

LAAG/13/A

**Town & Country Planning Act 1990 - Section 77
Town & Country Planning (Inquiries Procedure)
(England) Rules 2000**

Lydd Airport Action Group (LAAG)

Rebuttal to Complement LAAG/10/E

Airport Operations

Applicant: London Ashford Airport Limited (LAAL)
Location: London Ashford Airport Limited, Lydd, Romney
Marsh, TN29 9QL
Applications: Y06/1647/SH and Y06/1648/SH
Proposals: 294m runway extension and a 150m starter extension
plus a new terminal to accommodate up to 500,000ppa
**Inspectorate
References:** APP/L2250/V/10/2131934
APP/L2250/V/10/2131936
**Document
Reference:** LAAG/13/A to complement LAAG/10/E

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1.0 Scope of evidence

- 1.1 In this rebuttal I address issues presented in the Airport Operations proof of evidence submitted by Tim Maskens on behalf of London Ashford Airport (Lydd Airport). The technical aspects have been dealt with by Malcolm Spaven (Spaven Consulting) in his rebuttal (LAAG/10/E). These comments are of a more general nature.
- 1.2 My silence on a point made in this proof or the fact that I have not addressed it should not be taken as my agreement with that point.
- 1.3 I reserve the right to make further comments.

2.0: Mr Maskens Evidence

- 2.1 The “typographical error” referred to in 5.1 is the type of mistruth that has characterised this planning application.
- 2.2 One of the most significant “typographical errors” is the early portrayal of flight paths to the local community, councils and business groups. The map attached (Appendix 1) was widely used in presentations in the 2004, 2005, 2006 period (Appendix 2, page 2) until LAAG forced the airport to withdraw the map due to its inaccuracy.
- 2.3 The map shown in Appendix 1 clearly shows the portrayal of the Instrument Landing Flight (ILS) path out to sea and the ability to land and take off out to sea. This map was used to promote the view that airport noise would be minimal since the flight paths were out to sea. This is misleading since the flight paths are landside due to the nuances of the restricted airspace particularly above the Hythe and Lydd military ranges.
- 2.4 After the withdrawal of the flight map by Lydd Airport, it then adopted a strategy to only give flight path maps which depicted aircraft movements within the immediate vicinity of the airport, such as the maps shown in Appendices 5-7. Therefore, in addition to the shortcomings of these maps, the airport’s policy not to depict flight paths beyond the immediate vicinity of the airport left residents in Kent and East Sussex, unable to gauge the extent to which the airport’s development would affect them. The flight paths were published on the LAAG website in good faith to address this imbalance. As Mr Spaven has indicated, the assertion in 5.9 that “LAAG’s own interpretations of the flight paths are inaccurate or incomplete” is not justified (LAAG/10/E, 2.20 & 2.21).
- 2.5 Lydd Airport began marketing its new development in 2004, the final scoping opinion for the public inquiry was published in December 2005 and the original planning application was published in December 2006. There were four

subsequent sets of supplementary information. Not once was a comprehensive analysis given of possible destinations so that local residents and other commentators could gauge the intensity of flight activity on certain routes. Tables D.1 and D.2 produced by Ms Congdon in Appendix D of LAA/4/C represents the first time an attempt has been made to illustrate a possible route structure from Lydd Airport.

- 2.6 The claim in 8.3 that LAAG's assertion "that serious flaws remain in respect of the Applications relating to flight paths and modal split (runway utilisation) is not justified or properly explained", is untenable (See LAAG/10/E 2.30 -2.32.) Indeed, in its response to the fourth set of supplementary information LAAG continued to indicate to Shepway District Council that there remained outstanding issues including flight path issues (See CD3.6 (LAAG) Summary (see below) and 1.1-1.6).

Outstanding Information:

As discussed in our previous submissions, there remains outstanding information relevant to the planning application that ought to have been included for assessment before the completion of the Officers Report. Apart from the upgrading of the Biodiversity Action Plan, none of the submissions in SEI(4) addresses the remaining outstanding issues referred to in our previous submissions. We query why Shepway District Council has invited comments from Lydd Airport after the publication of the Officer's Report when this pertinent information remains outstanding.

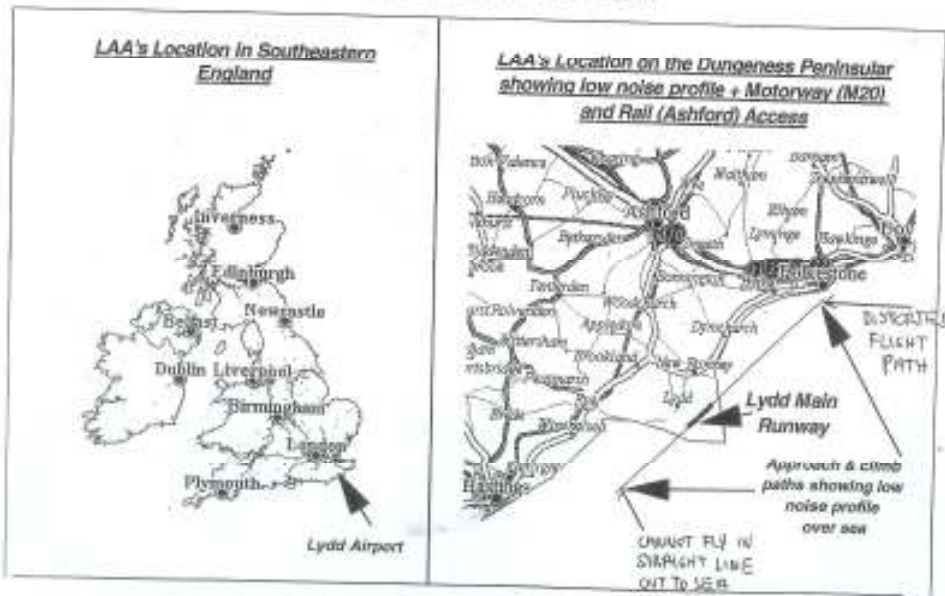
New Flight Paths and Need for Reassessment:

LAAG also draws your attention to relevant new information. Lydd Airport has been granted approval by the CAA (August 27th, 2009) for new RNAV (GNSS) (Area Navigation (Global Navigation Satellite System)) instrument approach procedures (flight paths) to both runway 21 and runway 03. LAAG believes the new flight paths necessitate a reassessment of most of the key issues relevant to this planning application - noise, pollution, nuclear safety and the economic benefits.

- 2.7 8.6: We do not disagree with the definition in 8.6. But, apart from not giving any figures for passengers on pleasure flights - mainly the fly and dine service around Romney Marsh in the summer period - the definition is applicable to all airports so that all airports suffer from this "underestimation" by varying degrees. The demand for this service, one would suspect, has declined in line with the reduction in demand for the service to Le Touquet since the demand drivers are broadly the same. According to the CAA, Lydd Airport carried less than 600 passengers in 2009. Even if the number of pleasure passengers were twice this number, which is unlikely, it would not alter any of the capacity utilisation arguments.

Appendix 1:

Minimal Noise & Pollution Impact Built "Out-to-Sea" on a Peninsula



LYDD
London's Second Airport

The Economically Friendly, & Environmentally Acceptable Regional Airport Development bringing strong Local, District and County benefits

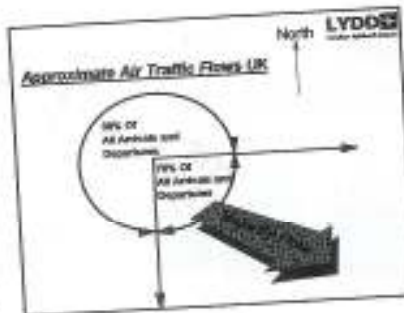
Welcome to:
Channel Chamber & KCC
October 22nd 2004

Objective

To develop Lydd as an important Regional Airport in the Southeast Airport Infrastructure in line with District, County and the Government's integrated transport policy and with due regard to both Safe Air Travel and the Environment

Key Note to Objective

Lydd's immediate plans are to develop the airport in order to cater for 2 million passengers per annum by 2014. This is consistent with existing District and County structure plans.



Headline Market Figures LYDDE

Current UK Market Growth 5% PA
 Passengers Double every 14 years
 UK Growth 10-11m passengers PA
 London area 6-7m passengers PA
 Southeast unable to cope before 2010

IATA Latest Figures LYDDE

IATA has just published figures for the first six months of 2004 which show:

An increase of 20.4% in international passenger traffic;
 and
 17% increase in cargo over 2003.

The Industry is Rebounding

Civil Aviation Market Segmentation LYDDE

General Aviation	- Private - Corporate
Commercial Passenger	- Schedule - Charter - Low cost - Intra-Regional
Commercial Cargo	- Break-bulk - Courier - Perishable

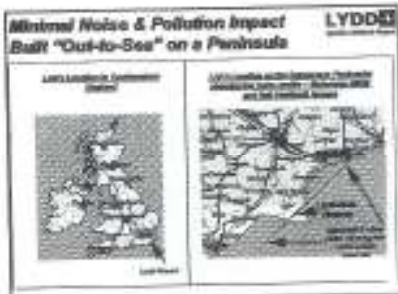
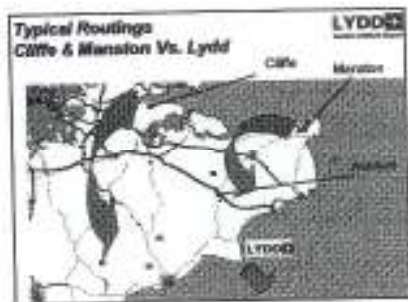
LYDDE

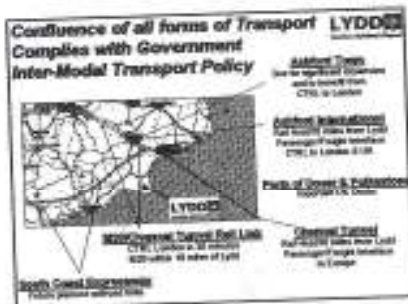
Government were advised in the late 1980's that the Southeast Airport system will reach saturation sometime between the years 2000 & 2010. Reports considered:

CAP 548 (CAA)
 CAP 570 (CAA)
 RUCATSE (DfT)

These are the three main authoritative documents produced in the last ten years.

The Future of Aviation & SERAS led to the White Paper looking 30 years ahead published Dec 2003 which included Lydd.





LYDD

Statement From Surface Access Study Completed for LAA in November 2002 By RPS Consultants

→ The existing transport infrastructure is sufficient to support the immediate growth of the airport to 2 million passengers a year subject to minor local improvements.

→ Additional improvements would be required in terms of network capacity and junction modifications to facilitate further expansion beyond this level. There are no major constraints in the area, which represent a barrier to the provision of these improvements.



LYDD

Lydd Airport - LAA's Based Airline

KEY DATAFACTS

- AOC issued April 2002
- First Charter Services May 2002
- Telexed official launch May 2002-2002
- Scheduled services started June 1st 2002
- First Freight Services June 2002
- First small carrier to go properly 'on line'

KEY STATISTICS

- 2002 total passengers carried 5,718, rev per passenger £24.73
- 2003 total pass 6,412, rev per passenger £24.94
- June 1st to Dec 31st 2002, 5,718 per, rev per passenger £24.72
- June 1st to Dec 31st 2003, 6,402 per, rev per passenger £24.91
- Direct comparison 2002 Vs. 2003
- 32% performance improvement