



## **COMMENTS ON PLANNING MATTERS**

### **LONDON ASHFORD AIRPORT, LYDD, ROMNEY MARSH, KENT**

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## Purpose of this Document

1. I am a planner with over 30 years experience in the public and private sectors, in the UK and abroad. In my role for Natural England I have, amongst other things, provided advice on planning policy and transport planning. As part of this role, my colleague Mrs Dear has asked for my opinion on the how the Application and the Applicant's evidence are affected by the main relevant policies of the South East Plan. In addition I have been asked to provide Mrs Dear with my opinion on the planning fallback position.

## South East Plan

2. South East Plan (CD 7.1) Policy T9 supports the development of Gatwick and Heathrow, as well as the development of Southampton and Kent International Airports (Manston) as airports of regional significance. The South East Plan provides no particular or specific support for the development of Lydd airport. No specific reference is made in Sections B or C of the South East Plan to Lydd or LAA. Paragraph 8.30 of the text of the South East Plan suggests that "*other smaller airports could play a valuable role in meeting local demand*" and indicates that "*local planning frameworks should consider policies which facilitate growth at these airports*". However, even this rather equivocal support is expressly qualified by the statement that this is "*subject to relevant environmental considerations*". Policy T9 generally indicates support for proposals that reduce the environmental impact of surface access and increase modal share in favour of public transport and sustainable modes. It is not clear to me that the Application proposals will be able to demonstrate an increase in modal share of public transport.
3. The South East Plan also includes Policy NRM5 that seeks to improve the conservation and improvement of biodiversity across the region. The policy says that planning authorities must:
  - avoid a net loss of biodiversity
  - give the highest level of protection to sites of international nature conservation importance
  - avoid damage to nationally important sites of special scientific interest.