

**FINAL**

# Lydd Airport Public Inquiry

## Statement of Case

Protect Kent – the Kent Branch of the  
Campaign to Protect Rural England

Planning Inspectorate Ref: APP/L2250/V/10/2131934, APP/L2250/V/10/2131936

Town and Country Planning Act 1990 – Section 77 and Town and Country Planning (Inquiries Procedure) (England) Rules 2000.

Applications by London Ashford Airport Ltd.

Site at London Ashford Airport Ltd., Lydd, Romney Marsh, TN29 9QL

Original Planning Applications to Shepway District Council:

Construction of a 294 metre runway extension together with an additional 150 metre starter extension (Y06/1648/SH);

Erection of a terminal building, capable of processing 500,000 passengers per annum, and 637 car parking spaces (Y06/1647/SH).

# Statement of Case – CPRE Protect Kent

Planning Inspectorate Ref: APP/L2250/V/10/2131934, APP/L2250/V/10/2131936

## 1 INTRODUCTION

CPRE Protect Kent is the Kent Branch of the Campaign to Protect Rural England. We are a membership organisation, founded in 1929, with 60,000 supporters nationwide. In Kent the membership includes 149 Parish and Town Councils and 53 community organisations so we represent the views of around 150,000 residents in Kent and Medway. Our national president is the author, Bill Bryson and our national patron is HM The Queen. CPRE Protect Kent is a registered Charity (number 1092012) and a company limited by guarantee, registered in England (number 4335730).

## 2 THE CASE

### 2.1 Impact on attractiveness and amenity

We will present evidence that the proposed escalation of activity at the airport would reduce the attractiveness and amenity of the area to residents and tourists alike. The erosion of tranquillity would detract from the viability of existing tourism enterprises, which rely heavily on the unique and unspoilt character of the area.

### 2.2 Impact on the tranquillity and character of Romney Marsh and the Kent Downs AONB

We will demonstrate the unique and remote character of Romney Marsh which makes it such an important island of tranquillity in the region. We will also highlight the impacts on the nearby Kent Downs AONB, an important tourism destination in its own right, and on the national trails which cross it.

We will present evidence that the tranquillity of Romney Marsh plays an important role in the historical and cultural heritage of the area. We will demonstrate that not only does this attract visitors, but also a range of artists and creative individuals who contribute to the vitality and economy of the area.

### 2.3 Impact of noise on public health and quality of life

The damaging nature of noise disturbance to physical and psychological health is all too easily undervalued and we will draw on recent European and international policy development, and its translation into English policy and regulation, which identifies the importance of preventing and reducing environmental noise, in particular where exposure levels can result in harmful effects on human health. The World Health Organisation's European Action Plan for Children's Environment and Health calls for children to be protected from exposure to harmful noise at both home and school.

We will also present evidence of the detrimental impacts of noise pollution on particularly sensitive local receptors such as the pupils of Greatstone Primary School and residents of Lydd, Greatstone and Littlestone.

### 2.4 Planning policy

We will identify the relevant planning policies and demonstrate where the proposal conflicts with the Government's current local and national planning policy objectives and with more recent Government statements on aviation.

Policy issues on nature conservation, biodiversity and geomorphological issues will be dealt with in detail in the evidence of other Rule 6 parties. However we are also concerned about the conflict in this area and the decision reached by Shepway District Council in relation to the Appropriate Assessment for the Habitats Regulations.

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### 2.5 Transport

We will demonstrate that the transport infrastructure supporting the site is inadequate. The road infrastructure is inadequate for the passenger numbers proposed. There is no public transport provision. Kent is particularly well equipped to offer alternatives to short-haul flying, with its channel crossings and high speed rail links. It therefore seems particularly perverse to encourage an increase in short-haul flights from LAA.

### 2.6 Greenhouse gas emissions from additional flights, airport operation, traffic generation and ancillary activities

We will present evidence that the expansion of runway capacity at Lydd is not compatible with the Government's carbon emission target for aviation that the level in 2050 should be at or below 2005 levels. This appeal is not compatible with expansion of the runway capacity for the south east, and recent policy decisions – in particular the decision to over-rule the third Heathrow runway – which point to an increasing recognition of the damaging environmental impacts of aviation.

While the applicants have outlined the methodology of a carbon management plan<sup>1</sup>, we will argue that the applicants have not provided any estimate of a carbon budget for their expansion plans or a baseline of their current operations, which we understand they may be required to do as part of the Carbon Reduction Commitment (CRC) regulations.

### 2.7 Sea-level rise and flood risk

We will demonstrate that the LAA site is a particularly poor choice for long term investment in infrastructure because of the long term risk from sea level rise and the current, and growing, risk from coastal flooding.

### 2.8 Employment and economic benefit

We will challenge the net economic and employment benefits of this proposal as put forward by the applicant and assessed by Shepway District Council.

## 3 DOCUMENTS

- Air Transport White Paper 'The Future of Air Transport', 2003
- Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change, 2007
- CPRE tranquillity map
- EU Directive 2002/49/EC - management of environmental noise
- KCC landscape character assessments
- Learning lessons from the 2007 floods - Pitt Review, June 2008
- Meeting the UK aviation target – options for reducing emissions to 2050, Committee on Climate Change, December 2009
- New style, old story: A review of UK Airport Noise Action Plans, Airport Watch, February 2010
- PPS1: 'Delivering Sustainable Development'
- PPS1 Supplement: 'Planning and Climate Change'

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<sup>1</sup> REVISED SUPPLEMENTARY ENVIRONMENTAL INFORMATION APPX. 13 - CARBON MANAGEMENT REPORT, August 2008

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- Draft revised PPS1 Supplement draft PPS1: 'Planning for a Low Carbon Future in a Changing Climate'
- PPS4: 'Planning for Sustainable Economic Growth'
- PPS7: 'Sustainable Development in Rural Areas'
- Draft PPS: 'Planning for a Natural and Healthy Environment'
- PPG13: 'Transport'
- PPS23: 'Planning and Pollution Control'
- PPG24: 'Planning and Noise'
- PPS25: 'Development and Flood Risk'
- RANCH project findings ([www.ranchproject.org](http://www.ranchproject.org))
- Shepway District Local Plan Review, 2006
- Strategic Flood Risk Assessment prepared for Shepway District Council, May 2009
- Unlocking the Potential - A proposal for a Kent and Greater Essex, Local Enterprise Partnership, September 2010

and such other relevant documents as may be necessary to address issues put before the inquiry.