

Inner Thames Estuary Feasibility Studies

Study 2 – Operational feasibility

Comments from Kent County Council

On the whole, Kent County Council (KCC) welcomes the study, which broadly concludes that a Thames Estuary airport would have substantial operational risks that would incur large costs, in the order of billions of pounds, to appropriately manage.

However, there are some data points and comments on the analysis and conclusions, which are highlighted below.

Taking each section in turn:

Section 2 – flood risk

This concludes that a comprehensive flood risk strategy is required to manage the risks of various sources of flooding, however, there is no reason that a successful package of measures could not be developed. Whilst this may be the case, the additional cost and environmental impact of these measures needs to be investigated further.

Section 3 – fog

This section recognises that fog could pose a risk to airport operations in the Thames Estuary, but occurrences of fog are not significantly more frequent or longer in duration than those at Heathrow or Gatwick airports. However, it acknowledges that the Estuary does experience fog in the night time and early hours which may cause some disruption to services operating at those times. Given that promoters of a Thames Estuary airport cite 24 hour operations as an advantage over Heathrow and Gatwick expansion, the impact of fog at these times may neutralise this operational advantage. Further investigation is needed into this impact on airport operations.

Section 4 – wind

This section concludes that given the east-west orientation of the proposed runways, cross winds do not form a material concern.

Section 5 – bird strikes

This section concludes that bird strikes, although posing a significant risk without adequate mitigation measures, is not insurmountable problem. However, it acknowledges that bird management is also needed off airfield and this will require additional habitat removal which will cause significant

further ecological damage. The additional off airfield bird management measures may also be difficult to implement without enacting new legislation or compulsory purchase. The extra cost of these measures needs to be quantified and further investigation is needed to establish the additional protected habitat decimation that would be required. Conclusive evidence is also needed as to whether bird strike from off airfield can be managed to an acceptable level of risk.

Section 6 – SS Richard Montgomery

Section 6 concludes that it is necessary for full treatment and/or removal and disposal of the munitions to be undertaken prior to the construction of an Estuary airport. This is a high risk and high cost activity.

Section 7 – airspace implications

The report prepared by National Air Traffic Services (NATS) confirmed that operations at London City and Southend airports would be severely restricted with an airport in the Thames Estuary and therefore would be likely to close. This writes off the significant recent private sector investment in these airports. NATS also state that changes would be required with neighbouring countries airspace and this is harder to achieve than if the changes were confined to UK airspace. This adds to the complexity of delivering an airport in the Thames Estuary, which would be further compounded by a phased opening of the new airport and phased closure of Heathrow.

Section 8 – energy facilities on Grain

This section clearly states that the Liquefied Natural Gas (LNG) facility is a safety risk to the potential airport; and the Health and Safety Executive (HSE) may advise against development of an airport within the planning consultation zones of the LNG facility. Grain LNG is of strategic importance to the UK and there is no known alternative site. Further development of the Estuary airport proposals must therefore consider a site assessment and cost estimate for relocation of the LNG facility.

Section 9 – transition

This concludes that there are no comparable examples in terms of the scale of the move or the distance involved. This agrees with the Runways UK conference on 26 June 2014, which focused on land issues. At this conference it was clear that the majority of industry experts are of the view that moving the UK's hub airport from Heathrow to the Thames Estuary, is to attempt an airport relocation that is unprecedented in terms of airport size anywhere else in the world. The only comparable example on the scale of Heathrow is the planned relocation of Istanbul's airport, however, that is accompanied by the development of a new 'airport city' to support the functioning of the airport. This type of development would not be possible around the Thames Estuary due to the restrictions on development from

internationally protected environmental sites; and the lack of available sites for housing and commercial development above that which is already permitted in order to meet existing and forecast future demand; without consideration of a new hub airport in the area.

It was also stressed that in the case of the new Istanbul airport, at a distance of around 35 miles from the existing site, this is at the threshold of the distance by which worldwide experience has shown that successful airport relocation can be achieved. Heathrow to the Thames Estuary is around double that distance and such a relocation attempt is unlikely to result in a replication of the economic engine that is Heathrow, West London, the Thames Valley, M4, M3 and M40 corridors around the Estuary.

In the report, the airport sizes and relocation distances in Table 5 on page 9-11 (PDF viewer page 75) are not consistent with those in the presentation at the Runways UK conference on 26 June 2014, by Chris Chalk, Deputy Chair, British Aviation Group (BAG). The differences are shown in the Table 1 below.

Table 1

Location	Distance (miles) between new and old airports in the report	Distance (miles) between new and old airports in BAG presentation	Passenger numbers at time of transfer (millions) in report	Passenger numbers at time of transfer (millions) in BAG presentation
Hong Kong	22	22	28.6	30
Munich	17	20	12.0	12
Denver	28	17	31.0	12
Athens	16	18	11.8	11
Oslo	35	--	14.2	--

Table 1 shows that most differences in distance could be explained by measurement error, e.g. road distances compared to straight line; and passenger number differences are likely due to rounding. However, for Denver, both the distance and the size of the airport are significantly different and the correct statistics should be ascertained.

Section 9 also highlights the difficulties of transition in terms of airline slots and some Air Services Agreements. Airlines and stakeholders expressed concerns about travel times to the new airport and the supporting infrastructure and housing that would be required. The conclusion that the challenges of transition amount to considerable cost and risk to the taxpayer that could result in failure, is in line with KCC's own assessment of the scenario of a new airport in the Thames Estuary.

Section 10 – attitudes

This concludes that with the exception of Kent businesses, all stakeholders considered that the Estuary airport scheme carries significantly more risk than

opportunity. KCC would like to point out that it is unlikely that all Kent businesses consider the prospect of an estuary airport as an opportunity. Many Kent businesses are likely to be negatively impacted by this fundamental change in the economic geography of the county; and therefore it is inaccurate to imply in the report that all Kent businesses look favourably on the Estuary airport proposals.

The Thames Gateway Kent Partnership (TGKP), which is a private and public sector partnership that works to champion sustainable economic growth across North Kent, submitted evidence to the Airports Commission in response to the 23 May 2014 call of evidence. This set out the 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 provided detailed evidence on housing deliverability and urged the Commission to rule out the Inner Estuary Airport option from further detailed consideration.

Overall conclusion

The report concludes that taken together, the issues addressed in the study appear to present a substantial risk that would incur large costs, in the order of billions of pounds to appropriately manage. The study also acknowledges that not all of those risks could be mitigated or costed to a reasonable degree, including the risk to safety, the on time delivery of the airport, the consequential impacts on local and regional economies, the attractiveness of the airport to airlines and customers, and ultimately the success of the hub airport located in the inner Thames Estuary.

From the conclusions of this study, Kent County Council urges that the Airports Commission rules out the Inner Thames Estuary airport option from short listing for further consideration as a feasible solution for additional airport capacity.

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Kent County Council

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