

## **Town and Country Planning Act 1990**

### **Applications by London Ashford Airport Ltd**

#### **APP/L2250/V/10/2131934 & APP/L2250/V/10/2131936**

#### **Site at London Ashford Airport Limited, Lydd, Romney Marsh, TN29 9QL**

#### **CPRE/07/C – Flood Risk & Sea Level Rise SUMMARY**

Statement by Sean Furey BSc (Hons) MSc C.WEM MCIWEM FRGS and Dr Geoff Meaden Ph.D.  
on behalf of Protect Kent (the Kent Branch of CPRE) on Flood Risk and Sea Level Rise

- 1.1 Protect Kent is the Kent Branch of the Campaign to Protect Rural England (CPRE). CPRE is a national charity which promotes the beauty, tranquillity and diversity of rural England. We advocate positive solutions for the long-term future of the countryside, as well as challenging proposals that will harm it. Founded in 1926, we have around 60,000 supporters and a branch in every county. The Kent Branch was established in 1929.
- 1.2 My name is Sean Graham Furey and I am employed as the Deputy Director of the Kent Branch of the Campaign to Protect Rural England (CPRE Protect Kent). I hold a degree in Environmental Sciences from the University of East Anglia and a Master's Degree in Infrastructure Engineering from Cranfield University. I am a Chartered Water and Environment Manager and Fellow of the Royal Geographical Society. I am responsible for campaigns on climate change and water management and co-ordinate the Kent Climate Change Forum, which comprises a number of national and local bodies including Kent Wildlife Trust, RSPB, Hadlow College, National Farmers' Union, Canterbury Christ Church University, Defend Our Coast and others non-governmental bodies who work in Kent. The Forum has focused particularly on coastal change and flood risk on Romney Marsh and North Kent. I was previously employed by the Environment Agency in Kent in various roles between 1999 and 2007 as a hydrologist, Assistant Flood Warning Duty Officer, Project Manager for Integrated Water Management and a Sustainable Development Officer dealing with strategic planning issues in Ashford, principally flood risk.
- 1.3 Preventing inappropriate development in high flood risk areas is a high Government priority and a major concern amongst the public. Major floods such as in 2000/01 and 2007 highlighted the vulnerability of major infrastructure to flooding and the need to prevent the disruption of their functions. Coastal flood risk is a major threat to the airport, as demonstrated by the tragic floods of 1953 that left 307 dead in the UK (and over 1,200 dead in the Netherlands) and 32,000 people had to be evacuated. Romney Marsh was spared from that event because it was caused by a tidal surge in the North Sea that devastated eastern England and North Kent. Although flood risk management has moved on considerably, public funding is under pressure and the risks are increasing as result of

climate change. Dr Meaden will present the case on the increasing risks from sea and groundwater level rise, and storm surges in his evidence.

- 1.4 It is our view that assessment of flood risk to London Ashford Airport ('the Airport') submitted for the planning applications for the runway extension and new terminal building has been inadequate and is out-of-date, as is the advice received from the Environment Agency in 2006. This Proof of Evidence sets out our main areas of concern.
- 1.5 The applicant's Flood Risk Assessment (FRA) was completed in December 2006 and submitted with the main application. Further mention of flood risk is made in Chapter 7 of the Environmental Statements for the runway extension and the terminal building, which on the issue of coastal defence are identical. No further updates were requested from nor provided by the applicants. It is our contention that the information provided to this inquiry is out-dated and inadequate to fulfil the requirements set out above.
- 1.6 The Environment Statement identifies the whole of Lydd as being within the 1-in-1000 year (0.1%), though actually most of the airport, including the proposed terminal buildings, is within the 1-in-200 undefended flood plain.
- 1.7 The FRA concentrates on the fluvial flood risk from the surrounding watercourses (sewers). The only assessment of tidal risk is that advice was received from the Environment Agency that they:  
*"believe that the site is defended to the 200 year standard as required under current policy guidance"*.
- 1.8 The Environment Agency also advised the applicants about their tidal flood forecasting and warning system.
- 1.9 Flood Zones are defined in PPS25. The Flood Zones refer to the probability of flooding from rivers, the sea and tidal sources and ignore the presence of existing defences, because these can be breached, overtopped and may not be in existence for the lifetime of the development.
- 1.10 Paragraph 10.1 of the applicant's Environmental Statement states that the  
*"Environment Agency Flood Map identifies the whole of Lydd as being within the coastal flood area for a 1 in 1000 year tide. The site is therefore identified as being within the 'at risk' area, although only a Zone 1 – Low Probability"*.
- 1.11 More recent information shows this to be incorrect:
  - 1.11.1 The Environment Agency online flood map shows that much of the site, including the area for the new terminal building is within the in 1-in-200 (0.5%) year undefended floodplain, and therefore cannot be categorised as being in Flood Zone 1.
  - 1.11.2 The Shepway Strategic Flood Risk Assessment (SFRA) provides Flood Zone maps for the purpose of interpreting PPS25. The Shepway SFRA shows that the Airport is wholly within Flood Zone 3a, which means it has a high probability of flooding. This zone comprises land assessed as having a 1 in 100 (1%) or greater annual probability of river flooding or 1 in 200 (0.5%) or greater annual probability of sea flooding in any one year.

- 1.12 PPS25 states that only where there are no reasonably available sites in Flood Zones 1 or 2 should decision-makers consider the suitability of Flood Zone 3. It is our view that if there is judged to be an overriding need for additional air transport capacity (and it is the view of CPRE that there is no such need) then there are alternative airport sites in the South East of England that do not lie within Flood Zone 3.
- 1.13 It is our view that the applicants want to make the Airport into a more critical transport infrastructure hub. It is at odds with PPS25 to allow critical non-water based infrastructure into Flood Zone 3 areas.
- 1.14 PPS25, as highlighted by the SFRA, highlights the Flood Risk Vulnerability Classification which shows that for Essential infrastructure (Essential transport infrastructure, strategic utility infrastructure, including electricity generating power stations) an Exception Test for Flood Zone 3a is required. This has not been carried out by the applicants. Part of 1 of the test is that the sustainability benefits of the proposal justify locating it in a flood risk area. The applicant has not established a case that shows that airport expansion would provide the wider sustainability benefits, given that other evidence put forward to the inquiry will show the impact on protected bird species and habitats, tranquillity and the local community. The sole benefit of this proposal is promise of employment for existing local residents, however it will be demonstrated through this inquiry that there will be little or no benefit to the existing population of Romney Marsh and overall decline in their quality of life.
- 1.15 The runway extension is on previously undeveloped land and while the proposed terminal building is on previously developed land, a further test in PPS25 is that a sequential test should be done within the development site so that development is preferentially located in the lowest risk areas
- 1.16 Sea level rise is a major threat to the sustainability of Romney Marsh and will entail escalating costs for flood defence. The accelerating rate of sea level rise is likely to increase the flood risk exponentially. My proof examines the evidence in the SFRA which shows that the Airport site is currently at flood risk if there is breach of the coastal defences, and that this risk is expected to increase significantly over the likely lifetime of the development.
- 1.17 Evidence arising from the Pitt Review into the 2007 Flood indicates that the climate change risk from sea level rise is serious and may have been underestimated.
- 1.18 Future changes to the shallow groundwater do not seem to have been considered.
- 1.19 Concerns about the airport are reinforced by the Government decision not to short-list Dungeness for a further 'C' nuclear power station. Coastal processes and flood risk were raised as major concerns affecting decision about the site, despite the majority of the new power station site being in Flood Zone 1 (Low Risk). In this context Government has decided to apply a sequential test to recommend nuclear sites for further development. It seems entirely consistent to apply the same principles to airports, particularly if the applicants achieve their goal of turning the Airport from servicing small private planes and limited chartered services into a regional passenger hub. Applying this logic, we recommend that the inspector apply similar strategic criteria to judging how regional air

passenger capacity can be met and reject this application on the grounds of objections put forward at this inquiry, including the material consideration that defending the site from sea level rise and storm surge may become increasingly difficult and unsustainable.

- 1.20 The Airport currently benefits from publically-funded sea defences. If the Secretary of State is minded to approve this application then we would strongly recommend that the applicant is required to make a funding contribution for the on-going programme of flood risk management on Romney Marsh. While it is not mandatory for applications that don't require a material change to on-going flood risk management activities, it is strongly encouraged by government policy.
- 1.21 The flood level information provided by the applicants and available in the SFRA shows that the proposed terminal building is at risk of inundation but we can find no evidence of how flood resilience has been considered in the building design and operation.

## **2 CONCLUSIONS**

- 2.1 The Flood Risk Assessment (FRA) for this application was completed in December 2006 however a number of material considerations have appeared since then, or were not fully considered at the time:
- a) The requirements of PPS25 have not been satisfied: the FRA is flawed and out of date as it states that the application site is in Flood Zone 1 (Low Risk) when it is in fact in Flood Zone 3a (High Risk). The applicants will need to meet the Exception Test set out in PPS25 before this application can be determined;
  - b) The FRA does not consider the impact of coastal flooding and sea level rise adequately. This will be dealt with in detail by the evidence of Dr Geoff Meaden;
  - c) The decision not to short-list Dungeness as a site for a new power station, partially on coastal flood risk grounds, has a bearing on this application;
  - d) The Pitt Review into the Floods of 2007 highlighted the risk from tidal flooding and the importance of reducing the vulnerability of key infrastructure. If Secretary of State is minded to grant these applications then the applicants should be required to make financial contributions towards the flood risk management that protects their asset;
  - e) There are inconsistencies in the flood levels presented in the Environmental Statement and correcting those puts those levels higher than the finished floor level of the terminal building, and much of the runway. There appears to be a lack of planning and design around flood resilience.