



# Lydd Airport Action Group

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♦ Protecting ♦ Defending ♦ Romney Marsh

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Shepway District Council  
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Dear Terry

**Supplementary Information - 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. The supplementary information does not change our view and we stand by the comments made in our original response.

The supplementary Environmental Information (SEI) only includes a proportion of the additional information requested by LAAG in April 2007 and a high proportion of the key fundamental information that is provided in the SEI is either incorrect or inadequate.

The main points are summarised below:

## **Incorrect Flight Paths, Baseline Scenarios and Implications**

- (1) Most of the flight path information is incorrect.
- (2) The baseline current conditions scenario for the Airport is incorrect. The current number of aircraft movements has been inflated, and regular, commercial service use of the airport is claimed, by aircraft types which rarely, if ever, use the airport.
- (3) The incorrect flight paths combined with the inflated “current conditions” scenario invalidates all the noise contour maps presented in the SEI and the analysis of the impact of aircraft noise on bird species of conservation interest. This incorrect information also casts doubt on the validity of the air quality analysis, the analysis of the predicted impacts of bird hazard control programmes on bird species of conservation interest, the analysis of the negative impacts of the airports development on tourism and the quality of the information used in the Appropriate Assessment

## **Flight Paths, Modal Split and Other Operational Issues**

(4) Assumptions about the proportionate use of each runway, ie the modal split, are not backed by wind frequency data and do not appear to take account of airspace and operational constraints in runway usage caused by the airports proximity to the Lydd and Hythe Military Ranges and the Dungeness Nuclear Power Stations.

(5) Assumed flight paths for departures from Lydd Airport are based on an incorrect account of the orientation of en route airways.

(6) There are no provisions for missed approach manoeuvres in the flight path assumptions or noise assessments.

(7) No account is given of how retaining the Instrument Landing System (ILS) aerials in their current location will impact on the feasibility and regularity of commercial air operations into Lydd.

(8) LAA assumes that some proportion of inbound and outbound flight paths will fly through the Lydd Range airspace, but no figures are provided on how many flights will be permitted to do this.

(9) No explanation is given as to how Boeing 737/A319 services will be maintained when the aircraft are incapable of landing on runway 03 ie coming from over the Lydd Range.

(10) The SEI and ES wrongly assume that airliners up to BAe146 size will approach visually, not using the ILS; will be capable of landing on runway 03; and will be capable of turning left on departure from runway 21 (towards Lydd) without infringing the Dungeness nuclear power station restricted area.

(11) Height assumptions used in the Boeing 737 flight trial noise assessment are invalid

## **Comparisons with Other Airports and Socio Economic Issues**

(12) The attempt to compare Lydd Airport with Bournemouth Airport to give the development proposal credence is misleading. Bournemouth Airport is backed by the Aviation White Paper, is within a heavily populated area, has good road infrastructure, an ILS on both runways, radar and unrestricted airspace - unlike Lydd Airport that has none of these features, and is never likely to have them, given its location.

(13) The analysis of the additional visitors to the Kent/Romney Marsh area as a result of the expanded Lydd Airport is incorrect since the metrics which are based on those for Bristol Airport have not been correctly applied. When this analysis is undertaken correctly it proves the point made in LAAG's original submission that foreign inbound visitors will be minimal.

(14) LAAG estimates that passenger levels of 500,000ppa (250,000ppa inbound) will yield less than 1000 inbound foreign visitors to Kent annually and less than 200 to

Romney Marsh. The revenue yielded by the visitors to Romney Marsh will not be sufficient to support one full time equivalent job on Romney Marsh. Most of the inbound passengers to Lydd Airport are likely to be returning British nationals, and of the few foreign inbound tourists, only a small proportion will remain in the immediate vicinity of the airport.

(15) The assessment of the potentially negative impacts of the airport's expansion on tourism fails to take into account the correct flight paths and modal split, the total number of movements per day including light aircraft, the likely seasonality of the business and the fact that people's behaviour is driven by expectations – an individual will make a decision to (say) buy or sell a caravan in advance of the point at which the noise/air pollution/urbanisation becomes intolerable.

(16) Lydd Airport and Manston Airport will compete for airline customers and for capital to grow their businesses.

## **Invertebrate Survey**

(17) The invertebrate survey was far too restricted in area, habitats and species groups. The survey was only conducted for aquatic invertebrates and for Medicinal leech in drainage ditches on the footprint of the proposed runway extension and for terrestrial invertebrates on a transect on part of the proposed runway extension.

(18) A large proportion of the material surveyed has not been identified.

(19) No moth survey was conducted. This is vital as many rare moth species are known from the area affected by the development, including one species only known from Dungeness.

(20) There has been no attempt to specifically examine the impact of pollutants, including nitrogen on flora and hence the impact on the invertebrates dependent on these plants.

(21) The mitigation measures suggested for invertebrates remain inadequate, and ignore earlier proposals. There are no concrete measures for mitigation that commit the developers to specific actions within a timescale.

(22) No evidence of consultation between all land-owners and statutory bodies to agree the sympathetic management of invertebrates in interconnected ditches.

## RECOMMENDATIONS

Shepway District Council should either:

- (1) Reject the planning Application outright on the basis of Lydd Airport's persistent reluctance to provide factual information on which to make the determination, or**
- (2) Recommend that Lydd Airport provide the following information before proceeding with a normal determination of the planning application.**

- (1) Re-submit the planning application 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.
- (2) Provide a "do nothing scenario".
- (3) Provide accurate, comprehensive flight path information for both commercial and light aircraft.
- (4) Provide an analysis of the wind characteristics of the area, and how the operation of the Military Ranges will affect the modal split of runway usage.
- (5) Provide accurate baseline information about the airport today, including accurate statistics for aircraft movements, the nature of the current aircraft mix, and the location and description of restricted flight zones over and around the Dungeness nuclear power stations and the Lydd and Hythe Military Ranges.
- (6) Reassess all information dependent on flight paths and the correct baselines - noise contours, the impact of noise on birds of conservation interest, bird hazard control, socio economic impacts, light and air pollutant analyses and the impact of light and air pollution on invertebrates.
- (7) 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. This is essential for the understanding of flight paths for commercial passenger carrying aircraft.
- (8) Provide an environmental assessment of the impact of the removal and re-installation of the ILS aerials, or if it is intended for the aerials to remain in the current location, outline how the airport intends to fully utilise the extended runway without breaching International Civil Aviation Organisation (ICAO) and CAA guidelines.

- (9) Assess the impact of the seasonality of the business on pollutants at the receptors.
- (10) Provide an 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.
- (11) Provide an analysis of how Lydd Airport's new facilities, flight infrastructure and use of runways compares with other regional airports.
- (12) Undertaken a radar based migratory bird studies as this is the only definitive way in which to gauge the scale of bird migration at Dungeness.
- (13) Undertake a comprehensive aquatic and terrestrial invertebrate survey covering a wide range of habitats over at least the area of the airport, but preferably a wider area. Habitats includes vegetated shingle, wetlands, dry grassland, ephemeral vegetation, scrub, swamp, margins of standing water, marshy grassland, semi-improved and unimproved, but managed grassland and bare shingle. All historic data must be taken into account and at least four visits during the season made, starting in mid May and using all the trapping methods already employed
- (14) Undertake a separate moth survey - a minimum of four moth trapping sessions during the season.
- (15) Survey for medicinal leeches in all ditches on site or connected with them and all other water bodies.
- (16) Assess the impact of light pollution on invertebrates and changes in flora due to increased nitrogen inputs since vegetation changes will adversely affect rare invertebrates in the area.
- (17) Ensure adequate mitigation proposals are in place, that the Airport commits to these, and that provision is made for monitoring in the future to assess the efficacy of the mitigation undertaken.
- (18) Include the impact of a new nuclear power station at Dungeness and the impact of proposed new housing in the Romney Marsh vicinity - particularly the Ashford growth area - when assessing cumulative impacts for the Appropriate Assessment.