

Friends of the North Kent Marshes

‘Woodlands’

High Halstow

Rochester

Kent

ME3 8SX

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Discussion Paper 05: Aviation Noise

Response from Friends of the North Kent Marshes 06 September 2013

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 Aviation Noise

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. Recent statements and proposals by London Mayor Boris Johnson, Norman Foster and others 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.

Aviation Noise

Noise and disturbance

Due to the many different estuary airport locations, the proposals have the potential to directly and indirectly impact on a range of internationally protected nature conservation sites (Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites), including:

Thames Estuary and Marshes SPA and Ramsar

Foulness (Mid-Essex Coast Phase 5) SPA and Ramsar

Benfleet and Southend Marshes SPA and Ramsar

Medway Estuary and Marshes SPA and Ramsar

Thanet Coast & Sandwich Bay SPA and Ramsar.

Outer Thames Estuary SPA

The Swale SPA and Ramsar

Benfleet and Southend Marshes SPA and Ramsar

Essex Estuaries SAC

The Swale SAC

Thanet Coast SAC

Margate and Long Sands SAC

Designated for a wide range of species and habitats, these sites are also underpinned and protected by the national Site of Special Scientific Interest (SSSI) notification.

There are clearly, therefore, a huge number of internationally designated nature conservation sites that could be affected (both directly and in-directly) by a new airport in the Thames Estuary. The potential impacts on protected bird species, from the airport alone, are numerous and significant. These include:

Direct loss of bird foraging habitat (and thus a reduction of food resource) in the Outer Thames Estuary pSPA;

Disturbance to birds from airport construction, including noise, vibration and lighting effects, resulting in displacement of a large (foraging) area in the estuary;

Disturbance to birds from airport operation, resulting in displacement of a large (foraging) area in the estuary

Direct loss of (foraging, roosting and/or loafing) coastal and inland bird habitat due to airport transport links to Essex and Kent

Disturbance to coastal and inland sites from associated transport links to Essex and Kent;

Potential alterations to hydrodynamics – flow changes can resulting accelerated patterns of erosion and/or deposition and therefore potential loss of intertidal habitat;

Atmospheric pollution - NO_x is the principal pollutant arising from aircraft and road traffic associated with airports. Deposition of nitrogen compounds (nitrates (NO₃), nitrogen dioxide (NO₂) and nitric acid (HNO₃)) can cause eutrophication of soils and water. This alters the species composition of plant communities and can eliminate sensitive species; and

Water pollution as a result of accidental spillage of aviation or other fuel. From loss of foraging, roosting and/or loafing habitat, through direct and indirect habitat loss and from increased human disturbance, bird populations could face decline in and around the Thames Estuary. This will have knock on effects for the environment and wider ecosystem because of the Thames Estuary's international importance (being in the top five internationally important sites in the UK) due to the numbers of waterbirds found there during winter and on migration.

The Thames Estuary area is currently the focus of many existing activities including large-scale commercial port operations, minerals extraction, dredging, transportation, recreation and numerous energy projects. The area is also presently the focus for new developments in a variety of sectors including large-scale port and energy projects.

These activities alone, and together with other pressures such as climate change, exert a significant pressure on the sensitive habitats and species in the Thames Estuary. These existing pressures may also be exacerbated if potential future developments that may also have an impact on the estuary, such as the proposed lower Thames crossing, ever get the go ahead

Decision making

With any proposal for an airport in the Thames Estuary, the Habitats Regulations (among other requirements such as environmental impact assessment) will apply. And as such the relevant competent authority will have to determine whether the project is likely to have a significant effect on

either the Ramsar sites⁴, the SPAs, pSPA⁵ and/or the SACs (known collectively as the European sites) either alone or in combination with other plans or projects.

The Likely Significant Effect Stage - any project not directly connected with or necessary to the management of an European site is to be subject to an appropriate assessment of its implications for that site in view of the site's conservation objectives if it cannot be excluded, on the basis of objective information, that it will have a significant effect on that site, either individually or in combination with other plans or projects.

If the project is likely to have such an effect there is a legal duty for the competent authority to make an appropriate assessment of the implications for the European sites in view of those sites' conservation objectives. The project can only receive permission if it can be ascertained that it will not adversely affect the integrity of the European sites.

As part of the appropriate assessment mitigation measures can be considered.

We believe that many effects of such a proposal on protected species cannot be mitigated, and therefore adverse effects cannot be avoided.

If it cannot be ascertained that the project will not adversely affect the integrity of the European sites, the provisions in regulations 49 and 53 of the Habitats Regulations would fall for consideration namely that there are no less damaging alternative solutions to the project, there are imperative reasons of overriding public interest to justify the project receiving permission despite the adverse effects on the integrity of the European sites and that compensatory measures can be provided before those effects occur.

We believe that there are alternative solutions to the project and that there are no imperative reasons of overriding public interest. Finally, we believe there is nowhere in the Estuary or arguably in Europe where such large-scale damage could be compensated for adequately.

Fish

The Thames Estuary is a significant nursery and spawning ground for many commercially important fish and hosts important shellfisheries. The health of these fisheries is important to the ecosystem as a whole, in addition to their economic and anthropogenic importance. The proposed airport could adversely affect these fisheries through:

Increased levels of suspended solid concentrations.

Noise and vibrations causing avoidance behaviour, physiological damage or mortality. Artificial lighting affecting reproduction and migration.

Reduced fish movement and migration

Marine species

Protected species such as short-snouted seahorses (legally protected under Wildlife & Countryside Act 1981 (as amended), and UKBAP species) common and grey seals (legally protected under the Conservation of Seals Act 1970) and cetaceans (legally protected under Conservation (Natural Habitats etc) Regulations and EU Habitats Directive) are known in the waters of the Thames Estuary.

These marine species will be vulnerable to any reduction in the quality of the habitat and noise and vibration impacts – likely affects of the proposed airport .

Communities

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 Schipol.”

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.

Over 22,000 people (could be up to 40,000 people if future planning permissions are granted - as a Thames estuary airport would be decades away) live on the Hoo Peninsula, many whose families have lived and worked here for generations and whose children have left home but stayed on the Hoo Peninsula to raise families of their own in this unique area. Nine villages, Grain, Allhallows, Lower Stoke, Middle Stoke, Upper Stoke, St Mary Hoo, High Halstow, Cooling, and Cliffe & Cliffe Woods would either be destroyed by the airport footprint, danger zones, the massive amount of new road, rail and infrastructure or become uninhabitable due to the sheer volume of huge jets flying low overhead 24 hours a day, 365 days a year with no respite. This is wholly unacceptable

Plans for Thames estuary airports are deeply flawed environmentally, economically and ecologically.

Communities in North Kent have been here before and stood shoulder to shoulder with RSPB and many others as it fought its largest ever campaign against a proposal to site a new airport on Cliffe Marshes. The successful 'No Airport at Cliffe campaign' brought a greater awareness of the Thames Estuary & its marshes, why they are so special and why they are protected under local, national & international law. These proposals, which were part of a Government review of airport capacity in the South East, were eventually rejected. The review also considered the option of siting an airport in the Thames Estuary. These proposals were also rejected. A new hub airport anywhere in or around the Thames Estuary would potentially be the single biggest piece of environmental vandalism ever perpetrated in the UK

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 hub airport anywhere in or around the Thames Estuary at the earliest opportunity.

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, our natural and cultural heritage and our communities here in the Thames estuary.

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

Yours faithfully

George Crozer, Joan Darwell, Gill Moore
Friends of the North Kent Marshes

