth targets, not against the more modest targets of Phase I. The company’s strategic vision poses, CPRE Kent feels, a severe risk to quality of life and quality of environment. Any growth plans should be considered at least in the context of the medium-term aspirations of the company, especially as Environmental Impact Assessment (EIA) regulations require that *overall* impacts are considered, not just the impacts of an application that will be one of several. The credibility of the planning applications must be seriously questioned in light of their failure to address the medium and long-term aspirations of 2 mppa and 6 mppa respectively.

Planning policy framework

Shepway Local Plan

Policy TR15 of the current Shepway Local Plan states: ‘*The District Planning Authority will permit proposals for the expansion of facilities at Lydd Airport directly related to the commercial and recreational flying use 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.*’ CPRE Kent strongly believes that there would be ‘significant impact upon the internationally important wildlife communities in the Lydd/Dungeness area’ if the planned development was allowed to proceed.

Section 11.41 of the Shepway Local Plan states: *‘The county council supports the growth of services at Lydd Airport and considers it could support increased aviation activity on a scale of 1 to 2 million passengers per year.’* This is incorrect: the current Kent & Medway Structure Plan *does not* support development at Lydd to a specific number of passengers per annum, nor is a passenger figure included in KCC’s statement to the ongoing South East Plan Examination in Public (EiP). The above statement of formal county council support regarding a specific growth target should be disregarded by the planning committee.

Policy TR15 of the plan refers to the fact that *‘regard will also be given to the likely effect of proposals [at Lydd Airport] on other special features in the area, particularly the power station.’* CPRE Kent believes the likelihood of Dungeness C being built would be severely diminished by the proximity of a regional airport, and that the operation of jet passenger aircraft such as the Boeing 737 from Lydd would pose a serious safety risk to the power station.

Kent & Medway Structure Plan

The developer’s application for a runway extension states that the Kent & Medway Structure Plan (KMSP) contains *‘policies which encourage the expansion of LAA’*. This comment must be qualified. There is, notably, no specific support in the KMSP for the 2 mppa figure for Lydd to which the developer aspires; and it is stated (8.59) that development of Lydd must not create *‘material harm on internationally or nationally designated environmental areas, and no significant detrimental impact on locally designated environmental areas.’* In CPRE Kent’s opinion it would not be possible for the runway extension to take place without material harm taking place to *‘nationally designated environmental areas’*.

Draft South East Plan

The draft South East Plan, currently at the EiP stage, states (Transport, 1.28): *‘The potential of Kent International (Manston) Airport to fulfil a significant role as a regional airport is now acknowledged, but other airports in the region are not considered to have strategic potential.’*

KCC, in its statement to the ongoing South East Plan EiP, writes: *‘The County Council is pleased that reference to an enhanced role for Kent International Airport at Manston as an airport of regional significance is made in Policy T9 but considers that reference to London Lydd Airport should be included in the Plan.’* CPRE Kent believes this policy U-turn from KCC does not reflect the best interests of the county or the region.

Air Transport White Paper

The Government’s Air Transport White Paper 2003 supports development at Lydd *‘In principle... subject to relevant environmental considerations’*. CPRE Kent believes the *‘relevant environmental considerations’* at Lydd make development of the airport inappropriate.

The Air Transport White Paper Progress Report 2006 (Annex A) identifies seven airports in south-east England which are expected to handle 20,000 aircraft movements (roughly equivalent to 2 mppa) each year by 2030. Lydd is not one of them.

Potential damage to protected sites and wildlife

There are areas of ecological importance close to – and immediately adjacent to – the airport runway. These have statutory designations of international, national and local nature conservation importance. Their maintenance must be a high priority in the consideration of any planning application. No mitigation programme could alter the fact that the planned development of the airport would have an extremely serious detrimental effect on the quality of these protected areas.

Lydd Airport is close to the Dungeness to Pett Levels Special Protection Area (SPA) and the Dungeness Special Area of Conservation (SAC). Both of these areas, and the wildlife which relies on them, would suffer significantly from the development of the airport, with complete destruction of part of the Dungeness SAC and part of the Dungeness Site of Special Scientific Interest (SSSI).

There are 240 hectares of open-water bird sites within five kilometres of the airport. The RSPB identifies one site alone – the Dungeness Gravel Pits – as supporting ‘*an average of 14,000 wintering birds*’. There will inevitably be a significant risk of bird strike at Lydd Airport unless strong bird-hazard-management measures are used by the airport operators. These measures will have a serious detrimental effect on nearby bird populations. CPRE Kent concurs with the opinion expressed by the RSPB that the airport developers have not done enough in their Environmental Statements to analyse potential damage to bird sites.

Section 16.24 of the runway extension ES states: ‘*The runway extension will not detrimentally impact upon the internationally important wildlife communities that surround the site.*’ CPRE Kent refutes this statement.

CPRE Kent also thoroughly disagrees with the statement (18.18 in the runway planning statement) that ‘*the proposed runway extension will have a neutral impact on the countryside*’. This is inaccurate in many ways: the runway extension would cause 19 hectares of green land to disappear completely; the enormous increase in air activity would affect negatively the tranquillity of a large part of Romney Marsh; air pollution would increase over extensive areas of protected countryside; and the increase in custom at the airport would have a knock-on effect on road traffic levels in the area.

Economic benefits

The runway application states: ‘*The Government’s Aviation White Paper recognises the substantial contribution of the aviation industry to the UK economy, and states that failure to allow for increased capacity of our airports could have serious economic consequences at national and regional level.*’

It must be noted, however, that airport development has negative as well as positive employment impacts.

The runway extension planning statement identifies a *'high reliance of the local economy on the tourism industry'*. CPRE Kent agrees with this analysis, and asks what effect a busy jet airport would be likely to have on the popularity of the area for tourists. England currently suffers an annual tourism deficit of approximately £18 billion (Office for National Statistics). Since budget airlines typically carry many more Britons abroad than they bring overseas tourists to Britain, it can be expected that development at Lydd would exacerbate this deficit.

CPRE Kent disagrees with the developer's assessment that *'no negative impacts to recreational facilities in close proximity to LAA are expected from the proposed development'* (11.5 in the runway extension planning statement). It would be extremely difficult to market successfully seaside holiday accommodation under a regional airport's flight path. The ES states that employment effects of the development would be *'all positive and therefore require no mitigation'*. CPRE Kent disagrees with this statement. There would be employment losses in the tourism industry, locally and further afield, and the potential for further employment losses in Dover's ferry services and at the Channel Tunnel. Both of these have struggled to compete with budget aviation in recent years.

Noise pollution

In assessing the operational noise impact of the proposed development, it is particularly important that the developer is made to use the medium-term growth figure of 2 mppa or the long-term figure of 6 mppa, rather than the short-term figures of 300,000 and 500,000. The residents of Romney Marsh deserve the clearest possible indication of the extent to which their lives will be affected by the proposed growth at Lydd – they will not obtain this indication from an analysis of the effects of 300,000 or 500,000 ppa.

This is particularly pertinent with regard to the issue of night flying. The developer has publicly stated that 2 mppa at Lydd would involve night flying (aircraft taking off or landing between 2300 and 0700), which has a far greater impact on quality of life than daytime operation. In the current application for operation to 300,000 ppa, however, the runway extension ES (16.3.22) states: *'The current proposals do not include any formalised schedule for aircraft movements at night.'* CPRE Kent is particularly concerned that on the issue of night flying the 2 mppa aspiration should be used to estimate noise impact. (It is worth noting that at Manston Airport near Ramsgate, night flights have become the dominant issue of public concern with regard to the airport's growth.)

As the ES states (runway 16.3.18): *'Aircraft using the ILS [Instrument Landing System – this includes Boeing 737 and Airbus 319/320 aircraft] will fly over the coastal villages of Littlestone-on-sea, St Mary's Bay and Dymchurch. At greater height the ILS approach path lies over West Hythe and Lympne... It is assumed for the purposes of the noise model that the ILS approach path is used for these larger aircraft at all times.'* This starkly illustrates the effect the airport's development would have on built-up areas nearby. The homes of thousands of people would be put underneath an airport's final-approach flight path during prevailing-wind conditions.

Aircraft taking off from Lydd into the prevailing wind would need to make a sharp climbing turn to the right to avoid the nuclear power station's 2,000-foot no-fly zone and the restrictions of the 4,000-foot danger zone of the Lydd firing range. This turn would take aircraft directly over the town of Lydd at full power, with extremely serious noise-pollution consequences.

Proponents of airport development often argue that nearby residents are aware they live near an airport and expect that there will be noise. This is misleading. While everyone in the area will be aware of the proximity of Lydd Airport, they have grown used to a small quantity of light-aircraft movements and occasional scheduled flights operating three-engine turbo-prop aircraft. It would be wrong to suggest that this level of aviation activity was practically comparable to the arrival and departure of short-haul, narrow-bodied jets such as the Boeing 737 or Airbus 319/320.

Weight should be given to the Sound Exposure Level (SEL) created by departing and arriving aircraft. This gives, in CPRE Kent's opinion, a more useful indication of noise impact than the LAeq 16-hour reading. There may be only a handful of noise events, which, evened out over a 16-period, do not make a large impact, but if those noise events have the power to stop people sleeping and generally significantly affect their quality of life, they must be considered highly significant.

The tranquillity map attached to this submission was produced as part of a nationwide tranquillity study undertaken by CPRE in 2006. It clearly shows that Romney Marsh is the largest relatively tranquil area in Kent. In the face of many types of development pressure, CPRE Kent believes it is vitally important to protect the few remaining islands of tranquillity in the South East. The planned development of Lydd Airport would unquestionably shatter the peace and quiet of much of the Marsh, and also have a profound detrimental effect on tranquillity further afield.

It is often noted by the supporters of airport development that modern jet airliners are considerably quieter than their predecessors. This may be true, but even at 20,000 feet a modern airliner will drown out birdsong. On landing approach of take-off, aircraft old and modern utterly destroy peace and quiet – and therefore quality of life – and can even cause structural damage to buildings through noise, as has happened beneath the approach to Manston Airport.

Traffic impacts of the proposed development

The Government's Planning Policy Statement 13 – Transportation and Land Use (PPS 13) says of airports: *'Only a small proportion of traffic [to and from airports and seaports] is currently conveyed by means other than private road vehicles. In future the emphasis will be on ease of access by alternative modes, including access by public transport users, pedestrians, cyclists and people with restricted mobility.'* (Section 74.)

The proposed development of Lydd would not be consistent with this policy. The ES estimates that 90% of airport users would arrive at and depart from the airport by car. It predicts that 42% of passengers would use long-stay parking, 28% would be picked up/dropped off by others in private cars, and 20% would arrive and depart by taxi.

The latter two forms of car transport will both involve far greater road mileage than the first. In addition, 95% of staff journeys are expected by the developer to be made by private car.

The dependence of the proposed development on private car transport is of particular concern to CPRE Kent, given the unsuitability of the local road network for the volumes of traffic the airport is likely to generate and the existing relative tranquillity of the surrounding area.

Since the proposed development will unarguably bring huge volumes of car traffic to a relatively peaceful part of rural Kent, and since public transport will not carry a significant percentage of passengers, in surface-transport terms the application should be considered unsustainable.

Chapter 14 of the runway application ES states that Hammond Corner (the junction of the A259 and B2075) is '*currently operating at near capacity much of the time*'. The airport developer states (in 14.9) that it will work with highway and planning authorities to improve the junction with a roundabout. While CPRE Kent acknowledges that a roundabout would improve traffic flow at this junction, the ES estimates potential traffic flow improvements based on 300,000 ppa (an additional 438 one-way car journeys per day). If, as should have been the case, the airport developers had assessed road access based on 2 mppa or 6 mppa, it would be clear that a junction already near capacity would need a lot more than a roundabout to prevent it becoming a congestion nightmare.

Air pollution is exacerbated by congestion – vehicles moving swiftly pollute much less than those caught in bottlenecks. Congestion points on roads to Lydd airport will lead to a large increase in air pollution in this profoundly rural part of Kent.

Rail access to Lydd is dismal. The developer is promising a half-hour bus transfer to Ashford International, but Ashford is still currently at least an hour – and sometimes as much as an hour and a half – from central London. An alternative suggestion from the developers (14.4.21 runway application) is for passengers travelling on the London-Ashford line to take a connecting 23-minute train to Rye (one train an hour) and then a 13-mile, 20-minute taxi ride to the airport. This could hardly be described as straightforward access. (While the operation of the London-to-Ashford CTRL will reduce London-to-Lydd journey time by a minimum of 23 minutes, the rail connections will still be very poor.)

The planning applications claim that LAA will '*promote increased use of public transport by passengers and staff*'. Given Lydd's location, remote from rail links and centres of population, can the company's promotion of non-car transport be expected to make any significant difference to the environmental impact of the airport's growth?

Proximity of Dungeness nuclear power station

There does not appear to be satisfactory analysis in the application and Environmental Statement of the risk posed by a developing airport to existing and possible future nuclear power stations at Dungeness.

CPRE Kent urges Shepway District Council to examine in detail the work undertaken on nuclear safety and the proposed growth of Lydd by John Large Associates, commissioned by the Lydd Airport Action Group. In particular, we ask that the council notes his comment made at a public meeting in January 2007: *'I know of no other nuclear power plant worldwide that has, or will have, a commercial airport operating within two miles.'*

The presence of a busy regional airport at Lydd would severely limit the chances of a new nuclear power station – 'Dungeness C' – being built. While CPRE Kent does not intend to analyse in detail the potential merits or otherwise of Dungeness C at this stage, it would at least be provably in the national interest, and would make a positive rather than a negative contribution to the country's carbon emissions levels.

Climate change

The Tyndall Centre for Climate Change Research estimates that aviation could produce as much as 26% of the UK's carbon dioxide emissions by 2020 and 36% by 2030, if the industry is permitted to grow in line with the aspirations of the Government Aviation White Paper 2003. This is clearly unsustainable.

CPRE Kent believes the Government's Aviation White Paper represents a lamentable return to the discredited policy of 'predict and provide'. The Government has predicted a growth from 180 million passengers per annum in 2002 to 500 million by 2030 and appears intent on providing that growth even though it would be environmentally disastrous.

Strict control of aviation growth is essential if carbon dioxide emissions are to be significantly lowered. This global issue is particularly pertinent to Lydd, since the whole of Romney Marsh is threatened with submersion by rising sea levels.

CPRE Kent would like to draw Shepway District Council's attention to the response of Uttlesford District Council, Essex, to BAA's proposals to construct a second runway at Stansted Airport. The council wrote: *'The Council maintains its position as set out in its response to the Department for Transport consultation on the Future Development of Air Transport in the UK that growth in air travel is incompatible with the Government's carbon emissions reduction obligations. This has recently been strengthened by the Tyndall Centre for Climate Change Research report Decarbonising the UK, published September 2005, which stresses that "if the UK Government does not curb aviation growth, all other sectors of the economy will eventually be forced to become carbon neutral". The Council will continue to press the Government to change its policies on air travel so that there is a coherent climate change strategy across all its departments consistent with the Energy White Paper.'*

Conclusion

Section 17.10.6 of the runway extension ES states: *'Whilst some local communities will experience changes to their rural lifestyle and character of the area as a result of increased noise, human and aircraft activity and traffic, mitigation has been proposed to mitigate this wherever possible.'* CPRE Kent does not believe the proposed mitigation will significantly lessen the serious negative impact of this proposed development on the surrounding countryside. A *'noise management plan,'* for instance, does not alter the fact that tranquillity will be shattered by low-flying jets; and a lot more than a *'travel plan to enhance local bus services'* would be needed to make the development proposal significantly less reliant on private car transport.

CPRE Kent believes the development of Lydd Airport would have profound negative consequences for Lydd, for Romney Marsh and for all of Kent. For that reason, we recommend the two planning applications – Y06/1647/SH and Y06/1648/SH – are refused, or that they are submitted to central government for a full public inquiry.

CPRE Kent, March 2007.

The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country. We promote a positive long-term future for the countryside – one which values its natural and built environment. Our Patron is Her Majesty the Queen. We have 60,000 supporters, a branch in every county, nine regional groups, over 200 local groups and a national office in London. CPRE is a powerful combination of effective local action and strong national campaigning. Our President is Sir Max Hastings.

CPRE Kent is the charity's largest county group, with more than 3,000 supporters, 12 district groups and three special-interest groups, which focus on housing, transport and environment.