



**GOVERNMENT OFFICE  
FOR THE SOUTH EAST**

## Draft South East Plan Comments Form

Office Use Only

Respondent No:

Comment No:

Date Received:

Acknowledged:

If you wish to comment on the Proposed Changes to the Draft South East Plan please:

- Complete all relevant details in Section A – this need only be done once irrespective of how many parts of the RSS you wish to comment on.
- Complete a separate page 2 of the form for each part of the RSS you wish to comment on. Ensure you insert your organisation name (or surname if responding as an individual) on each page 2 and complete Sections B, C & D. You may make copies of this form.
- Type or print clearly in black ink.
- Note that all comment forms will be made available for the public to read – they cannot be treated as confidential.
- E-mail or post (please do not send duplicates) the completed forms to be received by the Government Office for the South East before **5.00pm on Friday 24 October 2008**.
- Alternatively an electronic consultation form is available at [www.gose.gsi.gov.uk/planning/regionalPlanning](http://www.gose.gsi.gov.uk/planning/regionalPlanning)

**Please send all responses to:**

Regional Spatial Strategy Team  
Government Office for the South East  
Bridge House  
1 Walnut Tree Close  
Guildford, GU1 4GA

**E-Mail:** rss@gose.gsi.gov.uk  
**Telephone:** 01483 882532  
**Fax:** 01483 882489

**Section A**

Comments submitted by:		Agent (if applicable):	
Organisation	Lydd Airport Action Group	Organisation	
Surname	Barton	Surname	
Title/first name	Louise M	Title/first name	
Address Line 1	The Hook	Address Line 1	
Address Line 2	Madeira Road	Address Line 2	
Address Line 3	Littlestone, Kent	Address Line 3	
Postcode	TN28 8QX	Postcode	
E-Mail	blmbarton@aol.com	E-Mail	
Tel. (day)	01797 361 548	Tel. (day)	
Fax		Fax	

**To ensure your comments are taken into account this form must be completed and received by 5.00pm on Friday 24 October 2008.**

**Signature**...Louise Barton..... **Date**...10/9/2008.....

Would you like to be notified of the publication of the final South East Plan?  
(Copies will be available to purchase from the Stationery Office, and will be available to download free of charge from the Government Office Website)

yes

**Section B**

Support / oppose/ comment (please specify)	Oppose
Proposed Change Number (e.g. Chap 1 (01))	Section D4, Para 1.28
Paragraph No. - for comments on Sustainability Appraisal/Habitats Regulation Assessment Report	

**Section C**

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The South East Plan provides a regional framework which should provide clarity to assist all stakeholders. Although this is achieved in Policy T9 which clearly sets out the role of the two major airports Heathrow and Gatwick and the regional significance of Southampton and Kent International Airport (Manston) - through enhancing the role of the existing regional airport Southampton and elevating the status of Kent International Airport - the revised wording of the supporting text to T9 lacks clarity and the ambiguous message given will lead to costly and unnecessary legal challenges. The last two sentences of Para 1.28 are at fault: *“In addition to the potential previously identified for Southampton Airport smaller regional airports, such as Kent International Airport, could play a valuable role in meeting local demand and contributing to regional economic development. Subject to relevant environmental considerations, their development should be supported, and regional and local planning frameworks should consider policies which facilitate growth at these airports.”* The wording should be changed.

**Section D1**

If you wish to expand your response please use the space below, and attach additional sheets if necessary with your name on.

Para 1.28 should be changed for the following reasons.

- (a) Policy T9 section (i) supports the development of the larger international/national Heathrow and Gatwick airports while T9 sections (ii) and (iii) clearly set out the role of Southampton and Kent International (Manston) as airports of regional significance. **By implication the remaining airports in the south east must be of local significance.** Policy for these airports should be covered by Local Development Frameworks and Local Authorities will be required to conform to the Aviation White Paper (*The Future of Air Transport, December 2003*) when they are produced. .
- (b) The sentence: In addition to the potential previously identified for Southampton, smaller regional airports, such as Kent International Airport, could play a valuable role in meeting local demand and contributing to regional economic development - implies that there are other airports of similar size to Kent International Airport (Manston) in the South East which could assume similar regional status i.e. become of regional significance. This is not the case.

The table below shows the airports within the catchment area of the Aviation White Paper’s definition of the South East. This area is larger than the area defined by the South East Plan. In the table the airports have been divided into Commercial Passenger Airports (covers passenger, freight, business/general aviation) and airports that are primarily used for business/general aviation as they are defined in the Aviation White Paper.

As the table shows only 11 of the 20 airports covered by the Aviation White Paper’s definition of the South East are located in the catchment area of the South East Plan - seven commercial passenger airports and four business aviation airports. Further, there are only 5 smaller commercial airports when Heathrow and Gatwick are excluded.

<b>Airport Type</b>	<b>Airports both within the Aviation White Paper's definition of South East &amp; within the Catchment area of the South East Plan</b>	<b>Airports outside the South East Plan's catchment area but within the Aviation White Paper definition of South East</b>	<b>Total Airports covered by the Aviation White Paper's definition of South East</b>
<b>Commercial</b>			
Hub/Main	<b>Heathrow</b>		Heathrow
Main	<b>Gatwick</b>		Gatwick
Main		Stansted	Stansted
Main		Luton	Luton
Smaller		London City	London City
Smaller/Regional	<b>Southampton</b>		Southampton
Smaller		Norwich	Norwich
Smaller	<b>Manston</b>		Manston
Smaller		Southend	Southend
Smaller	<b>Lydd</b>		Lydd
Smaller		Biggin Hill	Biggin Hill
Smaller	<b>Shoreham</b>		Shoreham
Smaller	<b>Redhill</b>		Redhill
Smaller		Cambridge	Cambridge
<b>Business/General Aviation</b>			
Smaller	<b>Farnborough</b>		Farnborough
Smaller	<b>Blackbushe</b>		Blackbushe
Smaller	<b>White Waltham</b>		White Waltham
Smaller	<b>Fairoaks</b>		Fairoaks
		Northolt	Northolt
		North Weald	North Weald

In the preparation of the Aviation White Paper the government examined the capacity of established airports including the smaller airports (See Page 109 of the *Second Edition February 2003: The Future Development of Air Transport in the United Kingdom: South East – A National Consultation*). This analysis shows the airports potential passenger capacity in 2030, assuming that maximum use was made of existing runways in the major South East Airports and that no new runway capacity was provided in the region. The results for the smaller commercial airports in the catchment area of the South East Plan are shown below.

<b>Smaller Commercial Airports within the South East Plan Catchment Area</b>	<b>Potential Capacity in 2030</b>
	<b>(passengers per annum)</b>
Southampton	7million*
Manston (Kent International Airport)	3million (later raised to 4-6million)
Lydd Airport	125,000
Shoreham	500,000
Redhill	** No contribution

\* Southampton later questioned this figure and believes capacity to be 2-2.5mppa within its current boundary

\*\* Redhill dismissed as passenger airport due to conflict with Gatwick's airspace

Note: Farnborough was assessed as a passenger airport but dismissed due to "significant planning constraints surrounding the type, number and size of aircraft which can operate". The White Paper supports its continued business aspirations.

These are the relevant facts:

(1) There are only four smaller commercial passenger airports in the catchment area of the South East Plan outside Heathrow and Gatwick since Redhill's aspirations have been dismissed by the White Paper because of the conflict with Gatwick. As the above table shows the airports are Southampton, Manston, Lydd and Shoreham.

(2) Southampton and Manston Airports' inherent capacities exceed the other smaller airports by a wide margin. Southampton is already an active regional airport and Manston has the infrastructure, but is heavily underutilised. The remaining two airports – Lydd and Shoreham - are of local, not regional significance with potential carrying capacities of 125,000ppa and 500,000ppa respectively. Lydd Airport's local significance has already been confirmed by the South East Plan. The airport was removed as a regional growth focus (from Policy EKA4) in the consultation process due to the airport's unsuitable location and natural capacity constraints. This leaves only Shoreham Airport of the smaller passenger airports and its capacity limitations suggest it is of local, rather than of regional significance. Had it been deemed suitable as a regional growth focus it would have been identified and nominated along side Southampton and Manson Airports in Policy T9.

The remaining smaller airports are business/general aviation airports and the White Paper has not designated any of these airports as major growth focuses and only supports their continued expansion in the business/general aviation fields. ("We support the adoption of policies which encourage the continued provision of these services." 11.101 page 132, *The Future of Air Transport, December 2003.*)

There are therefore no airports outside Southampton and Manston which could become regional hubs. These airports primacy is further underpinned by the Aviation White Paper's policy to first make best use of existing airport capacity.

(3) The Aviation White Paper provides a clear framework for development for all the international and large regional airports across the UK, setting out whether or not additional runways will be permitted and sanctioning additional terminal capacity where necessary. By contrast, although the White Paper supports the development of smaller airports in principle, **it fails to provide any framework**. Indeed the lack of clarity in the White Paper leads to ambiguity. Clarification can thus be provided by Regional Spatial Strategies and Local Development Frameworks. The South East Plan clearly provides a regional perspective in policy T9 by supporting Southampton and Manston as airports of regional significance. The South East Plan's role is over. Any supporting narrative should back up the decision to support these two regional airports. The future of the two local airports Lydd and Shoreham should be dealt with in local development frameworks.

## SUMMARY

It is possible to conform to the Aviation White Paper and at the same time provide clear policy guidance that differentiates airports of regional and local significance.

The South East Plan provides a regional framework and should provide clarity to assist all stakeholders. This is achieved in Policy T9 which clearly sets out the role of the two major airports Heathrow and Gatwick and the regional significance of Southampton and Kent International Airport (Manston) - through enhancing the role of the existing regional airport Southampton and elevating the status of Kent International Airport. By contrast the revised wording of Para 1.28 lacks clarity and should be changed for the following reasons.

(1) Policy T9 (i) to (iii) clearly sets out support for the development of the two major airports – Heathrow and Gatwick and two regional airports – Southampton and Kent International Airport (Manston). By implication the remaining airports are of local significance. Support for their development should be provided through Local Development Frameworks in accord with the Aviation White Paper. It is not appropriate or necessary to include policy statements covering airports of local significance in the South East Plan. Local Authorities will be required to conform to the Aviation White Paper when Local Development Framework's are being produced.

(2) The wording of the revised Para 1.28 implies that there are other airports of similar size to Kent International Airport in the South East which could assume similar regional status ie become of regional significance. This is not the case. Studies supporting the Aviation White Paper clearly show that, of the smaller commercial airports falling into the catchment area of the South East Plan, only Southampton and Kent International (Manston) Airports have the inherent capacities of regional airports. Shoreham and Lydd Airports are the only remaining commercial airports and their inherent constraints indicate they are only of

local significance.

(3) The Aviation White Paper **does not** set out a clear strategic framework for the smaller airports, in a way that it does for the major airports, other than support their development in principle. This leads to ambiguity and leaves it open to the Regional Spatial Strategies and Local Development Frameworks to provide guidance. Once the Regional Spatial Strategies have provided guidance on the airports of regional significance their role is over. Greater clarity is provided if supporting narrative is confined to clarifying this regional decision. In the case of the South East Plan, the future of the two local airports Lydd and Shoreham should be dealt with in local development frameworks.

## **Section D2**

If you are suggesting changes to the draft plan please supply revised wording of policies or supporting text as you wish to see them:

The wording of Para 1.28 should be changed to: -

**The Aviation White Paper highlighted the important role that regional airports can play in providing access to air services that reduce the pressure on the international hub airports, particularly in the period before a new runway in the South East is built. In addition to the potential previously identified for Southampton Airport, the potential of Kent International (Manston) Airport to fulfil a significant role as a regional airport is now acknowledged.**

**Please ensure that you have written your name at the top of the page and any additional pages. Completed forms should be received in the Government Office for the South East by 5.00pm on Friday 24 October 2008. Late responses will not be accepted.**