

22 May 2014

Sir Howard Davies
Chair
Airports Commission
Sanctuary Buildings
20 Great Smith Street
London
SW1P 3BT

Dear Sir Howard

THAMES ESTUARY AIRPORT

You requested views on the Airport Commission's Interim Report. We write as the Leaders of Councils in Kent and Medway and representatives of a population of over 1.6 million people.

We start by stating in relation to a Thames Estuary Airport that we have been here many times before. In 1943 we saw off proposals for the first Estuary Airport at Cliffe with more proposals dismissed in the 1950's, 60's, 70's and most recently in 2003 when the Aviation White Paper ruled out an airport at Cliffe on the grounds of cost, environmental damage and the risk of bird strike. We believe that the people of Kent and Medway, and indeed those on the other side of the Estuary in Essex, have suffered for far too long with the uncertainty of an Estuary airport hanging over them. After 71 years we feel it is time to call a halt to these vainglorious projects once and for all.

In your letter to the Leader of Medway on 4 February you stated that the conclusion of this phase of your work would result in a definite decision to totally abandon plans for an Inner Estuary Airport or, if it is considered "credible", to take it forward along with Heathrow and Gatwick for your final report to be published in 2015. We believe the one thing which rules out an Inner Estuary option is that it is simply not, to use your words, "credible".

We all acknowledge the need to address Britain's aviation needs. Kent County Council and Medway, amongst others, have promoted the development of airports such as Lydd (which now has consent to expand following an unsuccessful High Court challenge by the RSPB) and also Rochester and Manston in Kent and supported colleagues in Southend to ensure that we continue to benefit from what smaller regional airports can deliver in terms of economic development. It is difficult to operate an airport, of any significant size, located in the far south-east corner of Britain when you lose 180 degrees of the catchment area before you have started. The effect is that you are at a severe disadvantage from an airport which has a 360 degree hinterland. In any case none of the smaller airports is an answer to the bigger question of how can we invest in significant improvements to Britain's airport capacity. It is likely that the only realistic answer to that is to enhance capacity at existing airports.

You stated in your 4 February letter that an Inner Estuary option could reduce flying across London. We believe that this seductive argument put forward by the Mayor of London is found wanting. It is highly unlikely that aircraft heading to and from the west are going to take a long detour across Europe to land or take off at such an airport - they will fly across London. Even if they could be "persuaded" to do so one only has to look at the effects of moving the congested air traffic patterns 68 miles to the east to realise what effects that would have. It will adversely interfere with European airspace especially at major airports such as Schipol, Paris and Frankfurt. Put simply why would European airport operators and countries support a UK airport development which then negatively affects their own operations. They would not. We have contacted the relevant European authorities who tell us they have yet to be consulted on such a proposal.

Your letter mentioned the potential regenerative effects of an airport in the South East. This is a view put forward by the Mayor and most notably by Daniel Moylan and Lord Norman Foster. It is simply not true. The Local Enterprise Partnership has published its manifesto for economic development in the South East. It is, following what the Government has asked us to do - a genuine partnership of the private and public sectors. Far from being Nimby's we are all signed up to deliver 200,000 new jobs and 100,000 homes in the next 6 years. Notably in North Kent where the Mayor lacks any democratic mandate, we are already delivering on 58,000 new jobs and 52,000 new homes by 2026. These figures are already in local plans, are deliverable and are being delivered.

Our estimates are that a new airport could create around 100,000 new jobs. Existing travel to work patterns show that 79 per cent of those working in North Kent live there. It is therefore a reasonable assumption that around 79,000 new homes would be required to house the workers from an airport. To set that in context, to build that quantum of housing is 246 per cent higher than the peak number ever achieved by developers in North Kent. It fails the "credibility" test.

To those of us who understand how Kent and Medway works, we do not believe that sites could be found to deliver this level of additional growth. The land take for 79,000 new homes would be around 2,600 hectares before factoring in the land for hospitals, schools and infrastructure. Could land, finance and political will combine to deliver this level of housing to ensure a new airport can open by around 2030? Without doubt, unless Government decides to nationalise house building in the South-East it will not. The more likely scenario is that developers do not deliver the number of houses required (they are not doing so at present of course), long distance unsustainable commuting is required and house prices escalate from their current high levels in Kent with negative impacts on housing affordability and worker mobility.

As long as the indecision on the possibility of an Inner Estuary airport continues it will do nothing to encourage house building in Kent and perversely will encourage land banking by developers who, like others in the private sector, require certainty before making investment decisions. It is not "credible".

Government has decided to promote a Garden City at Ebbsfleet. This is supported by Council's in Kent who see the re-use of a brownfield sites, well located to a high speed rail link and with good road access as a sustainable development delivering jobs and homes. Those numbers however are already factored into our plans and do not help the Inner Estuary Airport housing numbers at all.

Connectivity to an Inner Estuary Airport via new public transport links in particular could enable workers to travel considerable distances in order to work at the airport, though cost factors would likely militate against that. A similar journey from Ashford to London currently costs £68.90p for a return journey. By a possible opening date of 2030 that fare would have risen to closer to £80-£90. That is a cost a passenger will have to pay on top of the highest landing fees in the world. If a worker is thinking of commuting in from Central London the current annual season to Ashford International is £6,552. Transport for London maintain that the majority of workers would come from central London. For a relatively low paid worker, which the majority of airport jobs are, that is simply unaffordable. The location suggested for an Inner Estuary Airport is 76 miles from Heathrow via the M25 or 58 miles via central London. Transferring jobs from Heathrow to Kent or Medway without re-location of workers would present significant challenges in terms of commuting times and costs. Transport for London, in their proposal for an Isle of Grain Hub Airport, suggest that 50% of staff journeys could be drawn from a 13 miles "South Essex / North Kent" area, with the vast majority of the remaining 50% living in Greater London.

South Essex, in particular, faces similar pressures to North Kent, for instance a forecast population increase of 126,000 by 2031 has similar growth ambitions, including delivery of around 45,000 new homes and 52,000 new jobs. The possibility that a new Thames river crossing might bring more of South Essex within commutable distance of an Estuary Airport would not reduce the overall

additional housing requirement; nor, given the similar constraints and pressures on both sides of the Thames, would spreading the burden necessarily make that requirement more deliverable. It therefore seems reasonable to disregard the 'Essex factor' in examining travel to work behaviours and the impact on housing requirement.

If we further examine the additional 79,000 households in North Kent, the addition to the population of North Kent would be 180,000 people on top of existing forecasts. That in turn translates into significant additional requirements for services and facilities including up to 38 new two form entry primary schools, 9 to 12 new secondary schools (plus additional post-16 education and training provision), around 30 new GP surgeries and 522 general hospital beds, as well as other supporting transport, community and infrastructure and commercial space. None of that cost is likely to be borne by a private investor and will fall to the public purse.

It is unclear that sites could be found to deliver this level of additional growth, not least bearing in mind that some potential sites might be lost to accommodate the airport itself and the supporting infrastructure including new and upgraded roads and rail connections. TfL's estimate of the land-take for the airport footprint is itself 21 square miles. The land-take alone for 79,000 new homes, at 30-40 dwellings per hectare average, would be between 7.6 and over 10 square miles; this does not account for the land requirement for associated retail, commercial, educational, health and community facilities required. Existing and emerging revised local plans and strategic housing land availability assessments are nowhere close to this level of additional housing land even looking ahead to 2031. To set this in context Medway is 74 square miles. Half is already built up. Almost every blade of grass would disappear. We hear tales of alarm - concreting over the South-East - this would quite literally be just that.

New housing would, in principle, be needed in advance of the opening date of the Thames Estuary Airport, some of it by several years. This raises the question of where the "workers" occupying these new homes would be employed in advance of the airport opening, so that they would be in a position to take the airport-related jobs from day one of it becoming operational.

The road and rail links required to make an Estuary airport feasible could in the long term bring wider benefits to North Kent residents and businesses, provided they were effectively integrated with existing networks. However the additional vehicle and passenger movements would require very significant upgrading of certain key routes in North Kent, for instance the A226 and A228, as well as upgrades needed to the two-lane M2, three-lane M20 and the M25 from where most passengers will come. This could adversely impact upon regeneration schemes served by those roads and protracted disruption for existing communities along or adjacent to those routes, as well as having adverse impacts in terms of air quality, noise and light pollution.

The Isle of Grain/Hoo Peninsula has one of the most extensive networks of habitats for migrating birds in the south of England – estimated population 200,000 - which depend upon the salt marshes and inter-tidal flats for breeding and feeding. The area includes, or is part of the network of internationally designated Natura 2000 sites, including: the Thames Estuary and Marshes SPA, Ramsar and SSSI; the South Thames Estuary and Marshes SSSI; Medway Estuary and Marshes SSSI; and various marine conservation designations. There is no precedent for successful mitigation – i.e. habitat recreation and species relocation – on the scale that would be necessary to achieve no net loss of biodiversity. Moreover, for harm to the integrity of SPA/Ramsar sites to be justified it must be demonstrated that there is no alternative. There are alternatives. We are unconvinced how the legal hurdles could be overcome - in truth they couldn't and if a Government was so unwise to force the relocation of 200,000 protected birds there would be significant protests at a local, national and European scale. Using your earlier phrase it is simply not "credible" to think this number of birds can be successfully relocated and, of course, continue to be relocated.

The Commission will be well aware of the risks to aircraft safety, particularly on take-off and landing, from bird strikes. The well-known example of US Airways flight 1549, brought down into the Hudson River in January 2009 after being struck by geese, is ample illustration of the risks that airports in proximity to resident and migratory bird populations face. The last Government

proposals for an Estuary Airport conceded that the likelihood of bird strike here was around 12 times that of any other UK airport. Again this does not make the estuary Airport a "credible" location indeed it makes it a particularly dangerous one coupled with the prevalence of this area to fog which led to Britain's biggest ever road crash on the Sheppey Bridge when 150 cars collided in thick fog causing 200 injuries. That could have been a series of planes. The road crash took place over just 10 minutes. How many planes would have been affected at what the proponents maintain will be the world's busiest 24 hour airport?

Kent and Medway are important parts of the Thames and Medway Estuary eco-system. We would need to know what effects an Estuary Airport would have: tidal flood risk, particularly in Medway (Strood, Rochester and Chatham); estuarial flow behaviour, particularly on the Medway and Swale estuaries (but also having regard to potential impacts on important shipping channels serving the Medway Ports and DP World/London Gateway); and flood protection for London and coastline on both sides of the Estuary. Additional flood protection necessitated by the loss of marshland and other changes to the coastline would significantly inflate the overall cost of the Estuary option. We have of course seen the effects of heavy and prolonged rainfall in the South East during this winter and that is with the existing marshes effectively acting a sponge. Remove vast swathes by replacing it with concrete for the airport, housing, business and infrastructure and the net effect can only be to make the South East and London at far greater significant risk of flooding coupled with rising sea levels. Again this is simply not "credible".

Our calculations show that the realistic cost of the Thames Estuary Airport is in the region of £148,000,000,000. That is an "incredible" sum in anyone's book. To set it in context, the Olympics, which most accepted was a towering success for the UK, cost £3bn. Terminal 5 was £4bn and HS2 is £43bn. So taking those 3 projects and multiplying by a factor of three is the cost being talked of. Is it realistic and "credible" that private sector finance and Government subsidy on that scale is likely to be forthcoming? The simple answer is no. We also note that according to the Airports Commission that 202 of the top 300 companies in the UK are within 25 miles of Heathrow. 24% of those (around 50 of our major companies) will either see a substantial decline in their operations or relocate altogether.

For an Estuary hub airport to operate successfully would require the closure of Heathrow. Not only would major airlines refuse to move, it would, in any case, lead to a massive loss of employment and de-investment in the "engine room" of the UK economy. The Heathrow area has 50% more European companies than the national average, 60% more foreign ones, 100% more US ones and 260% more Japanese. The risk of significant numbers of these departing to other world destinations is a very high risk game to play.

Finally it will not have escaped the attention of the Commission that it will likely take 3, 4 or 5 Parliamentary cycles for an airport to be agreed, planned, procured, built and opened. To date no mainstream or even minor political party has supported this location. The last Labour Government rejected this location. The Transport Select Committee which of course has cross party membership opposes this location. The Councils of Kent, Medway and Essex and Southend oppose this location. Our surveys with reputable polling organisations such as Com Res indicate very low levels of public support for this location. Without political and public support the project in this location is doomed before it starts. It therefore fails the "credibility" test.

We are all committed to Britain's success. We need a vibrant economy and a sustainable future. The Estuary Airport is quite simply, unaffordable, in the wrong location and would be delivered at such an unacceptably high environmental and regeneration cost that it will not command the support or respect of the public, politicians or business. It needs to be rejected so we can continue to deliver on the jobs and homes we are committed to deliver without this unnecessary side show for the people of Kent and Medway and Essex.

We wish the Commission well in their future work and respectfully ask them to reject this undeliverable option.

Yours sincerely,



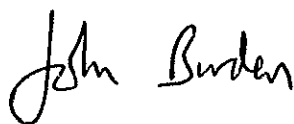
Councillor John Gilbey
Leader, Canterbury City Council



Cllr Jeremy A Kite MBE
Leader, Dartford Borough Council



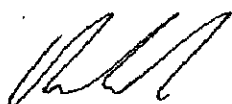
Cllr P A Watkins
Leader, Dover District Council



Cllr John Burden
Leader, Gravesham Borough Council



Cllr Paul Carter CBE
Leader, Kent Country Council



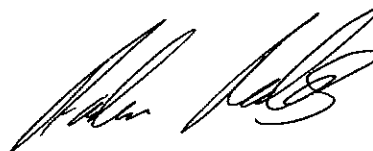
Cllr Christopher J Garland
Leader, Maidstone Borough Council



Cllr Rodney Chambers OBE
Leader, Medway Council



Cllr David Monk
Leader, Shepway Council



Cllr Andrew Bowles
Leader, Swale Borough Council



Cllr Iris Johnston
Leader, Thanet District Council



Cllr Nicolas Heslop
Leader, Tonbridge & Malling Borough Council

Airports Commission – Call for Evidence

- Inner Thames Estuary feasibility Studies**
- Socio-economic impacts (Study 3)**

Response from Kent County Council and Medway Council

The Airports Commission has given the opportunity to submit evidence, analysis, additional research and comments in relation to an inner Thames Estuary airport proposal. Kent County Council (KCC) welcomes the opportunity to respond to this consultation and would be happy to expand on any aspect in writing or as oral evidence.

KCC has previously submitted a response to the draft terms of reference for the Inner Thames Estuary Feasibility Studies. This response relates to the Commission's Study 3, and summarises the concerns surrounding the socio-economic impacts of the proposed airport on the Isle of Grain. It draws together many of the issues raised in response to the Commission's invitation for comments on the outline proposals submitted to the Airports Commission in July 2013.

Annexe 1 gives more detailed information on North Kent's economic geography.

Impact on the local community and development land availability

There will be significant social costs to building an airport on the Isle of Grain. Airport development would require a significant land take and the removal of whole communities. This is before land needed for the supporting infrastructure, ancillary industries, business agglomeration and housing etc, is even considered.

The population of the Peninsular ward (see Figure 1), which largely mirrors the footprint of the Isle of Grain airport, is 12,882¹; the majority of which would be displaced or, at a minimum, significantly affected by the proposed airport. In addition, the population of the Strood Rural ward (see Figure 2) has the potential to be significantly affected by an airport on the Isle of Grain – some 13,463 people. Many of those displaced by the development would need to be re-homed within the Medway area.

¹ Based on the mid-2007 population estimates, Office for National Statistics, 2009



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Figure 1 - Peninsular Ward



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Figure 2 - Strood Rural Ward

In December 2013 there were 11,142 people claiming unemployment benefit within the North Kent region (Dartford, Gravesend, Medway and Swale) and a further 16,001 throughout the rest of Kent². If the job creation figures, upwards of 100,000, associated with a new hub airport in the Estuary are correct, this will place further pressure on the housing stock within the Medway and wider North Kent area. Whilst unemployment varies over time, there will clearly be a large proportion of airport staff looking to move into the area from elsewhere in order to fill the posts that cannot be filled by the small size of the available indigenous labour market; some will commute, but this in itself places a strain on the rail and road infrastructure.

Commuting long distances at high cost will not be an option for the majority of low skilled and relatively low paid workers, e.g. baggage handlers, security, cleaners etc. These workers are essential for the functioning of the airport and they need suitable housing in close proximity to the airport. However, the significant housing levels needed to cope with the influx of workers for the airport are not available. Airport workers also need to be in place from day one of the airport opening and this brings into question the sequencing of the building of the homes and supporting infrastructure, and the availability of private finance to deliver this level of development within the required timescale.

Medway and North Kent were part of the Thames Gateway Growth Area and the now revoked South East Plan (subsequently modified by Local Plans) identified a housing requirement of 52,410 dwellings in North Kent between 2011 and 2031. This forecast housing requirement has been predicted on existing pressures (with long term demand already exceeding supply) and does not take into account the significant housing pressure that a new airport would impose. The South East Local Enterprise Partnership (SELEP) Strategic Economic Plan (SEP)³ aims to deliver through the Single Local

² Kent County Council: Unemployment in Kent, Research & Evaluation Statistical Bulletin, January 2014 (source data: NOMIS Claimant Count)

³ South East LEP: Growth Deal and Strategic Economic Plan, March 2014

Growth Fund (SLGF) 24,000 homes in Thames Gateway Kent in the period 2015 to 2021. In the Thames Gateway South Essex, an additional 10,040 homes in the A13 Corridor (Thurrock to Canvey Island) and a further 31,850 homes along the A127 Corridor (Basildon to Southend) will be delivered by 2021.

Existing forecasts suggest the population of North Kent will grow by 19.5% (ca 105,000 people) by 2031 based on a 2011 baseline⁴. Assuming that new housing is delivered to the planning trajectory, this population growth should be sustainable. Those forecasts are based on indigenous growth and Office of National Statistics (ONS) assumptions about in-migration. Success in attracting inward investment as well as growth driven by existing businesses could generate additional housing demand⁵.

In addition to the economic growth locations identified within the Thames Gateway Delivery Plan, there are now a number of new economic drivers placing further pressure on land availability in the Thames Gateway, including the development of a new Lower Thames Crossing and the major development of a world-class leisure facility on the Swanscombe Peninsula. The announcement by the Government in March 2014 for a new 'Garden City' at Ebbsfleet, initially with 15,000 new homes (which was already allocated development as part of the Thames Gateway), is to help meet housing demand in the South East from background growth without even considering the housing pressure arising from a national hub airport in the area. Scope for the significant development that an airport would generate is therefore likely to be more constrained than the headline brownfield land availability figures suggest.

Analysis of Local Plans will show that Local Planning Authorities in the area are challenged to find suitable sites for the housing supply to meet the demand from population growth associated with the existing socio-economic situation, without factoring in pressures from a new hub airport. Local Plans in the affected districts do not take account of the demand generated by a national hub airport being imposed on the area. It is therefore not appropriate to view the Thames Gateway area as a blank sheet of development land that could accommodate a new hub airport and the associated infrastructure and housing it would require.

It is clear that authorities in the northern part of Kent are struggling to find housing sites to cater for existing demand. Therefore there is serious doubt as to whether suitable sites are available to accommodate the demand from an Estuary airport. This is evidenced by recent and upcoming Local Plan processes, including: the Medway Local Plan which was recently withdrawn after being submitted for examination. The reason was the loss of one major proposed housing site which has been since registered as a Site of Special

⁴ Source: Office of National Statistics, Thames Gateway Kent Partnership Review of Evidence, October 2013.

⁵ Draft Thames Gateway Kent Partnership Submission to the Airports Commission, May 2014

Scientific Interest (SSSI). The loss of this one site resulted in doubt that the draft Plan would be able to provide enough housing sites to meet current needs. Another example is Maidstone Borough Council, having identified a housing need of 19,600 homes, have recently consulted (regulation 18 consultation) on a housing figure of around 17,000. This is on the basis that, at the time of going to consultation, there were not enough sites available to meet their current identified need. It is important to note that the majority of these sites are greenfield sites in open countryside, and the draft Plan has significant draft objections on this basis. There is some question as to whether the Maidstone Borough can accommodate the quantum of development currently required, without the significant increase to that need that would no doubt be generated by an airport in the Thames Estuary

It is therefore unclear as to whether sites could be found to deliver the level of additional housing needed to support a Thames Estuary airport; not least bearing in mind that some potential sites might be lost to accommodate the airport itself and the supporting infrastructure including new and upgraded roads and rail connections. Analysis of existing travel to work patterns shows that 79% of those currently working in North Kent in existing industries also live in North Kent⁶. Assuming that 100,000 workers are needed for the new airport, if the same pattern is held in relation to airport employment, it implies perhaps 79,000 workers at the Isle of Grain airport will wish to live in North Kent by the time the airport became operational. If we assume one airport worker per household, it suggests an additional housing requirement of 79,000 homes in North Kent by around 2030. The land-take alone for 79,000 new homes, at 30 dwellings per hectare average, would be over 2,600 hectares; and this does not account for the land requirement for associated retail, commercial, educational, health and community facilities required. Existing and emerging revised local plans and strategic housing land availability assessments are nowhere close to this level of additional housing even when looking ahead to 2031⁷.

An additional 79,000 homes needed for the influx of airport workers by around 2030 would mean, if started in 2015, an additional 5,266 homes being delivered annually in North Kent each year. Actual delivery of new homes has averaged below 2,000 per annum since 2000/01, peaking at 2,454 in 2008/9, although North Kent has consistently outperformed the national average housing completion rate since 1990. The implied additional annual housing requirement to 2026 alone would be more than double the peak output achieved by the construction industry in North Kent in 2008/9. These projections of new housing requirement do not include replacement of the estimated 1,600 homes that would be demolished to accommodate the airport site on the Isle of Grain⁸.

⁶ Source: KCC Research & Information, 2011.

⁷ Draft Thames Gateway Kent Partnership Submission to the Airports Commission, May 2014

⁸ Draft Thames Gateway Kent Partnership Submission to the Airports Commission, May 2014

In reality, over 5,000 new homes per year to support the workforce of an Estuary airport are highly unlikely to be built before 2030, because the airport-related demand would not arise significantly ahead of the airport becoming operational. Conceivably some workers might relocate from the vicinity of Heathrow into North Kent ahead of an Isle of Grain airport opening, but it is unclear to what extent housing developers would complete new housing in anticipation of that demand. A more likely scenario is that new housing provision would lag behind the latent demand from the airport related workforce, leading to a protracted period during which relocated workers would endure long-distance commuting. Pressure of demand would fuel escalating house prices with negative impacts on housing affordability and worker mobility within North Kent (and beyond)⁹.

Given that even at its peak the combination of available, permitted sites and construction industry capacity has not yet achieved new housing output levels consistent with the existing growth strategy; it is inconceivable that sufficient sites, planning consents and industry capacity could be brought together to deliver the scale of development and associated infrastructure within the required timescale of an airport development. Moreover, the house building industry would be competing for construction sector capacity with the bodies building the airport and the associated infrastructure. This is all likely to increase the costs of labour and materials with negative impact on housing schemes' viability¹⁰.

The development of an Estuary airport will therefore also bring social pressures with demand outstripping the supply of housing, schools, hospitals and other community infrastructure needed to service the influx of people needed to work at the airport (in addition to those that will need re-housing from the area within the airport footprint). The full range of social costs must be balanced against the perceived benefits of the potential 'regeneration' brought about by a new airport.

In addition to the land needed for the airport site, housing and community facilities; significant amounts of land will be needed for all of the ancillary industries that service the airport, e.g. long stay car parks, car hire, distribution and warehousing facilities for cargo, catering suppliers, hotels etc. All of these facilities would need to be located to the west of the Isle of Grain further along the Hoo Peninsular as to the north, south and east of the proposed airport is surrounded by water. Land availability is therefore severely restricted and development would result in extra pressure placed on the urban edges of the Medway towns and Gravesend. It would also encroach on protected sites including international and European designated Ramsar and Special Protection Areas (SPA); national designated Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR); and numerous sites with local

⁹ Draft Thames Gateway Kent Partnership Submission to the Airports Commission, May 2014

¹⁰ Draft Thames Gateway Kent Partnership Submission to the Airports Commission, May 2014

designations, e.g. Ancient Woodland. This is in addition to the loss of these designated sites from the development of the airport site itself.

Land will also be needed for the industries and businesses that want to locate in close proximity to the airport and the catalytic economic benefits are dependent on this agglomeration effect. However, the peninsular location of the Isle of Grain reduces the capacity of the area to develop in a similar way to the M4, M3 and M40 corridors with the connectivity benefits of being in close proximity to the UK's existing hub airport (Heathrow) having spread west from London. 202 of the top 300 companies in the UK are clustered within a 25 mile radius of Heathrow and compared to the UK average; the Thames valley has 50% more European companies, 60% more foreign companies, 100% more US companies and 260% more Japanese companies. If these businesses were to relocate so that they remained in close proximity to the new hub airport, and/or new companies attracted to the vicinity of the airport, there would be significant challenge to find suitable allocations alongside the aforementioned land use demands. It would also put pressure on housing stock further from the airport site itself in other parts of Kent, for example, in Maidstone, should these companies' employees wish to avoid a long and expensive commute to the Hoo Peninsular by living in other parts of the South East that are more distant from the new national hub airport and their companies' new premises.

Unemployment and deprivation

Proponents of an airport in the Thames Estuary claim it brings much needed job opportunities and benefit to the area. As previously stated, these job opportunities will actually place increased pressure on an already creaking infrastructure. Furthermore, with existing planned growth, labour market pressure is likely to rise significantly.

As of April 2014, 10,736 people were claiming Jobseekers' Allowance in North Kent. This is around 2.8% of the workforce, marginally higher than the national average¹¹.

As in the rest of the country, JSA claimant count levels are falling – in the year to April 2014, the North Kent claimant count fell by 3,432 (24.2%, which is roughly the same as the national average). While this fall in unemployment is in response to general national economic recovery, it is likely that in the longer term, employment demand in North Kent will rise significantly, with an estimated 58,000 jobs between 2006 and 2026 as a result of planned developments including those around Ebbsfleet Valley and with the prospect of the further expansion of Swanscombe Peninsula.

¹¹ JSA Claimant Count, April 2014: DWP, NOMIS

North Kent does contain some very deprived communities when measured at the Local Super Output Area (LSOA) level, i.e. neighbourhood level. However, the Government's Index of Multiple Deprivation (2010) shows that none of the North Kent districts (Swale, Medway, Gravesham and Dartford) are in the top quarter of the most deprived in England, with Dartford less deprived than the national average: whilst there are some 51 LSOAs in North Kent that are in the 20% most deprived nationally, these account for only 13.9% of the LSOAs in North Kent. Therefore, although there are pockets of significant deprivation, the overall concentration of deprivation is actually less than the national average. It is also unclear that an airport would improve these concentrations of deprivation, given the multiple and complex factors that tend to underpin them. Hounslow contains 12 LSOAs in the 20% most deprived nationally despite being on Heathrow's doorstep, a higher proportion of the borough than is the case in – for example - Dartford.

Estuary industries

On the Isle of Grain is Thamesport, one of the UK's busiest container ports, a liquid natural gas plant and EON Grain power station. These would need to be relocated if an airport were developed on this peninsula, a considerable task; and if marked for closure would put added pressure on the UK's limited energy supplies.

The Grain Liquefied Natural Gas (LNG) plant has the capacity to supply up to 20% of the UK's gas demand and is the 8th largest terminal in the world. National Grid plans to expand the capacity of the facility by a third by 2018 as North Sea gas supplies decline. The LNG plant is also already in the process of expanding its operation with land set aside for future development as the coal power plant is closed. The facility, which has already had £1.1 billion of investment, would be expensive and take time to re-build elsewhere. It would also need to be relocated and the new site fully operational before the current site could close, otherwise there would be a shortfall in gas supply to the UK. In addition, finding a suitable deep water site with available land in the UK could be a significant challenge.

The recent development of the London Gateway Port and logistics park in South Essex provides 2,700 metres of quay and six deep water berths with an annual capacity of 3.5 million TEU (twenty foot equivalent units, i.e. a standard size container) and a 9 million square foot logistics park¹². The London Gateway Port will create 12,000 direct jobs and generate around 20,000 indirect jobs¹³. This is a key part of the South East LEP's economic plan, creating jobs associated with shipping, a traditional industry around the Thames Estuary. A concern would be that a new airport in the Thames Estuary has the potential to change sedimentation and estuarine processes that could negatively impact on the port's operation.

¹² London Gateway Port: <http://www.londongateway.com/the-port/> accessed 06/05/14

¹³ South East LEP: Growth Deal and Strategic Economic Plan, March 2014

Within the Thames Estuary there are two offshore windfarms; Kentish Flats and the London Array, the world's largest offshore wind farm which is able to generate enough electricity to power nearly half a million homes a year (two thirds of the homes in Kent) and reduce CO₂ emissions by 925,000 tonnes a year. Both of these wind farms could interfere with radar activity for aircraft on both take off and final approach towards the airport. Phase 2 of the London Array wind farm development will not proceed due to environmental challenges and concerns over the impact on the habitat of the Red Throated Divers that overwinter in that part of the Thames Estuary¹⁴. This demonstrates that bird populations within this SPA can halt this type of development and similar constraints would prevent the construction of a Thames Estuary airport.

The potential economic benefits of a new hub airport in the inner Thames Estuary need to be weighed against the economic disbenefits that such a development would bring. The area could lose its 'energy sector' if the National Grid Power Station and Liquefied Natural Gas (LNG) facility is forced to relocate (if the LNG plant remains open, the Health and Safety Executive exclusion zone around the plant will further restrict the development of the airport site and its ancillary industries). There could also be restriction on further offshore wind farm development due to the conflict with airport radar operations.

The potential impacts on ports in the area, both Thamesport on the Isle of Grain and the newly opened London Gateway Port in Thurrock, and the impact on shipping lanes in the estuary also need to be assessed. The closure of Southend Airport will also have negative economic consequences for Southend and Greater Essex within the Thames Gateway and write off the recent significant private sector investment in this regional airport.

Agricultural land will also be lost, as will visitor revenue to this part of North Kent with its rich historic and cultural heritage alongside its natural environment and tranquillity value. The nature of business in this part of the South East will be radically changed and this will result in economic loss for some existing business sectors in this area. This needs to be weighed up against the net gain in jobs from the airport. Full consultation on these potential impacts is needed with the South East Local Enterprise Partnership (LEP) which includes business representation and the local Chambers of Commerce and Economic Boards.

Local Growth Strategies

There are no strategies adopted by the local authorities within the area that support the development of a new airport in or around the Thames Estuary.

¹⁴ London Array to stay at 630mw <http://www.londonarray.com/2014/02/19/london-array-to-stay-at-630mw/> accessed 14/03/14

The South East Local Enterprise Partnership (SELEP) recently published its Strategic Economic Plan¹⁵. This sets out a long term vision for the South East alongside a programme of key interventions over the next six years. In addition the housing numbers previously described, the plan intends to deliver 18,000 jobs in Thames Gateway Kent in the period 2015 to 2021. In the Thames Gateway South Essex, an additional 30,000 jobs in the A13 Corridor (Thurrock to Canvey Island) and a further 56,400 jobs along the A127 Corridor (Basildon to Southend) will be delivered by 2021. The Plan does not include a new hub airport. The new North Kent Growth Plan (currently in publication) similarly contains no reference to new airport development.

However, with significant planned investment in the Thames Gateway, the uncertainty from the Estuary airport proposal is having a damaging impact on business investment. For example investors around Southend Airport want confidence that the airport will still exist in ten years time, and hence there is currently a negative economic impact of the proposed Estuary airport in the short and medium term.

Impact on Heathrow and on other existing airports

An Estuary hub airport would only succeed if Heathrow was closed. Redevelopment of the Heathrow site to provide housing and other commercial opportunities may go some way to addressing the loss of the 114,000 jobs¹⁶ in west London associated with Heathrow; however, there will still be a significant detrimental effect in this area and along the M4, M40 and M3 corridors should the airport be forced to close. If Heathrow did close, it is uncertain whether businesses would stay in their existing location, relocate to the vicinity of a new hub airport in the Thames Estuary or whether they would leave the UK entirely, which would potentially have a devastating impact on the national economy.

Many operators currently at Heathrow are opposed to an Estuary airport, with nine of the ten major airlines currently based at Heathrow not wanting to move¹⁷. Willie Walsh, Chief Executive of International Airlines Group (IAG) which owns British Airways (BA) and Iberia, has said “Why would we move? Look at how much has been invested in Heathrow, look at the location. Heathrow is a global brand. BA won’t leave so other airlines won’t leave either. The level of investment required, the capital commitment and the return that would be required would make the operating costs of the [Estuary] airport so

¹⁵ South East LEP: Growth Deal and Strategic Economic Plan, March 2014

¹⁶ Optimal Economics, Heathrow Related Employment, 2011

¹⁷ Survey by Medway Council, 2010

high that nobody would want to fly there”¹⁸. If airlines are forced to relocate, they will need to be compensated for the investment they have made in new terminal facilities at Heathrow.

Over the past ten years, Heathrow Airport Ltd has invested around £11bn into the existing airport, including into the T5 and T2 terminal infrastructure. Heathrow’s current investment plans anticipate at least a further £3bn future investment.

Should Heathrow be forced to close, compensation would be required for the existing airport owners and users, estimated by the Oxera report ¹⁹ to potentially be as high as £20bn. Despite the significant cost, this has not been adequately considered by the promoters of a new hub airport and calls into question further the cost estimates and perceived economic benefits associated with their proposals.

However, there is no certainty that closing Heathrow would result in the relocation of airlines to an Isle of Grain airport. High charges at a Thames Estuary Airport (needed to recoup the significant capital investment in the new airport) would make other airports such as Gatwick and Stansted (with lower charges) more attractive. Airlines might relocate to these other existing airports rather than the new airport on the Isle of Grain. This could result in the commercial failure of the new airport and create pressure on the other existing airports (Gatwick and Stansted) to expand in order to meet growing demand.

Surveys of the large companies (those with more than 250 employees) in West London suggest that about half of them would relocate, should Heathrow close. It is hugely difficult to estimate any compensation requirements arising. Businesses in the proximity of Heathrow, including industrial estate developers, have invested hugely in the infrastructure in and around the airport. While it is not certain whether individual businesses would have to be compensated, it is also unclear on what basis such payments would be calculated as factors could include their current asset value, loss of future revenue or number of redundancies. Should compensation be paid, the eligibility criteria will be enormously difficult to define: businesses located in the 20-30 mile radius of Heathrow still rely on their proximity to the airport for their business. As the Government would need to nationalise Heathrow Airport to close it, i.e. compulsorily purchase it, businesses will be looking to Government for compensation.

Irrespective of whether compensation will be paid to businesses, local authorities in West London will suffer significantly from the loss of business rates as a result of business relocations in the wake of the closure of

¹⁸ The Telegraph, 18 January 2012

<http://www.telegraph.co.uk/finance/newsbysector/transport/9023843/BAs-Willie-Walsh-says-he-will-not-be-checking-in-at-Boris-Island.html>

¹⁹ Oxera, Would a new hub airport be commercially viable? A report prepared for the Transport Committee, January 2013

Heathrow: the companies in West London currently generate up to £37bn for the local economy.

An Isle of Grain airport would also result in the closure of London City and London Southend airports due to conflicting airspace operational requirements. Both of these airports have invested significantly in their infrastructure in recent years and closure would inflict damage on regional economies.

Economic impacts on the rest of the UK

Consideration is also needed in terms of the wider economic impacts on the UK economy as a whole; and whether building a new hub airport in the extreme south eastern corner of the South East helps to meet the Government objective to re-balance the economy in terms of regional differences. Especially as for most parts of the UK, accessing a national hub airport on the Isle of Grain by surface transport will be more difficult, take longer and cost more than it does for the majority of people across the UK, compared to travelling to the national hub airport's current location to the west of London (Heathrow).

The ComRes²⁰ survey in April 2014, on behalf of Medway Council, was commissioned to understand the views of the general population regarding the proposed hub airport on the Isle of Grain. There was a particular focus on the residents of London and the South East, as the population most likely to be affected by the proposed airport. Their findings included 'strong opposition to such an airport once British adults learn of the other airport closures required' and that 'an airport that is out-of-the-way or expensive to reach is likely to struggle to attract passengers'²¹.

Conclusion

The development of a new national hub airport in the Thames Estuary will have significant socio-economic impacts. Clearance of entire communities from the Isle of Grain would be needed to make way for the airport and the supporting infrastructure. Local labour availability is not sufficient to supply an airport with the required number of workers, therefore it is anticipated that

²⁰ ComRes: Headline Findings, Airport Expansion in the South East, April 2014, on behalf of Medway Council - ComRes interviewed 2,034 GB adults online between 4th and 6th April 2014. Data were weighted to be demographically representative of all British adults aged 18+. Data tables are available on the ComRes website, www.comres.co.uk

²¹ ComRes: Headline Findings, Airport Expansion in the South East, April 2014, on behalf of Medway Council - ComRes interviewed 2,034 GB adults online between 4th and 6th April 2014. Data were weighted to be demographically representative of all British adults aged 18+. Data tables are available on the ComRes website, www.comres.co.uk

there will be an influx of people into the area, given that a significant proportion of lower skilled, lower paid workers will not commute great distances and will need to live in close proximity to the airport.

There is not sufficient land availability for urbanisation on this scale given the confines of the Isle of Grain and Hoo Peninsular being surrounded by water on three sides and European and International designated sites of environmental importance across much of its area. Allocated sites as part of the Thames Gateway are already accounted for in Local Plans to accommodate growth from existing economic strategies. Airport related demand for housing would far exceed these allocations before land use pressures for other airport related industries and agglomeration of business has even been considered. The scale and rate of development required to match the opening date of the new airport is unprecedented and is unlikely to be deliverable.

The Thames Estuary has a diverse mixture of important industries including energy generation; and this vital sector for the UK economy could be constrained in the area with the development of an airport. There are relatively low levels of unemployment in the area and a credible strategic economic plan to deliver employment and housing growth is in place which does not include the development of a new national hub airport.

The closure of other airports, especially Heathrow and the subsequent loss of employment associated with the airport and the agglomeration of businesses would create economic devastation in West London and the Thames Valley as well as costing significant amounts in terms of compensation. This is to the detriment of the UK economy as a whole and the economic output of this area may not be easily replicated around the Thames Estuary. The relocation of the UK's hub airport is therefore not desirable on the basis of its socio-economic impacts and the optimum solution for economic growth is to expand existing airport infrastructure. The option of a new airport on the Isle of Grain should not therefore be added to the shortlist of plausible long term options for airport capacity in the South East.

Annexe 1: North Kent's Economic Geography

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23 May 2014

Annex 1:

North Kent's economic geography

This note sets out an overview of the economic geography of North Kent, the area primarily impacted by proposals for an airport in the Thames Estuary. It outlines current employment patterns, major economic infrastructure and anticipated future growth, as well as summarising the major growth projects planned or underway.

1. North Kent in context

'North Kent' is conventionally defined as the local authority areas of Dartford, Gravesham, Medway and Swale, on the southern bank of the outer Thames Gateway. The area is located on the A2/M2 corridor from London to the coast and is also connected by rail services on the North Kent Line and High Speed One.

Map 1: North Kent in context



The four local authority areas that comprise North Kent share a number of characteristics. In particular, these include:

- A common industrial heritage yielding a physical legacy of waterfront and former quarrying and other industrial sites for development;
- Strong linear transport connections;
- Recent and current delivery of extensive plans for new housing and employment growth, linked with North Kent's position within the Thames Gateway, and with extensive plans for further development, primarily on brownfield land; and

- Significant natural assets. In particular, North Kent enjoys more protected green space than either the London or Essex parts of the Thames Gateway, including protected wetlands along the coast and, further inland, the Kent Downs Area of Outstanding Natural Beauty.

Based on these characteristics, North Kent is a coherent economic area. However, economic links beyond the area's border – especially to London and to Maidstone, and to a lesser extent into South Essex – are also strong.

2. The long term strategy for growth

Since 1995, North Kent has been recognised as part of the Thames Gateway, a national priority location for economic growth. Since then, successive strategies have set out an approach to growth focused on the high-quality redevelopment of former industrial sites and the revitalisation of the area's primary urban areas, alongside new investment in rail and road connectivity and environmental quality.

Key achievements include:

- Major new infrastructure, including Ebbsfleet International Station, the Channel Tunnel Rail Link and High Speed 1 providing outstanding connectivity to London and continental Europe, the Sheppey Crossing, widened and re-aligned A2 and M25 interchange, and rail freight link at Northfleet.
- The creation of Britain's most successful regional shopping centre at Bluewater;
- New house-building, which has outstripped the national and South East average, with nearly 25,600 new homes built since 2000.
- A new University Campus at Medway, a centre of learning for 10,000 students and four Universities;
- Major regeneration at Chatham Maritime, new and expanded business parks including Crossways-Dartford and Eurolink-Sittingbourne and innovation centres at Kent Science Park, Innovation Centre Medway, The Nucleus and The Base at Dartford;
- The highly successful Parklands programme, including around £30 million HCA and match-funding in seven major environmental improvement projects across Thames Gateway Kent; and
- Significant improvements in residents' skills at all levels and in secondary school attainment;

Current strategic priorities are set out in the **North Kent Plan for Growth** (2014, forthcoming), which builds on the **North Kent Local Investment Plan** (2010) and is reflected in the South East LEP's recent Strategic Economic Plan.

3. Population

Current population

In 2012, North Kent had an estimated population of 607,600. The working age population stood at 389,300. Some 44% of the current population live in Medway, the largest urban conurbation in the South East outside London. However, North Kent has a polycentric character, with additional

medium-sized urban centres at Dartford, Gravesend and Sittingbourne, as well major new development at Bluewater and Ebbsfleet.

Chart 1: Population by district (2012 estimates)¹		
	Total population	Working age
Dartford	98,900	64,100
Gravesham	102,800	64,600
Medway	268,200	174,800
Swale	137,700	85,800
North Kent	607,600	389,300

Recent population growth

Since 2001, the population of North Kent has grown by 53,000, or 9.6% - considerably faster than the national population growth rate of 7.8%, and with especially rapid growth in Dartford.

Looking to the future, population growth will continue to be strong, with a forecast increase of 12.7% (about 76,600 additional residents) between 2012 and 2031. The working age (16-64) population is also set to rise, with the greatest increase (over 32%) in Dartford².

4. Spatial economy

Links and connectivity

North Kent currently benefits from transport infrastructure of national and international importance, including:

- Strategic road infrastructure linking the Channel ports with London, with the A2/M2 forming the main road spine through North Kent;
- Improved rail connections with London via High Speed One, and relatively frequent services on the 'classic' commuter network;
- International rail services from Ebbsfleet;
- Relatively close proximity to the London airports (especially Gatwick, City, Southend and Stansted); and
- Major freight ports at Sheerness on the Isle of Sheppey and Thamesport on the Isle of Grain.

These good connections are an economic strength. However, the concentration of nationally-vital transport infrastructure places significant risks to North Kent's transport network. In particular, the A2/M2 corridor is heavily used by local as well as inter-regional traffic, and will come under further pressure as a result of extensive planned development around Dartford and Gravesham.

In addition, the bridge and tunnel at Dartford remains the only crossing of the Thames east of London, carrying about 50 million vehicles per year. Heavily congested, delays at Dartford impose a national cost and increase pressure on the M25 and A2/M2. The Government's options for a new crossing are therefore very welcome to address current and planned demand.

¹ ONS, 2012 mid-year population estimates

² ONS mid-year population estimates, KCC strategy-based forecasts

Commuting patterns

North Kent's travel-to-work patterns are relatively complex. Around 64% of those living in North Kent work within the area, with around 55,000 commuting to London and 34,000 travelling to other parts of Kent (especially Maidstone).

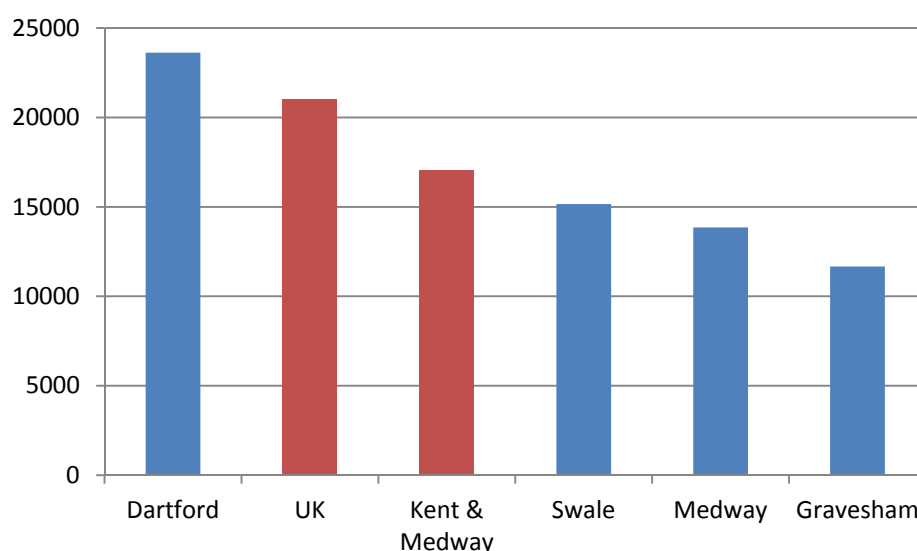
5. Economic scale and strength

Economic output

Gross value added (GVA) provides a measure of the value of all the goods and services produced in the economy, and is widely used as a measure of economic performance.

Generally, North Kent's GVA per head lags behind national and county figures, with only Dartford having GVA per head above the national average, reflecting its high concentrations of economic activity:

Chart 2: GVA per capita (£), 2010



Earnings

However, resident earnings are higher in North Kent than nationally (£443 per week in North Kent, compared with £407.50 across the country), highlighting the importance of London as an employment destination³.

Labour market response to recession and recovery

In April 2014, there were 10,736 Jobseekers' Allowance claimants in North Kent, accounting for 2.8% of the working age population (compared with a national average of 2.7%).

The claimant count has shown a fairly consistent fall over the past year, with an overall reduction of 24.2%, broadly in line with the national picture.

³ NOMIS, ASHE; KCC Statistical Bulletin, Earnings in Kent 2012

6. Business, sectors and innovation

The North Kent business base

In 2011, there were some **18,190 businesses** in North Kent⁴. As in the country as a whole, the area's business base is overwhelmingly made up of small enterprises, although a number of larger employers (such as BAE Systems at Rochester and Delphi at Gillingham) do maintain a substantial presence.

Key sectors

The manufacturing sector – especially strong in Medway and Swale – accounts for over 20% of North Kent's GVA, a higher proportion than in the county as a whole. While traditional employment sectors – such as distribution and logistics, port-related industries and construction continue to grow and make a vital contribution to the economy, there is a growing knowledge economy base, particularly focused on life sciences (for example at Kent Science Park near Sittingbourne and at Dartford), advanced manufacturing and (especially in Medway) creative and media industries. These emerging strengths are reinforced by the growth of North Kent's university cluster at Medway, currently accommodating over 10,000 students in four universities⁵.

7. Key locations and investment opportunities

Reflecting North Kent's long term strategy to meet planned housing and population growth, a number of major developments are being progressed.

These include:

Dartford

Dartford Northern Gateway. This area identified for mixed-use development comprises a number of sites. It will deliver around 1,300 new homes, 1,200 new jobs and a range of supporting facilities, including a primary school and a dedicated Fastrack rapid bus transit route. Housing development has commenced to the east and west of the area. The first phase of The Base, a hub for start-up businesses, is already operational and further sites for employment development have obtained planning consent.

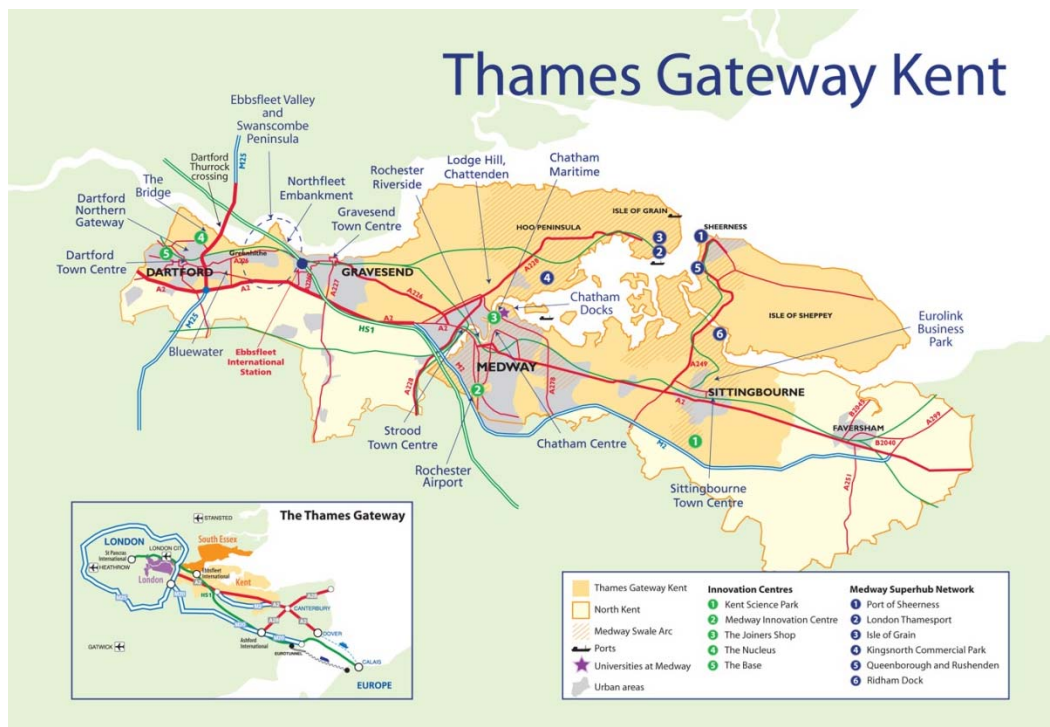
Dartford Town Centre. Dartford Borough Council and the HCA are collaborating to bring forward marketing proposals for a portfolio of sites, including the former Co-op site and the Station Mound, served by the newly-refurbished railway station. Possible uses include Retail, Leisure and Residential and future accommodation for civic offices. At Lowfield St, consent has been granted for a major redevelopment of this part of the town centre, providing retail space of over 10,000 sq m, including an anchor store for the town centre, residential development and community facilities. Construction is expected to start in 2015.

⁴ ONS, business demography dataset

⁵ University of Kent University of Greenwich, Canterbury Christ Church University and the University of the Creative Arts

The Bridge. This mixed development to the west of the Dartford-Thurrock Crossing will provide around 1,550 homes under a number of different phases and other facilities including a business/science park and school. Around 400 homes have already been completed. The Nucleus innovation centre is completed and occupied, and the SusCon Academy for sustainable construction completed and in use. Completion of housing is expected 2022/3. Other commercial occupiers are expected to take up space in 2014 and a Technical College is to open in September 2014.

Map 2: Major opportunities for growth



Ebbsfleet and Swanscombe

In his 19 March Budget Statement, the Chancellor of the Exchequer announced a new Garden City at Ebbsfleet, with the headline figure of 15,000 new homes supported by £200 million investment in infrastructure and delivery led by a dedicated new development corporation. The precise details of which sites would be included within the development corporation's boundary is not yet decided, but it is likely to include sites described under below as well as a number of other smaller sites.

Ebbsfleet Valley comprises a 260 hectare site between Ebbsfleet International station and Bluewater Shopping Centre, and straddles the boundary between the boroughs of Dartford and Gravesham with component sites in each area (e.g. Springhead Park in Gravesham). The original masterplan was for up to 10,000 new homes and around 800,000m² of mixed-use development, including commercial/retail development that could create up to 20,000 new jobs. The early phases of development at Springhead Park (over 200 homes) are complete, with capacity for around 700 more homes (plus business space) in later phases. Initial housing development, with the first homes due for completion in summer 2014, is underway at Eastern Quarry, as part of

this major mixed use development comprising up to 6,250 homes, a business park and a range of shopping, leisure and community facilities . On the former **Northfleet West Sub-Station** site, completion of the first homes on this mixed use development of 1,000 homes is expected in summer 2015. Proposals for other sites within Ebbsfleet Valley, including the scale and nature of commercial development, would be revisited if the Paramount scheme at Swanscombe Peninsula goes ahead. Supporting transport infrastructure is to be provided via the Homes and Roads programme: these developments are served by the A2 Ebbsfleet Junction.

Adjoining Ebbsfleet and strategically placed to exploit the potential of Ebbsfleet International station is the 353 hectare **Swanscombe Peninsula**. Proposals are at pre-planning stage for a major leisure resort licensed by Paramount. The £2billion development would be twice the size of the Olympic Park in East London, featuring an indoor water park, theatres, live music venues, attractions, cinemas, restaurants, event space, hotels and ancillary development. Allied to the project will be a training academy for the entertainment and hospitality sectors, a new country park, a large science and education visitor complex and "the biggest performing arts centre in Europe". It is estimated the development would include 2,500 staff apartments, 5,000 hotel bedrooms and create 27,000 jobs. The expected timetable is for a planning application in 2014 and opening in 2019/20: this would therefore be within the time horizon of this Growth Plan. A scheme on this scale has the potential to transform the fortunes of North Kent and linkage with other major development schemes in Dartford and Gravesham, in particular Ebbsfleet Valley, Bluewater and Craylands Lane (a site for 110 homes).

As a separate development, but in the same vicinity, the retail floor space at **Bluewater** regional shopping centre is being expanded by 20%, which is expected to create an additional 2,300 jobs in retail and associated occupations.

Northfleet Embankment – comprises two sites (East and West) totalling around 70 hectares on the western edge of Gravesend town centre close to Ebbsfleet International. Both components have extensive river frontage with deep-water access to the Thames. The Lafarge-owned Northfleet Embankment West site has the potential to deliver around 500 houses and 1,400 new jobs through a mixed-use scheme, while the HCA-owned Northfleet Embankment East site, with its proximity to Ebbsfleet International and its extensive river frontage with deep-water access to the Thames, makes it a potential location for quality commercial development and up to 240 homes (though the residential component is not definite). There is also potential for cruise liner facilities, linking especially to the tourism potential that might be unlocked on the Swanscombe Peninsula.

Gravesend

Gravesend Town Centre. Around 1,250 new homes and 1,500 new jobs will be created in and around the Gravesend Town Centre, focusing on four major sites (Heritage Quarter, Canal Basin, North East Gravesend and Clifton Slipways) capitalising on the 22 minute high-speed train service direct to London and other public transport interchange improvements in the town's new Transport Quarter (including £19 million upgrade of Gravesend station and the £8.1 million Rathmore Road link).

Medway

Chatham Centre. 3,682 new homes and 2,700 new jobs (in 50,000m² of employment floor space) will be created adjoining the renowned Historic Dockyard and waterfront centre – in addition to significant retail (6,800m²) and leisure opportunities.

Chatham Maritime. To complete the regeneration of Chatham Maritime there remain two outstanding development opportunities on this well established and prestigious development. St Mary's Island and the area between Chatham Maritime and Chatham Historic Dockyard will deliver a further 1,400 new homes and around 10,000m² of commercial space.

Gillingham Waterfront. A private sector led scheme to deliver 775 new homes and over 2,200m² of mixed commercial space.

Chatham Waters. Peel Land & Property are transforming a 10.5 hectare brownfield site adjacent to Chatham Maritime. This mixed-use scheme is expected to provide around 950 new homes and 3,500 jobs in 180,000m² of commercial space, and also includes the new Medway University Technical College opening in 2015.

Rochester Riverside. The first phase of affordable housing was completed in 2012 and phase 2 (Stanley Wharf) marketed in late 2013. This prestigious site is in a prime location served by the re-located railway station due to open in 2015 and linking directly into Rochester town centre. Once complete, the site offers potential for 1,200-1,500 homes and around 29,400m² of mixed commercial space (employment, hotel and retail).

Strood. The extensive waterfront area extends from the M2, through Temple Waterfront and Strood town centre, to Strood Riverside adjoining Strood station. It includes a number of distinct mixed-use development opportunities that will be complemented by infrastructure improvements in the centre and the refurbishment of the station that already offers access to HS1 services. In total these opportunities are expected to result in over 2,054 new homes, 42,300 m² of employment floor space and 22,500m² of retail.

Rochester Airport - situated close to the M2 and adjacent to a major BAE Systems complex, this strategic location is to be developed as a technology and knowledge-based cluster. The Masterplan was approved in late 2013. Rationalisation of the existing airport will create capacity for up to 300 jobs in phase 1 (3,000 m² innovation workspace for advanced manufacturing R&D and prototyping) and, in phase 2, up to a further 1,460 jobs in 34,240m² of high-quality commercial space.

Lodge Hill, Chattenden. This is the only proposed freestanding new settlement in the Thames Gateway, and occupies former military land on the Hoo Peninsula. The development would provide up to 5,000 new homes and a similar number of new jobs in 44,100m² mixed commercial space with associated health, education, retail, hotel and other community facilities. Part of the site was confirmed by Natural England as a SSSI in November 2013, leading to withdrawal of the submission draft Core Strategy. The future of this site remains under consideration by Medway Council in the

context of preparing a revised draft local plan. A revised outline planning application was submitted by the Defence Infrastructure Organisation / Land Securities in February 2014.

The Medway Estuary renewable energy cluster

North Kent has potential to become a major manufacturing hub for the offshore renewable energy industry, with the potential to create 2,000 new jobs at the Port of Sheerness alone. This potential, and the wider opportunities for growth building upon the existing concentrations of manufacturing and innovation in Medway and Swale, underpins the concept of the Medway-Swale Arc, which is included in the Assisted Areas Map 2014-20.

The Medway Superhub is a cluster of sites suitably sized and positioned to accommodate the integrated manufacture of blades, gearboxes, nacelles, towers and foundations for offshore wind turbines. The Superhub includes facilities which allow for the shipping in of components; laying-down and assembly; shipping and deployment of completed turbines; associated supply chain operations; storage and distribution of parts; and warranty maintenance. Further supply chain support is available from across Kent and Medway, but particularly at the nearby manufacturing clusters at Sittingbourne and Medway along with R&D support at the Kent Science Park. Together with operations and maintenance facilities at the Port of Ramsgate, these facilities contribute towards the **Kent CORE** (Centre for Offshore Renewable Engineering), one of only six such centres in England. The cluster of sites includes:

Port of Sheerness	50 hectare, port facilities, rail
London Thamesport & the Isle of Grain	224 hectare, port facilities, rail
Kingsnorth Commercial Park	46.5 hectare, water access
Queenborough and Rushenden	18 hectare, mixed commercial
Ridham Dock	4 hectare, water access

Swale

Kent Science Park. This prestigious 22 hectare site provides high security, high quality accommodation for innovatory businesses, particularly in ICT and bio-sciences. A 4 hectare expansion to provide an additional 3,000 m² of floor space is underway. Ambitious plans for a further expansion to create a further 100,000 m² of floor space providing 3,000 jobs require major infrastructure investment, particularly a new motorway junction (M2 J5A) to overcome restrictions on the existing network (viewed as a first step towards providing a new link between the M2 and A2 and with potential to unlock other development opportunities beyond current planning horizons).

Sittingbourne Town Centre. There are a number of developments proposed for the town centre. These include the redevelopment of the Bell Centre Arcade, completion of the housing component of the Sittingbourne Mill re-development and the town centre redevelopment proposed by the Spirit of Sittingbourne consortium (which would include redevelopment of land currently occupied by Council offices). These could provide around 500 homes and significant mixed use commercial

space. The **Milton Creek** site on the northern edge of the town centre offers potential for 400 homes and 700 jobs.

The 17 hectare Phase 5 of the successful **Eurolink** business estate has been granted permission and is expected to provide a further 1,000 jobs in over 43,000 m² of industrial and logistics development. Eurolink already provides accommodation for over 250 companies employing around 6,500 people.

Queenborough and Rushenden. This site on the Isle of Sheppey will deliver up to 1,100 new homes within a historic existing community, alongside approximately 180,000m² of commercial space at Neats Court, which could create up to 2,000 jobs. Both sites are well served by the new Rushenden Link Road connecting to the A249.

23 May 2014

Airports Commission – Call for Evidence

– Inner Thames Estuary Feasibility Studies

– Surface Access Impacts (Study 4)

Response from Kent County Council and Medway Council

The Airports Commission has given the opportunity to submit evidence, analysis, additional research and comments in relation to an inner Thames Estuary airport proposal. Kent County Council (KCC) welcomes the opportunity to respond to this consultation and would be happy to expand on any aspect in writing or as oral evidence.

KCC has previously submitted a response to the draft terms of reference for the Inner Thames Estuary Feasibility Studies. This response relates to the Commission's Study 4, and summarises the concerns surrounding surface access to the proposed airport on the Isle of Grain. It draws together many of the issues raised in response to the Commission's invitation for comments on the outline proposals submitted to the Airports Commission in July 2013.

1. Introduction to concerns surrounding surface access

The transport infrastructure that is currently in place is wholly inadequate for both passengers and staff travelling to an airport in the Thames Estuary. Poor transport links into the most extreme south eastern corner of the UK, and the extensive investment that would be required to address this, is one of the many good reasons why North Kent is not a suitable location for a national hub airport. The Airports Commission's own analysis concludes that an Isle of Grain airport would be 33 miles from central London (compared to 15 for Heathrow and 25 for Gatwick) and its easterly location makes it less convenient for the majority of UK air passengers.

2. High Speed Rail services

The outline plans for an Isle of Grain airport places significant reliance on High Speed One (HS1). However, there is no room for expansion at St Pancras International station in terms of platform capacity, and there is little scope for a greater number of services on the existing line. The expectation to run increased services on the line does appear to overlook the fact that it is a high-speed service, and cannot function to metro service frequencies of a train every 2 to 3 minutes.

There are capacity restrictions on HS1 which make it inadequate for serving a new hub airport. The capacity of HS1 is 18 trains per hour (tph); in the peaks

there are 6 domestic tph and 3 Eurostar tph, therefore spare capacity for 9 tph. Foster and Partners' proposal stated that 15 tph in each direction are needed to cope with demand from the airport (possibly rising to 20tph); however there is not the capacity on HS1 for this level of service given that there is only spare capacity for a further 9 tph after domestic commuter trains and Eurostar services have been taken into account. The restriction is, in part, due to the fact that the HS1 platform capacity at St Pancras for domestic trains is currently limited to 6 tph.

A number of the estuary airport proposals have stated that the ability of the HS1 service to increase its frequency was demonstrated during the 2012 London Olympics. This is contrary to our correspondence with Southeastern, who advised us that the higher frequency Javelin service operated during this time is unsustainable in the long term as it required modifications to the Eurostar timetable and was only delivered by providing a limited service to other Kent stations during the games. Also, providing a dedicated high speed shuttle service to an Isle of Grain airport would be an overall return journey distance of around 66 miles from central London, a lot further than the service provided during the Olympics to Stratford International.

HS1 does not have the ability to meet the passenger capacity demands presented by a new hub airport. As presented to the Airports Commission on their visit to Medway on 13 June 2013, a basic calculation of the rail demand from a new hub airport demonstrates that there is insufficient passenger capacity on HS1. Demand will exceed capacity by 78% just from air passengers using HS1 to travel to the airport before existing or future commuting passengers have been taken into account. This demand can be estimated at: a 140 million passenger per annum (mppa) airport equates to 384,614 passengers per day which, with a 70% mode share by public transport, means 269,230 passengers arriving or departing by rail per day¹. Assuming that they are evenly spread over an 18 hour operating day², this equates to 14,957 passengers per hour or 7,479 in each direction. With the current six trains per hour, a 12 car Class 395 with 698 seats would provide capacity for 4,188 passengers per hour which provides only just over half (56%) of the demand (7,479). With a peak in demand by time of year, day of the week or time of day, the capacity shortfall would be even more pronounced, especially given that commuter trains at peak times are already full.

Considering all the limitations of the current HS1 infrastructure, at least a doubling of the capacity of HS1 is required; that being four tracking of the line and a doubling of the platform capacity at St Pancras or use of a new London terminus station.

¹ Based on TfL's previously stated modal share target of 70% from public transport (now 65% in the TfL submissions to the Airports Commission, July 2013). Assumes: high speed rail is the only viable public transport option given the long journey times on other mainline rail or bus services; an even flow of passengers throughout the year, week and day (although highly unrealistic that there would be no peaks); and no passengers on Christmas day when there are no rail services.

² Assumption of limited flights between 00:00 and 06:00 and few rail services.

3. Mode share expectations

It would appear that the promoter's expectation to have 65% of airport passengers and staff travelling by rail is unrealistic. Schiphol Airport, Amsterdam, has a reputation as an airport with good public transport connections to the Dutch and trans-European rail network and a journey time to the centre of Amsterdam of around only 15 minutes, yet only 38.2% of air passengers arrived by rail in 2012³.

4. Airport staff, rail journey times and operating hours

Staff travelling to the airport are likely to also need to use mainline rail services (rather than high speed services), where there are already operational capacity constraints. Also, assuming many journey origins for airport staff will be in Kent and Medway, the journey is likely to be convoluted (possibly to Ashford, Ebbsfleet or even London) and therefore more time consuming than necessary. It is also important to consider that some staff may have transferred employment from Heathrow airport, and therefore will have excessive journey times from the West London area.

Travel by mainline rail services or an extended Crossrail to an Estuary airport would have unattractive journey time for both passengers and staff. Rail services from central London are slow – Gravesend 57 minutes and Rochester 73 minutes from Charing Cross. Foster and Partners' and TfL's proposals for the Isle of Grain include access by an extension of Crossrail from Abbey Wood. The estimated journey time from Central London (Bond Street) to Abbey Wood using Crossrail is 25 minutes; with Abbey Wood to the Isle of Grain a further 30 miles, journey times from Central London on Crossrail would be far in excess of an hour. The journey from West London, for staff transferring from Heathrow, would be even longer.

According to a recent survey conducted by ComRes⁴, the average acceptable journey time to an airport from central London is under an hour at 59 minutes. 44% of people would expect to be able to travel to an airport near London in 45 minutes or less. Based on the estimated potential journey time from central London to an Isle of Grain airport, it can be seen inferred that the Thames Estuary would not be a suitable location for a new hub airport due to journey times exceeding that which is acceptable to the travelling public.

It is equally important to note that rail services will not provide a 24hour service. This means that it will not be suitable for all shift patterns of workers

³ Schiphol Group Annual Report, 2012

⁴ ComRes: Headline Findings, Airport Expansion in the South East, April 2014, on behalf of Medway Council - ComRes interviewed 2,034 GB adults online between 4th and 6th April 2014. Data were weighted to be demographically representative of all British adults aged 18+. Data tables are available on the ComRes website, www.comres.co.uk

at the airport, especially those with particularly early starts. From central London, the earliest train to Heathrow leaves at 4.42am and the latest arrives at the airport at 11.47pm. However, as the airport does not operate continuously over the 24hour period, it would be unnecessary to have trains throughout the night. Conversely, it is possible to leave central London and arrive at Gatwick airport throughout the night. The 24hour service runs regularly and offers as many as eleven trains per hour in peak daytime periods. However, it is important to note that, although this service runs from central London, connecting services from areas outside of London do not run throughout the night, and therefore public transport is not truly available to all passengers 24hours a day. For example, the earliest a traveller can arrive at Gatwick airport if travelling from Maidstone in Kent, is 7.05am, after a journey of nearly two hours, three changes and a 32 minute wait at Tonbridge rail station⁵.

5. Increased rail fares

In a recent survey by ComRes⁶, 43% of people said that no additional travel costs would be acceptable if travelling to a new airport. It is important to have a clear understanding of how much tickets to the proposed airport from popular destinations are likely to cost, in order to assess public response. Currently, a ticket from central London to Heathrow Airport ranges from £9.90-£21 each way, while a return from London to Gatwick ranges from £15.10-£26.50. As with travel times, it is also important to remember the extra cost associated with connecting onward travel, as these services only provide access from central London.

Of the people surveyed by ComRes⁷, the average acceptable increase in travel costs is less than £10, with, as already stated, 43% stating that no additional cost for travel to a new airport would be acceptable. Therefore the challenge for an Estuary airport is to provide rail access at a cost that is comparable to the level of rail fares to London's existing airports. Given the high costs of providing new rail infrastructure and the need to recoup that significant investment to reduce the burden on the taxpayer in relation to rail travel, it is unlikely that rail fares to the airport could be priced low enough to be attractive to air passengers, unless there is further public subsidy. The result of higher rail fares is an increase in the attractiveness of accessing the airport by car, unless car parking is also priced high, in which case the cost of accessing an Isle of Grain airport by all modes will be unattractive compared to existing airports.

⁵ All rail times and prices were found at www.nationalrail.co.uk 2/5/2014

⁶ ComRes: Headline Findings, Airport Expansion in the South East, April 2014, on behalf of Medway Council - ComRes interviewed 2,034 GB adults online between 4th and 6th April 2014. Data were weighted to be demographically representative of all British adults aged 18+. Data tables are available on the ComRes website, www.comres.co.uk

⁷ ComRes: Headline Findings, Airport Expansion in the South East, April 2014, on behalf of Medway Council - ComRes interviewed 2,034 GB adults online between 4th and 6th April 2014. Data were weighted to be demographically representative of all British adults aged 18+. Data tables are available on the ComRes website, www.comres.co.uk

6. Airport passengers and rail services

As noted for staff requirements, the lack of a 24hour rail service will mean some air passengers will not be able to arrive by rail for late night and early morning flights.

It is important to consider the rail provisions and the changes that will need to occur in order to provide a suitable service for passengers to and from the proposed hub airport. Current commuter rail carriages only have a limited amount of luggage storage capacity. However, it can be assumed that, with a significant number of airport passengers using the rail services to access the airport, there will be a lot of suitcases and large items of luggage aboard the trains. This could incur costs related to making carriages more suitable, or loss of ticket revenue due to the lower number of passengers able to travel when carriage space is taken up by luggage; or uncomfortable journeys due to crowding. It is also important to realise that these trains already run at capacity with commuters.

Air passengers may have to make a convoluted surface journey to reach their final destination. The proposed site on the Isle of Grain, as previously noted, is only 33miles from London, but it is likely that multi-modal transport network will be needed to reach destinations other than London. The feasibility of the associated infrastructure for onward travel also needs to be considered.

7. Access by car – Strategic Road Network

Due to apparent restrictions with providing surface access by rail, it can be expected that many journeys to the airport will be made by private car or taxi. Passengers and staff commuting by road from the wider South East catchment would likely travel around London on the M25, the capacity of which is already reached in many sections. The southern section of the M25 has been upgraded as a managed or smart motorway with permanent hard shoulder running between junctions 5 and 7 in order to alleviate the congestion that already exists. Less than 60% of journeys on this section of the M25 were 'on time' according to DfT statistics⁸.

There would also be capacity issues when considering access from north of the Thames, due to the current issues associated with the Dartford crossing. Many of the proposals for an Estuary airport rely on the new Lower Thames Crossing facilitating road access into the airport from north of the Thames. However, a new Lower Thames Crossing would not provide sufficient capacity for the new demand generated by the airport as the new crossing is being proposed as only a two lane all purpose dual carriageway. In addition to the impacts on Kent and Medway, an airport in the Estuary will have implications

⁸ DfT, Reliability of journeys on Highways Agency's motorway and 'A' road network, England: April to June 2013, Department for Transport Statistical Release, 8 August 2013.

for areas to the north of the Thames, i.e. Essex, Thurrock and Southend, with passengers and workers needing to access the airport.

Access to Kent from north of the Thames is severely restricted due to the strategic bottleneck of the Dartford Crossing and this is a key inhibitor of commuting from Essex and Thurrock into Kent. The recent Department for Transport (DfT) consultation on corridor options for a new Lower Thames Crossing identified that a new crossing is needed now in order to deal with current and forecast traffic growth and did not assume traffic demand from a new national hub airport. The existing crossing operates above its design capacity for an average five days in every seven and the average delay for 50% of vehicle journeys is in excess of 9 minutes. The DfT forecasts traffic growth of 41% by 2035⁹, which on top of existing congestion levels demonstrates the need for extra capacity before traffic growth associated with accessing an airport is even considered. Therefore a new Lower Thames Crossing is needed now to alleviate current and forecast traffic growth and would not be sufficient to provide road access to a Thames Estuary airport.

Recent and planned upgrades to roads in Kent and the area surrounding the proposed airport site, such as the work on the M25 and A2, are to tackle current capacity issues and planned housing and employment growth in the area. Some Estuary airport proposals have incorrectly assumed that the recent upgrades to the A2 will “be sufficient for the initial stages of the airport’s development”. Although it is true that the A2 has been upgraded in recent years, this is to provide capacity for the planned housing and employment growth in the Thames Gateway, for which significant upgrades to key junctions are still needed (Bean and Ebbsfleet junctions). It is therefore not sufficient for the initial stages of the airport’s development.

The M2, east of Gillingham from Junction 4, has had no capacity improvements and is still the original two lane motorway. Significant investment is needed to upgrade Junction 5 (Sittingbourne), a new Junction 5a (Kent Science Park), Junction 7 (Brenley Corner) and complete the dualling of the A2 around Lydden on approach to Dover. This work is needed to accommodate the forecast increase in cross channel traffic and prevent congestion on the A20 and M20, resulting from the port’s expansion with the Western Docks Revival. This is without consideration of a new hub airport in this part of the country.

The Mayor of London has warned that building a third runway at Heathrow would result in the demand for widening the M4, the western sections of the M25 and the A4 through Chiswick and Hammersmith with knock on effects for the M3 and M40. The Mayor estimates the cost of these works at £12 billion¹⁰. Applying the Mayor of London’s approach to the strategic highway network in Kent serving an estuary airport, then the M2 and the A2 (between the M25 and M2) and potentially sections of the M20 are likely to require widening. The table below details the potential cost of motorway widening across Kent and

⁹ DfT Road Traffic Forecasts, 2011

¹⁰ Mayor of London’s press release 30 September 2013

Medway as a result of an Estuary airport by simply applying a rough cost of £30m per mile¹¹ to the current estimated mileage. The total cost of strategic road widening across Kent and Medway could be in the region of £2.5 billion.

	Total length (miles)	Cost per mile	Cost
A2 (from M25 to M2)	9	£30m	£270m
M2	25	£30m	£750m
M20	50	£30m	£1,500m
Total cost			£2,520m

8. Access by car – local road network

It is likely that a high proportion of airport staff will commute from Medway and Kent to an Estuary airport by private car, with a significant proportion of these trips crossing the River Medway using existing crossings on the local road network at A289 Medway Tunnel and A2 Rochester Bridge.

The A289 Medway Tunnel is a two-lane dual carriageway and the route becomes significantly congested during peak times. Medway Council is pursuing funding opportunities to increase network capacity as a result of planned development served by the route; however, this is simply to accommodate planned housing and employment developments in the area, not an airport. The A289 (including the Medway Tunnel) is also the diversion route when the M2 is closed.

Traffic flows through the A289 Medway Tunnel are detailed in the table below¹².

	East bound	West bound	Total
AM peak hour 08:00 to 09:00	2,174	1,805	3,979
PM peak hour 17:00 to 18:00	1,892	1,811	3,703
12 hour 07:00 to 19:00	18,202	17,584	35,786
24 hour	22,103	22,408	44,511

The A2 Rochester Bridge comprises two structures; one carrying east bound traffic and the other carrying west bound traffic. 2 lanes are provided in each direction. The route becomes significantly congested during peak times. The Rochester Bridge Trust maintains both structures. Traffic flows across the A2 Rochester Bridge are detailed in the table below¹³.

	East bound	West bound	Total
AM peak hour 08:00 to 09:00	1,487	1,645	3,132
PM peak hour 17:00 to 18:00	1,652	1,273	2,925
12 hour	15,283	14,774	30,057

¹¹ Cost from Highway Authority website

¹² Automatic count measured on Wednesday 17 October 2012

¹³ Manual count measured on Tuesday 16 October 2012

The calculation below details the impact on these existing river crossings if an assumed percentage of staff drive through these crossings over a 12 hour day on their way to and from employment at an estuary airport:

Estimated level of staff employed:	120,000
Total number of two way trips per day:	240,000
Assume 6% of trips pass through Medway Tunnel	14,400
Assume 3% of trips cross Rochester Bridge	7,200

This approximate calculation demonstrates the scale of predicted traffic growth of:

40% through the Medway Tunnel
24% across Rochester Bridge

These crossings will be experiencing high levels of congestion even with this small percentage of employment trips associated with an estuary airport passing through these crossings. This will significantly impact on the economic viability of the area. As a result additional highway capacity will be essential to mitigate the impact of an estuary airport on the local highway network in Medway for which funding does not exist.

Medway Council's provisional estimate for new crossings at today's prices amounts to £160m; this includes £100m for an additional Medway Tunnel and £60m for an additional Rochester Bridge. Applying RPI at 3% for 20 years to time when the additional capacity would be needed, then total cost amounts to in excess of £260m. In addition, significant additional capacity will be required on the local highway network through Medway in particular along the A289 and A2.

9. Car parking

Upon arrival at the airport, it can be assumed that long-stay parking facilities will be available. As previously noted, the ComRes¹⁴ survey concluded that more than two in five of the British public (43%) would be unwilling to pay a higher cost to travel to a new airport. However, with the target for a high public transport mode share, it is likely that car parking facilities would be priced in such a way as to incentivise the use of public transport; therefore resulting in higher costs for accessing the airport by car.

¹⁴ ComRes: Headline Findings, Airport Expansion in the South East, April 2014, on behalf of Medway Council - ComRes interviewed 2,034 GB adults online between 4th and 6th April 2014. Data were weighted to be demographically representative of all British adults aged 18+. Data tables are available on the ComRes website, www.comres.co.uk

10. Environmental impacts

Environmental impacts linked to the surface access to the proposed Estuary Airport have not been assessed and it is unlikely that a full assessment could take place until firm plans are in place for infrastructure developments to support the airport.

The proposed site on the Isle of Grain is an area vulnerable to sea level rise and flooding. This will be important for associated development, such as railway tracks and roads, as the flood risk will need to be mitigated and managed. There is a great deal of marshland in the area, which will pose its own challenges when developing the supporting infrastructure in addition to the airport site. This needs to be fully assessed, with consideration of the full range of impacts from the proposed airport development.

Environmental considerations such as noise and air pollution also need to be considered. Assessment of noise from surface access is relevant from the road traffic and the operating times of the extended rail services, if implemented, in order to provide for a greater number of staff and early morning flight passengers.

11. Financial considerations

Many of the cost estimates for the proposed airport have not fully assessed the costs associated with infrastructure development. It is apparent that that HM Treasury would need to be prepared to finance around £100 billion to establish a Thames Estuary airport. Without such a commitment, it simply cannot happen and, to date, unlike HS2 which has a financial allocation of £42.6 billion, there is no indication the Government (or indeed the opposition parties) are contemplating putting any finance aside for a Thames Estuary option¹⁵.

12. Conclusion

The ComRes¹⁶ survey in April 2014, on behalf of Medway Council, was commissioned to understand the views of the general population regarding the proposed hub airport on the Isle of Grain. There was a particular focus on the residents of London and the South East, as the population most likely to be affected by the proposed airport. Their findings included ‘strong opposition to such an airport once British adults learn of the other airport closures required’ and that ‘an airport that is out-of-the-way or expensive to reach is

¹⁵ Financial considerations calculated and presented by Medway Council within their additional response to the Airports Commission on the long term airport capacity proposals, October 2013

¹⁶ ComRes: Headline Findings, Airport Expansion in the South East, April 2014, on behalf of Medway Council - ComRes interviewed 2,034 GB adults online between 4th and 6th April 2014. Data were weighted to be demographically representative of all British adults aged 18+. Data tables are available on the ComRes website, www.comres.co.uk

likely to struggle to attract passengers'¹⁷. When this is considered alongside the surface access concerns described in this submission, it is clear that a considerable level of investment in surface transport infrastructure is needed in the area, should the proposed airport go ahead as neither the current or planned road and rail infrastructure would provide the capacity to accommodate the demand from a new airport on the Isle Grain. The ComRes¹⁸ survey shows that an airport is not likely to be attractive if accessibility proves difficult, time consuming and expensive.

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23 May 2014

¹⁷ ComRes: Headline Findings, Airport Expansion in the South East, April 2014, on behalf of Medway Council - ComRes interviewed 2,034 GB adults online between 4th and 6th April 2014. Data were weighted to be demographically representative of all British adults aged 18+. Data tables are available on the ComRes website, www.comres.co.uk

¹⁸ ComRes: Headline Findings, Airport Expansion in the South East, April 2014, on behalf of Medway Council - ComRes interviewed 2,034 GB adults online between 4th and 6th April 2014. Data were weighted to be demographically representative of all British adults aged 18+. Data tables are available on the ComRes website, www.comres.co.uk