Dear Inspector Hetherington,

In re: Decision APP/L2250/V/10/2131934 & 2131936, dated 10 April 2013 – Lydd Airport, Romney Marsh, Kent.

Here is the response of the Shepway Environment and Community Network (SECN) to the effect on the Shepway District Core Strategy of the decision by the Secretaries of State to uphold approval of development to extend and expand Lydd Airport.

Introduction

Following our participation in the Inquiry hearings before and after Christmas last we continue to have difficulty understanding many of your rules of engagement applying to comment on issues arising from the Core Strategy process.

Accordingly our central concerns are presented from first principles in the hope that you will find them applicable to your assessment of the effect of the Lydd decision and we hope to have avoided any charge of ‘friendly fire’.

Background

We know that you will be familiar with and apologise for repeating the quote that follows, but despite several decades of disappointment we persist in maintaining our policy of hope over experience and so restate the principle enshrined in section 4 of the Local Government Act 2002 and promulgated in the Sustainable Community Strategy 2007 viz: ‘..the principles [enshrined in a Core Strategy] should be in accordance with the Community Strategy for promoting or improving the economic, social and environmental well-being of their areas, and contributing to the achievement of sustainable development in the UK.’
Notwithstanding Government policy enunciated in the National Planning Policy Framework (NPPF) giving precedence to ‘sustainable development’ over and above social and environmental considerations, we maintain the policy central to our (SECN) constitution that the social and environmental well-being of communities areas outweigh the expectation of ‘economic improvement.’

We start from the premiss that the essential purpose of the time and effort being expended by all concerned with the Core Strategy is to arrive at a plan which provides and secures a good future quality of life and standard of well-being for those of us that live in the District of Shepway. Our comments and arguments have that central goal in mind.

The mere suggestion of airliner flight expansion makes a mockery of government concern about air pollution, rising global ambient temperature and the costly enforcement on tax payers of the very doubtful benefit of wind farms and other visible short term expedients aimed at reducing emissions from energy generation and encouraging the electorate to believe that our Government is taking meaningful action.

In any event the recent acknowledgement that global CO2 levels have exceeded 400ppm for the first time in man’s history should itself be enough to alert, yet again, everyone involved in setting and applying constraints on infrastructure development in all its forms.

**Main Issues**

**1. Road and rail transport**

There being no prospect of uprating, essentially dualling, the rail service between Ashford International and Lydd in the foreseeable future due to major financial and practical engineering constraints in addition to vital environmental and social sensitivities, the ensuing need greatly to increase the capacity of the road network on Romney Marsh would impact most adversely on its’ established village and farming communities and the unique landscape, natural environment and ambience as well as affecting the unsatisfactorily defined ‘Strategic Corridor’, including Hythe town, discussed at length during the Core Strategy Inquiry.

Those discussions were conducted without notable reference, if any at all, to the implications for Romney Marsh arising from the level of increased
transport provision required in the event the proposed expansion of Lydd Airport proceeds.

At the end of the Inquiry hearings in March last, together with undiscussed road transport issues there remained a number of unresolved development site allocations on Romney Marsh each of which would require yet more road transport provision.

Whilst we understand your reason for being unable to include as a live issue discussion of the major transport implications arising from the increasingly moribund development at Nickolls Quarry, the inescapable fact remains that the combined overall impact on communities and their environment, the total effect of road transport provision on the Marsh, has to include the Quarry and such as those proposed at Botolph’s Bridge and others in the pipeline at New Romney together with proposed development at Lympne Airfield and Newingreen. None of these are seen as having a connection, but taken together would be extremely damaging to both the environmental and social wellbeing of most if not all communities on the Marsh and its environs.

We consider the scenario characterised above to be innately unsustainable.

It is a fact generally acknowledged that communities fail to be made properly aware of the practical effect on the ground of development decisions. There is a gulf of misunderstanding that lies between the perception of advantages of convenience such as arise in the short term from new roads and more houses and the actual effect in the event. That being the case we believe it essential that provision is made for effective public consultation of the Marsh communities and discussion of local authority and Dept. of Transport plans arising from the Lydd decision.

**Environmental sustainability**

Having re-familiarised ourselves with the evidence presented during the discussion and debate that took place during the very protracted Full Shepway Council meeting on the evening and night of the 3rd and 4th of March 2010, we maintain our opinion that the proposed expansion of Lydd Airport would have a serious and longterm damaging impact on the natural environment and wildlife that numerous national and international protective designations are intended to prevent, notwithstanding acceptance by Council
Members of ameliorative measures proposed as a compromise and which continue to be the subject of objection by the RSPB and DEFRA.

**Source:** A verbatim transcription of the following relevant passages is recorded at pages 22 to 27 and last para of 136 and then 137 on of RSPB Webcast 12/03/10 – uktranscription.com – Typist ID: TB16.

We say that such a position is inconsistent with the requirement set out in ‘Sustainable Community 2007 and cited in para. 1 under ‘Backgound’ on page 1 of this submission.

**Social impact**

We cite the evidence of Paul Black representing Greatstone Primary School who referred to the effect of the test flight of the Boeing 737 on 24th Feb. 2007 used by the Airport owners to demonstrate the direct physical effect when the communities in the flight path were overflown.

We draw your attention to pages 46 and 47 of the RSPB Transcript where he describes the difficulty in continuing uninterrupted lessons when large aircraft pass overhead and ask you to consider the implication arising from the last para. of page 46.

**Safety**

We believe there remains an unacceptable risk of aircraft crashing into the nuclear power station despite the ONR and CAA’s relaxed attitude which is not accepted by people living in its vicinity and many others who do not.

This last issue is currently subject to review by the European Commission and it is our contention that it fails to comply with the requirement for social and environmental wellbeing as set out in the 2007 Sustainable Community Strategy.

David Plumstead
Shepweay Environment and Community Network