



Lydd Airport Action Group

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Preserving ♦ Protecting ♦ Defending ♦ Romney Marsh

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Terry Ellames
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Dear Terry

Planning Applications: Y06/1647/SH (new terminal to accommodate up to 500,000ppa) and Y06/1648/SH (runway extension - 294m extension plus 150m starter extension)

LAAG believes the planning applications - Y06/1647/SH and Y06/1648/SH should be rejected. Despite the inadequacy of the information provided in the Environmental Statements, we believe there is sufficient evidence to demonstrate that planning permission for both applications should be refused.

Our comments are set out below. We treat the application as one submission since a great deal of material is common to both applications (ie Y06/1647/SH and Y06/1648/SH) - when this is not the case, each planning application is specifically cited.

Before outlining the reasons for rejecting the planning application we would like to make the following points.

(A): LAAG believes, in the first instance, that Shepway District Council (SDC) should question the magnitude of the passenger numbers supporting the planning application and recommend that the planning application be resubmitted with an Environmental Impact Assessment based on passenger numbers up to 2million passengers per annum (2mppa). The following questions highlight why LAAG believes this is necessary.

- (a) Why has Lydd Airport submitted a planning application which is based on passenger numbers that are clearly well below the level required to achieve a breakeven level of profit?
- (b) Why has Lydd Airport changed the scope of its planning application from that set out in the revised Scoping Opinion published in December 2005 and the revised Parson Brinckerhoff's Scoping Report published in August 2005 which proposed a 294m extension and a 150m starter extensions to the existing runway, plus the construction of a new terminal in two phases - phase 1 for 500,000 passengers pa and phase 2 for 2million passengers pa. It was further proposed that there would be a detailed planning application for the

runway extensions and Phase 1 terminal and an outline application for phase 2 of the terminal building.

- (c) Why has Lydd Airport submitted a planning application based on no more than 500,000 passengers pa when it is clear from: (1) the text of the two individual planning applications (Y06/1647/SH and Y06/1648/SH) (2) the Airport's Master Plan, (3) the Airport's marketing material and (4) the Airport's website, that the true ambition is to grow passenger numbers to 2mppa by 2014/2015.
- (d) Why build a terminal which only increases capacity from 300,000 to 500,000pa, if it is intended to expand to 2mppa, only a few years thereafter.

In any event, it is LAAG's contention that the Airport's Master Plan qualifies as a "plan" under the Habitats Regulations and therefore should be considered in combination with the current planning application when determining the extent and scope of the Appropriate Assessment and **therefore the Appropriate Assessment should be based on the effects of 2 million passengers per annum and not 500,000 as currently proposed.**

(B) The planning application is riddled with errors. In some sections virtually every paragraph can be challenged.

(C) Crucial material has been omitted from the Environmental Impact Assessment (EIAs)/Environmental Statements (ESs) or has been poorly scoped so that the findings are inadequate.

In summary, LAAG believes the planning application should be rejected for the following reasons:

Safety

- (1) There are serious public safety issues associated with locating a regional airport close to a nuclear power complex. LAAG engaged the consulting engineers Large & Associates to examine the accidental crash damage risk associated with Lydd Airport's transition from a local to a regional airport. The consultant found for the expansion to 500,000 passengers per annum (ppa) that the overall risk of a commercial airliner accidentally crashing onto the Dungeness NPP site to be odds of 1 in 689,229 in each year. Should LAA expand to 2,000,000 ppa then the risk of aircraft crash increases to odds of 1 in 409,691 in each year. Both of these risk levels are substantially higher (ie more frequent) than the 1 in 10 million level of acceptable odds or risk of accidental aircraft crash imposed by the Nuclear Installations Inspectorate (NII) in order to maintain the nuclear safety case. In this respect, the risk generated by Lydd Airport would be unacceptable in terms of the potential radiological consequences to individual members of the public.
- (2) There are other safety issues associated with the airport's location: (a) Lydd Airport is the only civil passenger airport in the UK to have an Instrument Landing System (ILS) with a 5 degree offset. A 5 degree offset is the maximum offset allowed under international rules. This means pilots must

make a manual late stage correction to turn aircraft onto the centre line at 900metres from touchdown. This raises the risk of pilot error in the close vicinity of nuclear power stations and the highly active Lydd Military Ranges.

(b) The risk of bird strike is high as Lydd Airport is under one of the main migratory bird routes in the South of England.

Development Framework

- (3) The application does not comply with the *Aviation White Paper* as implementation would mean failure to make best use of existing runways in Kent and the effective promotion of a new regional airport in Kent over the existing better equipped Manston Airport (Kent International Airport). Further, Lydd Airport is only operating at 2.4% (~3000ppa) of its 125,000ppa potential in 2030 from its existing runway, as assessed by the government in the supporting evidence to the White Paper, yet the airport is proposing to extend its runway to cater for 500,000ppa. Lydd Airport is therefore failing to make best use of its existing runway. By contrast, the supporting documentation to the White Paper assessed Manston Airport to have potential up to 6mppa from its existing runway, reflecting its larger runway and relatively supportive infrastructure.
- (4) The application does not comply with the *Shepway Local Plan* and the *Kent and Medway Structure Plan*. Although these Plans support development this can only take place if certain stringent conditions are satisfied including demonstrating that development will not adversely affect designated sites and reduce the amenity of local communities. We believe it can be demonstrated that Lydd Airport's proposals will both directly and indirectly damage protected habitats and significantly reduce the quality of life of local residents.
- (5) The application does not comply with the emerging *South East Plan*. The *South East Plan* makes no reference to Lydd Airport as a regional airport, deeming it to be of local significance only. Policy EKA4 lists Manston Airport as the regional growth focus, supporting growth up to 6million passengers per annum.

Damage to Protected Habitats

- (6) The Appropriate Assessment for the *South East Plan* showed that it was not possible to conclude for all three European sites close to the airport - Dungeness Special Area of Conservation (SAC), Dungeness To Pett Level Special Protection Area (SPA) and proposed Dungeness to Pett Level Ramsar Site - that they will experience no adverse effect due to increased effluent discharge and increased water extraction associated with developments under the *South East Plan*, either alone or in combination with other plans or projects. In addition, it was not possible to prove for the SPA that pollution caused by roads would not have an adverse effect and similarly for recreational pressure for the Ramsar site. This analysis did not take into account the aspirations of Lydd Airport so that the increase in effluent

discharge, water extraction and road traffic caused by the airport as a result of passengers increasing from less than 3000pa to 500,000 pa will make it even more difficult to conclude that these habitats will experience no adverse effect. This added uncertainty is reason alone to reject this development.

In addition, the proposed expansion of Lydd Airport directly results in a physical reduction in the area of the SAC, at the end and along one side of the runway, due to the runway's extension and the creation of expanded runway safety strips. These changes will also reduce the area of the proposed Dungeness, Romney Marsh and Rye Bay SSSI which surrounds the runway.

Habitat loss, no matter how small, can be detrimental to the survival of some invertebrates since they require a rich mosaic of ground types for their survival. The need to extend the runway strip will result in the filling in of a large pond which was one of the main reasons for designating the SAC, due to the pond's population of great crested newts. The airport's own consultants acknowledge this pond's high nature conservation value for its invertebrates and recommended that the pond and environs are changed as little as possible.

Further, since the Dungeness area is noted for its diverse range of species associated with intrinsically nutrient poor shingle habitats - qualifying feature of the Dungeness SAC and Dungeness, Romney Marsh and Rye Bay SSSI - any artificial input of nitrogen causing eutrophication, particularly when existing nitrogen levels are at critical levels, will reduce the range of unique species present in the area.

Public Amenity

- (7) The noise contours shown in Figure 16.4 of Y06/1647/SH and Figures 16.3 and 16.4 of Y06/1648/SH are incorrect for the fleet mix assumed, and since the fleet mix assumed does not reflect the likely mix of aircraft that will use the airport, the noise contours give a highly misleading impression of the noise implications for local residents. The noise contours should be redrawn showing all passenger aircraft listed - B737, A319, BAE 146, Dash 8, ATR 42-500, SAAB 340 - turning RIGHT on take off as instructed by CAA's, CAP 032 - not LEFT. This will have particular consequences for the town of Lydd.

Employment

- (8) The airport has exaggerated the employment opportunities created by the development and has failed to take into account the impact the creation of a regional airport will have on: (a) employment in the leisure industry on Romney Marsh and surrounds, and (b) employment at the Dungeness nuclear power complex.

LAAG can demonstrate that a more realistic rule of thumb for direct employment at Lydd Airport is 300 jobs per million passenger throughput, compared to the 600 jobs per million estimate used by the airport.

LAAG estimates that the caravan/chalet parks on Romney Marsh employ 430 people including part time workers and that these jobs would be jeopardised if the airport is developed. Any diminution of this industry would lead to a considerable loss of spending power across Romney Marsh as thousands of

people stay in these parks each year. The creation of a regional airport at Lydd would also jeopardise the planning application for Dungeness C, leading to the loss of 600 full time, skilled jobs when the power station is fully operational and 1000 -1500 jobs over the long five to seven year construction phase.

Mitigation

- (9) Many of the proposals put forward lack substance, do not commit the Airport to specific actions within a time frame, and some are derisory - providing secondary glazing to Greatstone Primary School which is 600m from the end of the runway is clearly inadequate.

Recommendations

- (1) Shepway District Council should undertake an Appropriate Assessment (AA) based on 2mppa for the current planning application. Although the ES of this planning application is based on passenger numbers up to 500,000ppa, the Master Plan qualifies as a “plan” under the Habitats Regulations and refers to growth in passenger numbers to 2mppa by 2015 **(Summary, 6.0)**.
- (2) The planning application should be re-submitted based on the plans outlined in the Scoping Opinion, with the outline planning application for phase 2 of the terminal supported by an EIA based on 2mppa **(1.0)**.
- (3) The airport should base all comparisons on the exiting conditions scenario – not the future assessment conditions scenario, and provide a “do nothing scenario” **(1.0)**.
- (4) Lydd Airport should provide its own analysis as to why passenger numbers have been consistently lower than 5000 ppa for the last 10 years and why it needs to extend the runway when it is still only operating today at less than 1% of its current terminal capacity of 300,000ppa and less than 2.5% of the Aviation White Paper’s assessment of its likely projected operating capacity of 125,000 in 2030 **(1.0 & 5.0)**.
- (5) Provide accurate information about the airport today, including accurate information about passenger numbers, aircraft movements, the location of nuclear power stations in relation to the airport, the nature of restricted flight zones and an analysis of the types of aircraft that can operate from the existing runway and why they have not done so **(2.0)**.
- (6) Provide detailed flight path information **(2.0 & 3.0)**.
- (7) Provide an accurate description of the proposed development **(3.0)**.
- (8) Provide a more realistic assessment of the fleet mix likely to use the airport after runway extension **(3.0)**.
- (9) Provide an assessment of the seasonality of the business **(3.0)**.
- (10) Provide an analysis of the wind characteristics of the area and how this will affect the operating efficiency of the airport. Adverse weather conditions and the physical limitations of the airport will necessitate diversions in bad weather. It is essential to understand what proportion of flights will be diverted as this highlights an operational deficiency of this airport which needs to be understood in the light of the debate about Lydd versus Manston airports and the need to expand airport capacity generally **(3.0)**.
- (11) Provide an analysis of how increased operations at Lydd will fit into en route airspace - i.e. how traffic integrates with that from other airports **(3.0)**;
- (12) Provide an analysis of how Lydd Airport’s new facilities, flight infrastructure and use of runways compares with other regional airports **(3.0)**
- (13) Indicate the new location of the ILS aerals after the runway has been extended and location of an on-site sewage treatment plant if needed **(6.0)**.

- (14) Do a comprehensive invertebrate survey covering a wide range of habitats over at least the area of the airport, but preferably a wider area. In order to capture all species, surveying should be carried out in mid May, early and late June, early July and early to mid September. A separate moth survey should also be conducted - four surveys starting in late April/early May, continuing in early June, followed by late June and mid to end September **(7.0 & Appendix 7)**;
- (15) Survey a wider area of ponds and ditches for medicinal leech **(7.0 & Appendix 7)**.
- (16) Reassess mitigation strategies for invertebrates. Mitigation for the brown carder bee and the medicinal leech are priorities **(7.0 & Appendix 7)**.
- (17) Provide a comprehensive assessment of all the conservation aspects associated with the in-filling of the pond beside the runway **(7.0 & Appendix 7)**.
- (18) Undertake radar based migratory bird studies as this is the only definitive way in which to gauge the scale of bird migration at Dungeness **(8.0)**.
- (19) Do a comprehensive study of the behavioural characteristics of migratory birds in the Dungeness area **(8.0)**;
- (20) Analyse the impact of changing aircraft types on bird strike rates as aircraft speed significantly increases the risk of bird strike, and jet aircraft are more vulnerable to damage **(8.0)**.
- (21) Provide an assessment of the safety consequences of bird strikes **(8.0)**.
- (22) Provide an analysis of the likely breakdown of direct employment on site to justify the employment “rule of thumb” of 600 jobs per million passengers per annum throughput, and the prorated figure of 300 people per 500,000ppa and 180 people per 300,000ppa **(11.0)**.
- (23) Provide a complete reassessment of the noise contours which are incorrect since the flight paths of the aircraft making up the fleet mix assumed are incorrect. The noise contours should be redrawn and based on all passenger aircraft listed - B737, A319, BAE 146, Dash 8, ATR 42-500, SAAB 340 – using the ILS and turning right on take off, NOT LEFT **(12.0)**.
- (24) Re-examine pollution profile maps in the light of the comments about the aircraft flight paths in (23) above, **(12.0)**.
- (25) Provide NDB approach noise contours **(12.0)**
- (26) Include a new nuclear power station at Dungeness when assessing cumulative impacts **(13.0)**.