

Town and Country Planning Act 1990

Applications by London Ashford Airport Ltd

APP/L2250/V/10/2131934 & APP/L2250/V/10/2131936

Site at London Ashford Airport Limited, Lydd, Romney Marsh, TN29 9QL

CPRE/05/A – Transport and Access

Statement by Mr Gareth Thomas MSc C.Eng. MIMechE
of Behalf of CPRE Protect Kent

- 1.1 My name is Gareth Thomas. I have a degree in Mechanical Sciences from Cambridge University, am a chartered engineer and a member of the Institution of Mechanical Engineers. I completed the maximum allowed five years as chairman of CPRE Protect Kent some three years ago, but have been a member of its Transport Group and often its chairman for 12 years. I am chairman of the CPRE southeast region transport group. I also have a Private Pilots Licence (licence no 51577), although currently not valid since I decided not to continue the required annual flying hours.

2 THE APPLICATIONS

- 2.1 These two applications are essentially to allow the creation of a possible new commercial transport operation. The aviation business can be divided in to a number of categories: Commercial – scheduled: commercial – charter: general aviation: private flying: ultra-light flying. Currently Lydd airport operates wholly within the last three categories. The Lyddair operation, although operating scheduled flights, would be included in the general aviation category. The aircraft using the airport are very largely either piston-engined or turboprop types. The extension to the runway will allow mid-size commercial jet aircraft, such as the Boeing 737, to operate.
- 2.2 Lydd airport has just one runway, currently only 1505 metres in length. These applications are to increase the runway length to 1799 metres. There is in addition a 150 metre starter extension on the northerly end of the runway to allow for greater take-off run of 1949 metres from this direction (runway 21). However, this extension will give no benefit to take-offs starting from the southerly end of the runway (runway 03), take-off run then being the 1799 length. Also this extension is not to be used for landings, which must use the current runway threshold, and will not give added landing length.
- 2.3 It is anticipated by the applicants that this new facility will attract airlines to set up new scheduled or charter services in the near future, which will in consequence then attract sufficient passengers to justify these new services. It is suggested that passenger numbers could build up to pass through 300,000 then to 500,000 and eventually reach two million

per annum. The benefits of the applications are assumed to be that these new operations will provide significant employment opportunities for local people, and therefore be of economic value to the area. We are however unable to find any real quantification of these benefits, or market research to see how achievable any of these expectations might be.

- 2.4 These operations would however markedly increase the adverse environmental effects of the airport operation, including among others noise pollution affecting the local population, and increasing road traffic around the area.

3 THE AIRPORT LOCATION

- 3.1 Lydd airport is sited in one of the most remote and poorly accessed areas of the southeast region of England. It is effectively surrounded by sea on three sides, with Romney Marsh forming the landward side. It has a very limited immediate catchment area. The wider catchment areas include the south coast towns to the west as far as Bexhill/Eastbourne and northwards towards Ashford and Thanet.
- 3.2 Transport links: There is no passenger train connection whatsoever to the airport. The only major road in the area is the A259 which runs through the coastal towns to the west, and continues northeast up to Folkestone via the nearby New Romney village. This road runs some three kilometres to the north of the airport and is single carriageway only. The airport is situated to the south of this road down the B2075, which runs on to Lydd village then westward through Camber to Rye. It is a major concern that this road, which is the shortest route from Rye, will be used by traffic from the west instead of the A259. It is quite unsuitable, especially where it runs close to the sea through Camber, although likely to be the route chosen by most SATNAV systems. On the A259, some five and a half kilometres to the west from its junction with the B2075, there is a junction where the A2070 goes northwards to Ashford. This makes the road journey to Ashford some 24 kilometres, and would be the route to for anybody wishing to join, or come from, the rail network there, including the high speed line. All of these roads are single carriageway

4 REALISING THE BENEFITS

- 4.1 The indicated benefits will only come about if large scale scheduled or charter operations can be developed, presumably directly as a result of the extended runway. It is very difficult to see why any operators should choose to do this, particularly with the competition from Manston airport.
- 4.2 Manston, like Lydd, lies at the eastern end of Kent next to the sea. It is some 41 kilometres to the north of Lydd. It has a runway length of 2752 metres, nearly twice that of Lydd and is able to handle the largest aircraft. It has extensive facilities and hangarage. It is every bit as close as Lydd to most domestic and continental airports. It can be reached by the dual carriageway A253 which runs immediately adjacent to the airport, and is a direct extension of the M2 then A299 from London. The A28 to Canterbury branches off this road. It is relatively near to several railway stations including Ramsgate, Margate and Birchington, which are served by two alternative train lines. However, even with all these advantages, Manston really struggles to attract much passenger business. It has ample spare operating capacity. Currently only the airline Flybe does operate some services which are almost entirely domestic. In September 2004 an airline called EUjet was set up to operate mainly

continental routes, but failed in July 2005 after less than one year of operation. If Manston finds it so difficult to find business one must question whether Lydd would stand any chance of the developments achieving the indicated benefits.

5 POSSIBLE OPERATORS

- 5.1 We are unable to find any evidence within the Lydd documentation either of market research or commitments from existing operators. The Lydd marketing document (issued 2006) does mention 15 airlines which it hopes might be interested. Almost all of these operate aircraft types which could use Lydd as it is at present without any runway extension. They mostly use mid-size turboprops and the smaller jets such as the BAE146/Avro RJ85 and Embraer 135 and 145. A number of these currently operate services from London City Airport, which has a much shorter runway than Lydd, being only 1199 metres long. One airline that Lydd airport hoped to attract was Flybe, but this has now established its Kent operations at Manston. The lack of current interest from all of these airline operators is a strong indication that even if the developments were to be completed it is very unlikely that significant scheduled or charter operation would result.

6 TRAINING

- 6.1 There is no doubt that Lydd is very well placed to develop a role as a training airfield for mid-size commercial jets with the extension to the runway. Its remoteness, with relatively low nearby population, coupled with its position somewhat away from the most crowded airways and with low levels of air traffic, must make it attractive for airlines and commercial training enterprises. This is a function that the airfield management clearly wants to develop. It has the landing systems in place which are required for this. It already has facilities for *ab-initio* training and on to some commercial licences, but is considered to be restricted at this time by the length of the runway for this additional training for commercial jet aircraft. The additional training envisaged would be not merely for pilot conversion on to jets, but also for current pilots to renew or obtain type approval. This could mean a considerable number of jet flights would be introduced.
- 6.2 This type of training would of course not involve passengers. The additional employment therefore would be negligible, particularly as it is unlikely that the aircraft would be based at Lydd but instead fly in from their base airports. However the environmental damage would still be incurred.
- 6.3 One effect of this increased activity of jet aircraft would be to substantially increase the disturbance and noise problems locally. Jet aircraft are far noisier than those with piston engines. Furthermore, training would often mean the aircraft would be performing regular circuits with multiple take-offs and landings. These would increase the noise pollution enormously, and affect a wider area resulting in a substantial loss of tranquillity to a much greater area. This would arise not only from the jet aircraft themselves, but also from altering the landing patterns of the current aircraft. Light aircraft generally can use quite tight circuits, turning on to final approach often less than 500 metres from the runway threshold, avoiding the local population centres. Larger jets, particularly during training, would need to be lined up with the runway some kilometres out. This would cause other aircraft to follow suit and make much wider circuit patterns than they would otherwise, or

hold off, leading to additional noise, disturbance and persistent annoyance over a much greater area. Since the prevailing wind tends to be from the south-west around 70% of jet landings, whether training or carrying passengers, would pass over Littlestone-on Sea and close to New Romney, at 500ft or less, on ILS approaches, in “dirty” configuration with wheels and flaps down and engines spooled up. They would be in the noisiest possible condition. Landings and take-offs have very high levels of fuel consumption which would have an effect on local air quality. The cumulative effects of both noise and pollution would have a very negative impact on the surrounding communities.

7 PASSENGER NUMBERS

- 7.1 Notwithstanding the view expressed above about the prospects for growth, we must consider the effects of the anticipated passenger numbers actually reaching 500,000 per annum. We note the seasonable variation figure used in the transport assessment (TA) by Steer Davies Gleave and based on Leeds/Bradford experience. We would not disagree with this, although there is much more variation currently with the Lyddair schedules. With the seasonable variations this would equate to some 2000 passengers per day in the peak times, presumably 1000 departing and 1000 arriving.

8 GROUND TRANSPORT

- 8.1 The only way for passengers to arrive at or leave Lydd is by motor vehicle, be it private car, taxi or bus. Some airport staff might be living locally who could presumably use cycles, but the majority would have to come from further afield. The government policy on the approach to transport is set out in PPG13. This clearly sets out to minimise the amount of car travel in favour of public transport, walking and cycling. The growth of Lydd airport must be regarded as a introducing a major generator of travel demand, which would be particularly unfortunate in such a remote rural area. The aviation section of PPG13 states “The New Deal for Transport encourages regional airports to cater for local demand where it is consistent with sustainable development” It is clear that for Lydd airport to meet the anticipated demand it must expand its sources of passengers far beyond its local catchment area.
- 8.2 The transport reports in the application do go in to incredible levels of detail. Most of these are entirely speculative, being developed from presumed aircraft schedules, which give hourly numbers of passengers, and possible average car occupancy, to give hourly flows of cars at various road junctions. All this is entirely without any real foundation. For the airport passenger numbers to reach 500,000 passengers per annum more than one airline operator is likely to be involved, and higher and irregular peaks of arrivals and departures will occur, rather than the fairly spread approach taken in the TA.
- 8.3 We are unable to find any overall view of the area of origin of departing passengers, or the destination pattern of arriving passengers. There would appear to be a “three-pronged” range of passenger journeys, either northwards to Ashford and Canterbury, westward to the south coast towns including Rye, Hastings, Bexhill and Eastbourne, and northeast to Folkestone, Dover, Deal and up to Margate. It is not really possible to evaluate any breakdown between these three directions, the TA figure no. 6.2 not being particularly helpful, and no estimates have been given. In addition, the levels of service vehicles would

be particularly high in this area partly from the limitations imposed by the marsh and avoidance of polluting discharges. An estimate of these numbers needs to be added to the figures

- 8.4 It is likely that the Ashford /Canterbury direction would attract the greatest numbers of passengers. The TA suggests that about 10% of passengers would use the bus service between the airport and Ashford which would be set up as a result of a section 106 agreement. We would broadly agree with this figure, but it does mean only some 100 passengers each way spread over the day. This would not make the service viable.
- 8.5 The other 90% of passengers would arrive and depart by car, be it private or taxi. It is suggested that 70% would be by private car and 20% by taxi. We think that this probably overstates the taxi figure. In order to achieve this some 200 passengers arriving at the airport would need taxis based there. The average taxi journey from Lydd would be far longer than most other airports as the principal towns are all some considerable distance away. The average taxi journey including its return might well work out to be more than one and a half hours, meaning that any one taxi could only do a maximum of some four or five journeys in a day. If the average occupancy was two persons then more than twenty taxis would need to be based at the airport. While this is entirely possible it would cause problems in the off-peak times.
- 8.6 The details of local road problems have been covered in much detail in the TA. We would agree that a number of road improvements would be needed, including the A259/B2075 junction (Hammonds Corner). However it does not look at the traffic problems over the wider area. Very little traffic would originate from the immediate area, which has a relatively small population. The report does not indicate the levels of additional congestion that would be caused in most of the towns receiving traffic going to and from the airport. These would include Camber, Rye, Hastings and beyond to Eastbourne along the coast to the west. Folkestone and Dover would be affected, as well as Ashford and Canterbury. Most of these towns have severe congestion problems at the current time. Much of the A259, particularly to Hastings and beyond, is already far from free-flowing.
- 8.7 With some 1000 passengers departing on peak days the car parking proposed would not appear to be sufficient. It would be total speculation but we believe that car occupancy might be lower than at comparative airports because the type of passenger attracted would be less likely to be larger family groups, and also include a larger number of businessmen travelling alone. It is also speculation as to the average trip time during which cars are parked. But, for example, if only half the departing passengers arrived by car and left it in the car park, with two persons per car with an average trip length of 5 days, some 1250 spaces would be needed.
- 8.8 The situation is quite difficult for arriving passengers who originated elsewhere. If they have not made prior arrangements privately, and do not want to take the bus to Ashford or a taxi, they only alternative would be to hire a car. This might well be the likely be the option of tourists, for example, who wish to visit Kent and Sussex places of interest. It would however be necessary to introduce considerable car hire businesses, which require a quite a large amount of parking space. It would appear that no allowance has been made for this.

9 CONCLUSION

- 9.1 We believe that allowing these two applications would not provide the benefits assumed. The current runway is already suitable for most of the airlines thought of as possible operators but the potential business has not materialised. The relatively nearby Manston, with far better facilities, still struggles to obtain scheduled services, Flybe excepted. The increased use of Lydd airport for training flights would seem to be a real possibility, but this would incur greater environmental problems without realising any of the anticipated benefits. The effects of road traffic on the wider area have not been considered, although due to the size of the catchment area needed almost all traffic generated by the airport would have to travel through the major towns in Kent and Sussex which already experience congestion. We would ask that these applications be refused.