



Airports Commission
Sanctuary Buildings
20 Great Smith Street
London
SW1P 3BT



By email to estuary.studies@airports.gsi.gov.uk

Dear Sir

Estuary Airports Study

This letter is in response to the call for evidence to assist in the work on the potential of an Estuary airport. The Borough Council supports the representations from the Thames Gateway North Kent Partnership. As a starting point it has been consistently against an Estuary airport, and the material produced on the Cliffe proposal back in 2002 remains in outline the case against. A fuller set of views will be submitted when the full up to date evidence base is published later in the year.

Any examination of the issues has to have in mind some outline of what an airport might look like and how it might be served in transport infrastructure terms. For this purpose the ideas set out in the Transport for London material has been used as a guide being the most recent.

The Gravesham Local Plan Core Strategy has been under Public Examination, with the Inspectors report due in late July 2014. Prior to this appearing the most up to date version of the plan with proposed modifications (as tracked changes) can be found at (documents SCS18 a & b):

http://docs.gravesham.gov.uk/webdocs/Environment%20and%20Planning/GLPCS%20Mods/SCS-18a_Gravesham_Local_Plan_Core_Strategy_incl_Proposed_Modifications_April_2014.pdf

[http://docs.gravesham.gov.uk/webdocs/Environment%20and%20Planning/GLPCS%20Mods/SCS-18b_Gravesham_Local_Plan_Core_Strategy_Appendices_incl_Proposed_Modifications_April 2014.pdf](http://docs.gravesham.gov.uk/webdocs/Environment%20and%20Planning/GLPCS%20Mods/SCS-18b_Gravesham_Local_Plan_Core_Strategy_Appendices_incl_Proposed_Modifications_April_2014.pdf)

The entire evidence base is listed in full at:

http://www.gravesham.gov.uk/data/assets/pdf_file/0003/96321/Updated-List-of-Examination-Documents.pdf

None of this material covers the implications of an airport in the inner estuary but it does provide essential background material on Gravesham which can be used as required. Further clarification and data can be provided if needed.

The most basic point is inherent in the name – Isle of Grain. Although not an island it is on a peninsula with water to the north, south and east. Major new transport infrastructure will be required but this is not going to provide a 360° catchment either for workers and support businesses, or for passengers from the rest of the UK compared with Heathrow or Gatwick.

The choice of an Estuary Airport is not a simple choice over the location for additional/replacement airport capacity. It would be about a decision to pursue a regional development policy that has major implications at that scale for London and the South East – but with national and international ramifications.

The rest of this letter makes reference to some of the issues that the Commission will need to consider in arriving at its view as to whether such a project is worthy of being added to the short list. These have been organised by the four studies.

Environmental / Natura 2000

- Impact on the local environment
 - Noise (which needs to take account of future as well as existing development patterns)
 - Air quality (air and highway traffic)
 - Nature conservation (Ramsar/SPA & numerous SSSI's, Ancient Woodland)
 - Landscape (North Downs AoNB)
 - Green Belt (development pressure)
- A fundamental point is that it will be necessary to show that there is no reasonable alternative to the damage to the Ramsar/SPA – however there are already three options from the Commission
- The impact is the combined implications for local area of the airport, and its transport links, and its resulting development
- Mitigation measures for the loss of habitat elsewhere would be highly significant in scale and controversial wherever located (e.g. flooding the Wantsum channel area was discussed in relation to the Cliffe airport proposal)

Operational feasibility and attitudes about moving to a new airport

- Not an area where the Borough Council has any experience
- Incremental approach being taken to opening new Heathrow Terminal 2 would suggest that any airport would have to open in stages though for appraisal purposes this may not be relevant

Socio- economic impacts

- Borough Council is assuming that the Ebbsfleet Garden City and Paramount Park proposals go ahead which will mean that the supply of brownfield sites within the Gravesend/Northfleet urban area will have been exhausted prior to any airport coming into existence
- Airport construction jobs will be focussed in North Kent as good transport links to south Essex will not exist
- Introduce directly 100,000 extra jobs into North Kent/South Essex - some may commute from west London at least initially but many are low value jobs they are unlikely to do so in the longer term
- Access routes and capacity will influence the access to south Essex and the size of the local labour market catchment
- The development pressures will be significantly above those that are currently being considered in Thames Gateway – which will bring pressures on the Green Belt

- Additional development will give rise to additional requirements for yet more infrastructure of all sorts
- As with Lower Thames Crossing key question is whether extra costs (and risks) generate enough benefit – which is clearly a regional planning policy question and not just about the best place for airports capacity
- Strategic implications for the Green Belt around London since development pressures are likely to erode the current extend

Surface access impacts

- Transport systems in West Kent at peak hours, with the possible exception of HS1 where traffic is growing, are already operating at capacity
- Journey to work patterns will adjust over time – but the significant proportion of lower value jobs means inherently the workers will need to live in North Kent, South Essex, SE London and East London
- An option C Lower Thames crossing would be needed but not necessarily on the current alignment – it should perhaps be more east west in orientation than north south since its prime purpose would be to serve the airport – the Dartford Crossing may need to be improved in the short term
- A2 has already been widened to 4 lanes – further widening due to the proximity of HS1, and the frequency of junctions would pose major challenges in Gravesham

The Borough Council is more than happy to provide input to your studies in whatever way is appropriate. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]