

Inner Thames Estuary Feasibility Studies

Study 1 – Environmental / Natura 2000 impacts

Comments from Kent County Council

On the whole, Kent County Council (KCC) welcomes the study, which broadly concludes that an airport on the Isle of Grain would result in large scale adverse effects on international nature conservation designations and other designated sites within the Thames Estuary area. The airport would have to demonstrate that there are no feasible alternative solutions and Imperative Reasons of Overriding Public Interest (IROPI). It would then need to provide compensatory habitat on a scale unprecedented for any single development in Europe, which although is technically possible, its success is highly uncertain.

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

Taking each section in turn:

Ecology

We have not identified any factual inaccuracies. However, there will need to be further study to inform the detailed ecological baseline. We consider the current level of evaluation to have adequately informed the conclusions of the review at this level, particularly in relation to the requirements of the Habitats Directive, the Habitats Regulations Assessment (HRA) tests of Alternative Solutions and Imperative Reasons of Overriding Public Interest (IROPI) and the potential requirements for Compensatory Measures.

Flood Risk

There does not appear to be anything factually inaccurate or any omitted datasets. However, the proposed airport is within Medway Council's area, therefore Medway Council and the Environment Agency should be directly consulted on the content of the flood risk section of this report.

Landscape

This section lacks Critical Review: No critical evaluation has been carried out of the Landscape Character Assessments (LCAs) to form the baseline. The landscape may have changed or the LCA may not have been very good in the first place, or carried out for a different reason; however, this baseline has been established and each LCA description has been taken as read, even though it may not be true. Without a critical review the established baseline is likely to be flawed as ultimately the study is relying on third party information which may now be factually inaccurate.

The Landscape section seems to have not considered the full range of the dimensions of landscape and it would have been strengthened by including the sections on historic landscape from the 'Cultural Heritage' section into a fuller assessment of landscape. Whilst appreciating it is high level, the chapter omits looking at the historic landscape which KCC views as an oversight. Landscape is more than just the setting to heritage assets as is asserted in the report.

The Guidelines reference links to cultural heritage and historic landscape character when establishing the baseline. The Hoo Peninsula is the epitome of a historic landscape, and stating that it is covered in a separate chapter is not sufficient. It cannot be separated from landscape and should form part of the baseline as per the Guidelines, even if that means repeating some of it in the 'Cultural Heritage' chapter; although this would not simply be duplication of the information but would reflect the fact that landscape has many dimensions and the historic landscape aspects should be included in any landscape assessment. The addition of historic landscape could change sensitivities and the impacts identified, so it is fundamental it is included at the baseline stage.

Cultural Heritage

The Cultural Heritage section has taken on board comments which English Heritage and KCC made as part of the study process and as far as we are aware none of the information is factually incorrect. We would draw attention to two aspects though.

Firstly in 8.4.2, World Heritage Sites are a political designation so the absence of any World Heritage sites in the area does not mean that the cultural heritage present is not of international significance. The Thames Estuary and this part of it, where the Thames meets the Medway, in particular, is of considerable international significance particularly for military and industrial heritage.

Secondly the study states in 8.4.7 ii, that fewer cultural heritage assets are found in the northwest of the area than the northeast; however, this statement underplays the significance of the Potential Designated site of Cliffe Explosives works which is a multi-period site covering about a square kilometre in the northwest of the study area.

Also, the report should add a caveat for using the Areas of Archaeological Potential as indicators of regional archaeological potential:

"Areas of Archaeological Potential are zones defined by Kent County Council (KCC) within which KCC believes there to be a reasonable probability that locally, regionally or nationally important archaeological remains still survive. It is important to appreciate that Areas of Archaeological Potential have no formal or statutory basis – they have simply been defined by KCC Heritage

Conservation as a mechanism to trigger planning application consultations from local planning authorities.”

In terms of whether there is any new information or evidence at the Airports Commission should consider; it will be important that the Commission check which sites are taken forward for designation as part of English Heritage’s current Hoo Landscape project.

David Brazier
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