



Dear Sir

Discussion Paper 02:

Aviation Connectivity and the Economy

Response from Friends of the North Kent Marshes 17 April 2013

Friends of the North Kent Marshes is a voluntary group, formed in 2004 out of the No Airport at Cliffe Campaign Liaison Group, following the successful fight against the proposals for an airport at Cliffe. The North Kent Marshes stretch from Dartford in the west to Whitstable in the east and include the Hoo Peninsula, the River Thames, the River Medway, the Swale and Isle of Sheppey. They are some of the most unspoilt landscapes in Kent and are very rich in wildlife. Our aim is to promote the Marshes and the ways in which everyone can enjoy them. We work both with the local communities that live on and around the Marshes, and with groups such as the RSPB as they develop flagship visitor sites here. The area faces many threats as pressure for land and development in the southeast continues. We welcome the opportunity to make our voices heard in this important debate by taking part in this consultation on Aviation Connectivity and the Economy.

Summary

We are wholly opposed to the construction of an airport anywhere in the Thames Estuary because of the immense damage it would cause to the area's internationally important wildlife and the wider environment. The whole issue was exhaustively investigated in the run up to the publication of the previous Government's Aviation White Paper (2003). All the key players, including the aviation industry, contributed, and the idea of an airport in the Thames Estuary was ruled out. In addition to the unprecedented environmental damage and the resulting legal implications, the investigation found that an estuary airport did not make economic sense, would not meet the requirements of the aviation industry and presented a significantly higher (up to 12 times greater) risk of 'bird strike' than at any other major airport in the UK. It would potentially be the single biggest piece of environmental vandalism ever perpetrated in the UK. The Government would have to recreate any lost or damaged habitat elsewhere BEFORE work on the airport could start and even then only if they could prove there is no alternative site for the expansion and it is in the overriding public interest. They would face a legal battle, which could last for years. Recent statements and proposals

by London Mayor Boris Johnson, Norman Foster and others in favour of an estuary airport, do nothing to alter these findings. The threats and risks remain the same. An airport in the Thames Estuary is unrealistic due to the ecological, environmental and economic impacts it would cause. An estuary airport would destroy whole communities and adversely impact many others on both sides of the Thames estuary.

Connectivity and the economy

The Commission recognises that: *'The UK aviation market appears to offer a high level of connectivity, enabling people and businesses to travel efficiently and link effectively to a wide range of markets.'*

And that: *'Together [London's] five major airports serve more destinations than the airports of any other European city – over 360 destinations with at least a weekly service.'*

For example Heathrow has 990 departure flights each week to the world's key business centres. That is more than its two closest rivals, Charles de Gaulle (484) and Frankfurt (450) combined.

We welcome these statements from the Commission because the hyperbole surrounding aviation connectivity from the aviation industry and estuary airport proponents over the past few years has been most unhelpful, particularly when they promote the annihilation of whole communities and globally important wildlife sites.

The International Air Connectivity for Business report found that:

Heathrow is 'in a class of its own' as far as its inter-connectivity to the key business centres of the world is concerned, with more flights to these business destinations than any other airport in Europe – in fact, more than the combined total of its two nearest rivals, Charles de Gaulle and Frankfurt.

London as a whole has a greater number of total flights to the world's main business destinations than the other cities surveyed, though it serves slightly fewer total destinations (including leisure) than Paris. Many more passengers in total, though, use London's airports – around 130 million in 2010 compared with less than 90 million at Paris's airports (Airport Council International). Those who say that London and specifically Heathrow are losing out to European airports and that this will harm the British economy are therefore misinformed. Our connectivity to business destinations, key to economic growth, is still unrivalled.

London has the highest number of flights to the key markets in Asia, the Middle East, North America and Australasia; this is largely because Heathrow has a much wider spread of destinations outside Europe than its European rivals.

Heathrow has a lower percentage of intra-European flights than the other hub airports, reflecting the lower number of interchange passengers using it. But this doesn't materially affect the UK economy, given Heathrow's worldwide connections to business destinations are significantly better than those of the other European hub airports.

The largest number of flights from the European 'hubs' is to destinations within Europe, reflecting the huge amount of short-distance, intra-European flying that is taking place. This means that the key question is not lack of capacity at Europe's airports but how that capacity is used. The high percentage of intra-European flights suggests significant potential for modal shift from plane to train, particularly given Europe's growing high-speed rail network. The demand for air travel to short-haul destinations would decrease. This could potentially free capacity to business destinations whilst reducing overall demand for air travel.

Please see full report here:

http://www.aef.org.uk/downloads/Business_Connectivity_Report_August2011.pdf

Indeed UK aviation is at the forefront of global competitiveness. London is the best connected city in the world and the UK already has plenty of capacity to remain competitive in future. Further expansion in the South East is both unnecessary, expensive, and incompatible with our climate targets.

The Government must bring forward a sustainable framework for transport and aviation with climate change at its heart.

The WWF Briefing on Aviation Competitiveness stated:

UK aviation is at the forefront of global competitiveness. London is the best connected city in the world and the UK already has plenty of capacity to remain competitive in future. Further expansion in the South East is both unnecessary and inadvisable.

London airports are not 'losing out' to other European hubs. Surveys show that Heathrow remains the world's leading international airport with greater connectivity to both existing and emerging markets than its competitors.

UK does not need more runways or terminals. WWF/AEF research shows there is already ample capacity for substantial increases in both passengers and ATMs within the South East and nationally to 2050.

Businesses are divided about airport expansion. Progressive, competitive companies are making greater use of rail and video conferencing and flying less. Business flights have been declining year on year.

Aviation is one of the fastest growing sources of carbon emissions globally. The Committee on Climate Change is unequivocal that an unconstrained expansion scenario is incompatible with meeting our legally binding climate targets.

WWF-UK believes the UK should make better use of existing capacity whilst developing an integrated transport policy within environmental limits that addresses the whole system and the interconnections between different modes of transport.

Please see full briefing here:

http://assets.wwf.org.uk/downloads/wwf_briefing_aviation_competitiveness_debate_july_2012_final.pdf

In their written evidence to the House of Commons Transport Select Committee WWF stated that:

WWF/AEF analysis of UK airport capacity [2] shows that there is ample capacity, even in the South East, to accommodate aviation growth to 2050 within these recommended limits.

Please see link to WWF evidence to Transport Select Committee:

<http://www.publications.parliament.uk/pa/cm201213/cmselect/cmtran/writev/aviation/m69.htm>

We do not support aviation expansion be it anywhere in the Thames Estuary, Lydd or elsewhere. Climate change remains the greatest threat to mankind and biodiversity and we believe that there should be no further airport expansion. The construction of a massive new airport in the Thames Estuary will have impacts that extend far outside the immediate area. Emissions from aircraft are one of the fastest increasing sources of greenhouse gases. Unchecked, climate change may see up to a third of land-based species committed to extinction by regional climate change effects by 2050. The impacts of climate change on wildlife in the UK and abroad are already being felt. A report by DARA Climate Vulnerability Monitor 2nd Edition (<http://daraint.org/climate-vulnerability-monitor/climate-vulnerability-monitor-2012/>) estimates that climate change causes deaths on average each year today, of 400,000 people per annum and that together the carbon economy and climate change related losses cost the global economy \$1.2 trillion every year.

Emissions need to be slashed across all sectors if the 80 percent target is to be achieved, but emissions from aviation are rising rapidly – doubling between 1990 and 2000. Further airport expansion should be prevented until it can be demonstrated that significant increases in emissions from air-travel can be accommodated within a UK cut of 80% in emissions by 2050.

If aviation emissions are permitted to rise and our overall emission target is to be met, other sectors of the economy would have to make deeper emissions cuts, placing a greater financial burden on all other industries.

The demand for flights should be managed by encouraging the use of lower carbon modes of transport and the removal of the substantial subsidies that the industry currently enjoys including tax-free fuel, and the absence of VAT on all aspects of aviation. It is estimated that tax-free fuel and zero-rating for VAT costs the country £9 billion a year.

We do not believe that the case for extra capacity/new runways has been made ; there is good evidence, as detailed above , of plenty of spare capacity already present in the aviation sector.

Such evidence clearly undermines any calls for an expensive brand new hub. A Thames estuary airport should not be included as a viable option in any new Government strategy. Economically, environmentally and ecologically it would be a complete disaster plus it would be the most dangerous major airport in the UK due to the risk of bird-strike.

Furthermore an airport in the Thames Estuary would be massively expensive and the necessary additional transport infrastructure would further add to the cost. The overall cost (with current estimates around £95billion in total and taxpayers would have to fund around £65billion of that sum, more if the full £30 billion airport costs cannot be met by private investment) combined with its apparent unpopularity with the aviation industry would mean that the airport could struggle to survive economically.

There is no evidence of support from the City and thus nobody to pay for it.

The cost could negate the chance of any significant return on investment.

The volume of air traffic could mean that other London airports might need to close or have travel from them severely restricted. Indeed if Heathrow were to close it could cause huge unemployment around Heathrow, which employs 72,000 direct staff, and the collapse of the economy of the Thames Valley, west London, the M4 corridor and beyond even damaging the Welsh economy. Indeed if Heathrow closed would major airlines and global companies then relocate to the new airport or simply move to an existing hub abroad like Frankfurt or Dubai with no risks attached? This scenario could potentially mean 100,000's total job losses in the UK.

There is a strong sense of community among those that live alongside the marshes. We share the vision of the RSPB Greater Thames Futurescapes project and look forward to a sustainable future and a healthy environment where development happens to benefit wildlife and people.

Ours is the marsh country down by the river, within, as the river winds twenty miles of the sea and we will never give up the fight to protect our globally important wildlife sites and our communities here in the Thames estuary.

We thank you for reading our submission and trust that our concerns will be taken into account.

Yours faithfully

George Crozer, Joan Darwell, Gill Moore

Friends of the North Kent Marshes