



Friends of the North Kent Marshes



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**Inner Estuary Airport Studies – Airports Commission call for evidence
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 Inner Thames Estuary Feasibility Studies consultation

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, Metrotidal/Thames Reach, IAAG including the Airports Commission's own option based on a combination of those previously mentioned for 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 could destroy whole communities and would 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 that 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.

Environmental impacts

Climate Change

Climate change remains the greatest threat to mankind and biodiversity and we believe that there should be no further airport expansion.

In April 2014 the Intergovernmental Panel on Climate Change issued its report to policymakers on the 'mitigation of climate change' a summary of which can be found here <http://www.ipcc.ch/>

A more detailed report for policymakers can be found here http://report.mitigation2014.org/spm/ipcc_wg3_ar5_summary-for-policymakers_approved.pdf

The key point of this report is that the expansion of the emissions from the aviation sector is not only incompatible with UK's 2008 Climate Change Act, the report from the IPCC makes it clear that policymakers need to reduce emissions in all sectors as a matter of urgency. There is no room left to expand polluting activities like aviation.

Emissions from aircraft are one of the fastest increasing sources of greenhouse gases. Unchecked, climate change may see up to a third of land-based species committed to extinction by regional climate change effects by 2050. The impacts of climate change on wildlife in the UK and abroad are already being felt. A report by DARA Climate Vulnerability Monitor 2nd Edition (<http://daraint.org/climate-vulnerability-monitor/climate-vulnerability-monitor-2012/>) estimates that climate change causes deaths on average each year today, of 400,000 people per annum and that together the carbon economy and climate change related losses cost the global economy \$1.2 trillion every year.

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substantial subsidies that the industry currently enjoys including tax-free fuel, and the absence of VAT on all aspects of aviation

The WWF '1 in 5 Challenge' has had huge success in reducing business flights. While it is the case that business leaders need face to face contact, to forge new partnerships and trade, once those relationships are in place, demand for flights can be reduced significantly by the use of new technology. It is vital that the Committee understands the pace with which super fast broadband and new communication technologies and tools will impact upon future business demand for flights. There is real potential here to reduce business flights, saving firms time and money and to help to reduce aviation emissions.

Helping companies fly less - good for business, good for the planet.

http://www.wwf.org.uk/how_you_can_help/get_your_business_involved/one_in_five_challenge/

In a low-lying area like the Thames Estuary, the threat of climate change is particularly significant and it is foolhardy to consider building an airport that would only contribute to the underlying problem.

Birds and Wildlife

On World Migratory Bird Day, 10th May 2014, UN Secretary-General Ban Ki-moon, called for greater international efforts to restore and preserve migratory birds and the network of sites they need to survive as an important part of the environment on which we all depend.

"I fully support the global campaign to raise awareness about the threats to migratory birds from habitat destruction, overexploitation, pollution and climate change,"

<http://www.un.org/apps/news/story.asp?NewsID=47767#.U3yHJtJdUR3>

Destination Flyways: Turning one billion tourists into one billion opportunities to protect the world's original long-distance travellers. <http://biodiv.unwto.org/content/flyways>

Bird-watching can help boost ecotourism industry, says UN environment agency
<http://www.un.org/apps/news/story.asp?NewsID=41970#.U3yJodJdUR0>

Damage to Wildlife Sites

Every year, the wider estuarine complex is a hub for 300,000 migrant birds that rely on the area for feeding and roosting.

The Thames estuary has extensive areas of internationally protected wildlife habitats (called Natura 2000 Sites / 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.

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 Natura 2000 (Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites), including:

Thames Estuary & Marshes SPA and Ramsar - Foulness (Mid-Essex Coast Phase 5) SPA & Ramsar
Benfleet & Southend Marshes SPA and Ramsar - Medway Estuary & Marshes SPA and Ramsar
Thanet Coast & Sandwich Bay SPA and Ramsar - Outer Thames Estuary SPA - The Swale SPA &
Ramsar - Benfleet & Southend Marshes SPA and Ramsar - Essex Estuaries SAC - The Swale 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.

In addition to these; other designations include Medway estuary Marine Conservation Zone DEFRA's Greater Thames Marshes Nature Improvement Area NIA, not forgetting that the Thames estuary and The Swale are proposed Marine Conservation Zones

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)
- 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 3
- Disturbance to coastal and inland sites from associated transport links to Essex and Kent;
- Potential alterations to hydrodynamics – flow changes can result in 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 or de-icing chemicals
- 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 water-birds found there during winter and on migration.
- **Bird Strike** An airport in the Thames Estuary would be unsafe. To land planes in a foggy, bird-rich estuary makes it one of the most unsafe locations in the world unless draconian clearance of the flocks that make the Thames their home is undertaken, year after year. Even with an aggressive bird hazard management programme (i.e. shooting or scaring the birds away), the bird strike hazard could be up to 12 times higher than at any other major UK airport.

A 2002 study (Study on safety risks from birds and safety measures around Cliffe Marshes (on the Hoo Peninsula) by Central Science Laboratory/British Trust for Ornithology for the Department for Transport, 2002) commissioned by the Department for Transport on the bird strike issue found that

“the environment around the Cliffe airport option contains substantial numbers of birds hazardous to aircraft. Without a comprehensive and aggressive bird management programme in place, incorporating careful and considered airport design, appropriate habitat management and active bird control, an airport could not operate safely in this location. Even with such world class management and mitigation measures in place as identified in this report, it is not considered possible to reduce the risk to a level similar to that experienced at other UK airports.” We believe it would be irresponsible for any government to ignore such evidence.

- 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.
- Successive governments have stressed the importance of sustainable development, particularly in the Thames Estuary. The recent announcement of the Greater Thames Marshes Nature Improvement Area and the Medway Estuary Marine Conservation Zone suggests that the estuary is still seen as very important in environmental terms. Such importance would be disastrously undermined if the airport became a reality.
- Development of the scale proposed would alter tidal flows, changing erosion patterns; with potential negative outcomes for the estuary's busy shipping lanes.

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 4 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.

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 sites, the SPAs, and/or the SACs (known collectively as the European Natura 2000 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 building a new airport anywhere in or around the Thames estuary 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.

Historic Environment

The Thames estuary has formed an arterial route into the heart of England for at least 400,000 years.

As a result of this important strategic location the estuary is extremely rich in archaeological remains from the Palaeolithic to the Second World War. It also contains buried prehistoric landscapes, preserved as sea level rose after the end of the last glaciation.

In the estuary between Cliffe and Herne Bay there are records of 462 shipwrecks, many of which date from the last world war, including the SS Montgomery.

Because of its strategic position the estuary has always been important for defence of the realm, with many nationally important sites from the Tudor period to WW2.

The north coasts of the Hoo peninsula and Sheppey are particularly important historically because of their key positions protecting access to the inner Thames estuary, Medway estuary and Swale sea channel respectively..

The Thames estuary has a landscape rich in heritage sites with thousands of records listed The Historic Environment Record lists more than 1,000 records on the Hoo Peninsula and the Isle of Sheppey has thousands more. Indeed the recorded sites represent only a small proportion of the actual resource likely to be present.

English Heritage, <http://www.heritagegateway.org.uk/gateway/default.aspx> Medway Council, Kent County Council and Essex County Council, Kent Archaeological Society www.kentarchaeology.org.uk will have more detailed evidence of sites, monuments and listed buildings likely to be adversely impacted by a new airport and the massive amount of associated infrastructure that would need to be put in place.

Landscapes matter

Landscape is the relationship between people and place; it forms the setting for our day-to-day lives. It results from the way that different components of our environment – natural (geology, soils, climate, flora and fauna) and cultural (historic and current impact of land use, settlement, enclosure and other human interventions) interact and are perceived by us. Landscape character is the pattern that arises from particular combinations of these different components.

People's perceptions turn land into the concept of landscape. Understanding landscape is not just a matter of visual perception but also how we hear, smell and feel our surroundings and the feelings, memories and associations that they evoke. Our activities influence and shape the appearance and function of the landscape that surrounds us.

Landscape is valued for lots of different reasons – not all related to traditional concepts of aesthetics and beauty. It can provide and contribute to: habitats for wildlife; a cultural record of how people have lived on the land and harnessed its resources; social and community value; a sense of identity, well being, enjoyment and inspiration; it has economic value – it forms the context for economic activity and can be a central factor in attracting business such as green tourism e.g. bird watching, walking, cycling, writing, painting and more. Landscape Character Assessment has emerged as an appropriate way to look at landscape as it provides a structured approach to identifying character, distinctiveness and value.

Landscape is not just about special or designated areas. All landscapes matter. Our landscapes represent a coming together of the natural world, human society and people's needs. They provide a range of ecosystem services (the services that the Earth's ecosystems provide, including food, water, disease management, climate regulation, spiritual fulfilment and aesthetic enjoyment). They have influenced the character of our towns and cities and they provide places of widely ranging character, where people can relax, recreate and learn. Landscapes should be managed, planned and, where appropriate, protected to deliver a full range of ecosystem goods and services.

Greater Thames Estuary

Natural England 81 The Greater Thames Estuary National Character Area

“Despite its close proximity to London, the NCA contains some of the least settled areas of the English coast, with few major settlements and medieval patterns of small villages and hamlets on higher ground and the marsh edges. This provides a stark contrast to the busy urban and industrial areas towards London where population density is high and development pressures are increasing. Sea defences protect large areas of reclaimed grazing marsh and its associated ancient fleet and ditch systems, and productive arable farmland. Historic military landmarks are characteristic features of the coastal landscape.

The coastal habitats of the NCA are internationally important for their biodiversity interest and support large numbers of overwintering and breeding wetland birds, rare plant and invertebrate species, and diverse marine wildlife. The vast majority of the coastline and estuaries are designated as Ramsar sites and Special Protection Areas, while the Essex Estuaries are a Special Area of Conservation. Brownfield sites support priority open mosaic habitat and its associated nationally rare invertebrate species. The coastline is also of major geomorphological interest for the study of estuarine and coastal processes, and for its nationally and internationally important deposits of London Clay fossils and Pleistocene sediments.

There is a marked contrast between the wild and remote coastal marshes, and the industrial and urban developments which are highly visible in the low-lying landscape. A key challenge is to accommodate increasing development pressure in the area with the protection and enhancement of the natural landscape and its internationally important coastal habitats and species, and nationally important open mosaic habitat.”

http://www.naturalengland.org.uk/publications/nca/greater_thames_estuary.aspx

Medway Landscape Character Assessment

“Overall this is a predominantly remote and tranquil area with uninterrupted views out into the Thames Estuary; there is a degree of visual influence from Canvey Island industrial complex on adjacent side of Thames Estuary; impact contained by distance; the area is more coherent in character than the Medway Marshes – which suffer generally from greater impacts of urban and industrial influence.

High levels of biodiversity and nature conservation value; protected by national and international (SSSI, Natura2000/Ramsar designations; valuable areas of grazing marsh managed for protection of wetland birds by RSPB and others

Area forms part of wider North Kent Marshes area with its high overall level of landscape and biodiversity significance

Cultural heritage; landscape settled since Mesolithic period; finds from Roman times when salt panning and pottery were main industries; medieval settlements; 19th century cement and explosives

industries; major fort at Cliffe reflects former defensive importance of area; strong cultural associations with works of Charles Dickens – notably ‘Great Expectations’

High biodiversity, landscape and cultural value with long, open views and absence of tree cover (which is not generally appropriate to open marshland areas) means these landscapes are highly sensitive to change and will not readily be able to absorb new development.”

“This is an area that retains a distinctively remote, wild and isolated character. Charles Dickens lived and worked in this area and transmitted a deep understanding of the marshland landscape through his writings. In the opening chapter of ‘Great Expectations’, the author surveys the marshes from the churchyard at Cooling and paints a sensitive and atmospheric picture:

‘... the dark flat wilderness beyond the churchyard, intersected with dykes and mounds and gates, with scattered cattle feeding on it, was the marshes; and that the low leaden line beyond was the river; and that the distant savage lair from which the wind was rushing, was the sea ...’”

http://www.medway.gov.uk/PDF/Medway%20LCA%20Mar11_Main%20report.pdf

Impressions of Place ‘The Marsh Country’

<http://julianhoffman.wordpress.com/2013/09/30/the-marsh-country/>

Hazards

Bird Strike

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SS Richard Montgomery

A hazardous shipwreck packed with explosives lies in the estuary. The SS RICHARD MONTGOMERY was a US Liberty Ship of 7146 gross tons. She was built in 1943 by the St John’s River Shipbuilding Company of Jacksonville, Florida and was one of over 2700 of these mass-produced vessels built to carry vital supplies for the war effort. In August 1944 the ship was loaded with a cargo of some 7000 tons of munitions and joined convoy HX-301 bound for the UK and then on to Cherbourg. On arrival in the Thames Estuary, the vessel was directed to anchor in the Great Nore anchorage off Sheerness. The ship was to await the formation of a convoy to continue the journey across the Channel. However, on the 20th August 1944, she dragged her anchor in the shallow water and grounded on a sandbank running east from the Isle of Grain approximately 250m north of the Medway Approach Channel. The vessel grounded amidships on the crest of the sandbank and intensive efforts began to unload her in order to lighten the vessel so that she could be refloated and also to save the cargo of munitions that were vital for the Allies post-D-Day advancement. Unfortunately, by the next day, a crack appeared in the hull and the forward end began to flood. The salvage effort continued until the 25th September, by which time approximately half the cargo had

been successfully removed. The salvage effort had to be abandoned when the vessel finally flooded completely. The wreck of the SS RICHARD MONTGOMERY remains on the sandbank where she sank. The wreck lies across the tide close to the Medway Approach Channel and her masts are clearly visible above the water at all states of the tide. There are still approximately 1,400 tons of explosives contained within the forward holds.

The Department for Transport is responsible for the safety of the wreck. Medway Ports is contracted by the Maritime & Coastguard Agency to mark and guard the wreck. This includes the provision and maintenance of warning notices on the wreck, which are fastened to the masts. Medway Ports is also contracted to provide and maintain a circle of buoys around the wreck to ensure that shipping avoids the area. In addition, the wreck is under 24-hour radar surveillance by Medway Ports. Medway Ports, whose operations room is within sight of the wreck, provide a first line of response to any incursions within the area.

<http://www.dft.gov.uk/mca/mcga07-home/emergencyresponse/mcga-receiverofwreck/mcga-ssrichardmontgomery.htm>

BBC 'Coast' <http://www.youtube.com/watch?v=Qrs8D7Cr7ys>

LNG Plant

National Grid's £1bn gas import terminal on the Isle of Grain is the largest in Britain with suggestions to Mark Reckless MP that it would cost £3billion to remove it to make way for an airport and due to its remoteness would be extremely difficult if not impossible to relocate.

Fog

A report commissioned by Medway Council showed that the Thames estuary region was three times more susceptible to foggy conditions in comparison to Heathrow Airport. It may come as a complete surprise to the Mayor of London but we get 'weather' in the Thames estuary too.

Firing Ranges

There are military firing ranges located in the Thames estuary, due to its remoteness, in both North Kent and South Essex which would be extremely difficult if not impossible to relocate - these include a live firing range at Shoeburyness in Essex and Yantlet Demolition Range on the Isle of Grain in North Kent. There is also a Metropolitan Police Live Firing Range on Shorne Marshes in North Kent and due to its remoteness would be extremely difficult if not impossible to relocate.

Explosives

There is an explosives handling jetty at the Alpha Jetty in Cliffe. Due to its remoteness this would be extremely difficult if not impossible to relocate.

Potential Flood Risk impacts

The Thames estuary including the Medway and The Swale are particularly vulnerable to sea level rise and flooding. The full impact of any airport development in terms of flood risk to land and properties along the length of the estuary will require extensive study (particularly if incorporating a barrier) and must consider existing management policies within the relevant Shoreline Management Plans.

A barrier across the estuary would have significant effects, including a reduction in the tidal range and loss of intertidal habitat. These concerns are supported by the Thames Estuary 2100 (TE2100) project. This project has predicted that 1,200 hectares of salt marsh and mudflat could be lost this century as a result of sea level rise and efforts are being made to recreate this loss in order to comply with EU habitats and birds directives. The proposed airport developments would make this objective even more of a challenge to meet.

TE2100 research suggests that the construction of a barrier would adversely affect the water quality of the Thames, and would result in difficulties in meeting Water Framework Directive (2000/60/EC) standards as a result of "the impoundment of polluted waters." This "impoundment" would be particularly severe if a tidal energy unit was incorporated into the project.

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 (costs now estimated at £148billion+ via Mark Reckless MP and Medway Council), 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."

'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 with no respite for the people of Kent, Essex and London on a scale never before experienced in the UK - This is wholly unacceptable.

The myth that this area of North Kent is an unoccupied wasteland awaiting development and regeneration is most definitely not the reality.

North Kent

There are 14,000 unemployed in the whole of North Kent and 27,000 new jobs are to be created by Paramount pictures at a site near Swanscombe and the government has recently announced the construction of the new 'garden town' at nearby Ebbsfleet

Medway

As of February 2012, Medway had 6,508 unemployed. A Thames Estuary airport - which would see twice as many passengers use it a year as Heathrow (150million against 70million) - would employ

70,000 directly and at least another 50,000 in related industries such as warehousing, hotels, depots etc.

Medway does not need that many jobs - as there are not anywhere near that many jobless - and is already doing much to bring about investment without concreting the whole area.

For instance, Peel Holdings has just had a plan approved to build Chatham Waters a huge £650m development of flats, hotels and a media centre at Chatham Docks. This will provide 3,500 jobs. Elsewhere, 6,000 jobs are set to be provided at the National Grid Site in Grain while the largest single distribution centre in the south east (1.2million sq ft) has gained planning consent at Kingsnorth. There is now also a fast train to London making commuting easier and faster and four universities providing an education for more than 10,000 students.

In fact, Medway has worked closely with councils and businesses to bring regeneration across North Kent and the whole area is on target to see an extra 52,000 homes and 58,000 jobs in the years between now and 2026.

In contrast, a new Thames Estuary airport would be tied up in legal and planning issues for decades (BAA have already indicated they will take legal action against as they say it means Heathrow would be forced to close) and would not be built for decades.

Many of the jobs at an airport will be low paid.

As an airport will provide 20 times more jobs than needed for the local area, there will undoubtedly be a large influx of people to take these.

Estimates show that a new airport would need a new city the size of Manchester built to accommodate all these new people, or around 170,000 new homes in or within the immediate vicinity of Medway.

In addition, at least 20,000 people – and probably more as we are talking about two decades away – would also need re-housing following compulsory moves from the Hoo Peninsula to make way for any new airport.

Lastly, but by no means least, we come to the destruction of whole communities either under the footprint of a new estuary airport or due to noise, danger zones, pollution and the colossal amount of infrastructure that would be needed to service such gargantuan airport ideas. It has been suggested by Foster Partners that people have no comprehension of the size and scale of a new 21st century hub airport. Well, as communities who were last threatened with annihilation by an estuary airport only a decade ago, we most certainly do. It is so much more than just an airport and runways!

Over 23,000 people live on the Hoo Peninsula (could be up to 40,000 people if future planning permissions are granted - as a Thames estuary airport would be decades away) many of 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. Where would these close-knit communities and extended families (of which there are many on the Hoo Peninsula) go where they could remain together?

Communities in London, Kent and Essex would be subjected to noise and pollution on a scale never experienced before. On both sides of the Thames estuary, for a radius of at least 25 miles or more, vast swathes of countryside, more homes, businesses and the highest grade agricultural land, a national resource, would be lost due to the immense amount of infrastructure ‘strengthening’ that would be needed to service a new hub airport. Indeed all of this new infrastructure including massive water supplies would need to be in place by the opening date of the new airport - we do not believe that this is feasible.

There is a rich cultural heritage on the Hoo Peninsula, the Magna Carta is believed to have been drafted here, and there are distinctive Napoleonic military defences, 20th century pillboxes and the remains of the Hoo Stop Line which served as a defence to protect London in WW11.

This is Charles Dickens country; St James Church in Cooling was the setting for the opening scene of his novel ‘Great Expectations’.

“Ours was the marsh country, down by the river, within, as the river wound, twenty miles of the sea. My first most vivid and broad impression of the identity of things, seems to me to have been gained on a memorable raw afternoon towards evening. At such a time I found out for certain, that this bleak place overgrown with nettles was the churchyard; and that Philip Pirrip, late of this parish, and also Georgiana wife of the above, were dead and buried; and that Alexander, Bartholomew, Abraham, Tobias, and Roger, infant children of the aforesaid, were also dead and buried; and that the dark flat wilderness beyond the churchyard, intersected with dykes and mounds and gates, with scattered cattle feeding on it, was the marshes; and that the low leaden line beyond, was the river; and that the distant savage lair from which the wind was rushing was the sea; and that the small bundle of shivers growing afraid of it all and beginning to cry, was Pip.”

People come from all over the world to visit this beautiful area, a hidden gem, with its ruined castles, Norman churches, ancient monuments and fine listed buildings, where Charles Dickens lived, wrote and walked for miles. Indeed he took his house-guests out for walks across the marshes from his home nearby at ‘Gads Hill’ in Higham.

The ancient villages on the northern side of the Hoo Peninsula are still connected only by a medieval rural lane which is also a National Cycle Route and the Saxon Shore Way, a National Walking Trail, follows some of its path.

But this human history is underpinned by an even deeper natural heritage. The estuary is an ever-changing landscape of soaring skylarks and ghost-like owls, of huge flocks of geese, dunlin and knot, of herons and egrets fishing the margins while grebes and avocets dance on the pools.

RSPB Northward Hill reserve sits on a ridge overlooking the Thames Marshes and it includes a lovely bluebell wood where nightingales sing in spring. Over 100 pairs of grey herons nest in the trees in this National Nature Reserve, with what is one of the UK's largest and most famous colonies of little egrets, whose numbers have increased year-on-year since they first nested here in 2000, reaching an amazing 93 pairs by 2007. The reserve also includes great swathes of flat marshes, where lapwings, redshanks, and avocets breed. In winter you can see widgeons and teals, buzzards, hen harriers and merlins.

RSPB Cliffe Pools nature reserve offers a spectacular landscape of open water and big skies. The reserve is one of the most important places for wildlife in the UK with huge flocks of wading birds and waterfowl. A number of nature trails cross the reserve, affording great views of the pools, wildlife and the River Thames which runs alongside. During spring and autumn migration periods, there is an excellent chance to see some unusual species, such as sandpipers and stints. Big flocks of ducks and grebes also gather at this time, and hen harriers and other birds of prey are regular visitors. In summer, breeding redshanks, avocets and common terns may be seen, with nightingales and turtle doves singing from the bushes. Indeed 2013 saw a flock of over 10,000 black tailed godwits.

At Elmley Marshes National Nature Reserve on the Isle of Sheppey you can watch elegant avocets ‘scooping up’ microscopic aquatic life in their amazing sickle shaped beaks. They nest in mini colonies and are fierce defenders of their eggs and young. Redshanks can be seen all year round and gather in tight-knit groups to roost at high tide. Large flocks of teals pack onto the flooded grassland in winter - listen to their piping calls as they fly around in dense flocks. During winter flocks of widgeon are a daily sight with several thousand often on the reserve.

Just across the estuary Leigh on Sea in Essex is a great place to discover one of autumn's wildlife spectacles as thousands of Brent geese descend on the Thames estuary. They travel from Russia to over-winter on Southend's 'sunshine coast', before heading back to Siberia to breed.

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 to rule out 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 and our communities here in the Thames estuary.

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

Yours faithfully


Friends of the North Kent Marshes