

**LAAG/8/F**

**Town & Country Planning Act 1990 - Section 77  
Town & Country Planning (Inquiries Procedure)  
(England) Rules 2000**

## **Lydd Airport Action Group (LAAG)**

### **Summary of Rebuttal of LAA/4/A**

# **Socio - Economic Case**

**Applicant:** London Ashford Airport Limited

**Location:** London Ashford Airport Limited, Lydd,  
Romney Marsh, TN29 9QL

**Applications:** Y06/1647/SH and Y06/1648/SH

**Proposals:** 294m runway extension and a 150m starter  
extension plus a new terminal to accommodate  
up to 500,000ppa

**Inspectorate** APP/L2250/V/10/2131934  
**References:** APP/L2250/V/10/2131936

**Document**  
**Reference:** LAAG/8/F

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## **1.0: Introduction**

**1.1:** In this summary rebuttal I address issues relating to socio economic factors raised in the evidence given by Louise Congdon (LAA/4/A).

## **2.0: Economic baseline**

- 2.1 The economic baseline has not been assessed in context. The halo impact of the proposed development will largely apply to Romney Marsh yet the area considered is Shepway where the unemployment rate is influenced by the high rates in Folkestone. The average unemployment rate for Folkestone is 6.8%, ~ twice the national average, with the ward rates ranging from a high of 12.6% to 3.2%. By contrast, Romney Marsh's overall, unemployment rate is 3.1%, higher than the average for the South East but lower than the national average of 3.5% - with the rates varying from 1.3% to 4.3%.
- 2.2 Romney Marsh is a rural area. It has some of the most productive agricultural land in the UK, sandy beaches and at Dungeness some of Europe's most unique natural habitats. It is in the national interest to maintain Romney Marsh as a rural area: from a food production viewpoint, to provide a green/leisure "lung" to complement urban development in Shepway and Ashford and to act as a buffer zone for the protected habitats on the coast at Dungeness.
- 2.3 Young people are the highest component of the unemployed both nationally and on Romney Marsh. As a rural economy with seasonal leisure interests, Romney Marsh will be unable to provide full time employment for the entire complement of its young people, despite the presence of the power station. The appreciation that a rural economy cannot furnish its entire young people is axiomatic in other developed countries.
- 3.4 Changing attitudes and a more enlightened education system which makes its young internationally competitive, are the ingredients for overcoming pockets of deprivation on Romney Marsh. Labour mobility is high throughout Europe. Jobs have already, and will continue to be, taken on Romney Marsh by highly motivated people from other parts of Europe and the UK. New sources of employment on Romney Marsh will not eradicate or even alleviate unemployment "hot spots". Apart from international and national competition, local people with the tools to secure jobs outside the area, will remain on Romney Marsh and take any worthwhile positions available at the airport.
- 3.5 Although Romney Marsh is a rural area, its residents are better placed than many rural areas in the UK to secure work in the general vicinity due to the area's leisure interests, green tourism and a nuclear power complex. These industries will continue to be sources of employment, and in the latter case, a source of high quality, non seasonal employment provided the airport's development does not undermine the development of Dungeness C. In

addition, Romney Marsh/Shepway benefits from its proximity to Ashford, a major growth area and source of employment.

- 3.6 Romney Marsh also benefits from a higher proportion of the over 65 age group than Shepway. This age group is also growing faster than Shepway as a result of inward migration. Grey power should be seen as positive as many people have the financial resources to spend on local services, particularly when they have supplemented their pensions with equity release from larger houses in more expensive areas.

#### **4.0 Operational Constraints**

- 4.1 The author distils the Lydd Airport's ("LAA's") poor performance and need for the development to the operational constraints of runway length and terminal capacity, particularly the former. This is the explanation given by LAA's management. There has been no comprehensive analysis of airport operations and no appraisal of the competition, including a fully committed civil airport at Manston and alternative forms of transport such as trains via the Channel Tunnel.
- 4.2 The author identifies the types of aircraft that can operate from LAA's current runway, but fails to analyse why, not a single airline operating these classes of aircraft, is operating from the airport. This is despite an aggressive marketing campaign by LAA.

#### **5.0 Airline Considerations**

- 5.1 The author claims that the runway extension is required to "kick start" the market since the first adopter airlines will be charter airlines using larger jet aircraft which are unable to use the existing runway. This claim is not supported by facts.
- 5.2 The charter airlines the author cites, Thomsonfly and Thomas Cook Airlines, operate fleets which would face operational constraints on the extended runway. Further, the distinction between charter and scheduled airlines has blurred with both categories offering scheduled services and taking individual passengers. A charter operator might start developing a route with its own traditional package holidays on a low frequency basis but would be looking to establish higher frequency scheduled services over time. It would soon discover the operational constraints that characterise LAA.
- 5.2 It is wrong to imply that the charter first mover option is the only option available to "kick start" LAA. There are alternative route development options that are available which could be serviced by the existing runway via an airline such as Flybe, if the demand were present.

- 5.3 Up-scaling by airlines traditionally operating smaller aircraft is given as another reason for the runway extension, but the example given to illustrate this move is incorrect. The author incorrectly describes the nature of up-scaling at Flybe, the largest and most successful airline using smaller aircraft. Its replacement programme is focussed on replacing their smaller turbo prop aircraft with a jet aircraft of broadly the same size, rather than adopting larger aircraft.

## **6.0: Market for London Ashford Airport/Forecasting Methodology**

- 6.1 The methodology for forecasting passenger demand for LAA is based on a flawed analysis of the competitive position within LAA's catchment area which means the passenger projections are too optimistic. None of the LAA analysis recognises the existence of local markets served by one hour drive times from all three airports - Lydd, Manston and Gatwick.
- 6.2 Even after accepting the author's analysis, it will take 17 years (2028) to achieve the passenger objective of 500,000ppa under the low growth scenario and 13 years (2024) under the high growth scenario. This does not denote confidence in Lydd Airport's prospects.
- 6.3 The route development programme outlined by Ms Congdon is the first time in six years that a destination matrix has been published.

## **7.0 The Future in the Absence of development**

- 6.1 The author concurs guardedly with the airport's view that if the planning application is turned down, it would be unrestricted and would be forced to operate on a 24 hour basis targeting freight, heavy maintenance and other noisy activities. The threat of the "nasty" do nothing scenario was used to justify the development in the last planning application and the implication is the same here. By default the do nothing scenario did materialise since permission was granted, but lapsed. None of the horror scenarios has materialised.
- 6.2 There is a mistaken belief that the airport can grow in an unrestricted fashion. This is not the case. Under the Habitats Regulations, if it were assessed that the number and nature of the movements were adversely affecting the protected habitats there would be a review of the existing consent. Restrictions could be placed on activity in the light of the findings of an Appropriate Assessment.

## **7.0 Aircraft Movements**

- 7.1 The author's analysis that there would be fewer commercial aircraft movements than prescribed by the ES is flawed. It fails to take into account that larger aircraft such as the B737-800 would face severe operational constraints at Lydd, and ignores smaller more applicable aircraft types.

## **8.0 Socio Economic Impact of the Proposed Development**

- 8.1 The rule of thumb for direct employment at airports is still too high at 500 jobs per million passengers.
- 8.2 The author fails to appreciate that there is a clear employment pattern at UK airports. Those with ground tenants have higher employment numbers as do airports serving specialist aviation interests, while airports dependent solely on revenue from airlines and passengers and dependent on a single low cost operator, generate lower employment. Ground tenants are unlikely to be a feature at Lydd because of the strictures of the Habitats Regulations which means it will not be a high employer.
- 8.3 Even accepting the author's assessment of direct employment, the gains are only small at 130-140 jobs at 500,000ppa and will not be reached for almost two decades under the slow growth scenario and 13 years under the high growth scenario.
- 8.4 There has been a failure to assess the adverse impact the airport will have on local employment including employment at Dungeness.
- 8.5 Only inbound tourism has been considered. No estimate has been made of the majority outbound tourism and its impact on the local economy and employment. Twice as many UK residents visit Europe, compared to the number of residents from Europe that visit the UK. We estimate that 23 local jobs would be lost to the local economy as a result of the tourist deficit under the low growth scenario.
- 8.6 The author assesses domestic inbound passengers. This is irrelevant as it only represents the transfer of spending power between regions. There is no gain overall for UK Plc.
- 8.7 Failure to address the net employment situation means that all attempts to quantify the monetary gains to the economy resulting from this development are incorrect.
- 8.8 The estimates of journey time savings are flawed.