

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

SECTION 77 TOWN AND COUNTRY PLANNING ACT 1990 – REFERENCE
OF APPLICATIONS TO THE SECRETARY OF STATE FOR COMMUNITIES
AND LOCAL GOVERNMENT

TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURE) (ENGLAND)
RULES 2000

**PROOF OF EVIDENCE OF CLIVE SELF Dip LA CMLI
MA (Urb Des)**

LANDSCAPE AND VISUAL

In respect of:

Planning Application Reference: Y06/1647/SH (New Terminal
Building)

Planning Application Reference: Y06/1648/SH (Runway
Extension)

relating to land at London Ashford Airport, Lydd, Romney Marsh,
Kent, TN29 9QL

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1.0 QUALIFICATIONS AND EXPERIENCE

- 1.1 I am a Chartered Landscape Architect and an Urban Designer. I hold a Diploma in Landscape Architecture and a Masters Degree in Urban Design. I have 28 years experience in landscape and townscape assessment and design.
- 1.2 I am Managing Director of CSA, a registered landscape planning consultancy. Prior to forming CSA, in 1999, I was responsible for landscape architecture and landscape planning at PRC Fewster Architects. I have worked throughout the UK, Middle East and the United States on a broad range of landscape projects and environmental planning work.
- 1.3 CSA acts for a wide range of clients in both the public and private sector. We undertake work from environmental impact assessment to strategic planning.
- 1.4 My company is currently involved in projects that range from the master planning of new settlements to award winning schemes which involve the redevelopment of brownfield sites. We work throughout the UK.
- 1.5 I am a member of the National Playing Fields Association's ("NPFA") Land Protection and Planning Committee and was a member of the Advisory Working Party which drafted the NPFA's Standards for Outdoor Recreational Space - 'The Six Acre Standard'.
- 1.6 I have given landscape and urban design evidence at numerous Local Plan Inquiries and Section 77 and 78 appeals and enforcement inquiries. I also presented landscape and visual impact evidence on behalf of West Midlands International Airport Limited ('WMIAL') at a public inquiry in respect of a passenger facility and passenger flights at Coventry Airport.

2.0 BACKGROUND, SCOPE OF EVIDENCE AND APPOINTMENT

2.1 This proof of evidence is submitted on behalf of London Ashford Airport Limited ('the Applicant'). My evidence addresses landscape and visual matters in respect of two applications ('the Applications') submitted on behalf of the Applicant in December 2006, namely:

- (i) An application for the construction of a 294m runway extension and a 150m starter extension (Council reference Y06/1648/SH); and
- (ii) An application for a new terminal building capable of processing up to 500,000 passengers per annum (Council reference Y06/1647/SH).

2.2 The Applications include 287 car parking spaces which are to be provided on existing hardstanding associated with the runway extension, with a further 352 car parking spaces to be provided when the new terminal building is operational (total new car parking provision being 639 spaces). This is in addition to the existing car parking provision of 223 spaces at London Ashford Airport (the 'Airport').

2.3 The Applications were accompanied by an Environmental Statement ('ES') (CD1.14 and CD1.17) submitted to the Council by the Applicant in December 2006 and by supplementary landscape information submitted to the Council by the Applicant in October 2007 (CD1.23a) and August 2008 (CD1.31).

2.4 Shepway District Council ('the Council') resolved to grant planning permission at a Committee meeting on 3 March 2010, subject to an agreed package of control, mitigation and enhancement measures secured by way of planning condition and section 106 legal agreement.

2.5 I was not involved in the preparation of the ES or supplementary environmental information that accompanied the Applications but I am in agreement with its conclusions in respect of landscape and visual effects. I have also undertaken my own assessment of the likely landscape and visual

effects of the Development pursuant to the Applications, including those of aircraft in flight.

- 2.6 I will present my evidence in the following manner:
- 2.6.1 background, scope of evidence and appointment (this Section);
 - 2.6.2 the existing situation (Section 3);
 - 2.6.3 the Development proposals and landscape and visual effects (Section 4);
 - 2.6.4 response to Rule 6 Parties (Section 5); and
 - 2.6.5 summary and conclusions (Section 6).
- 2.7 In Section 5 I briefly respond to the main issues raised by Rule 6 parties. If there are any detailed or additional comments raised, these will be dealt with in rebuttal evidence as required.

Methodology

- 2.8 To inform my assessment of the Development I have visited the Airport and surrounding area on a number of occasions, from October to December 2010, and reviewed the documents that supported the Applications.
- 2.9 The methodology for my assessment has been based on that set out in the Landscape Institute's 'Guidelines for Landscape and Visual Impact Assessment', and is fully described in Appendix D to my evidence.
- 2.10 In assessing the effects of aircraft in flight I have made observations up to 11 km from the runway for arrivals (this equates to an altitude of approximately 2,000 feet or 609 metres), being the point at which most aircraft will adopt the glide path to the Airport and around 6 km from the runway for departures which similarly equates to an altitude of 2,000 feet.
- 2.11 Photographs contained within this document were taken using a digital camera with a lens focal length approximating to 50mm, to give a similar

depth of vision to the human eye. In some instances images have been combined to create a panorama.

Overview

- 2.12 My evidence will demonstrate that the proposed Development, pursuant to the Applications, including the operation of passenger aircraft out of the Airport, will have no material impact on the character of the wider area in terms of landscape and visual impact.

3.0 THE EXISTING SITUATION

3.1 For the purposes of my assessment, I have taken the existing situation to be the site condition at October 2010, (the time of my first site visit) and in terms of aircraft movements, those identified in the ES and evidence of Ms Congdon (LAA/4/A) and permitted under the Airport's current operating license.

3.2 The ES and supplementary environmental information provides a comprehensive description of the existing character and quality of the Airport and wider landscape. I briefly summarise that information below and add my own observations as appropriate.

Site Context

3.3 The context of the Airport is shown on the location plan at Appendix A and on the aerial photograph at Appendix B. The Airport lies at the south-eastern tip of Kent on the edge of Romney Marsh. To the south and east is the shingle promontory of Dungeness. Lydd is approximately 1.5 kilometres to the southwest; Dungeness Nuclear Power Station 5 kilometres to the southeast; Greatstone-on-Sea 2 kilometres to the east; and New Romney 3.5 kilometres to the north.

3.4 The surrounding landscape of Dungeness and Romney Marsh is relatively flat with little more than 5 metres difference in level across the entire area. Approximately 12 kilometres to the north of the Airport, the land rises steeply to the escarpment of the Old Romney Shoreline. Formerly coastal cliffs, prior to the reclamation of Dungeness and Romney Marsh, the escarpment displays extensive evidence of degraded sea cliffs, with areas of land-slip and erosion. The Old Romney Shoreline Escarpment is designated as part of the Kent Downs AONB. Approximately 13 kilometres to the west is the High Weald AONB which similarly occupies rising ground on the edge of Romney Marsh.

3.5 To the north and east of the Airport is farmland which comprises a series of irregular shaped fields, divided by shallow drainage ditches, frequently flanked by intermittent tree cover (see Photograph 1 in Appendix C). To the

east and southeast is the shingle promontory of Dungeness, designated as a Site of Special Scientific Interest and Special Area of Conservation (Photograph 2 in Appendix C) which is interspersed with flooded former gravel pits. The shingle forms a series of north-west to south south-east aligned ridges, running roughly parallel to the coast. To the south is Denge Marsh and Dungeness Nature Reserve, a low-lying area of farmland and lagoons. To the west and southwest is farmland, the settlement of Lydd and a wind farm.

- 3.6 There are also recreational land uses within the area including Lydd Golf Course, immediately to the northwest of the Airport; Lydd Water Sports Centre, approximately 2 kilometres to the southwest of the Airport; the holiday village at Greatstone-on-Sea; and Dungeness RSPB visitors centre to the south.
- 3.7 Tree cover is relatively sparse and largely confined to wind pruned willow and scrub alongside drainage ditches and the occasional stand of trees, typically in hollows and on the edges of former mineral workings, or providing shelter to isolated farmsteads.
- 3.8 Agricultural land comprises a mixture of pasture and arable farmland in irregular shaped fields, typically bounded by shallow drainage ditches. There are also some areas of commercial turf growing and horticulture.

Landscape Character

- 3.9 In terms of the landscape character of the wider area, the Airport lies within an extensive area identified as 'Romney Marshes: Character Area 123' (see Appendix G) in 'The Character of England: Landscape, Wildlife and Natural Features:1999' (a national assessment of landscape character by the Countryside Commission (now the Countryside Agency) and English Nature (now Natural England)).
- 3.10 The Romney Marshes Character Area runs from Hythe in the northeast, to Winchelsea in the south, and to Tenterden in the northwest. In the Character Map the key characteristics of this area are noted as:

- 3.10.1 *A flat, open and agricultural landscape, with distinctive drainage dykes, marshes and open skies*
- 3.10.2 *Widely dispersed settlements with a sense of remoteness*
- 3.10.3 *Clumps of trees, reed fringed ditches and patches of standing water*
- 3.10.4 *Areas of high nature conservation value concentrated in the wet grazing marshes, sand dunes and shingle ridges*
- 3.10.5 *20th century development is evident in the towns and costal strips*

3.11 In respect of Dungeness, the Character Map notes its remoteness and the fact that much of the 'area is dominated by the imposing power station and associated powerlines of Dungeness', and that 'past gravel extraction pits, now flooded, military uses and expanding resorts add to the general clutter along the coast'.

3.12 From my observations of the area, I concur with the description given above and add that the existing Airport contributes to the already established character of the area.

3.13 Kent County Council ('KCC') has undertaken a more detailed assessment of the local landscape: The Landscape of Kent, October 2004. That assessment identifies the Airport as lying within the 'Dungeness Shingles' character area and adjoining the Brooklands Farm, Romney Coast and Walland Marsh Farmlands. KCC's assessment attributes similar characteristics to the area to those identified in the Character Map.

Built Environment

- 3.14 Built development within and surrounding the Airport is generally of an undistinguished or utilitarian appearance. Dungeness power station and the overhead powerlines that emanate from it are highly conspicuous and the power station itself is of an industrial appearance (Photograph 3 of Appendix C). Similarly, the existing fuel farm and hangars at the Airport (Photographs 4 & 7 of Appendix C); the neighbouring farm buildings; industrial estate on the edge of New Romney; water works (Photograph 10 of Appendix C); and plant at the nearby gravel workings are all utilitarian in appearance.
- 3.15 Domestic architecture within the surrounding area largely dates from the post-war period and is for the most part undistinguished. Linear development, of mainly suburban houses and bungalows, extends along the coast from Lydd-on-Sea, in the south, to Littlestone-on-Sea, in the north (see Photograph 5 of Appendix C). There are however some pockets of older development which reflect the traditional vernacular of the area, notably within the historic core of Lydd and there are also distinctive clapper board cottages at Dungeness.

Tranquillity

- 3.16 The concept of tranquillity is highly subjective as it is entirely dependent upon an individual's perception of what constitutes tranquillity. It cannot be measured in an objective way and forms no part of national or local plan policy.
- 3.17 In 1999, in an attempt to identify so called tranquil areas, the Council for the Protection of Rural England ("CPRE") published a series of Tranquil Area Maps to identify what they believed were tranquil and non tranquil areas within England. These were replaced in 2008 by new maps derived from a 'tranquillity measurement tool' which combines perceptual qualities of tranquillity with topographic data, to establish areas of relative tranquillity.
- 3.18 The CPRE's web site provides an explanation of how their tranquillity maps have been produced. It states 'our new tranquillity measurement tool enabled

us to produce a detailed map of England revealing the likelihood someone would experience tranquillity in any locality’.

3.19 It then identifies the top 10 survey responses for what makes a tranquil area, as follows:

- 3.19.1 Seeing a natural landscape
- 3.19.2 Hearing birdsong
- 3.19.3 Hearing peace and quiet
- 3.19.4 Seeing natural looking woodland
- 3.19.5 Seeing the stars at night
- 3.19.6 Seeing streams
- 3.19.7 Seeing the sea
- 3.19.8 Hearing natural sounds
- 3.19.9 Hearing wildlife
- 3.19.10 Hearing running water

3.20 It then goes on to identify the top 10 survey responses for areas that are not considered tranquil:

- 3.20.1 Hearing constant noise from cars, lorries and/or motorbikes
- 3.20.2 Seeing lots of people
- 3.20.3 Seeing urban development
- 3.20.4 Seeing overhead light pollution
- 3.20.5 Hearing lots of people
- 3.20.6 Seeing low flying aircraft
- 3.20.7 Hearing low flying aircraft
- 3.20.8 Seeing power lines

3.20.9 Seeing towns and cities

3.20.10 Seeing roads

- 3.21 Surprisingly, and particularly in light of the above responses and the fact that Lydd military firing range is within 3 kilometres of the site, CPRE's tranquillity map for the South East of England identifies Lydd Airport and Dungeness as one of the more tranquil areas (see Appendix E).
- 3.22 From my own observations of the area, I have great difficulty reconciling CPRE's tranquillity map with local environmental conditions. For example, Lydd firing range is identified as a tranquil area, as is Dungeness power station (Photograph 3, Appendix C) and the existing Airport. All these areas currently feature urban development and activity and certainly are not areas I would consider tranquil.
- 3.23 It is also important to note that tranquillity mapping is an initiative by the CPRE and does not form part of any planning policy or development plan policy that relates to LAA.

Landscape Planning Policy Context

- 3.24 At Appendix A, I include a composite plan showing designated landscapes within a 15km radius of the Airport. On the plan I have also shown Conservation Areas that lie close to the approach and departure routes of runway 21 to illustrate how, if at all, such areas are affected.
- 3.25 Statutorily designated landscapes within the wider area comprise the Kent Downs AONB, approximately 12 km to the north of the Airport, and the High Weald AONB a similar distance to the west. The non statutory designation of the Romney Marsh Local Landscape Area ('LLA') washes over the northern tip of the Airport site, extending northwards and westwards to the Old Romney Shoreline Escarpment. To the east of the Airport, Dungeness is identified as a Special Landscape Area ('SLA'). Both policies seek to protect or enhance the character of the areas unless the need to secure economic and social wellbeing outweighs the need to protect the landscape.

Cultural Interest

- 3.26 There are also a number of sites of historic and cultural interest in the surrounding area. These are described in the Cultural Heritage Chapter of the ES, and include the anti-aircraft listening devices to the southeast of the Airport.

Site Description

- 3.27 The Application Site extends to approximately 132 hectares and comprises the existing runway (1,505m long), hardstanding, aprons and parking areas of the Airport, along with an area of relatively flat grassland either side of the runway. To the north of the existing runway is a further area of semi-improved grassland which will be developed as part of the runway extension and starter extension.
- 3.28 Buildings and structures within the Site include the existing terminal building, a one and two storey, flat roofed, white rendered building, approximately 8 metres high (Photograph 6 in Appendix C); two aircraft hangars, both clad in grey profiled metal sheeting, which are between 9m and 10m high; several smaller buildings; and a fuel farm (Photograph 7 in Appendix C).
- 3.29 Other structures within the Site include two lighting columns, approximately 30m high; perimeter fencing; the control tower; and signage.
- 3.30 The main runway follows a north-east to south-west alignment (210 degrees – 30 degrees) and there are associated taxi ways. The runway has directional landing lights and operates an Instrument Landing System ('ILS') which assists approaches to the runway during periods of poor visibility.

Aircraft Movements

- 3.31 The Airport's license allows it to operate scheduled and private services, 24 hours a day, seven days a week. The current operating hours are 08:30 to 1900 and at other times by arrangement.

- 3.32 Section 3 of the ES (CD 1.17) identifies the type of aircraft that were using the Airport at the time the Applications were submitted including a small number of rotary wing aircraft i.e. helicopters. The majority of current usage is from business and general aviation and includes scheduled flights to Le Touquet. There are seasonal variations in airport activity with the peak activity in the summer months.
- 3.33 The prevailing wind direction is such that runway 21 is used approximately 70% of the time and runway 03, 30% of the time. The flight paths for runways 03 and 21 are illustrated in the appendices to Mr Maskens evidence (LAA/3/A).
- 3.34 Larger aircraft approaching runway 21 on ILS will overfly Hythe, the coast at Dymchurch, St Mary's Bay, and Littlestone-on-Sea. Aircraft departing runway 21 will make a right turn, passing over Lydd. The exception to this is light aircraft which can make a left turn, avoiding the Dungeness exclusion zone, to pass over Lydd-on-Sea.

Landscape Character and Quality

- 3.35 In terms of intrinsic landscape character, the Site and adjoining area is not covered by any statutory designation for landscape character or quality. The northern tip of the Site does however fall within the Romney Marsh Local Landscape Area and the land to the east falls within the Dungeness Special Landscape Area.
- 3.36 From my assessment of the area, and using the methodology in Appendix D, I consider the Site to be of low landscape quality and I say that for the following reasons:
- 3.36.1 the greater part of the Site is free from any statutory designation for landscape character or quality;
 - 3.36.2 the Site is an operational airport with associated vehicular and air traffic;
 - 3.36.3 the existing buildings and structures within the Site are of a utilitarian appearance; and

3.36.4 the runway, car park and apron are lit.

3.37 In terms of the neighbouring area, I consider that to be of medium to low landscape quality. In arriving at that judgement I recognise that part of the area carries a designation for landscape character but balance that against the fact that there are pockets of considerably lower quality, such as the area around Dungeness Power Station, the existing Airport and the settlements along the coast, and because much of the area has been scarred by past and present mineral extraction.

Visibility

3.38 The Landscape and Visual Amenity Chapter of the ES (CD 1.14 and 1.17) and the supplementary environmental information (CD 1.23a) provides a comprehensive assessment of views of the existing Airport and as such I shall not repeat it here other than to say that the low-lying nature of the area and paucity of existing vegetation is such that the existing hangars and terminal buildings can be seen from a number of locations in the surrounding landscape. The settlements of Greatstone-on-Sea, Lydd and New Romney, the wind farm at Lydd and the overhead powerlines that cross the area can similarly be seen from numerous locations. I consider the key views to be as follows.

North

3.39 From the north there are glimpsed views of the hangars at the Airport from the public footpath that leads from Belgar Farm to New Romney; from sections of the B2075 and A259; and from the southern edge of New Romney.

East

3.40 From the east, within the vicinity of the former gravel workings and sound mirrors, there are views through the scrub vegetation towards the perimeter fence, terminal building and hangars (Photograph 2 in Appendix C).

3.41 From further east there are similar views from the Romney, Hythe and Dymchurch railway and from the footpath leading to the sound mirrors. It is also likely that there will be some views from the upper floor windows of a number of properties on the western edge of Greatstone-on-Sea, Lade and Lydd-on-Sea although the extent of the view will depend upon the orientation of the dwelling and the nature and extent of boundary and intervening vegetation.

South

3.42 From the south there are opportunities for views from the publicly accessible area of shingle to the south of the Site (Photograph 12 in Appendix C), from sections of Dungeness Road (Photograph 11 in Appendix C) and from the footpaths within Dungeness Nature Reserve. From this direction views are at some considerable distance (3-5 kilometres) and are mainly confined to the roof and upper part of the existing hangars.

West

3.43 From the west and southwest there are views of the existing buildings and structures within the Airport from Lydd Golf Course; from sections of Romney Road; the approach road to the Airport (Photograph 9 in Appendix C); the public footpath leading from Lade to Lydd; and from a number of properties on the eastern edge of Lydd.

Aircraft in flight

3.44 For the purpose of my evidence, I have also considered the effects of aircraft in flight and established a theoretical visual envelope of aircraft approaching and departing the Airport. The visual envelope for aircraft using runway 21 is illustrated on the context plan at Appendix A and is based on the flight paths for all groups of aircraft, including larger types such as Boeing 737s.

4.0 THE DEVELOPMENT UNDER CONSIDERATION AND LANDSCAPE AND VISUAL EFFECTS

4.1 In this section I consider the ability of the Site in landscape and visual terms to accommodate the proposed development pursuant to the Applications. In Section 5, I then go on to address the specific issues identified by Rule 6 parties.

Aircraft in Flight – General

4.2 In considering the effects of aircraft in flight, my evidence focuses on the effects of the larger aircraft as these currently do not regularly fly from the Airport.

4.3 With the Airport operating at a throughput of 500,000 passengers per annum ('ppa') there would be, on average, approximately 16 movements a day (eight arrivals and eight departures) of larger aircraft, of which eight movements would be from the largest proposed aircraft such as Boeing 737s.

4.4 The theoretical visual envelope of an aircraft in flight is very large. On a clear day, aircraft and their vapour trails can be seen passing overhead at high altitude. What matters is not so much the area from within which it is possible to see an aircraft in flight, but the area within which it could conceivably have some potentially material effects.

4.5 In my view, from my observations and past experience, a reasonable area to consider extends to around 11km from the runway for arrivals (this equates to an altitude of approximately 2000 feet or 609 m), being the point at which most larger aircraft will adopt the glide path to the Airport and around 6 km (this roughly equates to 2000 feet or 609 m) from the runway for departures. Aircraft may still be discernible on clear days at greater distances from the Airport, but I do not believe that they will generate any material effects. The visual envelopes for departures and arrivals of larger aircraft are shown on Figure CSA 1662/100 at Appendix A. The visual envelopes are an approximation only as the rate of climb will depend upon a number of variables, including the aircraft type and take-off weight, but represent a

reasonable assessment based on the climbing characteristics of the larger passenger jets.

- 4.6 Even within the visual envelope areas which I have set out above, a number of aircraft movements will not be visible, either because they take place during the hours of darkness or because they are above the cloud base. It is not possible to make a precise judgement about the numbers involved, but it is important to note that not all of these movements will be visible.
- 4.7 It is also important to place the proposed aircraft movements within the context of the existing operating license which allows the Airport to operate 24 hours a day, seven days a week, and the future baseline position for the Airport, should the Development not go ahead. It is also relevant to note that the proposed runway extension would neither change the size of the largest aircraft that can currently use the Airport nor would it significantly alter the flight paths. It would however enable the larger aircraft, such as the Boeing 737 to take off with a full and viable payload.
- 4.8 The existing fleet mix is set out in the ES with a refined and updated fleet mix in the evidence of Ms Congdon (LAA/4/A). Whilst there would be a slight increase in aviation activity as a result of the runway extension and terminal building (see evidence of Ms Congdon) the main change from a visual perspective would be the increase in the number of larger aircraft such as B737.
- 4.9 At Appendix H, I attach a photograph of an ATR 42-300, from the current fleet, approaching runway 21, and a montage of a B737 from the proposed fleet. It is evident when comparing the two that whilst the B737 is larger than the ATR 42-300 it is not significantly so.
- 4.10 The change resulting from the increased aircraft movements associated with the Development would have no material effect on the character of the area. I say that because there are already existing aircraft movements; the fact that the Airport will experience some growth, irrespective of whether or not the proposed development goes ahead; the total number of movements will be capped at 40,000 mpa; and because few larger passenger aircraft will use the

Airport. I have also taken into account the fact that the larger aircraft have good climbing characteristics and are therefore present in the landscape for a short time only.

Aircraft in Flight - Landscape and Visual Effects

- 4.11 In considering the effects of overflying aircraft, I have taken the SLA, LLA and Conservation Areas to be of higher sensitivity than the surrounding rural areas. I consider that the remaining areas around the Airport to be of lower sensitivity. The AONBs are likewise of higher sensitivity but these are a considerable distance away and as such do not fall within the area under consideration.
- 4.12 I have already described the approach and departure routes for larger aircraft and placing this in the context of designated landscapes it is relevant to note that the approach to runway 21 passes over the Romney Marsh Local Landscape Area for the last 5 km of the approach only. Between 5 and 10 km from the runway the approach is along the coast. Aircraft may overfly the Kent Downs AONB to the north of Hythe but aircraft would be at an altitude of at least 3,200 ft at this point and as such the effects would not be significant.
- 4.13 Departing larger aircraft would turn right from runway 21 to fly over the Romney Marsh LLA but would avoid the Dungeness SLA. If departing aircraft passed over either the High Weald or Kent Downs AONB then they would have commenced climbing to their cruising altitude and would have reached an altitude of between 5,000 – 7,000 ft.
- 4.14 My assessment is that effects of aircraft in flight on landscape character would be:
- 4.14.1 Limited to the visual envelope areas which I have identified. There would be neutral effects on areas outside the visual envelopes;
 - 4.14.2 Negligible impact on the so called Tranquil Areas. This is what would be expected, as the flightpaths are generally the same as those for existing aircraft using the Airport, and the so called

Tranquil Areas would not be expected to include aircraft flightpaths;

4.14.3 Minor adverse effects on the LLA as the proposed aircraft are slightly larger than those in the current fleet mix that use the Airport;

4.14.4 Minor adverse effects on the conservation area at Lydd; and

4.14.5 Neutral effect on the AONB as the aircraft would be at a considerable height as they pass over it.

Residential Properties

4.15 Residential properties are generally considered to be of higher sensitivity in visual terms, but would be subject to only a slight degree of change resulting from an increase in aircraft movements. It is also important to distinguish between a change involving passing aircraft which would be visible from most properties for only a very short duration (most windows will have a restricted view of part of the line of overflight only), and a more typical change consequent on a development (such as, for example, a new industrial building) which would be permanently visible. I therefore believe that any visual effects on residential properties would be extremely limited.

4.16 The principal effects would be experienced from properties under the approach to runway 21, namely the houses on Dune Road in Greatstone-on-Sea, and those within the Nicholas Road area of Littlestone-on-Sea.

4.17 For departing aircraft there would be some effects for the residents of Lydd but the aircraft would be at least 1,000 ft at this point and over the settlement for a very short period only.

Built Development

4.18 The new terminal, runway extension and associated development is described in the ES (CD 1.14 and CD1.17) and the Design and Access Statement (CD1.30) and can be seen to be modest in scale and fall within a

clearly defined developed context. The proposals would involve the introduction of a new terminal building, additional car parking, and modified access arrangements. A landscape strategy has been prepared to show how the external environment would be treated and the key influences on it.

- 4.19 The terminal building reflects contemporary airport design with smooth uncluttered lines. The building is split into two principal components which are linked by a smaller structure. The roof is curved, sweeping down from the airside to the landside with a projecting canopy providing shelter for passengers.
- 4.20 The DAS explains how the form of the building responds to the surrounding landscape with the mono pitched curved roof reflecting the wind formed landscape of Dungeness. On the airside the façade is translucent allowing views over Romney Marsh and Dungeness. On the landside coloured composite aluminium panels are to be used to compliment the colours of the surrounding landscape.
- 4.21 The DAS also explains that extensive consultation was undertaken with relevant stakeholders, including the Department for Transport, UK Immigration Services, HM Customs and Excise and Special Branch in relation to the design of the new terminal building.
- 4.22 A passenger drop off and pick-up area is provided to the west of the new terminal building and a staff and short term parking area to the northwest. To the south the existing parking area will be reorganised to provide 323 parking bays.
- 4.23 The runway extension comprises a northerly extension of runway 03/21 by 294 metres, taking its length to 1,799 metres and provision of an additional 150 metre long starter extension. In addition, a clear and graded area extending 105 metres either side of the centreline of the runway will need to be provided.

Built Development - Visual Effects

- 4.24 The visual envelope for the new terminal and parking area of the Development is identified on the ZVI plan in the ES (CD1.23a) and a detailed assessment of effects made. Likewise, the effects of the runway extension are assessed in some detail and as such I shall not duplicate that information here.
- 4.25 In general terms the visual envelope of the new terminal will be similar to that of the existing hangars as they are of a comparable scale and in a similar location. The proposed terminal building is however of a very different design and responds to its landscape setting in a far more sensitive way.
- 4.26 At Appendix F, I include 3 photomontages of the proposed terminal building and briefly comment on them below.
- 4.27 Montage 1 is taken from Dungeness Road, approximately 1.2 kilometres to the southwest of the proposed terminal building. In the existing view the hangars, terminal building and lighting columns at the Airport can be seen on the right hand side of the frame and the fuel farm in the centre.
- 4.28 In the corresponding montage the terminal building can be seen alongside the existing hangars. The montage shows that whilst the height of the proposed terminal building is comparable with the existing hangars its impact on the landscape is significantly less mainly because of the curved roof and the fact that the eaves on the landside of the building are considerable lower than on the airside. The montage also shows how the mass of the building has been reduced by dividing it into two interlinked volumes.
- 4.29 Montage 2 is taken from a location approximately 1 kilometre to the southwest of the proposed terminal. In the existing view the hangars and lighting columns can be seen on the right hand side of the frame. The montage shows the two volumes of the terminal building and the way the roof sweeps up from the low-lying landscape. The montage also shows how the vegetation on the Site boundary screens ground level activity and allows the building to be assimilated into the surrounding landscape.

- 4.30 Montage 3 is taken from the public footpath on the western edge of Lydd. In the existing photograph the hangars and lighting masts can be seen towards the right of the frame. In the montage the terminal building can be seen above and beyond the shingle ridge, partially hidden by the landform and scrub. The montage also shows the way the building responds to the prevailing landform, echoing its undulating nature.
- 4.31 My overall conclusion in respect of the new terminal building is that it is of high quality design, responds sensitively to its site and surroundings and will not appear out of place or discordant in the local landscape.
- 4.32 Any night time effects of the proposed terminal building and car parking area would also be extremely limited, given that the general area is already lit and that the existing apron is floodlit. Night time effects are dealt with in greater detail in the lighting chapter of the ES (CD1.14 and CD 1.32).
- 4.33 The proposed car park and circulation areas will, for the most part, occupy existing areas of hardstanding and will be partially screened by the vegetation alongside the ditch on the western boundary and the ground modelling alongside the golf course to the north. As such, the visual effects of the car park will be limited and localised.

Built Development – Landscape Effects

- 4.34 In terms of the effects of the Development pursuant to the Applications on the character of the wider area I do not believe it would give rise to any significant effects and I say that for the following reasons:
- 4.34.1 the Airport is an active airport with associated infrastructure;
 - 4.34.2 the new terminal building is of a sympathetic design;
 - 4.34.3 the runway extension does not result in the loss of any significant landscape features;

4.34.4 the new circulation and parking areas are closely related to the terminal and their effects can be mitigated by new landscaping; and

4.34.5 the site is not covered by any statutory designation for landscape character or quality.

Effects in Terms of Landscape Policies

4.35 I have noted previously that the Council has raised no issues in terms of potential conflict of the Development with landscape policies. However, I briefly comment on the principal policies below and the extent to which the Development accords with them.

4.36 Statutorily designated landscapes within the wider area comprise the Kent Downs AONB and the High Weald AONB. There will be no direct effects on either of the AONB as a result of the Development but some indirect effects from overflying aircraft, albeit at some considerable height. Given that the AONB is over 12 kilometres from the Airport and that aircraft will be at least 3,200 ft high as they pass over it the impact will be negligible.

4.37 There will be no direct effects on the SLA of Dungeness. The northern tip of the site is however washed over by the Romney Marsh Local Landscape Area (saved Policy CO5). This policy does not preclude development but requires new development not to adversely impact on the character of the area. Given that the runway extension results in the loss of only a small area of semi-improved grassland within the LLA the loss is not considered significant and therefore there would be no adverse impact on the character of the area.

5.0 RESPONSE TO RULE 6 PARTIES COMMENTS

5.1 I have already described the Development pursuant to the Applications and provided an assessment of why I consider the Development appropriate in landscape and visual terms. I now briefly comment on the matters raised by Rule 6 parties in relation to landscape, visual and tranquillity.

Tranquillity

5.2 The CPRE have made representations about the impact of the Development pursuant to the Applications on the tranquillity of the area. In Section 3 of my evidence I have briefly outlined the methodology used by the CPRE to determine areas of so called tranquillity. In essence, the CPRE's tranquillity maps are based on perceptual qualities of tranquillity. This obviously makes it a highly subjective process and one that is difficult to interrogate.

5.3 The effects of noise are dealt with in the evidence of Richard Perkins (LAA/5/A), on behalf of the Applicant, and as such my observations relate to perceptual qualities only.

5.4 The CPRE's web site provides an explanation of how the tranquillity maps have been produced and identifies the top 10 survey responses for what makes an area tranquil and similarly the top 10 survey responses for areas that are not considered tranquil. Of the latter, the following six elements can all be experienced within the environs of the Airport:

- 5.4.1 Seeing urban development
- 5.4.2 Seeing overhead light pollution
- 5.4.3 Seeing low flying aircraft
- 5.4.4 Hearing low flying aircraft
- 5.4.5 Seeing power lines
- 5.4.6 Seeing roads

5.5 Given that six of the top ten responses for what is not a tranquil area can be experienced within the environs of the Airport it is very surprising that the

CPRE should identify the area around the Airport as one of the more tranquil areas in England.

- 5.6 From my own assessment of the area it is apparent that there are a number of urbanising influences in the locality, including Dungeness Power Station, the linear post-war development along the coast and the Airport and activity associated with it.
- 5.7 Whilst the proposed Development will result in increased activity in the area, both on the ground and in the air, this has to be seen within the context of the existing landscape and operations at the Airport. The new terminal building will after all be in an area that is already developed and contains buildings of a similar scale and there are already a significant number of aircraft using the Airport. Given these existing conditions, I do not consider that the increased activity at the Airport will have a material effect on the tranquillity of the area, whatever that is judged to be.

Effects on Romney Marsh

- 5.8 SECN has expressed their concern that the airport would have a serious adverse effect on Romney Marsh. I have already provided my assessment of the effects of the Development pursuant to the Applications on the local landscape and explained how the scheme responds sensitively to its site and surroundings. I have also noted that only the northern most tip of the runway extension falls within the Romney Marsh LLA and concluded that there will be no material impact on the character of the Marshes.

Effects on the AONB

- 5.9 The CPRE are also concerned over the effects of the Development on the AONB. I have also stated that there will be no direct effects on the AONB but potentially some indirect effects from overflying aircraft but that the impact will be negligible given the distance of the AONB from the Airport and the fact that there is already some overflying of the area.

5.10 There may also be other indirect effects from tourists visiting the AONB and potentially vehicles passing through it but such effects are extremely difficult to quantify and are unlikely to give rise to any perceptible effects.

6.0 SUMMARY AND CONCLUSION

- 6.1 The Airport lies at the south-eastern tip of Kent on the edge of Romney Marsh. To the south and east is the shingle promontory of Dungeness. Lydd is approximately 1.5 kilometres to the southwest; Dungeness Nuclear Power Station 5 kilometres to the southeast; Greatstone-on-Sea 2 kilometres to the east; and New Romney 3.5 kilometres to the north.
- 6.2 The surrounding landscape of Dungeness and Romney Marsh is relatively flat with little more than 5 metres difference in level across the entire area. Approximately 12 kilometres to the north of the Airport the land rises steeply to the escarpment of the Old Romney Shoreline which forms part of the Kent Downs AONB. A similar distance to the west is the High Weald AONB. The Airport is not covered by any statutory designations for landscape quality.
- 6.3 In terms of the landscape character of the wider area, the Airport lies within an extensive area identified as Romney Marshes: Character Area 123 in The Character Map of England. In respect of Dungeness, the Character Map notes its remoteness and the fact that much of the 'area is dominated by the imposing power station and associated powerlines of Dungeness', and that 'past gravel extraction pits, now flooded, military uses and expanding resorts add to the general clutter along the coast'.
- 6.4 The Application Site extends to approximately 132 hectares and comprises the existing runway (1,505m long), areas of hardstanding, aprons and parking areas, along with an area of relatively flat grassland either side of the runway. To the north of the existing runway is a further area of semi-improved grassland which will be developed as part of the runway extension and starter extension.
- 6.5 Buildings and structures within the Site include the existing terminal building; two aircraft hangars, both clad in grey profiled metal sheeting; several smaller buildings; and a fuel farm.
- 6.6 The new terminal, runway extension and associated development is modest in scale and falls within a clearly defined developed context. The proposals

involve the introduction of a new terminal building, additional car parking, and modified access arrangements.

- 6.7 The proposed terminal building is of a contemporary design with smooth uncluttered lines. The building is split into two principal components which are linked by a smaller structure. The roof is curved, sweeping down from the airside to the landside.
- 6.8 The DAS explains how the form of the building responds to the surrounding landscape with the mono pitched curved roof reflecting the wind formed landscape of Dungeness. On the airside the façade is translucent allowing views over Romney Marsh and Dungeness and on the landside coloured composite aluminium panels are to be used to complement the colours of the surrounding landscape.
- 6.9 My overall conclusion in respect of the new terminal building is that it is of high quality design, responds sensitively to its site and surroundings and as such will not appear discordant with the local landscape.
- 6.10 The Airport's current license allows it to operate scheduled and private services, 24 hours a day, seven days a week. The current operating hours are 08:30 to 1900.
- 6.11 The proposal will see a greater intensity of use, both in the air and on the ground. With the Airport operating at a throughput of 500,000 ppa there would be, on average, approximately 16 movements a day (eight arrivals and eight departures) of larger aircraft, of which eight movements would be from the largest proposed aircraft such as Boeing 737s.
- 6.12 I consider that the change resulting from increased aircraft movements associated with the Development pursuant to the Applications will not have a material impact on the character of the area. I make that judgement in the context of existing aircraft movements, the fact that the Airport will experience some growth, irrespective of whether the proposed Development goes ahead, and because few larger passenger aircraft will use the Airport. I have also taken into account the fact that the larger aircraft have good climbing

characteristics and are therefore present in the landscape for a short time only.

- 6.13 I do not consider the area to be particularly tranquil and I say that because of the activity associated with the existing Airport and the fact that urban development is already readily visible in the local area. Whilst the proposed Development will result in increased activity this has to be seen within the context of existing operations at the Airport. As such, I do not consider that increased activity associated with the proposals pursuant to the Applications will have a material effect on the tranquillity of the area.
- 6.14 For the foregoing reasons, in landscape, visual and tranquillity terms, I consider that the proposals will not result in any material harm to either the character or quality of the surrounding landscape.