

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

**REBUTTAL PROOF OF EVIDENCE OF
KEITH SOWERBY BSc (Econ), FIHT
TRANSPORT**

In respect of:

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

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

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



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LYDD 
London Ashford Airport

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1 Introduction

- 1.1 This Rebuttal sets out written responses to certain Proofs of Evidence that relate to matters of transport and surface access to the Airport.
- 1.2 The following chapters of this rebuttal respond to matters raised in the evidence of:
 - | Mr Brian Lloyd (CPRE Protect Kent) [CPRE/01/A]
 - | Mr Gareth Thomas (CPRE Protect Kent) [CPRE /07/A]
 - | Ms Louise Barton (LAAG) in relation to Need for Development [LAAG/07/A] and, Conformity to Aviation White Paper [LAAG/09/A].
- 1.3 This rebuttal proof of evidence only deals with certain points where it is considered it is helpful to respond in writing. Where a specific point has not been dealt with, this does not mean that these points are accepted and these other points will be addressed at the Inquiry

2 CPRE/01/A - Planning Policy

Introduction

- 2.1 The Planning Policy Proof of Evidence by Mr Lloyd on behalf of CPRE includes comments on the Applications and their compliance with relevant planning policy. In this chapter I respond only to transport policy-related assertions.

Overview of Mr Lloyd's Proof

- 2.2 Mr Lloyd's proof contains what he considers to be the planning context of the Airport development as interpreted by the Campaign to Protect Rural England (Protect Kent) as a basis for their objections.
- 2.3 The proof refers to national, regional and local planning policy.

Objection 1: Future of Air Transport White Paper 2003

- 2.4 Mr Lloyd refers to the White Paper "The Future of Air Transport", published in 2003 [CD5.24]. Although he concedes that the policy is supportive of airport development in the South East (paras 3.7 and 3.8), he claims that subsequent policy and a change of Government has meant that the White Paper is superseded and therefore this diminishes the 'weight' that should be given to the policy at this Inquiry.
- 2.5 In relation to transport, Mr Lloyd refers to the White Paper as providing key guiding principles. In particular, the 'need for easy and reliable access to airports' [Para 3.14].

Response:

- 2.6 The Surface Access Strategy included within the Applications demonstrates that surface access, and the needs of the Airport passengers amongst other things, has been considered in detail and appropriate provision has been made to provide options to access the Airport by private or public transport.
- 2.7 The change of Government has not resulted in any alterations or changes to the Aviation White Paper and the 'weight' of the policy is considered to be unchanged. Moreover, a speech by the Rt. Hon Theresa Villiers on 26 January 2011 at the 'New Strategy for Aviation' conference again made clear that the new Coalition Government is seeking 'to create the right conditions for regional airports to flourish'. This issue has also been addressed in some detail by Ms Congdon.
- 2.8 Since the Inquiry commenced, the Government has published two consultation documents of relevance - "Developing a Sustainable Framework for UK Aviation: Scoping Document" and "Reform of Air Passenger Duty". Both of these documents reiterate the continued support for regional airports by the Coalition Government. Paragraph 2.10 of the Scoping Document states "*Regional airports also have an important role in providing international and domestic connections across the UK, and contributing to local economies.*"

Objection 2: National Infrastructure Plan

- 2.9 Mr Lloyd claims that the recently published National Infrastructure Plan supersedes the Aviation White Paper and it recommends that the best use should be made of existing airport capacity.

Response:

- 2.10 The National Infrastructure Plan referred to in his Proof (para 3.11) was produced by the Coalition Government as a vision for infrastructure investment in response to the economic downturn and to address the demand over the next five years. It is a high level document outlining key themes for investment, without identifying details of specific schemes. It does not supersede the Aviation White Paper.
- 2.11 The only significant mention of aviation developments is the need to make best use of existing airport capacity. The extension to the runway at Lydd will do this by unlocking LAA's potential as a Small Regional Airport to meet the air travel needs of its catchment area in a better way, and relieving pressure on other congested airports in the south east. The plan is of a high level in policy terms. There is nothing in it that can reasonably be interpreted as being opposed to the expansion at Lydd or altering the White Paper policy which supports making best use of existing capacity.

Objection 3: PPG13 'Transport', 2001 (Updated Jan 2011)

- 2.12 Mr Lloyd's Proof refers at paragraph 3.16 to the specific advice given in relation to planning for aviation developments for local authorities. He refers to advice on related and non-related developments.

Response:

- 2.13 The Applications being considered are for development of the existing airport itself, not further 'related or non-related' developments.
- 2.14 But in any event, principles of sustainability are taken into consideration with all new developments. In this case considerable efforts have been made to provide a range of surface access options to passengers and staff in accordance with a strategy of access that has been agreed with both Kent County Council and the Highways Agency.
- 2.15 The location of the airport, 26 kilometres from Ashford, is within a highly populated area. The majority of this population currently travels outside Kent to other airports in the south east to access international flights. CAA data and the evidence of Ms Congdon demonstrates that there is sufficient demand within Kent to support both Lydd Airport and Manston Airport as Small Regional Airports, each serving their own catchments.
- 2.16 Based on the CAA passenger survey data identified in my Transport Proof of Evidence [LAA/12/A] and the identified market catchment detailed in the Socio-Economic proof of Ms Louise Congdon [LAA/4/A] and her other evidence, it is clear that the provision of a regional airport at Lydd would in fact reduce the average car mileage of passengers within a 60 minute catchment by an average of 40%, saving over 800 tonnes of CO₂ per annum.

Objection 4: Kent Local Transport Plan 2006-2011

- 2.17 Paragraphs 3.24 to 3.34 of Mr Lloyd's proof refer to the second Kent Local Transport Plan. Mr Lloyd contends that Kent International Airport at Manston is identified as having the potential to develop into a regional airport, whereas Lydd would have a more limited role in serving local business needs.

Response:

- 2.18 Even with Kent International Airport and its potential to develop, the Plan does not prevent or otherwise seek to inhibit the development of operations at Lydd nor does it assert or claim that this would not be possible. Indeed, the Plan later goes on to state that "any proposals to develop aviation will be assessed for their impact on the surrounding environment...and the choice of transport options providing access to the airport." These impacts have been fully considered in great detail within the Applications and the Surface Access Strategy provides a sufficient and appropriate choice of transport options to access the airport and I refer again to my evidence above.

Objection 5: Final Draft Integrated Transport Strategy "Growth without Gridlock", 2009

- 2.19 Paragraphs 3.35 to 3.38 of Mr Lloyd's evidence refer to an overview of the latest Integrated Transport Strategy for Kent. Mr Lloyd refers to Chapter Seven of this document where both of Kent's Airports are considered in the context of their expansion plans. He then seeks to compare this with Chapters later in the document where he states that the Airport is not identified as a priority for Shepway District. He also queries the discussion of Appledore as a 'parkway' station which is not included within the Transport Assessments.

Response:

- 2.20 The Integrated Transport Strategy provides significant details of the proposed expansion at Lydd and includes an image of how the new terminal building might look. The document makes no criticism of the plans.
- 2.21 There is reference to a potential Parkway station at Appledore as detailed within the Strategy. This plan has not formed part of the Applications up to this point; however, within the Travel Plan there is a commitment to assess the potential for links to Appledore Station as passenger levels increase. The line at Appledore is such that the potential to increase rail service capacity is very limited and, at present, there are no commitments by Network Rail to improve the line. However, Appledore does offer the opportunity to connect with high speed services from Ashford International and the Travel Plan will advertise taxi services to the station. This is detailed within my Proof of Evidence document (LAA/12/A para 8.11).

3 CPRE/05/A - Transport and Access

Introduction

- 3.1 Protect Kent have submitted a Proof of Evidence relating to Transport and Access prepared by Gareth Thomas. There are a number of areas within Mr Thomas's Proof with which I disagree and consider that his interpretation of the Application documents is incorrect. I set out some of these below.

Objection 1: Airport Location

- 3.2 In section three, Mr Thomas claims that Lydd Airport is remote and poorly accessed; and has a limited immediate catchment area.

Response:

- 3.3 The nature of airports is such that they rarely have 'immediate' catchment areas with passengers travelling more significant distances to access flights than is otherwise the case for other land uses. The Transport Assessments have demonstrated that a 60-minute drive area to have a catchment population of 848,000 based on the latest analysis.
- 3.4 Based on the CAA passenger survey data used within my Transport Proof of Evidence [LAA/12/A], and the identified market catchment detailed within the Socio-Economic proof of Ms Louise Congdon [LAA/4/A], the provision of a regional airport at Lydd would in fact reduce the average car mileage of passengers within a 60 minute catchment by an average of 40%, saving over 800 tonnes of CO2 per annum. This analysis is based on a comparison of the existing CAA mode share for existing airports compared with the forecast LAA passenger mode share.

Objection 2: Poor Highway Network

- 3.5 Paragraph 3.9 of Mr Thomas's Protect Kent proof refers to the local highway network and asserts that the potential problems that may occur. In particular, he claims that traffic generated by the Airport will use the B2075/C24 through Camber due to SATNAV technology.

Response:

- 3.6 I disagree with this assertion as these systems by default generally advise the quickest route rather than the shortest. Based on this, the main A259 route from the west is significantly quicker than the coastal route. In addition to this, significant discussions have been held with both Kent and East Sussex County Councils to identify and agree mitigation to prevent additional traffic using Camber Road to access the airport.
- 3.7 A signage strategy has been proposed within the s106 agreement to encourage all traffic from the west to travel via the A259 and Brenzett. A commitment to monitor traffic is also included to ensure that, where traffic is generated, any further problems would be addressed.

Objection 3: Seasonal Variation

- 3.8 In Section 7 of his Proof of Evidence, Mr. Thomas seeks to question the seasonal variation assumptions used within the Transport Assessment reports.

Response:

- 3.9 The assumptions have been carefully selected to be the most appropriate comparators and have been agreed with both Kent County Council and the Highways Agency.
- 3.10 With regard to the use of Leeds Bradford Airport as a comparator airport for flight timetables, this was considered to be a representative airport for these particular purposes and modelling a robust worst case scenario if it were to occur. In addition, seasonal variation was built into the assessments for Lydd, with the busiest month (August) showing 10.3% of the annual passenger movements. As stated in my Proof, Air Services at Regional Airport - CAP775 [CD 16.3] shows that Leeds Bradford has typical seasonality characteristics for regional airports. Using LyddAir as a comparison is not appropriate as it does not operate on the same scale as a commercial airline and, as a leisure flight operator, exhibits extreme seasonality.

Objection 4: Ground Transport - PPG13

- 3.11 Mr. Thomas' Proof of Evidence makes a number of claims with regard to alleged poor ground transport to which I respond.
- 3.12 In paragraph 8.1, the Proof purports to consider the Applications against PPG13 and the generation of travel demand in what he considers to be a 'remote rural area'.

Response:

- 3.13 The strategy and Travel Plan put forward within the Applications looks to reduce the use of private car as far as possible through the introduction of alternative travel options for staff and passengers. In this regard, the Applications are in line with PPG13. I refer to the points I have already made above.

Objection 5: Transport Assumptions

- 3.14 Paragraph 8.2 of his proof of evidence claims that the detail of the Transport reports in the Applications is 'speculative'.

Response

- 3.15 The nature of Transport Assessments is such that there is always a degree of error involved as with any forecasting technique. Such errors are minimised by the use of robust data and its statistical interpretation; for example, in case of such transport assessments by sensitivity testing. The data used has been subject to extensive scrutiny and a range of sensitivity tests undertaken in agreement with the Highways Agency.
- 3.16 The Transport Assessments have made use of a range of data sources in order to identify the most appropriate assumptions for travel characteristics of a Regional Airport for these purposes. All assumptions are considered to be the most appropriate available for such purposes and have been agreed with both Kent County Council and the Highways Agency.

- 3.17 Existing comparator data has been used to generate an approximate flight schedule based on Leeds Bradford Airport schedules in 2005 to model the transport implications in a worst case scenario. The timetables were adapted to reflect full-flight peaks rather than simply factored to ensure that higher and more irregular peaks of arrivals and departures do occur within our modelling.
- 3.18 Our approach is considered to represent a worst case scenario in traffic generation terms with the flight schedules adjusted to coincide with background traffic peak hours. The assertion that such well-established forecasting techniques are ‘speculative’ is rejected. As Ms Congdon has explained, in reality the traffic generation is unlikely to coincide with background traffic peak hours in this way so the model presents a very robust and worst case basis for assessment.

Objection 6: Passenger Origins

- 3.19 In paragraph 8.3, Mr Thomas claims that the origin of departing passengers is considered to be unclear.

Response:

- 3.20 A clear distribution of passengers by local authority district is provided within the Transport Assessments [CD 1.6 and 1.7]. Passenger survey data obtained from the Civil Aviation Authority for East Sussex and Kent has been used to forecast the distribution over the 60-minute catchment area. This distribution has then been used to assign traffic to the local highway network.

Objection 7: Service Vehicles

- 3.21 Paragraph 8.3 of Mr Thomas’s proof claims that service vehicle numbers should be added to the traffic levels. It is said that the location of the airport necessitates that polluting discharges are restricted.

Response:

- 3.22 Service vehicle numbers have been included within our traffic forecasts and are discussed in detail in Chapter 7 of both Transport Assessment documents. These service vehicle numbers include the collection of waste water and sewage from the on-site cesspit.

Objection 8: Shuttle Bus

- 3.23 Paragraph 8.4 of his proof of evidence refers to the proposed introduction of a shuttle bus between Ashford and the Airport.

Response:

- 3.24 It is recognised that this service will need initially to be subsidised by the Airport. The service is proposed to be complementary to the flight timetable with at least one service available for all arriving and departing passengers.
- 3.25 A requirement of the section 106 agreement is that the bus service is in operation prior to the throughput of the airport reaching 30,000 ppa. The shuttle bus will be publicised to passengers and staff in order to enhance the service’s viability and to minimise the level of subsidy required.

Objection 9: Wider Highway Network

- 3.26 Paragraph 8.6 of Mr Thomas's evidence claims that the wider traffic network has not been considered within the Transport Assessments.

Response:

- 3.27 The wider network has been assessed, as demonstrated in Table 9.2 in CD 1.6 and Table 9.2 in CD 1.7. In particular, the impact of additional airport-related traffic on the A259/B2075 Hammond's Corner and A259/A2070 Brenzett junctions has been assessed in detail.
- 3.28 Beyond these junctions, traffic flow increases are not expected to have any material impact on the wider highway network.
- 3.29 The A2070 north of Brenzett is forecast to experience a daily increase in traffic of 3.6% (Table 9.2, **CD 1.6**) with the Runway Extension Application and a further 2.4% with the Terminal Development [**CD 1.7**]. The A259 west of Brenzett would have an increase of 2.2% with the Runway Extension and a further 1.5% increase with the Terminal Development. The A259 east of Hammond's Corner would experience increases of 0.6% and 0.4% respectively.
- 3.30 Lydd Airport traffic is not expected to use the B2075 through Lydd and Camber and would be signposted via the A259. However, it has been agreed with East Sussex County Council that traffic levels along Camber Road will be monitored following the opening to public flights of the runway extension and additional measures will be taken to deter traffic from using this route if necessary.
- 3.31 The Terminal Development assessment also considered Junction 10 of the M20 at Ashford to identify the forecast increase in traffic. Table 9.8 of the Transport Assessment [**CD 1.7**] forecasts a maximum increase in flow at the junction of 2.5%; therefore, the development would not have a significant impact on the junction operation.
- 3.32 The Applications have assessed the operation of the highway network and key junctions on access routes have been shown to operate satisfactorily. Traffic flow increases on the wider highway network have been considered but are not sufficient to have a material impact on their operation.

Objection 10: Parking Provision

- 3.33 The parking provision is apparently questioned by Mr Thomas in paragraph 8.7, with reference to the assertions being 'total speculation'.

Response:

- 3.34 Detailed parking accumulation modelling has been used to determine the optimum parking levels to be provided at the Airport. Such modelling has clearly not been carried out by Mr. Thomas therefore I reject the suggestion that the identified parking provision is insufficient based on a speculative statement made by Mr Thomas. As part of the s106 agreement a Car Park Management Strategy will be agreed with the local authority to monitor parking uptake and ensure that provision is appropriate as the Airport grows.

4 LAAG/7/A - Need for Development

Introduction

- 4.1 LAAG has submitted a series of Proof of Evidence documents referring to issues of need. Again, here I respond to transport related statements as contained within the ‘Need for Development’ Proof of Evidence produced by Louise Barton.

Objection 1: Excess Airport Capacity in Kent

- 4.2 Section 3.1 of Ms Barton’s Proof makes reference to existing airport capacity in Kent at both Manston and Lydd.
- 4.3 At paragraph 3.1.1, she refers to what she claims is the ‘ceiling capacity’ of Lydd Airport based on her interpretation of the Aviation White Paper. There is a claim that this is a “capacity” which is, in part, based on the limited immediate catchment population and the poor surface access.

Response:

- 4.4 I reject Ms Barton’s assessment of ceiling capacity and this is a matter that has been dealt with by Ms Congdon. In any event, the Transport Assessments have demonstrated that there is sufficient capacity on the local transport network for 300,000 annual passenger movements with agreed mitigation.
- 4.5 The evidence of Ms Louise Congdon [LAA/4/A] provides details of passenger forecast for the Airport. The market analysis carried out within this evidence demonstrates that the airport can attract the passenger levels proposed from the Kent and East Sussex areas and she has dealt fully with these issues.

Objection 2: Availability of Alternative Forms of Transport

- 4.6 In paragraph 3.6 of her evidence, Ms Barton claims that the Eurostar services serving Ashford International provide alternative forms of transport to Europe.

Response:

- 4.7 Since the opening of Ebbsfleet International Station, the number of Eurostar services calling at Ashford has reduced to just five services to Europe and four from Europe per day - only one of these being a Brussels service. Such a low level of service and the limited number of destinations available does not provide sufficient alternative transport options for residents of the Kent and East Sussex. Neither does it relate to the identified air travel markets for the local catchment area, as detailed further in the evidence of Ms Louise Congdon [LAA/4/A]. Further supplementary evidence provided by Ms Congdon provided further evidence [LAA/4/I] that journey times by rail, other than to direction destinations such as Paris or Brussels, are considerably higher than they would be via LAA.

5 LAAG/9/A - Conformity to Aviation White Paper

Introduction

- 5.1 LAAG has submitted a Proof of Evidence which purports to deal with the Conformity of the Applications to the Aviation White Paper. For the purposes of this rebuttal document, I only respond to points relating to transport and access.

Objection 1: White Paper Background Research

- 5.2 The Future Development of Air Transport in the UK: South East [CD 8.8] provided the background to the Aviation White Paper. Within this document, airports across the southeast are considered and some assumptions on levels of passengers based on existing conditions (in 2002) and infrastructure are included.
- 5.3 LAAG claims that there is an assumed maximum capacity of 125,000 annual passenger movements at Lydd having regard to one of the stated constraints being poor surface access and limited catchment potential.

Response:

- 5.4 LAAG's interpretation has already been dealt with in some detail by Ms Congdon and I refer to her evidence on this issue. It is inevitable for an airport of this kind that provision for access other than by private car under present conditions will be subject to limits. However, the Applications provided a Surface Access Strategy aimed at broadening the options for travelling to the Airport, in particular through the introduction of a Shuttle Bus service and enhancing existing bus services. The research underpinning the capacity forecasts within the White Paper is out of date and should not be used as a basis for this Public Inquiry. The infrastructure exists at the Airport to handle considerably higher levels of passengers and the catchment area is sufficient to achieve the levels of passengers forecast within the Applications, demonstrated in more detail in the evidence of Ms Louise Congdon [LAA/4/A].

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