

Mr Terry Ellames
Shepway District Council
Castle Hill Avenue
Folkestone
CT20 2QY

5 January 2010

Dear Mr Ellames,

Further Response to Lydd Airport (aka London Ashford Airport) Supplementary Information

Although Protect Kent has provided detailed arguments against the Applications Y06/1647 and 1648/SH, additional information has been published which shows the futility of expanding aviation on this site. We also take the opportunity to refute parts of the summary of statement prepared on behalf of the Airport ('Airport Statement' AS) to Shepway District Council's Officer's Report A/09/05 to the Council.

- 1 (a) We have already commented on noise, but the World Health Organisation has produced new guidelines for night noise. The Government aims to achieve the WHO guidelines, and these say that for good sleep, sound level should not exceed 30 dB(A) for continuous background noise, and individual noises events exceeding 45 dB(A) should be avoided. We suggest that the Airport would find it impossible to operate aircraft with sound levels below 45 dB(A), so no night flights must be permitted. There is an expanding amount of research showing that noise, especially that from aircraft which is tonal and more disturbing than noise from other sources, causes significant health problems.
(b) With regard to the AS views about Adverse noise effects on the local community, PPS4 (see below) requires protection of the countryside for itself and this includes its tranquillity, therefore this provides even more weight to the noise objections.
- 2 The Government has agreed with the aviation industry that total actual aviation emissions (ie without trading or permits) for the UK must be no more in 2050 than they were in 2005. As UK aviation emissions have grown since 2005, this means that aviation cannot grow unless new aircraft with much lower emissions are introduced, and such planes are merely on the drawing board, and will not be available for decades. Hence further expansion is impossible if that agreed target is to be met.
- 3 (a) A detailed document "The Expansion of Regional Airports Really a good thing?" (AirportWatch report (September 2009 www.airportwatch.org.uk/publications/index.php) shows that there are very strong positive reasons for restraining development of regional airports.

(b) With regard to the AS views about claimed economic benefits, and the apparent

disregard of Report A/09/05 to SDC Economic development Officer's advice, this was no doubt due to Ashford Borough Council's economic advice to SDC, and our evidence showing that airports damage the economy. As well as that previous evidence, and the Regional airports report just quoted, the assessment of the damage that Bristol Airport has done to tourism in the South West region ('Tourism in the South West, its impacts and the relevance of Bristol International Airport') provides detailed evidence of how local economies suffer from airport expansion (See attached).

4 Finally the Government has issued Planning Policy Statement 4: Planning for Sustainable Economic Growth, which says (our emphasis in bold):

"Paragraph 10. To help achieve sustainable economic growth, the Government's objectives for planning are to:

- deliver more sustainable patterns of development, reduce the need to travel, especially by car and respond to climate change (See also Planning Policy Statement 1: Delivering sustainable development and the supplement to PPS1: Planning and climate change.)
- raise the quality of life and the environment in rural areas by promoting thriving, inclusive and locally distinctive rural communities whilst continuing to protect the open countryside for the benefit of all

In particular the following PPS4 Policies support our case against the Applications:

"EC6.1 Local planning authorities should ensure that the countryside is protected for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources and to ensure it may be enjoyed by all.

EC7.1 To help deliver the Government's tourism strategy, local planning authorities should support sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors and which utilise and enrich, rather than harm, the character of the countryside, its towns, villages, buildings and other features.

EC10.2 All planning applications for economic development should be assessed against the following impact considerations:

whether the proposal has been planned over the lifetime of the development to:

- a. limit carbon dioxide emissions, and minimise vulnerability and provide resilience to, climate change (See Paragraph 9 and 42 of Planning and Climate Change: Supplement to Planning Policy Statement 1 (CLG, 2007)."

5 We therefore request that you will continue to maintain your view that the applications should be refused.

Yours sincerely

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Deputy Director

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