

Additional LAAG Comments - Section 106 Agreement/Conditions

Movement Limits

(1) Lydd Airport is flagging the concession it is making by reducing the limit on the number of movements from 56,000 at the time of the last planning application, to 40,000 movements this time round. This gesture carries little weight as the reduction will be by light aircraft (ie < 5.7tonnes) so will be outside the orbit of the aircraft types (mostly Group 1 & 2 aircraft types) that will cause noise disturbance.

As the wording of the Conditions stand (F. 20. page 12, and F. 19. page 21) all these 40,000 flight movement could be made by Group 1&2 aircraft which would have a serious impact on residents and the environment. This compares with the activity levels today where only 1% of movements are by aircraft types weighting over 5.7 tonnes (see CD 4.4 (LAA) para 3.15). None of the 1% of movements is made by Group 1 aircraft, with the balance consisting of movements by Group 2 and Group 3 aircraft.

When flagging this concession, Lydd Airport conveniently omitted to mention the more meaningful restrictions introduced by the Secretary of State in 1992 (see below) - See Lydd Airport's Statement of Case - Appendix 1, Secretary of State's decision 1992, Para 66 (2).

“The number of aircraft movements shall not exceed 56,000 movements per annum in total of which no more than 6000 shall be by jet or turbofan aircraft, no more than 10,000 movements shall be by aircraft having a maximum takeoff mass (M.T.M.) greater than 2.3tonnes and less than 5.7tonnes and no more than 600 movements shall be by helicopters.”

This was a watered down version of a recommendation made by the Nuclear Installations Inspectorate (NII) in 1988 - (see CD 13.5, Appendix C, Relevant Planning Conditions 1.)

“The number of aircraft movements shall not exceed 56,000 movements per annum in total of which no more than 6000 shall be by jet or turbofan aircraft or by propeller driven aircraft over 5.7tonnes (M.T.O.W) no more than 10,000 movements shall be by any aircraft greater than 2.3tonnes M.T.O.W. and less than 5.7tonnes M.T.O.W. and no more than 600 movements shall be by helicopters.

The NII wording should be the condition adopted as the definition captures all aircraft types over 5.7tonnes. The Dash 8 propeller aircraft mentioned as a group 2 aircraft in the noise assessment (CD1.41A, Appendix 16.4A) and again in Ms Congdon's Table 5.6 Page 49, LAA/4/A (DHC-8-Q400 and DHC -8-300) would be excluded in the definition used by the Secretary of State in 1992 since it is a turboprop (propeller) based aircraft. Jet or turbofan refers to different types of jet aircraft.

[Note the DHC-8-Q400 and DHC-8-300 and the Dash 8 referred to in CD1.41A, Appendix 16.4A are the same aircraft series - Bombardier Dash 8 or Q Series, previously known as the de Havilland Canada Dash 8 or DHC-8 - a series of twin-engined, medium range, turboprop airliners. They were introduced by de Havilland Canada (DHC) in 1984 and are now produced by Bombardier Aerospace. The variants are from 100-400. They are referred to in many different ways - The series 3 can be referred to as: The Dash 8 Q300 regional airliner, Bombardier Q300 DHC-8 Dash 8 Regional Turboprop Airliner, Dash 8 and as above by Ms Congdon]

No Movements when Nuclear Waste Train Passes

(2) There should be formalisation of the requirement for aircraft not to land and take off while a loaded waste train is passing. The definition of the duration of “passing” should be clear and confirmed by the Nuclear Installations Inspectorate. A common sense approach would be to state that no aircraft can land or take off between the time the waste train leaves the railhead at Dungeness and the level crossing at Lydd.

The necessity to maintain the alleged present procedure is given in Lydd Airport’s own evidence - CD1.40B para 30 page 6 - see below.

RISK TO RADIOACTIVE WASTE TRANSPORT

30. Operational and decommissioning wastes from the Dungeness sites are removed using the railway line that passes south-west of the airport. These transport operations themselves require a nuclear Transport Safety Case to provide assurance of their safety. The airport has indicated that it will continue the present Air Traffic Control procedure, whereby no aircraft are allowed to land on runway 03, or take off from runway 21, while a loaded waste train is passing.

Note too the ceiling of 600 helicopter movements prescribed by the Secretary of State in 1992. Lydd Airport is asking for a doubling of this limit despite the non military helicopters (non exempt) amounting to less than 400 movements in 2005 (See LAAG/5A).

PURCHASE SCHEME

(3) Mr Perkins in his evidence LAA/5/A, (4.2.7.2 page 14) refers to “Five Communities Scheme” whereby the applicant would *undertake voluntarily to purchase residential properties in the five communities of Lydd, Lydd-On-Sea, Greatstone-On-Sea, Littlestone-On-Sea and New Romney in the event that they fall within the 66 dB LAeq,16hr or more noise contour in the future.*

This scheme should be incorporated into the Section 106 Agreement and go beyond this to be an obligation by Lydd Airport to undertake to make offers to purchase residential properties from residents in the five communities cited, in the event that they fall within the 66 dB LAeq,16hr or more noise contour in the future.

The price paid should be related to an appropriate index of house prices in the area for a similar property, not the distress selling price caused by the property’s proximity to the airport. Since the airport’s consultant is confident that no properties would be exposed to annual or summer average levels above 57dB (A) [(Para 8.1.4) LAA/5/A] the airport should not be concerned about this commitment. Indeed it begs the question as to why the cut off point is not the 60 Leq dB(A) given in PPG24.