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**Date:** 1 September 2014

**By email**

Dear Sir

**Inner Thames Estuary Airport**

This letter is the Borough Council's response to the Commission's question as to whether there is a case for putting an Inner Thames Estuary Airport (ITE or Isle of Grain more specifically) option on the existing short list for consideration in providing additional runway capacity in the South East. It takes into account the information submitted to the Commission as a result of the call for evidence and the additional reports that you published in July 2014.

In the Borough Council's view, for the reasons set out below, is that an Inner Thames Estuary airport remains sufficiently undefined, the consequences and impacts unclear, and the steps that will need to be taken so many and complicated, for it to be shortlisted. As a solution, putting the matter very simply, to the provision of an additional runway in the South East by circa 2030 it is a very uncertain, expensive and high risk strategy.

Any decision on new runway capacity has regional planning implications, but the choice of an Inner Thames location can be more accurately described as a regional planning decision with airport implications.

The range of options suggested by third parties means that there are different detailed implications from each of them. The Borough Council has focussed on the overall principles, and followed the approaches used by the Commission's consultants in their reports. From the perspective of Gravesham the key issues are:

- Impact of noise and air quality from the operation of the airport on local residents
- Location and impacts of the transport infrastructure needed to support the airport
- Location of the necessary development to support the airport – and its supporting transport, social and other infrastructure
- The consequential impacts of all elements on nature conservation, landscape and planning policy
- The impacts of closing Heathrow (and possibly London City and Southend)
- Feasibility of the delivery
- Whether the net economic benefit outweighs the costs and risks involved, compared with other options

The current short listed options involve the examination of the incremental impacts of an additional runway on airports that already exist. Much of the support infrastructure already exists for these airports, though the proposals are still of a significant scale physically and financially even then. The Isle of Grain site will require a whole different level of investment to support it, not least because of the geography of the area which will concentrate labour demand and access into very specific geographical areas because much of the immediate catchment is water.

## **Cost**

It is necessary that schemes are compared on a consistent basis – but it is equally essential that additional costs are noted where these are a necessary part of the delivery of a scheme. In particular it is important to emphasise that a North Kent option would require the construction of a significant amount of housing and other development to support the airport at the same time as it is being built, and this will have to be done to some extent in front of demand. This will have costs, both financial and in planning policy terms, with particular pressure on Metropolitan Green Belt and North Downs Area of Outstanding Natural Beauty. Additional work would be needed to even begin to quantify these costs, but they add to the uncertainties. Whilst for initial assessment purposes assuming that development will occur where required may be a convenient assumption, to take any scheme forward would require a proper understanding for what could actually be done, with all its costs/impacts etc.

One factor that could be significant in financial and social terms is the blight that short listing may produce in North Kent due to the uncertainty that will be caused to residents and businesses. Potential Heathrow and Gatwick expansion plans have been well known for many years. Based on the experience with HS1 (a very much smaller scale project) the uncertainty caused by being put on the short list could have serious short term impacts on economic development. If the proposal is not then carried forward it would leave a legacy of foregone opportunities.

Whilst in the longer term the redevelopment of Heathrow (and other airport sites if required) would no doubt be achieved, it could not happen overnight. The sites would be brownfield and their reconfiguration would entail substantial redevelopment costs. Logically also Heathrow would receive no further major transport investment over that committed, as it would not have an economic life, which may pose issues in the later 2020's to keep it functioning.

## **Environment**

The airport and its support infrastructure would have a major impact on Natura 2000 sites. The impact has to include the implications of the transport infrastructure that would be required to support it since this would have to cross some of the same habitats.

The Natura 2000 impact tests are that:

- No feasible alternative solution to the plan or project which are less damaging to the affected European sites(s)
- There must be “imperative reasons of overriding interest” (IROPI) for the plan or project to proceed
- All necessary compensatory measures must be secured to ensure that the overall coherence of the network of European sites is protected.

It is taken as a given that an ITE scheme as currently outlined would have major impact on habitat though this would need to be formally tested if it were to be short listed. It is clear that the answer to the first question on the basis on seeking an extra one runway is that there are three schemes already on the shortlist. The answer is therefore yes - there are feasible alternatives. The project goes no further forward as the other tests are irrelevant. The test is about the absolute protection of habitats not an environmental assessment test where it would be relevant to balance the impacts in the round. If the question is where to put a 4 runway airport then an analysis would

probably have to start from a different place since there may be opportunities that have not been considered by the Commission in its earlier sifting process.

No evidence that compensatory habitat can be provided in reasonable close proximity, on the scale required which is large, has emerged. The area involved has to be close to the area of displacement and much would need to be intertidal to meet the requirements of the bird species involved. The requirements for bird strike control suggest that it should be at least 13 miles away. It is not clear where or how this could be provided and a great deal of technical work (including experimentation and surveys) would be required to reach a robust conclusion on this matter.

Noise and air quality are key local concerns. The Mayor of London's technical material, for example, shows flight paths that pass either side of the Gravesend/Northfleet urban area. The map implies that the west side is some form of 'development' gap between Dartford and Gravesend – it is not with existing development never mind being the location of Ebbsfleet Garden City. Gravesham already has a number of transport related AQMA's, and the combination of the road schemes necessary to support an airport plus new development will increase pressure.

### **Operational feasibility**

It is clear that an inner Thames Estuary airport has a significant number of obstacles to overcome, including the very basic point as to whether it is actually feasible to shut down one airport and move to another on this scale, at least in an environment where competition is supposed to be a major driver. Given that overnight transition is probably impossible or unrealistic the whole process would be difficult and expensive. For example in practical terms passengers could not have connections between flights at Heathrow and ITE because of the time and distance involved. Both airports would need to operate in sub-optimal and uneconomic configurations for a period of time.

The airlines have major concerns over the peripheral location of the airport compared to Heathrow for both passengers and staff. For passengers it is not an attractive location unless starting from Central London due to the distances involved, and in particular reliability of the use of the M25. The LNG terminal is a good example of a major local issue which is not simple to solve and for which the Commission has no current evidence that it could be relocated in the timescale involved.

### **Surface access**

In simple terms the Isle of Grain is a peninsula with currently a single carriageway road and a freight only railway line. A completely new transport infrastructure would be needed – including a Lower Thames Crossing east of Gravesend quite apart from what may be required in the short term to relieve pressures on the existing Dartford crossing. The two processes would need to be aligned.

Demand to access the airport comes for three different groups. Air passengers, employees and servicing (with freight), all of which have different requirements, though they may use the same infrastructure. This location is in the order of 75km from Heathrow straight line (120km + via M25) so it is not well located for existing passengers. Central London would be 50km away so with High Speed access journey times will be 26 minutes whereas Heathrow Express takes only 15 minutes, an increase of over 70% in journey time. There is of course concern over capacity on HS1 and whether an additional link (e.g. to Waterloo as suggested by TfL) would be required.

Some 45% of Heathrow employees come from 6 Boroughs/Districts within an 8 miles radius of it. 73.9% work in personal services occupations, sales, and other basic operations. Their average income was £26,200 and 82.8% earn less than £30,000 (all data from Optimal Economics Study 2011 of Heathrow). It is therefore a reasonable working assumption is that a large number of the employees would need to live close by because of travel costs. An annual season ticket from Gravesend to London Zones 1-6 is £3,816 (£4,924 with HS1) to help put a scale on the potential commuting costs involved. The connections to the airport, if the Heathrow model is followed, will be considerably more expensive (i.e. Travelcard is valid on the underground but not Heathrow Express or Connect) than the simple pro rata additional distance would imply. This has

implications for the infrastructure needed and the location of housing development to support the airport as many of the workers will not be financially able to live far away unless subsidised.

Major new infrastructure would be located in Gravesham including a Lower Thames Crossing, connecting roads to the airport, connecting rail links, HS1 connection on the south east side and 4 tracking the North Kent line through a tightly built urban area, and further widening of the A2. This brings with it noise and disturbance and from the road infrastructure air quality issues. There would be major implications for residents from this quite apart from the urban development pressures that would result.

## **Economy**

Based on the assumptions made, the studies imply that very high charges per passenger would need to be made, significantly more than Heathrow, from day one to make a new airport work financially. This would depend on what infrastructure the airport is paying for and what the Government picks up.

There would be massive socio-economic impacts – in effect 100,000 jobs would be required in a very short space of time and as is indicated above in a fairly confined area of North Kent and (depending on connections) South Essex. This in one sense that would be a clear economic benefit, but:

- Such an exercise requires a major regional planning exercise both in Thames Gateway and for the implications of closing Heathrow (and potentially other airports)
- A decision to go for an Inner Thames option is therefore of major economic significance and not just about (if an extra runway can be described as ‘just about’) additional runway capacity
- The scale of jobs involved is way above the identified potential of the area
- The London Paramount proposal on Swanscombe Peninsula is a £2bn investment that could provide up to 27,000 jobs by 2020 will have removed much local labour demand already across North Kent

A major re-planning of the whole area would be required. Gravesham is mainly Green Belt, but within that there are significant flooding and landscape constraints. There are no easy options – but physical geography would require significant investment in additional capacity – to give one simple example to tap the labour from the main urban area of Medway plus Sittingbourne would require a new transport link across the Medway.

Against this has to be set the costs and implications for the Western corridor of having Heathrow removed as growth hub and the inevitable lag before the site could be redeveloped.

## **Conclusion**

The overall issues are summed up in a quote from Leigh Fisher in their Operational feasibility report (July 2014) for the Commission:

*“Examined individually, the topics addressed by each chapter of this report, in the main, highlighted significant but perhaps not insurmountable challenges and risks to successful development of an airport in the inner Thames Estuary. Considered together, however, they appear to present a substantial risk that would incur large costs, in the order of billions of pounds, to appropriately manage.”*

The Borough Council feels the same basic point applies across all the topic areas that have been considered in the reports. None of the evidence from third parties provides substantive evidence, as opposed to unsupported assertions, that the various obstacles could be overcome. It would highlight the Habitats Regulation Assessment tests as being an obstacle that cannot be avoided

and is not a technical issue that can somehow be designed out at some later stage. It has to be dealt with correctly upfront so a properly informed decision can be made in mid 2015.

If you have any technical queries on this letter please contact [REDACTED]

Yours faithfully

[REDACTED]  
Leader, Gravesham Council