



## York Aviation

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### **Note in Rebuttal of Brian Lloyd CPRE01/D to Public Inquiry into developments at London Ashford Airport (APP/L2250/V/10/2131934 & APP/L2250/V/10/2131936)**

1. In his Rebuttal Proof of Evidence, Brian Lloyd includes a rebuttal of parts of my evidence. As this was not submitted in time for me to respond before or during oral evidence, this Note has been prepared to deal only with the additional points which he raises.
2. This Rebuttal is not intended to be an exhaustive rebuttal of his additional evidence. It only deals with selected points where it is considered helpful to respond in writing at this stage. I do not repeat the evidence provided in my Proof of Evidence in response to points about which I disagree. I simply clarify some points or correct statements given in CPRE/01/D where appropriate. Where a specific point is not dealt with in this Rebuttal, this does not mean that these points are accepted.

#### **National Policies**

3. Brian Lloyd comments on the recent Department for Transport Consultation Document "*Developing a sustainable framework for UK aviation: Scoping Document*"<sup>1</sup> and claims that, in the light of this document, he seriously questions the reliance that can be placed on the Future of Air Transport White Paper as a relevant policy document for this Inquiry<sup>2</sup>. He is selective in his quotations from the document and is wrong to draw the conclusion, even from the material which he does quote, that the White Paper "*got the balance wrong in its essentially pro-growth position*"<sup>3</sup>. Whilst the Secretary of State for Transport makes clear that the Coalition Government no longer supports some of the proposals within the previous White Paper, in particular the support granted to the provision of new runways, the foreword to the Scoping Document states clearly that "*aviation should be able to grow*". Hence, it is clear that the Coalition Government is seeking, in developing its new framework, to explore how growth can be accommodated, albeit within the overarching constraints of climate change considerations. I dealt with these latter considerations in my Rebuttal Proof, LAA/4/D<sup>4</sup>.

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<sup>1</sup> Department for Transport, March 2011, CD5.36

<sup>2</sup> CPRE/01/D, paragraph 2.1.10.

<sup>3</sup> Ibid, paragraph 2.1.9.

<sup>4</sup> Paragraph 2.4.

4. I have also dealt with the position taken in respect of regional airports in this Scoping Document in my Supplementary Note to the Inquiry, LAA/4/I. I do not repeat this here. Suffice it to say that the Scoping Document makes clear that, whatever the policy towards provision of additional runway capacity at the major airports, the Coalition maintains its support for the important contribution which regional airports, such as LAA, can make to meeting demand locally in a sustainable manner.
5. It is also relevant to consider the implications of the Government's "*Plan for Growth*", as Brian Lloyd does at section 2.5 of his Rebuttal Proof. This sets out the Government's encouragement for proposals which will foster economic growth and employment as a contribution to the recovery from recession. As covered in my evidence, LAA has the potential to make a meaningful contribution locally if the current applications are approved, particularly in the context of the forthcoming loss of jobs at Dungeness. A further factor in the Plan for Growth is support for proposals which would increase consumer choice<sup>5</sup>. Clearly, creating the conditions whereby LAA could attract airlines to offer commercial air services locally to a range of destinations would increase consumer choice for local residents who presently have to travel to Gatwick for most international air journeys.

#### **Local Transport Plan for Kent**

6. I dealt in my Proof of Evidence with the treatment of LAA in various Kent County policy and strategy documents. The differential treatment of LAA and Manston Airports has to be seen in the context of the different scales of growth foreseen at the two airports, with proposals for LAA confined to 500,000 passengers per annum under the current applications, whilst the Masterplan for Manston Airport foresees growth up to 4.75 mppa by 2033. I believe that this 10-fold difference in potential scale explains why the plans and policies address the potential implications of the development of Manston, because of its larger scale effects, and do not, in all cases, address the much smaller scale of implications arising from the development of LAA. As I have stated previously, this does not undermine the support which is given to LAA by Kent County Council in view of the valuable local economic contribution which it can make.

#### **South East Plan**

7. Although he acknowledges, at paragraph 2.6.4 of CPRE/01/D, that the valuable role of smaller regional airports in the South East is supported under policy T9 of the South East Plan, Brian Lloyd then goes on to claim that this support is not taken forward. I deal with the correct interpretation of policy T9 at paragraph 3.15 of my Rebuttal Proof (LAA/4/D). It is clear that the South East Plan supports the contribution which can be made by the smaller regional airports in meeting air travel demands within the region, subject to environmental considerations. This position is not undermined, as Brian Lloyd suggests, by the specific references to Manston Airport in some local policy documents subsequent to the South East Plan.

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<sup>5</sup> As quoted at paragraph 2.5.2 of CPRE01/D.

### **Best Use of Existing Capacity**

8. At paragraph 5.4 of his Rebuttal Proof, Brian Lloyd seeks to claim that allowing LAA to extend its runway would not constitute best use of existing capacity because the Airport once handled 250,000 passengers a year on its existing runway. As I have explained in both my Proof of Evidence and Rebuttal Proof of Evidence, this is entirely academic as the characteristics of the air transport industry, coupled with competition from the ferries and more recently Eurotunnel, means that the business model adopted by airlines operating from LAA, which provided high frequency car ferry services to France, is no longer commercially viable. Hence, the Airport is unable to practically use the capacity (capability to handle a given number of aircraft movements) it has available due to limitations on its capability. Hence, the runway extension is a proposal aimed at improving the physical capability of the runway to meet the changing needs of the air transport sector so that its available capacity is capable of being utilised.
9. As I make clear in my Rebuttal Proof at paragraph 2.28 and 2.29, the 'best use' phrase relates particularly to runway capacity and has not been a bar to approval of either extended runways or expansion of terminal capacity, including approvals granted by the Coalition Government. Brian Lloyd is wrong, at paragraph 5.7 of CPRE/01/D, to claim that extending the runway is effectively creating a new runway. Clearly, this interpretation of policy is at odds with the approval granted in the last 12 months to Southend Airport to extend its runway as noted in my Proof of Evidence (LAA/4/A) at paragraph 3.9, which was not treated as new runway capacity. Similarly, the phrase 'best use' has not precluded approval being given last year to expansion of terminal capacity, such as a major extension at Bristol Airport to provide additional capacity for some 3-4 million passengers a year.

### **High Speed Rail**

10. Brian Lloyd suggests, at paragraph 5.9 of CPRE/01/D, that the policy of the Coalition Government in support of high speed rail means that approval should not be granted for upgrading of LAA. However, this is simply not relevant as I do not, in any event, forecast air services from LAA to domestic points to be served by future high speed rail from London, even if the timing of such a new rail link was certain, as I deal with at paragraph 2.15 of my Rebuttal Proof (LAA/4/D).
11. I also go onto explain in my Supplementary Note to the Inquiry (LAA/4/I – paragraph 39) that high speed rail would not provide a viable alternative for the destinations expected to be served by air from LAA.

### **Spin-off Development**

12. Brian Lloyd's position in relation to spin-off development associated with growth at LAA is confused. On the one hand, at paragraph 2.4.13 and 2.4.14 of CPRE/01/D, he says that the failure of Shepway District Council to designate the Airport as a strategic site is illustrative that it will not have a catalytic role in regeneration of the District, yet at paragraph 5.20 he reiterates the concern expressed in his original Proof of Evidence that there will be associated development leading to land use pressures in the vicinity of the Airport. These two positions are inconsistent.

13. The important consideration is the extent to which development of the Airport to handle 500,000 passengers per annum is likely to lead to pressure for urbanisation of adjacent land. In my experience of the economic role of airports, it is highly unlikely that an airport operating at the scale of 500,000 passengers per annum would give rise to any agglomeration pressures on adjacent land. It would lack the critical mass to act as a magnet for specific airport related activities, over and above the identified on-site aircraft maintenance activities. However, the jobs created directly, indirectly and through secondary rounds of spending will make a material contribution to regeneration in the area, as will the beneficial effects of inbound tourism and business productivity spread over the whole catchment area. To that end, the jobs supported by LAA will contribute to regeneration of much of Kent, including the area affected by the closure of Pfizer, albeit it may not be central to the plans for the regeneration of that area.

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