



Lydd Airport Action Group

www.lyddairportaction.co.uk

Preserving ♦ Protecting ♦ Defending ♦ Romney Marsh

August 4th, 2011

K. D. Barton BA (HONS) DIPARCH
The Planning Inspectorate
Room: 4/02, Temple Quay House
2 The Square, Temple Quay, Bristol BS1 6PN

Dear Inspector Barton

Airport Security Fence

LAAG is drawing the following to your attention for your consideration since the need for security fencing was flagged by one of our members. It is an issue that LAAG believes should have been covered earlier by Lydd Airport (LAA) in its planning application and is in addition to the matter of new runway approach lighting raised by Mr Bingham in his submission on July 5, 2011¹.

Lydd Airport (LAA) requires security fencing since it is a qualifying airport under the provisions of the National Aviation Security Programme (NASP). This has been confirmed by the Department for Transport - See Appendix 1 and the CAA Appendix 2. The requirement for this fencing has been further underpinned by new European Legislation (Commission Regulation (EU) No 185 2010) which was incorporated into UK law in April 2010 - see Appendix 3, paragraphs 1.1.1.1 and 1.1.1.2 attached.

It appears that the onus is on LAA to determine when to erect the fence. LAA's only obligation is to report its intention to the Department for Transport (DFT). The DFT was unable to answer why LAA has not proceeded with the fence already.

The fencing required must be BS 1722 Part 10 standard which covers chain link and welded mesh Fences, 2400 mm high with extensions for barbed wire above with the bottom either buried 300 mm, hair pinned stapled to hard standing or placed in a concrete sill.

The fence will therefore have the potential to cause adverse impacts on the surrounding European designated sites and particularly the Special Area of Conservation (SAC). Further, the nature of the fence project is known. Therefore it cannot be argued that the project is insufficiently formed to be assessed.

Although the fence is required whether or not the proposed development proceeds, it is axiomatic that the need for it is greater under the proposed development scenario because the risks are greater. Since LAA has yet to construct a fence and it would form an essential part of the proposed development, this suggests under the EIA regulations that its potential environmental effects should be assessed as part of the current planning applications, or as a

¹ Paragraph 8c

minimum factored into the decision making process. Further, because it has the potential to cause adverse impacts on the surrounding European protected sites, either alone or in combination, LAAG questions whether it should also form part of the consideration process under the appropriate assessment for the current applications.

Even if the fence could be erected under permitted development rights, because the fence has the potential to cause adverse impacts, either alone or in combination with other plans or projects, it cannot proceed until the need for an appropriate assessment has been considered and LAA has received written notice of approval from Shepway District Council, after it has in turn received advice from Natural England².

LAAG understands that LAA could delay the construction of the fence even if it is granted planning permission. This is irrelevant. The development of a security fence is a formal requirement and an integral part of the airport's operation. This suggests to LAAG that the impact of this fence must be assessed, or at least form part of the consideration of the applications, now. Delaying the construction of the fence would be consistent with other already assessed features of the application such as the terminal where LAA is asking for 10 years headroom for construction in the conditions attached to the planning application.

Yours Sincerely

Louise Barton MCSI
Lydd Airport Action Group
The Hook
Madeira Road , Littlestone
Kent ,TN28 8QX,
01797 361 548
blmbarton@aol.com, www.lyddairportaction.co.uk

Attached

Appendix 1 - Email audit from Department for Transport

Appendix 2 - Email from the CAA

Appendix 3 - Commission Regulation (EU) No 185 2010

² See LAAG/11/F, paragraph 7.8 penultimate page