

Basildon Council

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Airports Commission
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Date	Friday 5 August 2014
Please ask for	
Department	Planning Policy
Tel. No	01268
E-Mail	
Ref	

Dear Sir/Madam,

Re: Inner Thames Estuary Airport – Feasibility Studies

Thank you for inviting Basildon Borough Council to consider and respond to the consultation on the feasibility of an Inner Thames Estuary Airport Hub to provide a credible option to addressing the requirement for additional UK airport capacity, and whether to take this option, along with three others, forward for further consideration in September. This consultation response follows Basildon Council's previous submission of evidence as part of the Inner Thames Estuary feasibility studies: Call for Evidence in May 2014.

Four feasibility studies have been produced for consideration:

Environmental Impacts

The Environmental Impacts study highlights the fact that the airport footprint may destroy habitats of high conservation value and require the removal of bird attractions outside the airports footprint. The obvious solution is to create compensatory habitat to replace that which has been lost and the study states *"There are several potential intertidal habitat creation sites associated with managed realignment policies along the Essex and Suffolk coast which would be the first area that should be considered"*.

Basildon Borough Council would agree with the latter statement that *"These potential land areas, however, are likely to reduce as constraints in terms of availability, suitability and additional impacts are considered"* and *"would require significant study to determine realistic deliverability"*.

Basildon Borough Council is of the opinion that the airport would be unable to demonstrate that there aren't any feasible alternative solutions for meeting development objectives in accordance with the Habitats Regulation Assessment (HRA). As the study points out, even if an airport development was to pass the alternative solutions test, the area of compensation habitat creation would be on a scale unprecedented for any single development in Europe.

Operational Feasibility & attitudes to moving to an Estuary Airport

The operational feasibility study states that in terms of the environment *"The opportunities for habitat creation within the airport design are limited by the need to control the bird strike risk, so off-site compensation is the obvious solution"*. Owing to the required distances to successfully mitigate the bird strike risk, it is unlikely that this habitat can be

re-located safely in the north Kent or south Essex Borough's and therefore there would be a permanent loss of habitat of a high conservation value in this area of the Thames Estuary to the detriment of many areas in north Kent and south Essex.

This study also illustrates the difficulties of a potential airport to co-exist with the number of energy facilities in close proximity to the chosen site. As the study quite rightly states, even if they could co-exist, this would inhibit the expansion of the airport to a southerly direction, undermining the attraction of the Isle of Grain site and would be likely to deter or prevent further energy infrastructure development in this area.

One of the most significant issues raised by this study is that the Estuary airport will need a substantial workforce and that Airport businesses anticipate a lack of willingness amongst staff to transfer to the new airport. The lack of housing stock, the difficulty in finding sites for and constructing housing within the time period, means there would be a significant shortfall in housing within reasonable commuting distances of the Estuary airport. This lack of housing stock is likely to put significant pressure on the Basildon Borough, which would be within commuting distance of the new airport, certainly if the proposed Lower Thames Crossing were to be constructed. Therefore, this is likely to result in a significant increase in the need for housing in the Basildon Borough, which is already constrained by its size, land designations such as Green Belt, and capacity issues with supporting infrastructure. As will be explored further in the response to the Socio-Economic Impact study, Basildon Borough Council considers that insufficient evidence has been considered in terms of the overall impact of the development in the Basildon Borough and in south Essex overall.

Socio-Economic Impacts

The Socio-Economic Impact Study looks at both the national and local impacts of the Thames Estuary hub airport proposal. It defines the 'local area' associated with the new inner Thames hub airport as six local authorities in north Kent (Medway, Swale, Maidstone, Tonbridge & Malling, Gravesham and Dartford) and a further five local authorities in south Essex (Thurrock, Castle Point, Southend-on-Sea, Basildon and Rochford).

The socio-economic impacts of the proposed hub airport on the Basildon Borough have been grossly underestimated by this study and the Council would request that further consideration is given to the evidence it has previously submitted.

From a housing perspective, the study states that in order to provide capacity for a new airport, many new homes would need to be built, as well as infrastructure, utilities and employment premises. It also states that for *"the Essex authorities included in the review, the picture is slightly different. They all have significant pressure on affordable. However, due to distance from the airport, additional housing pressure is unlikely to be as significant as north Kent. Ultimately, this additional pressure will depend on whether there is sufficient access across the river"*.

Basildon Borough Council feel that the impact is significant and as such, south Essex should have been modelled in further detail as part of this study. The comment that additional pressure will depend on whether there is access across the river is dismissive of the potential impact of the airport hub in south Essex due to study's lack of content on this impact, certainly when it has been established in the proposal submissions and in

consultation workshops with the Airports Commission that a Lower Thames Crossing would almost certainly form part of any hub airport proposal in this area.

The study takes a similar stance in terms of the economic impact of the hub airport proposal. It states that *“While impacts on south Essex have not been modelled to the same extent as north Kent, with a new Lower Thames Crossing in place, as the various schemes propose, access would be provided to the new airport from the north. This would therefore provide some opportunity for employment impacts in south Essex”*. There is no detail of what the extent of this impact might be, in reference to the submission by TfL, the study states that they provided *“a very high level analysis of the Estuary airport on south Essex. This suggests that the airport could support a small number of jobs but the precise number was not given”*. Also, table 4.7 only includes a summary of the local economic risks and constraints in Southend, Thurrock and Castle Point. However, when discussing the catalytic employment impacts of the airport, table 5.1 shows a significant projected spatial distribution of employment growth specifically in the Basildon area. The diagram shows that this could potentially be an additional employment growth of more than double the existing number of jobs currently being considered as part of the Basildon Borough Council’s production of a Local Plan. This is a significant impact and would put huge pressure on the need for housing, employment locations and supporting infrastructure in the Basildon Borough.

Whilst the study does mention that several of the areas identified as locations for this activity have identified capacity issues around housing, transport and workplaces would need to be addressed, it is felt that the extent of these capacity issues has been seriously underestimated with regards to south Essex and the Basildon Borough in particular due to a lack of information presented on these specific areas.

Surface Access

The ultimate aim of the Surface Access study was to provide guidance to the AC on the feasibility and likely issues associated with the most viable packages of surface transport measures.

Basildon Borough Council has identified in the production of its Local Plan that in meeting its objectively assessed need for housing and employment land, it would result in significant capacity issues with both rail and highway infrastructure. It has yet to determine whether or not these issues could be successfully mitigated to successfully deliver the required housing growth. The surface access study has identified that *“By 2050, rail option 4 is the only credible option, due to the predicted growth of London, would cost around £13bn, rising to around £27bn and even then some capacity issues would still remain. For highway costs, the total estimate is between £10.1bn and £17.2bn”*.

Whilst the Roads assessment element of the study shows a requirement of *“around 30km single lane widening of the A12/A127/A13 roads on their approach to the M25 from outside London”* and *“around 55km single lane widening of the A12/A127/A13 in various locations”*, Basildon Council is concerned that the overall impact of the airport hub to the Basildon Borough has potentially been underestimated and that further requirements may be needed. Also, the cost of these improvements to road and rail infrastructure is likely to make the potential development of an airport hub unviable.

Whilst the Airports Commission is welcoming general comments with regards to the feasibility studies, it is specifically inviting views on the following questions:

- a. Is there information on the studies which is *factually inaccurate*? If so, please let us know.

Basildon Borough Council is satisfied from the perspective of its own Borough that the information provided in the feasibility studies is factually correct, although there is insufficient reference to specific evidence relating to the Basildon Borough to present an accurate depiction of the overall impact of the Thames Estuary hub Airport on the Basildon Borough and the south Essex area as a whole.

- b. Is there any *new* information or evidence that you wish the Commission to consider before it makes its decision?

Basildon Borough Council does not support the Thames Estuary Airport proposal. The impact of such a proposal on South Essex has been severely underestimated and much more detailed evidence into the potential land constraints and impact on Housing, Economic and Infrastructure requirements in the Basildon Borough and in South Essex overall would need to take place if a Thames Estuary Airport option were to be given serious consideration. However, it is considered that any further studies would only identify significant additional risk to the proposal. The feasibility studies presented as part of the consultation provide sufficient evidence to justify no further consideration of the proposal as a practical or viable option in addressing additional UK airport capacity requirements. The studies demonstrate that the proposal cannot be justified as a reasonable option for comparison with the expansion of existing London airports.

I trust that this response is satisfactory, but should you require any further information, please do not hesitate to contact me using the details above. Basildon Borough Council would like to continue to be involved and informed of the consultation process and is happy to provide any further information to the studies as appropriate.

Yours faithfully,

Planning Policy Manager