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Response to Lydd Airport (aka London Ashford) Supplementary Information

Introduction and Summary

We continue to state our total opposition to the proposed expansion at Lydd Airport, both for the reasons previously given and for the additional information provided below on the recently provided Supplementary information.

We also wish to make it clear that none of our previous concerns have been addressed. In particular that the assessments should include those for 2 million passengers per annum (mppa), as that is the aspiration in the Master Plan, and it is also a requirement of the Environmental Impact Assessment Regulations to assess the potential impacts of a complete project, not just the sequential parts of it, which the current applications represent.

We regret that the job creation claims of Lydd Airport are misleading and that allowing Lydd airport to expand would destroy far more jobs than would be created.

The evidence from the Airport only considers potential jobs created, and ignores job losses. The detailed report from the respected economist, Brendon Sewill (which we quote below), shows how the aviation industry has exaggerated job creation numbers and how the relative number of jobs at airports have declined with expansion. Furthermore that expansion has had an enormously detrimental effect on the economy negating any benefits of jobs at airports.

Thus we highlight the huge economic damage that allowing Lydd Airport to expand would cause, resulting in job losses, not the job creation promoted by the airport.

We also continue to emphasise the devastating impact expansion would have on this beautiful tranquil area visited by many people precisely for its peacefulness. We are totally opposed to any night flights, or indeed any flights after 10 pm or before 8 am.

We do not take a moral view on flying- that is an individual choice, but Sewill's research clearly shows that flying is not only bad for the economy but for the climate as well.

So we highlight the responsibility of the Council and everyone in the area to achieve the requirements of the Climate Change Act 2008, which has a target of an 80% reduction in global warming emissions by 2050. Radiative forcing means that aviation's emissions are at least twice as damaging as land based emissions, so any expansion of the airport means that local emissions would have to be reduced by twice as much.

Is the Council prepared to tell local electors to turn their heating off so that people can fly to Alicante?

Socio-economic Update

The Airport appears to be confident that it can find passengers to use its facilities. Despite the current downward trends in both its own operations as well as those nationally. Lydd would also be competing for the same passengers as Manston Airport, whose recently released Draft Master Plan suggested more than enough capacity to cope with Lydd's proposed expansion. If Lydd cannot attract passengers, then no jobs would be created, but the area would be blighted by the development.

The Airport promoters appear to have the illusion that expanding the airport would create jobs, however the opposite is actually the case- expanding the airport would destroy jobs. This is clearly described in Brendon Sewill's report: " Airport Jobs: false hopes, cruel hoax" (www.aef.org.uk/?p=317) from which we have extracted relevant information.

Since 'jobs' is such an emotive headline, it seems almost like sacrilege to ask if more jobs in aviation actually benefit the nation. In a recession, more jobs in almost any industry, even jobs digging useless holes in the ground, are welcome.

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In more normal times, however, when there is reasonably full employment, if the public have a fixed amount of money to spend, then more jobs in aviation will mean fewer jobs in other industries. This was the point made in a study by Berkeley Hanover Consulting (*The Impacts of Future Aviation Growth in the UK*. Berkeley Hanover Consulting, 2000). It has also been acknowledged (sotto voce) by OEF (*The Contribution of the Aviation Industry to the UK Economy*. Oxford Economic Forecasting, November 1999. For an analysis of how far the DfT relied on this report see *Alexander's Ragtime Band*. AirportWatch, 2007). So more pilots and more air hostesses, more baggage handlers and more air traffic controllers would mean fewer doctors, fewer nurses, fewer teachers, fewer waste collectors, fewer shop assistants, fewer people behind the bar in the pub. That is fine, and good economics, if it reflects real consumer preferences about how they wish to spend their money. And if the prices of the various services reflect their true cost, without any subsidy.

Economic growth, or real wealth per head, is created by increasing efficiency. This means reducing the number of jobs for a given output, not increasing them. More jobs in aviation will only add to economic growth if they replace less productive jobs elsewhere. But many jobs in aviation, such as baggage handling or aircraft cleaning, are relatively unskilled. And they are all subsidised.

The UK currently runs a tourism deficit of £20 billion a year (2008 results on:

http://www.statistics.gov.uk/hub/release-calendar/index.html?newquery=*&uday=0&umonth=0&uyear=0&title=Overseas+Travel+and+Tourism+-+Monthly+Release&pagetype=calendar-entry). This is the difference between what British tourists spend on their travels and what incoming tourists spend in the UK. The £20 bn includes tourists arriving or departing by train or ferry: the tourism deficit due to aviation is around £17 billion a year.

The average pay of people employed in the UK tourist industry is £19,000 a year (Gross pay of employees in hotels, restaurants, recreational, cultural and sporting. ONS. 2008). It can thus be deduced that the aviation tourism deficit is equivalent to a loss of roughly 900,000 jobs in the UK- or that Lydd expansion would cause the loss of 1,912 jobs- not necessarily all in Shepway, but in the wider area.

For the year 2008, UK airports had 235,359,361 terminal passengers (i.e. not transit) (Table 2.2 on www.caa.co.uk/default.aspx?catid=80&pagetype=88&sqlid=3&fld=2008Annual). So the aviation tourism deficit of £17 bn attributable to those who flew equates to £72 per passenger. So if Lydd expanded to take 500,000 ppa, this would mean a deficit attributable to Lydd of £36 million. This is in stark contrast to the maximum benefit of £3.025m suggested in para. 4.16 (All references in this section are to the Socio-economic Update unless otherwise indicated).

Whichever calculation is used, it shows the huge damage to the economy caused by expanding Lydd, which completely negates any benefit of a few extra jobs. For a claimed 300 jobs created, it effectively means that each job would be subsidised by £120,000 per annum.

The airport's estimates are for some 300 new jobs for 500,000 ppa (Para 4.4.). This estimate of new jobs is on the high side- it equates to over 600 jobs per million ppa (mppa), and the recent SQW report from Prestwick shows 201 jobs per mppa, (SQW Consulting Economic Impact of GPA Prestwick, Table 3-1) which equates to 101 jobs for Lydd, The Airport Operators Association commissioned York Aviation to study future employment trends (*Economic and Social Impact of Airports*. September 2005. www.aoa.org.uk/publications/Economic_Impact_Report.doc) and their calculated ratio of extra jobs to extra passengers is only 166 per mppa, which equates to 83 for Lydd. Councillors at Luton found it has 100 jobs per mppa, which would mean only 50 for Lydd. All these figures are for the 500,000 ppa situation.

Direct employment includes jobs in airport shops. Airport shops do not provide much extra employment; they mainly take business away from the High Street. Indeed buying goods at an airport is basically illogical: it is cumbersome to carry shopping on and off an aircraft. The only reason why most people shop is that, due to possible delays in reaching the airport, and long check-in times, many people arrive several hours before their flight and are corralled with little else to do. It could be argued that jobs in airport shops should be included in the statistics of retail employment, not under aviation.

Indirect employment has a certain validity as a statistical concept but has the fatal flaw that it means double-counting people employed in other industries. For example, it is stated that it includes jobs in

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producing aircraft fuel: thus it may include some workers on the North Sea oil rigs. Since these people are also included in the statistics of workers in the oil industry, there is obvious double-counting.

The inclusion of construction workers is incorrect: Government guidance (EGRUP guidance www.webtag.org.uk/archive/msapart1/11.htm) says that they should be classified under 'construction', and not be included in the industry for which they may be undertaking a project.

If every other industry used the same technique the number of people employed in British industry would far exceed the total population.

The definition of indirect employment also leads to some rather far-fetched results. It is said to include the workers who produce the goods sold in airport shops: thus it includes, for example, the Scottish distillery workers who produce the whisky sold in airport duty-free shops.

Travel agents do depend largely on selling holidays by air. But with the increasing trend to buy flights and book hotels on the internet, travel agent employment is likely to decline. Again there is double counting: travel agents are also included in the statistics of employment in the tourist industry.

Induced employment could be a valid concept if applied to public works designed to relieve serious unemployment. John Maynard Keynes (*The General Theory of Employment, Interest and Money*. John Maynard Keynes, 1936) used the concept of the multiplier to explain how providing extra employment could trickle down through the economy. Yet as he acknowledged, this theory was mainly applicable to a situation of mass unemployment. "It is obvious that the employment of a given number of men on public works will ... have a much larger effect on aggregate employment at a time when there is severe unemployment, than it will have later on when full employment is approached."

Moreover, many of the induced jobs are not created in the local area: the baker who bakes the pilot's loaf may be local but the man on the oil rig certainly is not. To the extent that a sizeable proportion of expenditure by every family these days is on goods produced abroad, the induced jobs will not even be created in the UK.

According to OEF and other airport studies, induced employment includes jobs due to purchases by both direct and indirect airport employees, again leading to some far-fetched results. Thus it includes not only the bakers who provide the bread for the airline pilots but also the bakers who provide bread for the oil rig workers and the distillery workers. When the man on the oil rig takes a holiday in Cornwall, the hotel staff (or at least a proportion of them) are counted as part of aviation employment. When the distillery worker buys some kippers for his family supper, some of the fishermen who caught the herrings are counted as being employed in aviation!

There is no reason why the process should not go on indefinitely. Why not also take into account that when the fishermen spends some of their income on cabbages that creates jobs for farmers, and when the farmers buy newspapers that helps to create jobs for journalists, and when the journalists fly abroad that creates jobs in aviation, and so on ad infinitum.

Para 4.11 refers to the 3,700 currently employed in tourism in Shepway, and expresses uncertainty as to this continuing. Of course if Lydd Airport were to expand, tourists would be put off by the noise of the airport- people come to Romney Marsh for its peace and quiet, so such employment would decrease.

Paras 4.13 and 4.14 refer to the nebulous figures of indirect and induced jobs in the tourism sector. Using the same argument, the existing tourism employment itself creates indirect and induced jobs, so that any losses in existing employment would be magnified by the effects of Lydd's expansion, which indicates the untenable use of estimates of indirect and induced jobs.

Aviation pays no fuel tax and no VAT. It benefits from duty-free sales at airports and from artificially low landing fees. Although it pays air passenger duty this is comparatively low compared to the fuel tax and VAT reliefs. The net tax subsidy received by air travel as compared to car travel is around £9 billion a year (*The Hidden Cost of Flying*. Sewill, 2003. The Treasury have accepted that the absence of fuel tax and VAT amount to £10 billion a year. Response to Emissions Cost Assessment Consultation.).

This means that, on average, the tax subsidy per (direct) job in the aviation industry is £50,000 a year; or £1,000 a week; or £25 an hour. In the case of Lydd Airport's claim of 300 jobs, this equates

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to £1.5 million per annum.

Any industry could promise to provide more jobs if it received that level of subsidy.

It is interesting that the list of aeroplanes suggested seems to be short of UK manufactured planes. For example, Boeing is an American company, so the economic benefits from additional aircraft manufacturing go elsewhere, unlike, for example, car manufacturing, which has substantial activity in the UK

Para 4.15 refers to a 2003 South West report, but in 2007 the South West Regional Development Agency commissioned the consultants EKOS to undertake an economic assessment of South West Regional Airports which found that "The relationship between high growth sectors in the region and air travel appears to be weak. Air travel may not necessarily be a prerequisite for economic growth"

Para 5.8 refers to the education and skill levels of potential employees, A 1998 survey of Economic Development Officers in local authorities (*Transport Links and the Economy*. Automobile Association and Confederation of British Industry) concluded that the availability of workforce skills and suitable development sites were of equal or greater importance than transport in terms of attracting inward investment.

Looking at UK companies only, a Cushman and Wakefield survey (UK Cities Monitor 2008, www.cushwake.com) of 200 executives asked what factors were most important in deciding their choice of location. 'Transport links internationally' was only mentioned by 30 % (22% in 2007). Seven other factors were considered more important, and it is well known that a key factor in encouraging new employment is having a source of qualified and skilled employees. Although Lydd Airport proposes some education and training initiatives, these are minimal in relation to the District's needs and would be bought at a very high cost to the economy, and more direct ways of improving local skills would be more cost-effective.

The aviation industry, and indeed the Air Transport White Paper, make a great play with the importance of inward investment. The point has been answered by Professor John Whitelegg:

Data for the UK as a whole show that the amounts of money invested by UK companies abroad is higher than that invested by overseas businesses in the UK. If there is a link between the enhanced accessibility provided by international air services (as the aviation industry claim) then it works to the disadvantage of the UK and supports a net outflow of resources. Put very simply potential jobs in the UK are sacrificed for the benefits of investing abroad. Whilst we would not wish to claim that this job loss and net outflow of funds should be "laid at the door" of aviation we also wish to question the logic of the opposite assertion from the industry itself. Inward investment cannot be claimed as a benefit of airports or aviation. If it is claimed then equal weight has to be given to the debit side of the balance sheet.

The balance sheet shows a substantial net deficit ... approximately £38 billion each year.(United Nations Conference on Trade and Development (UNCTAD), World Investment 2002, Transnational Corporations and Export Competitiveness. September 2002.)

This net deficit has a direct equivalence in job losses. If we accept that the cost of creating a job in the UK is approximately £23,000 (National Audit Office, 1999) then this outflow represents a job loss of 1.65 million each year for 5 years.... This job loss is facilitated by the development of air services and the aviation industry (The Economics of Aviation: a North West England perspective. John Whitelegg, April 2003)

Air travel may be a great benefit to the UK in that it enables the British public to travel the world, and to enjoy the sun. Or it may be a great disaster in that it is causing ever increasing climate change damage.

But what it does not do is to provide more jobs in this country.

More jobs in Alicante and Athens; more jobs in Corfu, Ibiza, Larnaca; more jobs in Palma and Prague.

But fewer jobs in Britain.

Noise

Para 16.11.1 (of Report 7065244- CHAPTER 16 March 2009) refers to two baseline conditions: the

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situation with the runway extension and the airport operating at the capacity of the existing terminal of 300,000 ppa, and expansion to 500,000 ppa with the new terminal.

However there is nothing to physically stop more aircraft using the airport than is predicted by the proposed mix of aircraft. For example if freight aircraft were to use the airport, the passenger terminal size would be irrelevant to restricting flight numbers. Freight aircraft are typically noisier and often older aircraft, and so are more disturbing and have greater emissions than modern passenger planes.

It is possible that instead of the larger, full payload 737s being used, a greater number of smaller planes could use the site to make up the proposed the proposed passenger numbers. Although there is no agreement on the actual noise level at which annoyance starts, the ANASE study (mentioned in 16.3.32) did achieve agreement on people being more disturbed by aviation noise than previously and that the number of flights is a more significant parameter than has previously been found. Hence a lot of small planes would be annoying even though their maximum noise levels could be below that of a large plane.

There are also proposals for what are known as "Open Rotor" aircraft: a recent conference (www.omega.mmu.ac.uk/conference-open-rotor-powered-aircraft.htm) revealed that: "Open rotor engine technology is an alternative way of propelling aircraft while drastically reducing emissions – potentially cutting fuel consumption by as much as 30%. However, the open rotor propeller faces major challenges, notably on noise and safety issues." The noise is more tonal than other sources so they are far more disturbing than many current aeroplanes.

Hence the noise studies underestimate potential noise levels in the future.

As part of the additional information required for the assessments of impacts of 2 million passengers per annum, there needs to be greater clarity on how much additional Controlled Airspace is needed. A major source of annoyance to the public is where new airspace is used, creating noise levels which may be below what is officially called 'annoying', but are highly disturbing when they intrude on previously undisturbed areas. Hence the Airport should have already defined what new airspace will be needed and consulted and sought approval for this from the CAA. As there is a lack of airspace in the South East, delaying this process could mean that airspace will not be available, or that what is available would be over protected areas such as AONBs.

We therefore continue to press the point that the impact assessments are too limited, because the 300,000 ppa and 500,000 ppa assessments do not reflect the potential impacts from different numbers or types of aircraft which could use the airport, and that assessments for all these factors should be carried out for 2,000,000 passengers per annum.

Biodiversity

Planning Policy Statement 9 states that planning decisions should aim to maintain, **and** enhance, restore or add to biodiversity and geological conservation interests. It is therefore necessary for any development proposal to show how it will enhance, restore or add to biodiversity regardless of any likely negative impacts. The land around the existing Lydd Airport, offers opportunities to enhance biodiversity in a way which would help meet national biodiversity targets. We would expect any development of the scale of the proposed Lydd expansion to be able to demonstrate that it would lead to substantial biodiversity benefits, but we have seen insufficient evidence of this.

New requirements from the European Aviation Safety Agency (EASA www.easa.eu.int/ws_prod/g/g_about.php) means that the Airport needs a documented 'Wildlife Management Plan'- not just a 'Bird Control Programme' (5.102 Overview of Application). This needs to be provided so that all consultees, as well as the relevant authorities, can see how this issue is to be managed.

In addition, we would quote the EASA: NOTICE OF PROPOSED AMENDMENT (NPA) NO 2008-15: "Essential Requirements for Civil Aviation Environmental Protection" which says:

"Paragraph 2.j is to create a clear legal basis for prohibiting any use of the aerodrome for which it was not intended and designed from an environmental protection perspective."

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Hence information is needed as to how the airport intends to address this requirement.

We have concerns about the proposed sewage treatment works. This needs full assessment as part of the runway and terminal assessments, and includes being assessed under the Habitats Directive. Of course the requirement is that the assessment must prove (not just suggest) that the proposals will not have an adverse impact on the European sites.

Safety

We would express our concern that the Nuclear Installations Inspectorate has yet to clarify the relative safety of expanding Lydd Airport. We believe that allowing Lydd to expand would unacceptably increase the risks of accidents involving Dungeness Power Station, and therefore must be refused permission on these grounds alone.

We also highlight the recent crashes on the Hudson River, New York and Ryanair in Rome caused by bird strikes. It would seem irresponsible to allow expansion of an airport so close to a bird reserve, where the danger is likely to be even higher, bearing in mind that a major reason for Cliffe airport not going ahead was for bird strike reasons.

Climate Change

Once upon a time jobs in aviation seemed romantic: brave pilots; seductive air hostesses; far-flung destinations; all the buzz of being at the forefront of technological innovation. Now that we have learned how polluting the industry is, employment in aviation seems less glamorous. In 2005 UK aviation produced 37.9 million tons of CO₂, forecast to rise to 59.9 million tons in 2030 even after taking into account more efficient aircraft (*UK Air Passenger Demand and CO₂ Forecasts*. DfT, January 2009.). On average at present each aviation worker is responsible for over 200 tons of CO₂ per year, or the equivalent of around 400 tons if radiative forcing is taken into account.

Each job in aviation is thus about twenty times more damaging to the climate than the average job in the rest of industry (energy supply, business and transport) (www.defra.gov.uk/environment/statistics/globalatmos/gagccukem.htm).

Although the Airport promotes its Carbon Management Plan, (5.64 Overview of Application) airport emissions would be miniscule compared to the aircraft emissions, and these need management to ensure we meet the requirements of the Climate Change Act, 2008. Hence full details of how the airport would manage aircraft emissions are needed.

Mitigation

The Tables of proposed Mitigation are inadequate (Page 63 Vol 1 onwards). The examples listed below need to actually specify the relevant agreed strategy or plan and include full details of what is proposed. This information then needs to be provided to consultees before Planning Permission can be even considered.

Examples of inadequate detail of proposed mitigation:

The EMS will contain a solid waste management strategy, which will identify how individual waste streams are managed, collected, and disposed of (airside and landside).

A forum will be established to include local landowners to control bird strike whilst retaining and improving ecological and/or agricultural value of surrounding land.

A habitat and biodiversity action plan (BAP) will be developed for the airport in collaboration with appropriate stakeholders. The BAP will be in line with

the outline BAP submitted with the 2008 Supplementary Information and include:-

1. habitat suitability for reptiles, invertebrates and small mammals to be encouraged in locations away from operational areas of the site;
2. habitat management of waterbodies and drainage ditches within the site to be undertaken in agreement with the Environment Agency, IDB and Natural England;
3. measures to reduce the risk of siltation and contamination of watercourses;
4. appropriate methods to ensure that the ornithological value of the area is retained and, where possible, enhanced.
5. methods to ensure a balance is met between recognising the importance of the wetland habitat around the airport for bird conservation and the need

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to minimise bird strike hazard.

LAA will develop and implement a Travel Plan, which will be in line with the outline Travel Plan submitted with the 2008 Supplementary Information. LAA will develop and implement a car park management scheme, which will monitor the number of spaces at LAA; safety, security, cleaning and other operational arrangements; car parking charges; and signage.

LAA will develop an air quality strategy together with an air quality monitoring strategy.

Noise & Vibration Noise

Management

LAA will develop a noise management plan, which will include measures such as controlling ground noise; establishing noise performance standards for aircraft based at LAA; and managing flight path, departure, arrival and taxiing procedures. A noise monitoring strategy will also be developed.

Noise & Vibration Noise

Management

LAA will restrict the number of helicopter movements to 2,000 movements per annum (excluding emergency and military/Government activities and the

air show) and have a complete embargo on helicopter movements at night time (again excluding emergency and military/Government activities).

LAA

will also establish a noise preferential route for helicopter movements.

LAA will commit to minimising its own carbon footprint by establishing a carbon management plan (in line with the framework submitted with the 2008

Supplementary Information) which will include examining airfield buildings, ground operations, aircraft fleet, flight paths and landing/take-off operations.

LAA will also become a signatory to the UK Sustainable Aviation Strategy. In terms of cleaner aircraft, aviation fuel tax and emissions trading, these are

all initiatives which the Government is targeting primarily towards airline operators. LAA will review the environmental practices of airline operators wishing to use the developed facilities

LAA will develop and submit to the local planning authority for approval a lighting strategy which will be in line with the outline strategy submitted with

the 2008 Supplementary Information. LAA will then light the external areas of the terminal building in accordance with the approved strategy and monitor the performance of the strategy.

Landscape Landscape

works

LAA will develop and submit to the local planning authority for approval a landscape strategy which will be in line with the outline strategy submitted with

the 2008 Supplementary Information. LAA will then landscape the external areas of the terminal building in accordance with the approved strategy and

monitor the performance of the strategy.