

Protect Kent (Kent Branch of the Campaign to Protect Rural England)

Protect Kent is charity, founded in 1926, exists promote a better quality of life for everyone in the county and to protect the beauty, tranquillity and diversity of the Kent countryside by encouraging the wise use of land and other natural resources. It is part of CPRE, which has over 60,000 members and supporters nationally. The president is the author Bill Bryson and the patron is HM The Queen.

The follow is a summary of more detailed arguments on why Protect Kent objects to both these planning applications:

- There is no explicit support for the expansion of Lydd in the final South East Plan, as there is for the Kent International Airport, at Manston.
- The need for expansion at Lydd has not been demonstrated. Neither Lydd nor Manston have achieved their current operating capacities nor made a profit in recent years.
- Increased aviation traffic at Lydd Airport would significantly damage the tranquillity of much of the Kent Downs AONB and the countryside beyond. The loss of tranquillity in a nationally significant landscape cannot be justified by the expansion of an airport which the final South East Plan does not consider nationally or regionally significant.
- CPRE's research into mapping tranquil areas has revealed the Romney Marsh and the Kent Downs AONB to be among the most tranquil areas of the county (Figure 1) Protecting and enhancing this tranquillity is important because rural areas rely on tranquillity to attract visitors. CPRE's research revealed that 49% of those who visit the countryside do so in search of a tranquil environment. Based on Government data, this suggests that through rural tourism, tranquillity directly supports 186,200 jobs and 12,250 small businesses and contributes £6.76 billion a year to the UK's economy. Increased air traffic would cause overall harm to local economy by making Romney Marsh a less desirable tourist destination and induce more domestic tourists to leave the UK for rival continental destinations.
- Work by former HM Treasury economist, Brendon Sewill, demonstrates that on average, the tax subsidy per (direct) job in the aviation industry is £50,000 a year; or £1,000 a week. In the case of Lydd Airport's claim of 180 direct jobs, this equates to £9 million per annum. Aviation pays no fuel tax, no VAT and artificially low landing fees. Although it pays air passenger duty this is comparatively low compared to the fuel tax and VAT reliefs. The net tax subsidy received by air travel as compared to car travel is around £9 billion a year. Therefore the economic case for Lydd expansion is flawed.
- There would be an increased noise impact on residents and tourists in Lydd, and surrounding communities up into the Kent Downs AONB, due the flight path constraints imposed the military ranges and nuclear installations.
- The submitted impact assessments are too limited, because the 300,000 ppa and 500,000 ppa assessments do not reflect the potential impacts from different numbers or types of aircraft which could use the airport, and that assessments for all these factors should be carried out for 2,000,000 passengers per annum.
- There is poor access to the airport, particularly by public transport.
- The Climate Change Act 2008 sets legally binding targets to reduce greenhouse gas emissions of at least 80% by 2050, and reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline. (Source: www.defra.gov.uk). This is not compatible with increased air and road travel to and from an expanded Lydd Airport.

June 2009

- Romney Marsh is one of the most vulnerable areas of the UK to climate change because sea-levels are expected to rise by around a metre by 2100 under medium 'business as usual' emissions scenarios (Source: www.defra.gov.uk). Unless local and global carbon emissions are reduced then significantly more taxpayers money in Shepway will have to be committed to flood risk management and more land will be lost to the sea through 'managed realignment' of coastal flood defences.
- The airport expansion will have an unacceptable impact on the European designated habitats of Dungeness, as shown in detail by other organisations, including the RSPB and Kent Wildlife Trust.
- There will be an increased risk to the Dungeness nuclear site and that the airport expansion may limit future options, which are more likely to be in the national interest.

In conclusion, it is the considered opinion of Protect Kent that all the objective evidence shows that the proposed expansion of Lydd will worsen the social, environmental, economic and climate change situation across Romney Marsh and south east Kent. Therefore both applications fails to meet the basic requirements of sustainable development as set out in PPS1, the South East Plan and supporting plans and policies.

Figure 1: Tranquility Map for Kent (CPRE 2007)

