

**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/01/B – Planning Policy  
SUMMARY**

Statement by Brian Lloyd

on behalf of Protect Kent (the Kent Branch of CPRE) on Policy Considerations

- 1.1 This statement has been prepared by Brian Edward Lloyd, and I am a chartered town planner employed by Protect Kent. I hold an honours degree in Geography from the University of Birmingham and a Masters degree in Town Planning from the University of Wales. I was elected as a corporate member of the Royal Town Planning Institute in 1989. I have 26 years professional experience, entirely in the field of planning policy. I have been employed by Protect Kent since December 2007 as a Senior Planner.
- 1.2 In my statement I seek to identify the planning and other policy context which provides the basis for Protect Kent's objections to the proposed development at Lydd airport. The statement is presented in two main parts. Firstly, I consider policy in relation to aviation generally and more specifically as it relates to Kent and the expansion of Lydd, and secondly I consider planning policy in regard to the issues of particular concern to Protect Kent.

**Policy on Aviation**

- 1.3 In my statement I consider policy at the national, regional, sub-regional/county and local levels.
- 1.4 At the national level the most recent Government policy on aviation is presented in the White Paper 'The Future of Air Transport', published in 2003. The intention of the White Paper is to set out a strategic framework for the development of airport capacity in the United Kingdom over the next 30 years.
- 1.5 Chapter 11 of the White Paper deals with future demand for capacity in the South East, and where and how that capacity will be met. The first priority is to make the best use of

existing runways at the major South East airports. In addition, it is proposed that two new runways are needed – at Stansted and at Heathrow.

- 1.6 The White Paper supports the development of smaller airports in the South East to meet local demands subject to environmental considerations. These smaller airports are considered to have an important role to play in the future provision of airport capacity, particularly to meet local demand and to relieve pressure on the main airports. It acknowledges that the operators of Southend, Lydd and Manston airports consider that each could grow substantially and have plans to do so, and it states that they could play a role in meeting local demand, and growth could be supported subject to environmental considerations.
- 1.7 The White Paper is clearly a consideration in this inquiry, it being the Government's only currently published guidance on aviation policy pending the preparation of the National Policy Statement on Aviation. However, there have been three significant changes since it was published in 2003. Firstly, the Climate Change Act of 2008 has set legally binding targets for emissions, which were not taken into account by the White Paper. Secondly, the Country has experienced a deep economic recession which will inevitably mean that the assumptions about demand and aspirations for growth on which the White Paper is based are likely to be very different now. Thirdly, there is now a new Government that has made it clear that it does not support many of the specific proposals included in the White Paper. These changes, in my view, significantly diminish the weight that should be given to the White Paper in this inquiry, in particular its proposals for an increase in airport capacity.
- 1.8 In the Coalition Agreement the new Government has made a number of commitments, namely to:
  - cancel the proposed third runway at Heathrow;
  - refuse permission for additional runways at Gatwick or Stansted;
  - replace the Air Passenger Duty with a per-flight duty; and
  - establish a high speed rail network to help secure a low carbon economy.
- 1.9 Also, in October 2010 the Government published its National Infrastructure Plan which sets out its broad vision for infrastructure investment. With regard to airport infrastructure, and echoing the commitments in the Coalition Agreement, the Plan proposes to:
  - make best use of existing airport capacity to help improve the passenger experience; and
  - continue development of the high-speed rail network and rail connections between the North and South of the country to further reduce journey times to Glasgow and Edinburgh, so that a large proportion of domestic airline travel on these routes transfers to the train, reducing carbon emissions and releasing airport capacity.
- 1.10 The emphasis of the new Government's emerging policy has clearly moved from a position that supports expansion of airport capacity, as expressed in the White Paper, to one that

seeks to make better use of existing capacity and to promote alternative high-speed rail connections that will free-up existing capacity. Importantly, whilst the White Paper envisaged that it would be through the expansion of the smaller airports that pressure would be relieved from the major airports, the Government now sees this as being achieved by the promotion of high-speed rail connections. The Government is actively pursuing this, for example through High Speed 2.

- 1.11 At Lydd, it is clearly the situation that the existing potential capacity is not being used, and in accordance with emerging Government policy the priority here should be to maximise this potential before any consideration is given to expansion. This is especially important given the environmental impacts that expansion at Lydd will have, and the fact that High Speed 1 rail services are now operational across Kent. We believe that this means that the expansion of Lydd to increase airport capacity is unnecessary.
- 1.12 The South East Plan, and other sub-regional and county level strategies, also generally support the expansion of airport capacity, including at the smaller airports. This is not unsurprising as they have been prepared in the context of the Air Transport White Paper. In particular, in regard to Kent's airports, the documents give strong support to the expansion of Kent International Airport at Manston. The South East Plan designates this as an airport of regional significance. In contrast, the South East Plan gives no specific support for expansion at Lydd, including in the more detailed guidance for the East Kent and Ashford sub-region.
- 1.13 Furthermore, in considering airport expansion proposals, Policy T9 of the South East plan requires regard to be given to airport masterplans. There is no up-to-date masterplan agreed for Lydd, which means that an important context for considering the plans for expansion does not exist. This makes it a purely speculative proposal.
- 1.14 A review of the various other strategic documents for Kent and East Kent reveals very limited support for expansion at Lydd and a lack of any specific role for the airport in the county's economic development strategy.
- 1.15 Most of the discussion of aviation in these documents reflects the 2003 Air Transport White Paper. Consequently, there are general expressions of support for airport expansion in Kent in many of the documents. However, the focus for this support is firmly on the Kent International Airport at Manston rather than Lydd. Support for Lydd is at best luke warm, and whilst many of the documents report the aspirations for growth as reflected in the current applications none of the documents actually offer support for them. In my view, if Lydd airport has an important role to play in the transport and economic development strategies of Kent, and in particular East Kent, then I would have expected to have seen a more supportive position being taken on its expansion. This, though, is not the case, and the clear strategic priority in Kent is the expansion of Manston airport.
- 1.16 Furthermore, I consider that it is important to note that in the more recently produced documents – 21st Century Kent, the East Kent Sustainable Community Plan and the LEP bid – there is a clear shift in emphasis away from general support for aviation expansion towards the role of high speed rail, and the linking of Manston Airport to it. This, I have no

doubt, reflects the recent introduction of the HS1 services and the dramatic changes in journey times from the eastern parts of Kent to London that have now become a reality, and the changed circumstances since the White Paper was produced which I have already referred to. In my view, this even more undermines the case for expansion at Lydd, which would be at odds with this new emphasis.

- 1.17 With regard to the Shepway District Local Plan Review, Policy TR15 supports expansion of Lydd subject to no significant impacts, particularly on wildlife. However, it is clear from the supporting text that this support for expansion is in part a reflection of proposals in the Kent Structure Plan that was in force at the time the Local Plan was being prepared. This was not the Kent and Medway Structure Plan adopted in 2006, but its predecessor that was adopted in 1996 and to which the Local Plan had to conform. Consequently, it is my view that the support for expansion as advocated in the Local Plan should be given limited weight.
- 1.18 The Council's most up-to-date position on Lydd is as expressed in the Preferred Options document of its Core Strategy published in June 2009. This acknowledges the current proposals for expansion, but offers no view on them. The Council's Preferred Option, though, does not promote airport expansion; rather it seeks to support ancillary aeronautical business opportunities at the airport. It states that this Preferred Option will not entail planning permission being required for further flights, a new terminal or a runway extension. It seems from this comment that expansion of the airport is not necessary to achieve the Council's economic objectives.
- 1.19 Whilst the emerging Core Strategy will have only limited weight in the inquiry, it has reached the stage of Preferred Options – the stage at which the Council presents its conclusions on the options previously presented for consultation, and it is the likely basis for policies to be included in the published Core Strategy. As such it is a relevant consideration, and highlights a conflict between the Council's emerging strategic policy position on the role of Lydd airport and its position on these planning applications.
- 1.20 In the light of the above, it is my conclusion that there is a lack of support in either strategic planning or other policies for expansion of Lydd airport. Consequently, as a matter of principle the expansion of the airport should be refused.
- 1.21 Finally, I would briefly mention PPG13. Paragraph 7 of the PPG explains that as airports grow not only are they significant traffic generators in their own right, but they will also attract a range of related and non-related developments. Whilst at this time such related and non-related development is not specifically proposed, regard needs to be given to the potential for this to happen and whether or not this is a sustainable location for such development to occur on the back of a much expanded airport. Indeed, it is the Council's Preferred Option for its Core Strategy to see airport related development, even without the proposed expansion of the airport. It is inevitable that expansion of the airport will, in due course, bring pressure for associated development. Consequently, the general objectives of PPG13 are important because they seek to:
  1. promote more sustainable transport choices for both people and for moving freight;

2. promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and
3. reduce the need to travel, especially by car.

1.22 It is our view that the prospect of such further development at the airport would lead to an unsustainable concentration of development in a remote rural area, contrary to the objectives of PPG13.

### **Other Policy Considerations**

- 1.23 If it is considered that there is a strategic case for expansion at Lydd, which we consider is not the case, then it is clear from the various policies and strategies on aviation that expansion must be acceptable in planning policy terms and must not have adverse impact on the environment that cannot be mitigated.
- 1.24 It is our case that expansion of Lydd airport will have unacceptable environmental impacts. Chief amongst these are the impacts on the internationally important nature conservation designations that adjoin the airport, and we rely on the evidence from Natural England and RSPB in this regard. We do, however, consider that there will be other environmental impacts, namely in regard to:
- Impact on tranquillity and quality of life;
  - Greenhouse gas emissions/climate change; and
  - Flood risk.
- 1.25 Other witnesses on behalf of Protect Kent provide detailed evidence on these matters, and in my statement I look at the national, regional and local policies to provide policy context for that evidence.
- 1.26 With regard to tranquillity and quality of life, I examine planning policy and guidance contained in the Rural White Paper (2000), PPS1, PPS4, PPS7, PPG24, the South East Plan and the Shepway Local Plan Review. Together, these provide clear advice that development should ensure a better quality of life for everyone, now and for future generations, as an essential component of sustainable development. An important aspect of this is the value that people place on the countryside and its distinctive and intrinsic character and quality, which development should seek to retain, including its tranquillity
- 1.27 PPG24 recognises that the introduction of noise can have a significant effect on the environment and the quality of life of individuals and communities. This is not just the volume of noise, but also the nature of the noise which is highlighted as a particular issue at airports. The South East Plan specifically identifies the enjoyment of tranquillity as contributing to quality of life.

- 1.28 The Shepway District Local Plan Review recognises the diverse and attractive nature of the environment in the District, and the need to protect it. It is a general aim of the plan to enhance people's quality of life. These matters are embraced by Policy SD1. Similarly Policy CO1 seeks to maintain and enhance the distinctive character, functioning and quality of the countryside. The quality, and distinctive character, of the countryside in this area is clearly demonstrated by the landscape designations that surround the airport.
- 1.29 It is our case that tranquillity is a fundamental part of the intrinsic character of the countryside around the airport, and that the erosion of this will impact on the character of the area, the quality of life of individuals and communities, and the enjoyment of the area. Consequently, we consider that the applications should be refused for being contrary to the national, regional and local policies that I highlight in my statement.
- 1.30 With regard to greenhouse gas emissions and climate change, it is our case that the proposals do not comply with government policy to reduce greenhouse gas emissions. In this respect, I highlight the content of the supplement to PPS1 on climate change and the South East Plan which places the issue of climate change at the heart of the planning system. This is a Government priority that has come to the forefront since the 2003 Air Transport White Paper, reflecting the 2008 Climate Change Act which sets specific targets for reductions in emissions.
- 1.31 The Local Plan is relatively mute on the issue of climate change, and only considers it in the content of energy. As such, I consider that it should be given limited weight in this regard, with the more recent national and regional policies taking precedence.
- 1.32 In regard to flood risk, it is our case that the applicants flood risk assessment does not meet national policy tests on flood risk. The primary policy guidance on flood risk, and its assessment, is provided in PPS25, the content of which is considered in detail in the evidence presented by Mr Furey (CPRE/07/A).