

EB 13.96

Core Strategy Review - Statement of Common Ground

London Ashford Airport and Folkestone &
Hythe District Council

December 2020



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Statement of Common Ground between London Ashford Airport and Folkestone & Hythe District Council

1. This statement has been agreed by London Ashford Airport (LAA) and Folkestone & Hythe District Council (F&HDC) to address LAA's representations regarding policy for the airport, particularly Core Strategy Review Policy SS1: District Spatial Strategy.
2. Representations submitted by LAA at the Regulation 18 stage of the Core Strategy Review highlighted LAA's ambitions for future development at the airport.
3. F&HDC amended Policy SS1 in the Regulation 19 version of the Core Strategy Review to address LAA's representations. Wording was added to the sixth paragraph of the policy to state:

"Should development proposals come forward for the further expansion of London Ashford Airport 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."
4. It is F&HDC's view that, should major development proposals come forward for the airport beyond the current planning permission, then - given the location of the site adjacent to European-designated sites - development should be guided by an Area Action Plan to allow for the proper consideration of the proposals. The inclusion of this wording in Policy SS1 was intended to facilitate this.
5. LAA's concerns about this wording are set out in its comments to the consultation on the Regulation 19 Core Strategy Review (representor number 588507) and in its Hearing Statements on Main Matters 4, 6 and 10 (WSP on behalf of LAA).
6. LAA is concerned that, as currently drafted, Policy SS1 is unclear as to how the process of preparing an Area Action Plan will work and how F&HDC will

London Ashford Airport and Folkestone & Hythe District Council

approach any planning application for minor development that may be submitted by LAA before the Area Action Plan is adopted.

7. Further discussions have taken place between LAA and F&HDC to try to resolve these issues following the submission of LAA's Hearing Statements. Correspondence between LAA and F&HDC is appended to this joint statement (see Appendices 1 and 2).
8. F&HDC has proposed a further modification to Policy SS1 to address LAA's concerns and clarify the position regarding minor developments. It is proposed that the sixth paragraph of Policy SS1 be amended as follows:

Policy SS1: District Spatial Strategy [proposed new text underlined]

"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 further expansion of London Ashford Airport 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."

9. LAA supports this proposed modification to Policy SS1.
10. Accordingly we recommend this modification to the Inspectors undertaking the examination and ask that it be considered for inclusion as part of the Main Modifications to the Core Strategy Review.

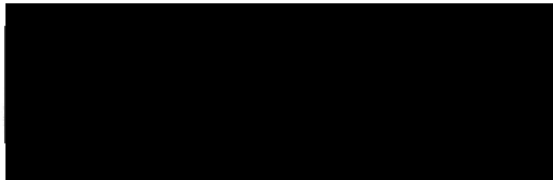
London Ashford Airport and Folkestone & Hythe District Council



Sean McGrath

On behalf of London Ashford Airport

X December 2020



Adrian Tofts, Strategy, Policy & Performance Lead Specialist

Folkestone & Hythe District Council

15 December 2020

London Ashford Airport and Folkestone & Hythe District Council

Appendix 1: Letter from the Leader, Folkestone & Hythe District Council to the Accountable Manager, London Ashford Airport (29 October 2020)

Appendix 2: Letter from the Leader, Folkestone & Hythe District Council to the Accountable Manager, London Ashford Airport (4 November 2020)

Our Ref: [REDACTED]
Tel: [REDACTED]
Email: [REDACTED]
Date: 29th October, 2020



By Email & Letter

[REDACTED]
Finance & Operations
FAL Aviation Ltd & Associated Companies
Accountable Manager
London Ashford (Lydd) Airport
Lydd
Romney Marsh
Kent TN29 9QL

Dear [REDACTED]

Development proposals for London Ashford Airport

It was good to meet with you yesterday to hear about your aspirations for London Ashford Airport (LAA) at Lydd. The council would like to work with you to achieve your vision for the airport, and bring additional investment and jobs to the area.

As you are aware, the area is extremely sensitive environmentally, with internationally protected habitats and other nationally and locally protected sites. It is also relatively remote, with limited transport connections and other infrastructure.

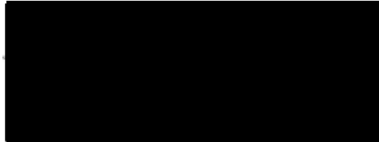
It remains our position that, if LAA are planning major development or expansion at the airport, then the best way to deliver this would be through an Area Action Plan (AAP) which would be a development plan document once adopted following due process. The benefit of this approach would be that it would address environmental and other considerations at the outset, would be the subject of public consultation and would enable us to engage with the statutory bodies, such as Natural England, and other stakeholders from the beginning. Should upgrades to local infrastructure be needed, then these could be linked to the completion of the different phases of the expansion through the AAP.


Such an approach would bring greater clarity and certainty to the decision-making processes that would be engaged through an application or applications for planning permission, as the principles of the development will have been established through the AAP process. We don't believe that this would delay your plans, as work on the AAP could commence in parallel with LAA developing its proposals (with appropriate public and stakeholder engagement).



At present we do not know enough about the nature and scope of your proposals to make a plan-level assessment of their potential impacts. However, we hope that you will be able to work with us, and we would welcome your cooperation through removing your objections to the Core Strategy Review.

Yours sincerely




Leader, Folkestone & Hythe District Council

██████████
Finance & Operations
FAL Aviation Ltd & Associated Companies
Accountable Manager
London Ashford (Lydd) Airport
Lydd
Romney Marsh
Kent TN29 9QL



Date: 4 November 2020

Dear ██████████

Development proposals for London Ashford Airport (LAA)

Thank you for your email of yesterday.

Determination of planning applications

You ask about how a planning application would be determined at present. The Council can and have a duty to determine planning applications whether or not there is an adopted policy for a site. Currently we would have to determine any application submitted based upon national planning policy and the general development management policies in the Council's adopted development plan, which includes the 2013 Core Strategy and 2020 Places and Policies Local Plan.

There is no 'cut off' point in terms of the size of the application above which a specific policy is needed, but if your proposals for the airport are ambitious and look to the long-term, an Area Action Plan (AAP) would offer clear parameters for you to develop your plans and for consultees to assess your proposal against. Any application coming forward on the site will be the subject of some complex planning issues such as environmental impacts, the effect on nearby communities, the need to improve infrastructure etc and in the absence of a detailed policy framework detailing how these could successfully be addressed, it would be more difficult for the Council to progress the application quickly. It would also be subject to early consultation and public engagement ensuring any local concerns could be addressed at the earliest opportunity.



Area Action Plan

Looking at other examples, we believe that an Area Action Plan (AAP) could be prepared within a period of about two years, if no major constraints are identified by stakeholders during the process. The final stage of the process would be determined by the Planning Inspectorate and the timetable would be in the hands of the planning Inspector examining the plan.

If drafting of an AAP were to begin next year, after the close of the Core Strategy Review examination, an indicative timetable could be:

- February to May 2021 – LAA develops its vision and proposals for the airport and shares this with the Council; the Council prepares supporting evidence and engages with key stakeholders; the Council drafts the plan for consultation;
- June 2021 – the Council takes the draft plan to Cabinet for approval for public consultation;
- July to August 2021 – public consultation with the local community, businesses and key stakeholders;
- September to November 2021 – the Council assesses the consultation comments; further discussions between the Council, LAA and key stakeholders; the Council amends the plan following consultation comments;
- December 2021 – the Council takes the amended plan back to Cabinet for approval for the final consultation stage;
- January to February 2022 – public consultation on Submission draft plan;
- March to May 2022 – the Council collates consultation comments and evidence and submits the plan to the Planning Inspectorate for examination;
- July 2022 – public examination is held by an independent planning Inspector;
- November-December 2022 – receipt of Inspector's report into the plan;
- January-February 2023 – adoption of the plan by the Council.

As I said earlier, we believe that developing an Area Action Plan (AAP) would be the best approach for the expansion of the airport. This would enable you to address important environmental and other considerations at the outset and for you to address any concerns early in the process that are raised as a result of early public consultation. It would also enable us to engage with the statutory bodies, such as Natural England, and other stakeholders from the beginning.

We do not believe that this would delay your plans, as work on the AAP could commence in parallel with LAA developing its proposals (with appropriate public and stakeholder engagement).

I look forward to meeting you tomorrow. I hope that you will be able to work with us, and I would welcome your cooperation through removing your objections to the Core Strategy Review.

Yours sincerely

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Leader, Folkestone & Hythe District Council