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/B – Transport and Access SUMMARY

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. I 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 SUMMARY

- 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.
- 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. 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.
- 2.5 Lydd airport is sited in one of the most remote and poorly accessed areas of the southeast region of England.
- 2.6 Transport links: There is no passenger train connection whatsoever to the airport. The road network is poor and vulnerable to disruption from accidents.
- 2.7 It is very difficult to see why any operators should choose to do this, particularly with the competition from Manston airport. 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.
- 2.8 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. 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.
- 2.9 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. It 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 could mean a considerable number of jet flights would be introduced. 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.
- 2.10 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 increasing the noise pollution enormously, and affect a wider area resulting in a substantial loss of tranquillity to a much greater area.
- 2.11 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.
- 2.12 The other 90% of passengers would arrive and depart by car, be it private or taxi. 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.

- 2.13 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.
- 2.14 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.

3 CONCLUSION

3.1 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.