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Dear Terry

Lydd Airport Expansion – Scope of Environmental Impact Assessment

As mentioned to you on the telephone last week, the RSPB have had a meeting with the Airport management to discuss the bird strike hazard management elements of their Environmental Impact Assessment (EIA). To aid this discussion the RSPB and Natural England were given draft copies of the Environmental Statement (ES) chapter on bird hazard management, a Bird Hazard Risk Assessment and Bird Control Plan. The RSPB sent detailed comments on these documents to the Airport at the end of October but our main concerns were as follows:

Concerns regarding data

- The bird surveys carried out to inform the EIA did not cover designated nature conservation sites or Wetland Bird Survey areas. This means a large area to the south and east of the airport has been missed out. The scoping opinion issued by Shepway DC in December 2005 noted (p.17) that surveys should be extended to include areas to the south of the airport. The RSPB has reiterated to the Airport management that this winter's bird surveys should be extended to cover the area south and east of the airport.
- Gulls are a significant hazard to aircraft but an accurate picture of their numbers, distribution or movements is not presented in the ES or associated documents. The ES states that the total number of gulls roosting on the Dungeness peninsula perhaps totals 30,000. However, the Dungeness Bird Observatory (DBO) 2000 report (published 2001) includes a report of a count made on 6 February 2000 of the roost at Lade Sands, which totalled 90,000 gulls. Due to this lack of understanding of the risk, no hazard management measures to reduce the risk from gulls are proposed. The RSPB is concerned that measures to reduce the gull roost at Lade Sands, which is proposed as part of an extended Special Protection Area (SPA), may need to be introduced following expansion to the detriment of the SPA. The RSPB has recommended that the Airport extend this winter's bird surveys to include a systematic count of the gull roost on Lade Sands.

- Waterfowl flying over the airport are identified as a significant bird strike risk but there is no assessment of how often this happens. The possibility of Bewick's swans flying over is mentioned as the only 'unusual' bird hazard at Lydd, but there are also a large number of mute swans, geese and large waders that would also present a hazard. The RSPB has reiterated its recommendation to the Airport that an assessment of bird movements is made (as noted in the scoping opinion issued by Shepway DC).
- A bird strike rate of 12 per annum is cited in the ES but this is not derived from the conditions (bird numbers, flight lines) at Lydd, but is based on other airports and based on measures that other airports put in place to reduce bird strike. The RSPB has recommended that the Airport justify this assumption by providing information on the bird numbers and control programmes at other airports.

Concerns regarding impact on birds

- To reduce the risk of bird strike the Airport is proposing a range of habitat management and bird scaring measures. The Airport does not have control over the management of land outside its boundary so will have to rely on agreements with neighbouring landowners, for example over game bird rearing and agricultural practices. The ES does not contain any assessment as to whether this is possible or will achieve the desired effect of reducing bird numbers and hence the bird strike risk. The RSPB is concerned that the Bird Hazard Risk Assessment states that it will be necessary to take a firm line against all wetland developments, even though, individually, they may seem relatively insignificant. This statement is worrying to the RSPB as a major landowner and player in the future land-management of the area.
- The ES and associated documents state that bird control (of species allowed by the Wildlife and Countryside Act 1981 as amended) and bird scaring will need to be carried out. A buffer zone around the airfield over which bird scaring would take place is mentioned, but the width of this is not clarified. Remote scaring of feeding swans and dispersal of starling roosts are also mentioned but locations are not given. The lack of understanding of bird use and movements in the area noted above has led to this lack of clarity. Without detail on the bird scaring measures needed, it will not be possible for Shepway DC to determine whether there will be an adverse impact on the Special Protection Area (SPA) in the Appropriate Assessment required by the Habitats Regulations. The RSPB is concerned that although the bird species targeted for either control or scaring may not be those of conservation concern, non-target species for which the SPA and SSSI are designated will also be displaced away from the designated sites.

Despite what the Airport management may be reporting at various meetings, the RSPB remains very concerned about the impact of expansion on the wildlife and amenity of Dungeness. We will be objecting on a number of grounds: lack of data; disturbance to birds from air traffic and bird hazard management measures; direct loss of part of the Special Area of Conservation and SSSI; air pollution impacts on SSSI lichen communities; impacts on the RSPB's ability to create new wetlands in the future; impacts on the amenity of the Dungeness RSPB reserve; and climate change impacts.

Please get in touch if you would like any further information on the points raised in this letter. I hope they are useful to you.

Yours sincerely

Alison Giacomelli
Conservation Officer

cc. Dominic Coath, Natural England