November 2007

CPRE Kent response to planning applications Y06/1647/SH and Y06/1648/SH to extend the runway and construct a new terminal building at London Ashford Airport, Lydd, Kent.

We are pleased to have had the opportunity, albeit brief, to study the additional information supplied by London Ashford Airport in support of its applications to extend the runway and construct a new terminal building. CPRE Kent retains its opposition to these planning applications for the following reasons set out in Sections 1-7 below. In section 8 we offer comments on specific elements of the Noise Study.

1. Planned future growth of London Ashford Airport, Lydd (LAA)

We continue to hold the view that the noise study should have considered the full potential impacts of growth at the airport. The EIA regulations say that a 'drip-feed' of applications as part of a larger scheme must be accompanied by an EIA for the full scheme, not its individual parts. Since the airport wants the runway extension specifically to facilitate an increase in passengers, the study of its impacts should be based on the total future potential customers, not just the level of passengers that are sought for the immediate future.

We consider the additional environmental information that has been supplied is also deficient in that it refers to a capacity of 500,000 passengers per annum (ppa) so its assessments of impacts using 300,000 is irrelevant to the current applications. This is particularly important because recent research (see section 6) shows that annoyance from aircraft is not a simple matter of noise levels but a combination of noise levels and the **number** of noise events. So, an increase in passenger numbers (and, *ipso facto*, an increase in flight numbers) will increase annoyance, even if the Lmax figures remain the same. Moreover, in practice, an increase in passenger numbers is likely to mean that planes will be more heavily loaded and so will be noisier, especially on take-off.

We continue to question the need for any development at Lydd. In the significant time since the general proposals were originally publicised the airport has seen little expansion of throughput, despite having a terminal supposedly with capacity (according to LAA) of 300,000 ppa. Likewise, the comparable Kent International Airport at Manston, with its new terminal and other facilities, has failed to attract passenger numbers. As Appendix 2 of the supplementary information says (paragraph 6.13:

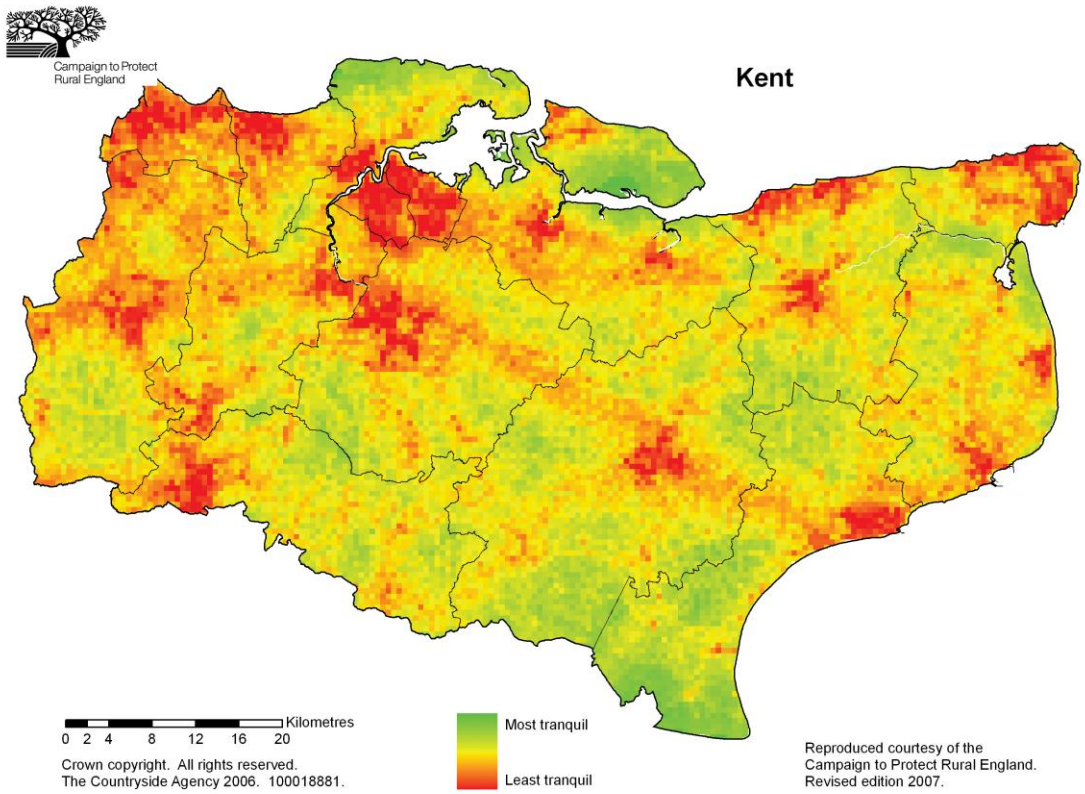
> *"During 2006 Kent International Airport also handled 10,000 passengers, with 97% of these passengers travelling on charter rather than scheduled services. This figure represented a significant fall compared with 207,000 passengers using the airport in 2005."*

These figures would suggest that there is no need for expansion at Lydd. To grant planning permission now would provide a hostage to the future and blight the area, ruining the chance of tourist development or other more beneficial economic activity.

Our concerns are reinforced by the recent deliberations of the Inspectors who examined the draft South East Plan and recommended deletion of the policies relating to Lydd.

2. Impacts on rural tranquillity and the Kent Downs AONB

Increased aviation traffic at Lydd Airport would significantly damage the tranquillity of much of the Kent Downs AONB and the countryside beyond. We do not propose to duplicate the arguments made eloquently by the Kent Downs AONB Executive in their responses, merely to endorse them. The loss of tranquillity in a nationally significant landscape can not be justified by the expansion of an airport which the Inspectors' report on the draft South East Plan considered not to be regionally significant, let alone nationally significant.



Tranquillity map for Kent: dark green represents the most tranquil areas

CPRE's research into mapping tranquil areas has revealed the Romney Marsh and the Kent Downs AONB to be among the most tranquil areas of the county. The importance of protecting and enhancing this tranquillity is reinforced when we consider the fact that rural areas rely on tranquillity to attract visitors. CPRE's research revealed that 49% of those who visit the countryside do so in search of a tranquil environment[1]. Based on Government data, this suggests that through rural

[1] "Landscapes in Britain": Mori Poll, 2004

tourism, tranquillity directly supports 186,200 jobs and 12,250 small businesses and contributes £6.76 billion a year to the UK's economy[2].

3. Sustainable Transport implications

In Appendix 2 of the Supplementary Information LAA state that they propose expansion of short haul flights (paragraph 6.15):

> *"The proposed runway extension from 1,505 metres to 1,799 metres (with a starter extension of 150 metres) for LAA will only provide for short haul aircraft serving UK and European destinations."*

In terms of the environmental impact, short-haul aeroplanes cause the worst impact per passenger, especially for climate change effects. With the new, faster Eurostar services, which include free transport within Kent to their stations, most European cities are now accessible by rail within short journey times and at less than one-tenth the environmental impact of flying.

4. Economics

We consider the job creation prospects of this application to be greatly overstated. Even if Lydd were to succeed in attracting 300,000 ppa, we calculate that the jobs created would be far fewer than the applicants claim. Recent monitoring at Luton Airport[3] has suggested that at 7,700 jobs for 9.4 million passengers in 2006, the equivalent net increase in job numbers at Lydd would be lower, at 127, not the 182 claimed by LAA (bringing the total jobs to 245, not the 300 claimed).

Furthermore a large part of the local area's economy depends on tourism, with large numbers of people who visit the Romney Marsh for leisure. These tourists will tend to go elsewhere if flights increase, with disastrous impacts on the local tourism economy.

5. Comments on the Travel Plan

The travel plan appears purely aspirational; it is not adequate for a proposal of this scale. A revised travel plan would have to form part of any formal Section 106 Agreement, and must be signed off before the granting of any planning permission for expansion.

[2] "The Rural Strategy", Defra, 2004
[3] Luton Annual Monitoring Report for 2006

If the revised travel plan is to be meaningful it must include clear targets for reducing reliance on car-based travel, with clear penalties for failure to achieve those targets. We propose the following targets as an example:

Passengers per annum	% travelling by car
Current	90
50,000	80
100,000	70
200,000	60
300,000	50
500,000	40
1,000,000	20
2,000,000	10

These targets should apply to all journeys to and from the site, whether by staff, passengers or visitors. The travel plan should also clearly state the actual parking charges that would be levied on staff bringing cars to the site. It should also clearly specify the bus and coach services to be provided at different rates of passenger throughput.

Penalties for failure to meet targets in the travel plan should be such that they exceed the income from car parking (for example if the car park charge is £20 per day, then the penalty applied should be of the order of £45 per excess vehicle per day, based on LAA's assumptions that cars will carry two passengers each). Shepway DC would also need to ensure that no additional car parks were created off site.

6. Comments on the Additional Noise Study

We consider it a matter of some urgency that the noise study should be carried out again using more appropriate noise thresholds together with appropriate passenger numbers and flight numbers per hour and per day.

The noise study's platitudes that expansion of the airport would cause only minor disturbance are both wrong and misleading. Our reasons for this are detailed below.

6.1 Timing of flights

The additional information states that it works on the assumptions of the Environmental Statement that daily flight numbers would be the same throughout the year; we question whether this will actually be the case. At other airports most traffic is concentrated around peak periods such as summer holidays, Christmas and Easter. In addition the number of flights tends to be concentrated at certain times of day, so that the number of flights per hour can vary hugely. As a result the average noise levels (Leq 16 hours) at peak periods are much higher, even if the maximum noise level per event, Lmax, remains unchanged.

The study implies that night flights will be a part of the normal operation of the airport. CPRE Kent strongly opposes night flights and considers they should not be

allowed at all. The recent ANASE report[4] (referred to more extensively in section 6.2) found that noise from a midnight flight causes 80% more disturbance than one at noon. Only one flight is needed to awaken people and cause significant loss of sleep.

6.2 Noise thresholds

The Study suggests that 57dBA represents the onset of *low* community annoyance. This is wrong: even the Department for Transport (DfT) described 57dBA as the onset of *significant* community annoyance, which is a very different situation.

The recent ANASE report showed that aircraft noise is much more annoying than previously believed, and that significant annoyance is felt at much lower noise levels than hitherto accepted by the DfT. It found that the Leq measure does not adequately describe the annoyance felt, and a combined metric which incorporated both noise and number of events would correlate better with what is experienced by the people affected. It also found that people working from home are much more disturbed by noise than the average population.

There is also the issue of the distinction between A-weighted noise measurements (used at low overall levels of sound, where generally speaking the low frequency component is not distressing) and C-weighted noise measurements (used when the noise is loud, and especially when there is a large low frequency component). The World Health Organisation (WHO) now recommends that C-weighted measurements are used to measure aircraft noise which has a large low-frequency component and is tonal, and therefore particularly likely to cause disturbance,[5] as does the European Noise Directive.[6]

Environmental Protection UK (formerly NSCA) advises that the ultimate target of Lnight (the average un-weighted noise level over the night-time period) is 30dB, with interim targets set progressively at 55dB and 40dB.

6.3 European Noise Directive (END)

No mention is made of the END. This requires existing noise levels to be restrained and not to increase, and for tranquil areas to be especially protected. It also requires that noisy areas be made quieter. The airport cannot expand without increasing noise; therefore this application directly conflicts with this Directive.

6.4 Health implications

Recent research has also shown the adverse effects of noise and sleep deprivation on many aspects of human health,[7] including heart disease[8] and diabetes.[9,10]

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[4] "Attitudes to Noise from Aviation Sources in England": see www.dft.gov.uk/pgr/environmetalissues/Anase/

[5] Guidelines for Community Noise, Exec Summary 3.10 - World Health Organisation

[6] EC Directive 2002/49/EC Annex 1.3

[7] "Dying for some quiet: The truth about noise pollution" New Scientist 22 August 2007

8 *"A prospective study of change in sleep duration; associations with mortality in the Whitehall II cohort"* to be published in the Journal SLEEP and currently available online at http://www.journalsleep.org/Accepted.aspx

WHO has recognised this in its guidance for night noise levels, acknowledging that the threshold for cardiovascular problems, for example, is chronic night-time exposure of 50dB or above. For sleep disturbance, the threshold is lower, at 42dB, and lower still for general annoyance, at 35dB. The threshold of noise judged to have a negative impact on children's learning is 55dB during night or day.

7. Control and Enforcement

Over and above the conditions that we have suggested regarding car use by this expansion, any planning permission would have to be preceded with a rigorous S106 Agreement that places clear conditions on:

- the flight paths to be used, both laterally and vertically, including use of Continuous Descent Approach using at least a 3°glide slope from above 5,000 feet
- no increase over current noise levels
- location of operations to avoid disturbance or visual intrusion
- limitations on lighting and light pollution
- provision of full monitoring equipment, and
- procedures to ensure demonstrable adherence to these conditions.

8. General comments on the Noise Study

Para	Comment
3.6.2	We are appalled that the Study merely suggests that "other considerations may be necessary to mitigate certain key receptors, such as the primary school during school hours". It is essential that noise levels at school are kept low: the National Curriculum expects a significant proportion to be taught outside. Furthermore, children need to play outside, to be able to converse, and not to be frightened by aircraft thundering overhead. The same conditions apply to hospitals, residential homes or nursing homes where peace and quiet are essential to wellbeing.
3.9.2	Recent WHO publications have highlighted greater risks to health than have previously been appreciated (see our comments in section 6.4)
3.9.4	No source is provided for this table. It suggests that increase or decrease of noise have similar effect, whereas in reality increases cause great annoyance, especially for aircraft noise. In addition the ANASE report showed that noise increases from a low-level baseline are more annoying than from higher levels. As the general area is one where low noise levels are normal, *any* increase will be more disturbing. Therefore this table is not relevant.

[9] "*Relation between sleep quality and quantity, quality of life, and risk of developing diabetes in healthy workers in Japan: the High-risk and Population Strategy for Occupational Health Promotion (HIPOP-OHP) Study"* BMC Public Health 28 June 2007

[10] *"Sleep loss alters basal metabolic hormone secretion and modulates the dynamic counterregulaory response to hypoglycemia "*Journal of Clinical Endocrinoloy and Metabolism 2007; 92(8):3044-51

3.9.8	This paragraph ignores the need for children to go outside, both for lessons, sports and play – as noted above. Therefore the 50dBA figure is not applicable as it assumes activities indoors only.
4.1.8	Experience from other airports shows that planes are disturbing even when 30 miles away and at 5,000 feet, so the supposition that the B737 would only be noticeable in the immediate vicinity is wrong.
4.3.2	The assumption that passengers for only one B737 might be using the road is questionable. Passengers arriving at the airport to depart on a B737 flight may well be using the same roads at the same time as those passengers who have disembarked from the same plane.
Table, page 138	This table appears to suggest that the area enclosed by noise >45dBA would be 9.51 km^2 but would *decrease to 9.12 km^2 for PAX of 300,000*. Tshis appears highly questionable because the aircraft using the airport would include B737s, which are far noisier than the BAe146, for example. This may be due to the inadequacy of the Leq metric, as pointed out in the ANASE report (see above), because we are sure that more people will be disturbed by the extended runway and its associated larger and noisier aircraft.
Various	Various tables show predicted increases in noise (table 8.3 onwards). For aircraft noise, increases of up to 31 dBA Leq in the day and 38 dBA Leq at night are predicted. Such increases will be particularly noticeable, and especially the larger increase at night.
	We note that the BS4142 tables only show a penalty for GPU/APU noise. In reality aircraft noise, whether taxiing or flying, is tonal; it should therefore also have a penalty, further increasing the noise levels.