



Friends of the North Kent Marshes



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emerging.thinking@airports.gsi.gov.uk

Airport Commission Consultation: Seeking views on the Airports Commission's emerging thinking on airport capacity in the UK.

Response from Friends of the North Kent Marshes

Friends of the North Kent Marshes is a voluntary group, formed in 2004 out of the No Airport at Cliffe Campaign Liaison Group, following the successful fight against the proposals for an airport at Cliffe. The North Kent Marshes stretch from Dartford in the west to Whitstable in the east and include the Hoo Peninsula, the River Thames, the River Medway, the Swale and Isle of Sheppey. They are some of the most unspoilt landscapes in Kent and are very rich in wildlife. Our aim is to promote the Marshes and the ways in which everyone can enjoy them. We work both with the local communities that live on and around the Marshes, and with groups such as the RSPB as they develop flagship visitor sites here. The area faces many threats as pressure for land and development in the southeast continues. We welcome the opportunity to make our voices heard in this important debate by taking part in this discussion about the Airports Commission's emerging thinking on airport capacity in the UK.

Summary

We are wholly opposed to the construction of an airport anywhere in the Thames Estuary because of the immense damage it would cause to the area's internationally important wildlife and the wider environment. The whole issue was exhaustively investigated in the run up to the publication of the previous Government's Aviation White Paper (2003). All the key players, including the aviation industry, contributed, and the idea of an airport in the Thames Estuary was ruled out. In addition to the unprecedented environmental damage and the resulting legal implications, the investigation found that an estuary airport did not make economic sense, would not meet the requirements of the aviation industry and presented a significantly higher (up to 12 times greater) risk of 'bird strike' than at any other major airport in the UK. It would potentially be the single biggest piece of environmental vandalism ever perpetrated in the UK. The Government would have to recreate any lost or damaged habitat elsewhere BEFORE work on the airport could start and even then only if they could

prove there is no alternative site for the expansion and it is in the overriding public interest. They would face a legal battle, which could last for years. Proposals by London Mayor Boris Johnson, Foster Partners, Testrad, Metrotidal, IAAG, Beckett Rankine Ltd, London Medway Airport, Flagship Concepts and private individuals in favour of an estuary airport, do nothing to alter these findings. The threats and risks remain the same. An airport in the Thames Estuary is unrealistic due to the ecological, environmental and economic impacts it would cause. An estuary airport would destroy whole communities and adversely impact many others on both sides of the Thames estuary.

We do not support aviation expansion be it anywhere in the Thames Estuary, Lydd or elsewhere. We believe that the demand for flights should be managed and the current Government policy on airports should be revised away from the 'predict and provide' expansionist approach of the last decade that threatens the climate and important wildlife sites. There must be a moratorium on air travel expansion until it can be demonstrated that significant increases in emissions from air-travel can be accommodated within a UK cut of 80% in emissions by 2050, as enshrined in law by the Climate Change Act (2008). Without this, the scale of the cuts required in the rest of the UK economy to offset a continuing rise in aviation emissions would be potentially crippling. Instead, demand for flights should be managed by encouraging the use of lower carbon modes of transport and the removal of the substantial subsidies that the industry currently enjoys including tax-free fuel, and the absence of VAT on all aspects of aviation.

We do not believe that the case for extra capacity/new runways has been made and even if the Government ever came to the conclusion that it had, a Thames estuary airport should not be included as a viable option in any new Government strategy. Economically, environmentally and ecologically it would be a complete disaster plus it would be the most dangerous major airport in the UK due to the risk of bird-strike.

Airports Commission's emerging thinking on airport capacity in the UK.

In the Q&A session after a [recent speech](#) given by Sir Howard Davies, Sir Howard indicated that in the interim report due later this year '*we may acknowledge that some options don't reach "first base" in environmental terms.*'

Climate Change

We join the **Aviation Environment Federation** call for the no new runway option to be put back on the table <http://www.aef.org.uk/?p=1646>

' Earlier this month, Sir Howard Davies, head of the Airports Commission and the main man tasked with examining the need for extra runway space in the UK, made his first public speech since consulting stakeholders in the airports debate.

Sir Howard started well; he spoke of the importance of meeting our national carbon targets, the availability of existing space for more flights, and the uncertainty of what future demand for flying will look like as strong reasons against creating more runway space. But he made the wrong conclusion that we need a new runway in the UK. Now I would like to correct him.

On climate change, Sir Howard's message was confusing. On the one hand he emphasised how "we (the Airports Commission) are alive to the climate change problem", while on the other Sir Howard stipulated that additional runway capacity is necessary in the UK. This runs contrary to Lord Nicholas Stern's advice from his groundbreaking 2007 report on the economics of climate change, in which he highlighted the dangers of investing in what he calls "new carbon intensive infrastructure". Unfortunately, a new runway is exactly that – carbon intensive infrastructure – and once the concrete sets, it will be used to the max, irrespective of the future climate impact and the availability of solutions.

Growth of the UK aviation industry and combating climate change are not mutually exclusive by any means. Indeed, as Sir Howard Davies said, passenger demand could grow by up to 60% and still allow us to meet our national carbon target of reducing emissions by 80% by 2050. Allowing such growth, however, would boost emissions from flying up to a quarter of total UK emissions and require large carbon reductions from other sectors to meet our 2050 target.

The Committee on Climate Change, the body relied on by government to advise on climate change, believes such alternative reductions are achievable. Yet should other sectors carry the burden of cutting emissions so that this one industry can continue to grow? And if a runway is built, how do we put the brakes on the aviation industry's growth?

The second question is particularly pertinent today. If the industry grows more than 60% then further measures are needed to limit and reduce emissions than relying on improvements in technology. The main one identified is carbon trading. However, there's now huge uncertainty there. In one fell swoop, the UN body responsible for aviation effectively nullified the European Union Emissions Trading Scheme and made only vague commitments towards a global scheme.

So there is no guarantee that aviation's future emissions will be limited or have offsets elsewhere. This is why Sir Howard's conclusion can be called into question. A sensible alternative is to have the no new runway option available. There is sufficient capacity in the UK's current airports to accommodate the 60% growth of the industry that might be possible within our climate commitments. And this spare capacity is largely available in the regions where the demand arises.

Of course, many of us fly occasionally. We go on holiday, we visit friends and family or we do business, and we would like to know that we will be able to continue to do so in the future. But most of us also believe that climate change is a problem that we have to do something about. As a nation we have a carbon target that makes us a leader on climate change. If we are to meet that target, we have to remove a hell of a lot of carbon from our lifestyles. That doesn't mean we should stop flying but allowing runway expansion now will increase the size of our future challenge.

Sir Howard Davies is aware of all of this but he made the wrong conclusion in his speech. To show that he really is "alive to the climate change problem", Sir Howard should put the no new runway option back on the table.

This blog first appeared on Huffington Post UK and is available in its original format [here](#).

Noise

Aviation Environment Federation states : Aircraft noise is a particularly emotive subject and can have a significant impact on quality of life for those people living close to airports or under flight paths, especially when penetrating aircraft noise results from 24 hour-a-day operations. Noise often causes annoyance and interferes with communication, children's learning, and enjoyment of the outside world. It can also have health impacts including depression, sleep disturbance and hypertension, which in turn may have serious consequences.

For AEF papers on noise please go to <http://www.aef.org.uk/?cat=7>

Airportwatch states: *Noise is the major problem for most communities living around airports and under flight paths, especially at night.* Aircraft noise has been an issue ever since the introduction of the first jet aircraft, since when the benefits of progressive technological improvements have tended to be offset by the introduction of larger aircraft, more frequent movements (often at sensitive times of day) and growing community expectations.

For Airportwatch papers on noise please go to http://www.airportwatch.org.uk/?page_id=4923

Mark Reckless MP *"Not only would the estuary airport impose a massive financial cost to the nation as a whole, it would devastate Medway and subject many across Kent to constant aircraft noise..."*

...Richard Deakin, chief executive of air traffic management association, NATS, pointed out that four runways in the estuary would mean some approaches and departures being over London, compounding noise problems and conflicting with the flight paths of other airports, including Schiphol."

'Deakin said the proposed site for the new airport, on the Isle of Grain, was directly under the convergence of major arrival and departure flight paths for four of London's five airports.

Pointing to the Thames estuary on a map, he said: "The very worst spot you could put an airport is just about here."

Guardian 13th April 2012

Speaking at an evidence session of the Commons Transport Select Committee, on Aviation Strategy, Simon Hocquard, Operational Strategy & Deployment Director, NATS, said that as the prevailing wind in the south east of England is from the west, for some 75% of the time planes taking off from an estuary airport would fly, heavy and relatively low, over London. They could be persuaded to fly around London, to avoid subjecting London

residents to the noise, but this would increase cost to the airlines, fuel burn and carbon emissions. For more information please see <http://www.airportwatch.org.uk/?p=2491>

An estuary airport would mean noise 24 hours a day, 365 days a year for the people of Kent, Essex and London on a scale never before experienced in the UK - This is wholly unacceptable.

Damage to wildlife sites

An airport sited in the Thames Estuary would, damage or destroy huge areas of legally protected habitat. With any proposal for an airport in the Thames Estuary, the Habitats Regulations (among other requirements such as environmental impact assessment) will apply.

The Thames estuary has extensive areas of internationally protected wildlife habitats (called Special Protection Areas). These protected areas stretch along both sides of the estuary from Gravesend to Harwich and across to Margate and include the newly designated Outer Thames SPA which covers the entire wider Thames Estuary, east of Sheerness.

The Government would have to recreate any lost or damaged habitat elsewhere *before* work on the airport could start – and even then only if it could prove there is no alternative site for the expansion and it is in the overriding public interest. It could face a long and protracted legal battle.

Any damage must be compensated for and there is nowhere in the Estuary or arguably in Europe where such large-scale damage could be compensated for adequately

RSPB on Thames estuary airport options

“We are vehemently opposed to the construction of an airport in the Thames Estuary and that includes any and all the latest proposals – and there are at least 6 of them now! – coming forward as part of the Government's review into the UK's aviation capacity.

“Proposals to build airports in the Thames estuary are nothing new – dating back to shortly after the Second World War. That all of them have been rejected on business, aviation, safety and environmental grounds is a signal from history that this is a bad location for an airport.”

“the largest single deliberate act of protected wildlife habitat destruction ever perpetrated in the UK”

“That so much of our natural coastal environment has survived in the Thames Estuary into the 21st century is something we should celebrate. At the RSPB, we are proud of the role we have played in protecting, nurturing and sharing the wild landscapes of the Thames in Kent, Essex and Greater London.

Proposals to construct an airport in the Thames go back to just after World War II when Cliffe was rejected as the site for a new airport in favour of a small village to the west of London called Heathrow. Indeed the challenge of plans to build on Maplin Sands off the Essex coast over 40 years ago was the stimulus to developing an objective approach to conservation planning. It led directly to the establishment of the Birds of Estuaries enquiry, a

forerunner of the modern Wetland Bird survey that underpins so much of our knowledge about the importance of our coastal wetlands for bird conservation.

The Thames Estuary is one of the most important wetlands in Europe and is protected by an array of designations. Perhaps the most significant of these are the Special Protection Areas, which are there to protect the internationally important flocks of migrating birds – over 300,000 of them spend each winter throughout the estuary before they head back to the arctic to nest. There are also Ramsar sites (a global marque applied to the planet's most important wetlands), Special Areas for Conservation, Sites of Special Scientific Interest, National and Local Nature Reserves. You can also find several RSPB nature reserves (covering a total of over 50 square kilometres) right across the Greater Thames. Although being an RSPB nature reserve doesn't convey any legal protection on the site, it is an indication of how important we believe the area is for wildlife – and, of course, gives people great opportunities to see that wildlife for themselves.

A similar proposal to construct a four-runway airport in the same area was rejected nearly a decade ago following our No Airport at Cliffe campaign. Since then various flights of fancy have emerged proposing estuary airports, but none of them have progressed into a real proposal. Now, with the review of airport capacity in full swing, there are no less the 6 separate proposals for airports, big airports, in the Thames Estuary.

Perhaps the most widely promoted option (from Lord Foster) – four runways on the Isle of Grain with linking infrastructure – has been propelled into the eye of a media storm but still exists only as architects drawings and plans.

We believe that the option of an estuary airport should be rejected outright. After several months of prevarication, the Government announced that they would set up an independent commission to assess airport capacity and the need for aviation expansion. The Davies Commission was set up in late 2012 and is currently taking evidence on a range of issues relating to aviation expansion. We have submitted evidence on a variety of topics and will continue to do so as appropriate. Those submissions include an independent report by CE Delft, which we commissioned WWF and HACAN (the group opposing Heathrow expansion), that questions the economic justification for aviation expansion.

The Commission will publish an interim report at the end of 2013 and their final recommendations will appear in 2015, after the next General Election. We believe that a Thames Estuary airport should not be included as a viable option in any new Government strategy and we will be working hard to ensure that this is the case.

We oppose this airport proposal because the massive environmental impact is unjustified. It would cause an unprecedented level of damage and destruction to internationally important and legally protected wildlife habitat, which we do not believe can be adequately compensated for.

We oppose the airport because to land planes in a foggy, bird-rich estuary makes it the most unsafe locations in the UK. Birdstrike would be up to 12 times more likely here unless draconian clearance of the flocks that make the Thames their home is undertaken, year after year.

We also oppose this airport proposal because it would be the world's largest airport and would lead to the generation of massive carbon emissions at a time when we urgently need to reduce emissions from all sectors in order to meet the UK's short and long term climate targets.

Finally, we oppose this airport proposal because of the so far un-quantified impacts on the important fish spawning and nursery grounds in the estuary and the subsequent effect on established fishing operations. Development of the scale proposed would alter tidal flows, changing erosion patterns with potential negative outcomes for the estuary's busy shipping lanes.

The myth that North Kent is an unoccupied wasteland awaiting development is not reality. There are strong local communities who have banded together in the past to oppose similar schemes that threatened their homes, ways of life and precious local environment. Their deep commitment to protect this historically and environmentally important landscape for future generations to enjoy is as strong as ever.”

<http://www.rspb.org.uk/ourwork/casework/details.aspx?id=tcm:9-304003>

Kent Wildlife Trust on Thames estuary airport options

Airport proposals 'catastrophic' for wildlife

Any airport development in the Thames Estuary would be catastrophic for fragile ecosystems and wildlife, warns Kent Wildlife Trust which is prepared to fight any proposals.

This is in the wake of news that the Government may include options for an airport in the Thames Estuary in a draft policy framework for UK aviation, due for public consultation in March.

John Bennett, Chief Executive of Kent Wildlife Trust, said:

“The Thames and Medway estuaries are extremely rich in wildlife and are internationally important for nature conservation. An airport here, whether coastal or offshore, will be catastrophic for wildlife communities.

“The impact on breeding, feeding and migratory birds will be huge, but there is also a wider community that includes wildflowers, bees, water voles and brown hares. Offshore, there are important habitats for fish and seals.

“Thames Estuary Airport options must be withdrawn from the draft policy framework for UK aviation.

“Ten years ago, Kent Wildlife Trust, with many others, successfully campaigned against plans for an airport at Cliffe Marshes in North Kent. However, the area is still under considerable pressure. If necessary, we are prepared to fight once more to protect our natural heritage.”

Water-voles

The Hoo Peninsula is home to important populations of this mammal, which has undergone a long decline in Britain. A new airport on the peninsula would lead to direct habitat loss and indirect damage to the remaining habitats.

Black-tailed-godwit

The Thames and Medway Estuaries are famous for their thousands of waterfowl and waders, such as the black-tailed godwit. The coastal habitats also support majestic birds of prey, such as the marsh harrier. A new airport in the area would render large areas uninhabitable for many species of birds.

Shrill-cardener-bumblebee

The Hoo Peninsula supports important populations of nationally rare bumblebees such as the shrill cardener bumblebee. Building an airport over the Isle of Grain would destroy a large area of coastal grassland that these bees need. Air pollution from aeroplanes could also harm habitats elsewhere in the area, reducing the number of wildflowers.

Short-snouted-seahorse

Seahorses have been found in the Thames and Medway Estuaries but we know very little about them as yet. Loss of marine habitat to a new airport could be bad news for populations of this species.

Seals

Common and grey seals use the sandbanks in the Thames Estuary at low tide. Planes using a new airport may scare them off and the loss of marine habitat from an airport would probably affect populations of the fish they feed on.

<http://www.wildlifetrusts.org/news/2012/01/24/airport-proposals-catastrophic-wildlife>

The Thames Estuary with its wildlife and habitats protected under local, national and international law should not even be considered (or “*reach first base*”) as a site for a new airport when other options are available.

Indeed Mark Reckless MP stated <http://www.theyworkforyou.com/debate/?id=2013-10-24a.538.0> in his recent speech during an aviation debate in the House of Commons that

“Crucially, given the level of environmental protection in this area, legislation states that there must be an “absence of alternative solutions” even before we can consider building such an airport. It cannot be a credible option, therefore, if it has already been determined, as the Davies commission must, that there are other credible options.”

There is a strong sense of community among those that live alongside the marshes. We share the vision of the RSPB Greater Thames Futurescapes project and look forward to a sustainable future and a healthy environment where development happens to benefit wildlife and people.

We strongly urge the Airports Commission not to include a new Thames estuary airport as a viable option in any new Government strategy and to rule out building a new airport anywhere in or around the Thames Estuary at the interim report stage.

Ours is the marsh country down by the river, within, as the river winds twenty miles of the sea and we will never give up the fight to protect our globally important wildlife sites and our communities here in the Thames estuary.

We thank you for reading our submission and trust that our extremely grave concerns will be taken into account.

Yours faithfully


Friends of the North Kent Marshes