



## **STATEMENT OF CASE**

Kent Wildlife Trust

### **Re: London Ashford Airport, Lydd, Romney Marsh, Kent**

Y06/1647/SH: Erection of a terminal building (capable of processing 500,000 passengers per annum) and 637 car parking spaces  
Y06/1648/SH: Construction of a 249m runway together with an additional 150m starter extension

### **Planning Inspectorate Refs:**

APP/L2250/V/10/2131934  
APP/L2250/V/10/2131936

24 September 2010

## **1. Kent Wildlife Trust**

1.1. Kent Wildlife Trust was established in 1958 and has a membership of over 30,000. It is part of our role to further the conservation of all biodiversity in Kent and Medway, and, in order to achieve this, the Trust seeks to influence planning policy and implementation and employs professional staff with planning and ecological expertise.

## **2. Dungeness and its importance for biodiversity**

2.1. Dungeness is the largest shingle spit in Europe and possibly the world. The combination of its extent, geomorphology, location in the UK and past management history has led to its supporting nationally and internationally important habitats and communities of plant and animal species. Some of these species are not found anywhere else in the world.

2.2. For these reasons, Dungeness enjoys both national and international protection, parts being variously designated as a Special Area of Conservation (SAC), and Special Protection Area (SPA), a Site of Special Scientific Interest (SSSI), and a National Nature Reserve (NNR). Consultation is also underway on designation of an extensive Ramsar site and on extension of the SPA.

## **3. Kent Wildlife Trust's involvement with the current planning applications**

3.1. Kent Wildlife Trust submitted a formal objection to the current planning applications on 27 February 2007. The Trust has reviewed information submitted by the applicant subsequent to the original submissions and has maintained its objection in letters submitted in November 2007, October 2008, March 2009 and January 2010.

#### **4. Kent Wildlife Trust's reasons for objection**

##### **4.1. The impact of the proposals on vascular plant and lower plant species of conservation importance.**

4.1.1. The vascular and lower plant interest of the Dungeness Peninsula is well documented, and the site is known to support a number of species listed in the UK Red List as Near Threatened, Vulnerable, Endangered or Critically Endangered, as well as several species listed on the UK Biodiversity Action Plan and s41 list of Species of Principle Importance in England.

4.1.2. Many of these species are associated with habitat types which occur within the zone of influence of the proposed developments, and some are known to occur there. These species are potentially vulnerable to direct impact through development works and/or associated infrastructure provision. There is a significant potential for indirect impact, particularly through the increased deposition of nitrogen arising from the proposed increase in airport capacity, which may reduce the ability of the species of conservation concern to compete with other plants. Other pollution effects, including eutrophication of ditch habitats, may also have an impact on important plant species.

##### **4.2. The impact of the proposals on invertebrate species of conservation importance.**

4.2.1. Dungeness supports an important assemblage of rare invertebrates, many of which are associated with plants of the vegetated shingle and shingle scrub habitats. This assemblage includes a number of species included on the UK Red List and/or listed on the UK Biodiversity Action Plan and s41 list of Species of Principle Importance in England. At least one species and one subspecies are found nowhere else in the world, and several other species are only known in the UK from Dungeness.

4.2.2. These species are potentially vulnerable to direct loss of habitat, and some may also be impacted by light pollution arising from operation of the airport during the hours of darkness, or by eutrophication and other pollution of ditches around the airport.

4.2.3. Most of the species of concern are herbivorous and may therefore be impacted directly or indirectly through the effect of increased nitrogen availability upon their host plants: the availability of nitrogen may not only lead to a reduction in the abundance of host plants (through increased competition from faster growing or taller species) but may alter interactions between the invertebrate and its host plant.

**4.3. The lack of adequate surveys of plant and invertebrate species to inform the environmental statement and the formulation of any mitigation or compensation.**

4.3.1. It is the Trust's view that surveys for vascular plants, lower plants and invertebrates have been inadequate in terms of their extent, scope and timing. This is particularly significant given the known interest and importance of the flora and invertebrate fauna of Dungeness. As a result, it is not possible to fully assess the extent and severity of any direct or indirect impact of the proposals upon the important plant and invertebrate interest of Dungeness, nor to put this within the context of the wider Dungeness area. It follows, therefore, that it is not possible to adequately develop, or assess, proposals to mitigate or compensate for any impact.

**4.4. The inadequacy of surveys of protected reptile species to inform the environmental statement and the formulation of any mitigation.**

4.4.1. Protected reptile species are a material consideration in planning. A survey has been carried out of these species, but is inadequate to inform any proposed mitigation or compensation measures.

## **4.5. National and local planning policies**

4.5.1. National and local planning policies set out a number of tests and constraints which apply to developments likely to have an impact on features of biodiversity importance and to development more widely. In particular, these refer to the need to avoid harm to biodiversity; to give appropriate weight to designated sites, and species and habitats of interest; to maintaining the integrity of European and other designated sites; and to demonstrating over-riding need and absence of alternatives.

4.5.2. The Trust will refer to the legal status of the area and the national and local policies applicable to it. This will include, but not be limited to PPS9 and the Shepway District Local Plan (2006) including policies EN6, EN8, CO8, CO9, and CO11. We will demonstrate that the proposals are significantly in conflict with key planning policies.