

Matter 6: Lydd Airport: Statement of Common Ground – London Ashford Airport and Folkestone & Hythe District Council

I would like to make the following points with regard to the soundness of Policy SS1 as it relates to London Ashford Airport (Lydd Airport) and the agreed Statement of Common Ground between the above parties.

- (1) It is unreasonable for Lydd Airport to seek alleged clarity over a policy without other parties having the opportunity to comment on the validity of the changes put forward and similarly make policy proposals.
- (2) The wording of Policy SS1 as it relates to Lydd Airport is irrational as it refers to an Area Action Plan (AAP) which denotes the need for a new framework for the Lydd Airport Area – one which has already been provided by the planning permissions granted in April 2013.

Expanding on these points:

- a) Thomson Reuters practical law guide defines the function of an AAP: *An AAP provides specific planning policy and guidance for a particular location or an area of significant change, for example a major regeneration area.* The Planning Portal defines an APP as: *A type of Development Plan Document focused upon a specific location or an area subject to conservation or significant change (for example major regeneration).* While a number of Councils define them as: *a set out area-specific visions, planning policies and masterplans for key regeneration areas.*
- b) A framework has been established to provide a future vision of the Lydd Airport site through the planning permissions granted in April 2013 for a runway extension and a new terminal to accommodate a throughput of 500,000 passengers per annum. This will take the airport from a small local airport catering mainly for light aircraft to a regional airport capable of supporting large passenger jets. In addition to this permitted development rights give the airport the opportunity to develop ancillary businesses should they choose or the demand dictates.
- c) This application took almost a decade of plan making supported by vast amounts of expert evidence from many parties. Thus the plan making and evidence base for this site was extremely comprehensive and culminated in the framework set out in the planning approvals granted by the Secretary of State (SOS) in April 2013. As such there is no necessity for an AAP.
- d) The scope of the development defined by the permissions granted went to the outer reaches of environmental and nuclear safety tolerances – indeed, many parties would argue went well beyond accepted thresholds. This precludes material development on the Lydd Airport site in addition to that permitted by those permissions.
- e) In terms of progress, planning permission was granted in April 2013, the High Court judgments were handed down in May 2014 and most of the environmental work was completed by the end of 2015. During 2016 Lydd Airport's runway extension was

implemented from a planning perspective, but has not been extended physically. In addition, in 2016 the number of permitted helicopter movements was quietly changed to allow Bristow Helicopters Ltd search and rescue (SAR) operation to operate from Lydd Airport after Manston Airport's closure.

- f) It is now the end of 2020. The planning permission has not been enacted for the simple reason there was never a commercial case for the airport. The airport's non standard flight procedures caused by the scale of restricted airspace in its immediate vicinity, plus its remote location, renders it unattractive to operators.
- g) The prevarications over Mr Thomson's land re the runway extension is nothing more than a face saving excuse for the lack of progress. If the demand were there, the land would be acquired with or without a Compulsory Purchase Order. The Covid situation has accentuated the poor viability of the airport and if the press articles are true that a railway link is planned from Gatwick to Ashford this will further neuter its financial prospects.
- h) Further evidence of the lack of interest in Lydd Airport's services can be gleaned from its hosting of an annual pop concert rave¹.

Conclusion

- i) An AAP is only relevant and justified for the **redevelopment** of all or part of the Lydd Airport site.
- j) In the interests of clarity and soundness Policy SS1 should be changed as follows:

*The strategic growth of New Romney is also supported through Policy CSD8 to allow the market town to fulfil its potential to sustainably provide for the bulk of the housing, community infrastructure and commercial needs of the Romney Marsh Area. Development will also be planned at other identified settlements in line with the Settlement Hierarchy sufficient to ensure the achievement of growth requirements. In particular, development that helps to maintain and support the local role of the market town of Lydd can meet priority needs. Should development proposals come forward for the **redevelopment of the whole or part of the London Ashford Airport site at Lydd**, the council will work with the airport, local community and other stakeholders to prepare and adopt an Area Action Plan for the site. The Council will support small-scale operational development integral to, and required to maintain, the airport use, subject to being satisfied that there would be no impact on the integrity of nearby nationally and internationally designated sites of biodiversity value."*

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¹ <https://www.kentonline.co.uk/romney-marsh/news/more-acts-revealed-for-airport-rave-207966/>