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Airports Commission
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Dear Sir/Madam

I am writing as Chairman of the Thames Gateway Kent Partnership (TGKP) to respond to the Commission's call for evidence to inform the study outputs on the feasibility of an Inner Estuary Airport.

TGKP is the private and public sector partnership that works to champion sustainable economic growth across North Kent (Dartford, Gravesham, Medway and Swale).

The attachment to this letter, which has been endorsed by the TGKP Board, sets out evidence supporting the Partnership's view that the housing, surface access and other infrastructure that would be required to support an Inner Estuary Airport is undeliverable; and that the negative environmental impacts of such an airport and associated development would be unacceptable. TGKP therefore urges the Commission conclusively to rule out the Inner Estuary Airport option from further detailed consideration.

Yours faithfully

[redacted]

Airports Commission: Inner Estuary Feasibility Studies – Submission by the Thames Gateway Kent Partnership

1. Introduction

1.1 This submission is made on behalf of the Thames Gateway Kent Partnership (TGKP) Board. TGKP is a public-private partnership consisting of the Leaders of Medway Council and the district councils of Dartford, Gravesham and Swale, the Cabinet Member for Economic Development at Kent County Council, members from the Private Sector (including the Chair) and observers from further and higher education sectors, the Homes and Communities Agency, Environment Agency and a North Kent Member of Parliament.

1.2 TGKP accepts the Airports Commission's conclusions about the need to increase runway capacity in South East England, and supports the Commission's preference to consider options at Heathrow and Gatwick. The Partnership would emphasise the importance of ensuring good connectivity to the airport ultimately chosen for expansion, to serve the needs of businesses and air travellers across as wide an area as possible and particularly including North Kent.

1.3 TGKP opposes the proposals for an Inner Estuary Airport and asks for the evidence contained in this submission to be taken into account in deciding whether or not to proceed with more detailed work on the IEA option. TGKP would contend that more detailed work on this option should not be pursued.

2. Summary

2.1 An Inner Estuary Airport (IEA) would create an undeliverable requirement for additional housing and associated infrastructure and facilities. The scale and pace of development and infrastructure required to support an IEA would be detrimental to the quality of North Kent's offer to existing communities and potential investors. (section 4.2).

2.2 Creation of an IEA could potentially blight regeneration proposals in the second decade of TGKP's growth strategy particularly in terms of impact on land availability and affordability (section 4.3). This could include flagship proposals for Ebbsfleet Garden City and the proposed Paramount Leisure Resort at Swanscombe Peninsula.

2.3 An IEA would have significant negative environmental impacts, causing unacceptable damage to internationally important habitats, elevating the risk of tidal flooding in the Thames and Medway Estuaries and posing increased risk to people and property (section 5).

2.4 The presence of migratory bird populations pose a significant safety hazard to aircraft taking off and landing (section 5.4).

2.5 The costs and undeliverability of the IEA option mean that it is not worthy of further detailed examination compared to the alternative options already identified by the Airports Commission.

3. Context and assumptions

3.1 In making this submission, TGKP acknowledges the context of the call for evidence:

- The feasibility and impact studies on an Inner Estuary Airport comprise a continuation of Phase 1 of the Commission's work.

- The terms of reference for this work covers four areas: Environmental / Natura 2000 impacts; Operational feasibility and attitudes about moving to a new airport; socio-economic impacts; and surface access impacts. This submission primarily addresses the third of these, with some additional observations that bear upon the first, second and fourth.
- TGKP recognises that the Airports Commission has requested evidence by 23rd May and will publish outputs from its studies and analysis of evidence received in July, with an invitation to comment during August ahead of a decision in September as to whether the Inner Estuary proposal is a credible option to be taken forward for detailed development work.

3.2 Certain assumptions are necessary in order to establish a framework for the evidence in this submission:

- The Airports Commission's Interim Report points to critical shortfall in runway capacity by 2030. Since an IEA is predicated on replacing Heathrow, the working assumption has to be that to deliver the additional capacity and supposed benefits of a hub airport it would be operational by or from around 2030 (at which point Heathrow would close).
- We assume that in order to deliver the supposed benefits of a hub airport, an IEA would have to be fully operational from day 1, enabling a comprehensive switch of operations from Heathrow. It is recognised that in practice a more likely scenario is gradual closure of one site and gradual opening of the other, giving rise to a degree of functional duplication and additional operational and other costs. We have not attempted to consider transitional or other scenarios whereby Heathrow and an IEA would overlap operationally.

4. Socio-economic impacts

4.1 An IEA of the type proposed would be a once-in-lifetime investment and could potentially have transformative impact on the local economy. It is therefore necessary to explain how and why that potential could conflict with ambitions for regeneration in North Kent. This submission focuses primarily on the issues of deliverability and impacts on regeneration objectives and quality of life in North Kent.

4.2 Implications for population growth and delivery of housing and associated development

4.2.1 ***Population Forecasts.*** Existing forecasts suggest the population of North Kent will grow by 19.5% (ca 105,000 people) by 2031 based on a 2011 baseline[1]. That looks beyond TGKP strategy period; but assuming new housing is delivered to our planning trajectory this population growth will be sustainable. Those forecasts are based on indigenous growth and ONS assumptions about in-migration. Success in attracting inward investment as well as growth driven by existing businesses could generate additional in-migration and housing demand. Our targets of around 50,000 new homes and 58,000 new jobs in the period 2006-26 are ambitious but calculated to maintain a sustainable equilibrium between new homes, jobs and population growth.

4.2.2 ***Existing external pressures.*** The Mayor for London, in his revised London Plan, is clearly signalling an expectation that local authorities outside London, particularly eastward into North Kent and South Essex, will help absorb housing

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

demand arising from the Capital's expanding population. The extent to which such pressures are factored into North Kent's forecast housing provision would be determined through the local planning process including the Mayor's duty to inform and consult neighbouring authorities on the London Plan. It should be noted that those pressures exist irrespective of decisions about a future IEA.

4.2.3 ***Population and housing demands generated by an IEA.*** The additional population and housing pressures that would be generated by an IEA, on top of those allowed for in our growth strategy and arising from outside pressures, particularly from London, do not appear sustainable or deliverable, as illustrated below.

4.2.4 **Job forecasts.** Total Heathrow-related employment on site and in the immediate vicinity is estimated at 114,000; London-based Heathrow-related jobs are estimated at 136,600; and Heathrow-related jobs in the rest of UK are estimated at 205,900[2]. The Mayor of London's submission to the Airports Commission suggests 100,000 new jobs at an Estuary Airport by 2030[3]. An IEA is proposed to be twice the size of Heathrow, but that increase is primarily in runway capacity rather than total functions, so it would not translate into a doubling of the number of jobs required at the airport or in its immediate vicinity. Other factors such as new technology will also have a bearing on the number of jobs directly related to the operation of an IEA. So for present purposes, and leaving aside consideration of airport related jobs in London or elsewhere, **it seems a fairly conservative assumption that perhaps 100,000 net additional workers[4] would be employed within or in the immediate vicinity of an IEA**.

4.2.5 ***Jobs-related new housing requirement.*** 100,000 new jobs does not mean 100,000 new homes. Some of those jobs might be taken by people already resident in North Kent[5] (i.e. some existing workers at/near Heathrow would not relocate); and some households might have more than one member employed at the airport. But whereas indigenous growth would partly be accounted for by increased household size, and therefore not necessarily additional housing requirement, influx of new households means a need for additional housing.

4.2.6 ***Travel to work behaviours.*** Travel to work behaviour affects the quantum and location of housing and other provision required to support an airport workforce of 100,000. It is reasonable to assume that for the IEA to function effectively, a substantial portion of its workforce would need to live relatively locally and have access to the airport from its operational date. Airports offer a wide range of employment, but a significant proportion of jobs are not particularly highly paid and travel cost (and time) will be a factor in determining the catchment from which workers are drawn.

4.2.7 In principle, connectivity to an IEA 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. It should be noted that the broad location suggested for an IEA is 76 miles from Heathrow via the M25 or 58 miles via central London. Transferring jobs from Heathrow to an IEA

[2] Source: Optimal Economics, September 2011

[3] Source: Airports Commission Interim Report, paragraph 6.27, p182.

[4] The assumption of 100,000 jobs could actually mean more than 100,000 workers, depending on whether jobs were full or part time.

[5] Without more detail on the skills mix required, it is not currently possible to map the likely take-up of IEA jobs by existing North Kent residents, nor what impact that might have on existing unemployment levels.

without re-location of workers would present significant challenges in terms of commuting times and costs. Transport for London (TfL)[6], in their proposal for an Isle of Grain Hub Airport, suggest that 50% of staff journeys could be drawn from a 20km "South Essex / North Kent" area (particularly mentioning Basildon and Medway), with the vast majority of the remaining 50% living in Greater London. TGKP is not persuaded that these estimates are realistic. "Reverse commuting" is less common chiefly because of differentials between workplace earnings and residential living costs. For instance, median workplace earnings in Medway are 75% of those in London, whereas median house prices in London are double what they are in Medway[7]. The contrast is even more extreme based on mean incomes and prices[8]. So the value of airport-related jobs would have to be high enough to overcome such differentials. TGKP considers that a more likely scenario would be that a higher proportion of workers than TfL have assumed would need to live in close proximity (20km or less) to the airport.

4.2.8 TGKP would further argue that accessibility of an IEA from north of the Thames should be treated as a neutral factor. South Essex, in particular, faces similar pressures to North Kent, for instance a forecast population increase of 126,000 by 2031[9] (and see paragraph 4.2.2) and has similar growth ambitions, including delivery of around 45,000 new homes and 52,000 new jobs[10]. The possibility that new river crossings might bring more of South Essex within commutable distance of an IEA 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 – see 4.2.11 and 4.2.12 below. It therefore seems reasonable to disregard the 'Essex factor' in examining travel to work behaviours and the impact on housing requirement.

4.2.9 Returning to the assumption that most of this 100,000 workforce would wish to live within a reasonable travel-to-work time and distance from the IEA, a significant proportion of those would be looking to live within North Kent. Existing travel to work patterns show that 79% of those working in North Kent live in North Kent[11]. If the same pattern held in relation to IEA employment, that implies perhaps 79,000 workers at the IEA wishing to live in North Kent by the time an IEA became operational. If we assume one IEA worker per household, **that suggests an additional housing requirement of 79,000 homes in North Kent by around 2030**. This is more than double the unrealistic estimate of 31,000 to 35,000 extra households suggested by TfL.

4.2.10 ***Jobs-related population increase.*** The population increase associated with that workforce influx would be much greater numbers. The average household size in

[6] Source: https://www.tfl.gov.uk/cdn/static/cms/documents/isle-of-grain-hub-plan-summer-2013.pdf, p.21, para 5.3.

[7] Source: Annual Survey of Hours and Earnings, NOMIS – based on Q4 2012, and DCLG Live Table 582, Median House Prices based on Land Registry Data. Median Gross Annual Pay: Medway = £26,192, London = £34,951; median house price: Medway = £158,000, London = £315,000.

[8] Mean earnings in Medway (£28,325) are 59% of mean earnings in London (£48,032); the mean London house price (£467,448) is 2.6 times the Medway mean house price (£179,944) – source (Q4 2012) Annual Survey of Hours and Earnings, NOMIS, DCLG Live Table 581.

[9] Source: ONS, 2010-based Population Projections

[10] See Thames Gateway South Essex Chapter of South East LEP Strategic Economic Plan, p.182, paragraph 4.270.

[11] Source: KCC Research & Information, 2011.

North Kent by 2031 is forecast to be 2.28 persons[12]. If that forecast were applied to an additional 79,000 households, **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[13], 9 to 12 new secondary schools[14] (plus additional post-16 education and training provision), around 30 new GP surgeries[15] and 522 general hospital beds[16], as well as other supporting transport, community and other infrastructure and commercial space. It should be emphasised that these requirements would be additional to those generated by projected population increases and planned growth. These projections of new housing requirement do not include replacement of the estimated 1,600-2,000 homes that would be demolished to accommodate an IEA.

4.2.11 ***New housing deliverability.*** The existing North Kent target of 50,000 new homes requires more than 2,700 annual housing completions between now and 2026. This is challenging but sustainable. An additional 79,000 homes by around 2030 would require, if started in 2015, an additional 5,266 homes being delivered annually in North Kent each year. Actual delivery of new homes has averaged just below 2,000 per annum since 2000/01, peaking at 2,454 in 2008/9 – though North Kent has consistently outperformed the national average housing completion rate since 1990. **The implied additional annual housing requirement to 2026 alone would be over 215% higher than the current annualised requirement and 246% higher than the peak output achieved by the construction industry in North Kent in 2008/9.** Even TfL's unrealistic suggestion of 31,000 to 35,000 new homes required would involve doubling the current rate of completions.

4.2.12 To put this further into perspective, given the suggested potential for workers to commute from South Essex, it should be noted that new housing completions in South Essex[17] have averaged around 1,550 units in the last ten years[18] and were below 1,000 in 2013/14. The acceleration in housing delivery required to meet existing targets is already challenging; expecting a further contribution towards the requirement for airport-related housing looks seriously optimistic.

4.2.13 ***Site availability.*** 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 55 square kilometres[19]. The land-take alone for 79,000 new homes, at 30-40 dwellings per hectare average, would be between 19.75 and over 26 square kilometres[20]; 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

[12] Source: KCC Strategy Forecast, Research & Information, November 2012.
[13] Source: KCC, based on population estimates from KCC R&I Interactive Population Toolkit (Nov 2012).
[14] Source: KCC, based on population estimates from KCC R&I Interactive Population Toolkit (Nov 2012).
[15] The ratio of GPs to patients is 1,495. Source: The Health and Social Care Information Centre. 4 GPs per surgery has been assumed.
[16] The number of hospital beds per 1,000 of the population in the UK is 2.9. Source: World Bank.
[17] Thurrock UA, Southend-on-Sea UA, Basildon, Castle Point and Rochford Districts.
[18] Calculation excludes 2008/9 to 2010/11 as data for Thurrock are unavailable.
[19] As per footnote 6, p.10.
[20] 1,975 to 2,600+ hectares.

strategic housing land availability assessments are nowhere close to this level of additional housing land even looking ahead to 2031.

4.2.14 ***Construction industry capacity.*** 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 our growth strategy, **it is highly improbable that sufficient sites, planning consents and industry capacity could be brought together to deliver that scale of development and associated infrastructure within the timescale or even 10 years beyond that**. Moreover, the house building industry would be competing for construction sector capacity with the bodies building the airport and associated infrastructure itself. This is all likely to increase the costs of labour and materials with negative impact on housing schemes' viability. This also needs to be seen in the context of a chronic and cumulative shortfall in housing provision in England into which existing interventions show no sign of making significant in-roads.

4.2.15 ***Timing.*** New housing would, in principle, be needed in advance of the opening date of the IEA, 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.

4.2.16 In reality, over 5,000 new homes per year to support the workforce of an IEA are highly unlikely to be built before 2030 because the airport-related demand would not arise significantly ahead of the airport becoming substantially operational. Conceivably some workers might relocate from the vicinity of Heathrow into North Kent ahead of an IEA 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 IEA-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).**

4.2.17 ***Development Industry.*** There seems a risk, which is difficult to quantify, of developers and property companies land-banking sites in anticipation of increasing land values based on rising future demand. Were this to happen, it could encroach upon the availability of sites and development opportunities within the period of our current growth strategy. This could therefore have the effect of stalling or 'sterilizing' development and regeneration sites to the detriment of our current strategy for sustainable economic growth, as well as driving an upward spiral in development costs. **We suggest there could be value in the Commission evaluating this risk in taking a view on the socio-economic impacts of the IEA proposal.**

4.3 Implications for existing regeneration ambitions.

4.3.1 As already indicated, TGKP has significant ambitions for regeneration in North Kent, set out in our growth strategy for 2006-26 and reviewed on a regular basis[21]. This highlights our vision for sustainable economic-led growth in North Kent, including ambitious but deliverable targets of 58,000 new jobs and 50,000 new homes. Our objectives, priorities and targets are incorporated into the South East LEP's Strategic Economic Plan.

[21] See TGKP Growth Plan 2014-20 at www.tgkp.org/documents.

4.3.2 Much has already been achieved through significant investments, particularly but not exclusively through Thames Gateway-related programmes. These include the High Speed 1 domestic and international rail services; Ebbsfleet International Station; improvements to the western section of the A2/M2; creation of the Sheppey Crossing; regeneration of the former Naval dockyard at Chatham Maritime, including a thriving University Campus bringing together three of North Kent's four universities; excellent new further education provision; new innovation centres; and the delivery of over 25,000 new homes since 2000/01.

4.3.3 Though slowed by the recession, new development regeneration activity continues and is picking up pace. Major proposals in the pipeline include Ebbsfleet Garden City including up to 15,000 new homes, to be led by a new development corporation, and a Paramount Leisure Resort at Swanscombe Peninsula (likely to be within the new development corporation boundary) with potential for up to 27,000 jobs. Further east, TGKP is giving strong support to growth in renewable energy technologies, particularly offshore wind, and is home to key sites forming part of the Kent CORE (Centre for Offshore Renewable Engineering). This also ties in with our strategic aim to grow advanced manufacturing and low carbon sector businesses in North Kent.

4.3.4 Paragraphs 4.2.14 and 4.2.17 above highlight the risks that construction sector capacity and site availability could be constrained in the short- to medium-term by the demands that an IEA would generate. This could impact negatively on delivery and build-out of schemes already factored into our growth strategy. Whilst the construction phase of an IEA and associated infrastructure would itself create significant employment opportunities particularly in the construction sector, this could have adverse impacts on the labour supply for other significant infrastructure investments proposed beyond 2021. The implications for, and interaction with, options for a Lower Thames Crossing – including the possible necessity for one or more crossing in addition to that currently being considered by the Department for Transport - would need thorough examination.

4.3.5 The road and rail links required to make an IEA 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. 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.

4.3.6 The Paramount development in particular is expected to be a world-class resort handling more than 14.5 million visitors annually. In TGKP's view, this is not a reason to favour an IEA; rather, and more cost effectively, it strengthens the business case for extension of Crossrail via Dartford to Ebbsfleet, Gravesend and Medway, thus improving public transport connectivity to and from London, Heathrow and other London airports.

5. Impacts on the environment and quality offer in North Kent

5.1 The success of regeneration in the Thames Gateway, including North Kent, depends on achieving high quality development and investments contributing towards sustainable communities. This includes:

- Well-designed and high quality housing, commercial buildings, facilities and services to attract businesses to invest and people to live, work and take leisure in North Kent;
- Maintaining and enhancing the Gateway's environmental assets – which include internationally important sites for biodiversity, habitats and species, many of the most extensive of which are concentrated in the vicinity of the area suggested for the IEA.

5.2 TGKP is therefore concerned about the impact of an IEA on the **quality of the environment** in North Kent.

5.3 ***Adverse environmental impacts - Damage to and loss of habitats and impacts on biodiversity.*** 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[22] - which depend upon the salt marshes and inter-tidal flats for breeding and feeding. The area includes, or is part of the important 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, SPA and Ramsar; 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: TGKP would contend that in relation to options for location of additional airport capacity, there clearly are alternatives that do not involve harm to SPA/Ramsar sites. Even if habitat recreation and species relocation could be successfully achieved, those environmental assets would be lost from North Kent.

5.4 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. TGKP would strongly argue that major airports and important habitats for bird populations are not compatible and that the control measures that would be required to minimise the risks to aircraft safety would themselves be environmentally unacceptable.

5.5 ***Adverse environmental impacts - Landscape, Green Belt and agricultural land.*** In addition to the habitats and biodiversity issues, the Commission is asked to note that areas that would be affected both by an IEA itself and the surface access routes required would involve Metropolitan Green Belt land that provides the separation between the urban concentrations of Gravesend and Medway, a significant tract of Grade 1 agricultural land on the Hoo Peninsula, Cobham Woods SSSI, and parts of the Kent Downs AONB. The national planning policy protection for these ecological, landscape and best and most versatile land classifications should be accorded due weight by the Commission in considering the environmental disbenefits of an IEA.

5.6 ***Adverse environmental impacts – carbon emissions.*** A hub airport would be a nationally-significant development, and carbon emissions associated with its construction and operation would be experienced wherever it was located. However, the uplift in energy consumption, carbon and other emissions would run counter to

[22] British Trust for Ornithology Study for Medway Council and Kent County Council, May 2014.

TGKP broad quality objectives and desire to foster low carbon environmental goods and services.

5.7 Surface access by road would add significantly to carbon emissions and other pollutants in North Kent, with negative outcomes for residents in terms of noise and air quality. So whilst by comparison with other options the noise and emissions associated with the operation of an IEA itself might affect a smaller population, access routes to an IEA would generate a significant impact on existing communities, particularly in Medway and Gravesham, both during construction and subsequent operation.

5.8 ***Adverse environmental impacts – flood and flood defence.*** North Kent is an important part of Thames and Medway Estuary eco-system. TGKP is concerned about the impacts development of an IEA could have on: 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 could significantly inflate the overall cost of the IEA option.

6. Conclusion

6.1 This submission does not attempt to add further to the well-rehearsed comparison of costs between the different options identified by the Airports Commission, nor to look at the implications an IEA would have for closure of other airports including Heathrow, London City and Southend.

6.2 For the IEA option to merit further detailed work, the potential benefits would have to be seen to outweigh the significantly greater costs, which most recent estimates place at £147billion at today's prices. But those potential benefits could only be realised if they were deliverable. It is TGKP's contention that whether or not construction of an IEA is achievable within a timeframe to address the capacity constraints that are central to the Airports Commission's study, the additional housing and infrastructure development required to support an IEA are not deliverable.

6.3 Moreover, such development would have unacceptable negative impacts on the quality of life offer to, and sustainable growth of, communities provided for in North Kent, as articulated in our Growth Strategy. The IEA proposal itself would have unacceptable negative impacts on biodiversity, habitats and species in the Thames and Medway estuaries and there are no precedents for delivering successful mitigation measures on the scale that would be required by this development.

6.4 TGKP is therefore opposed to the IEA option and would urge the Airports Commission once and for all to reject this option from more detailed consideration.

Thames Gateway Kent Partnership

23 May 2014