

## **Airports Commission Public Consultation**

### **Representations by,**

### **The Dickens' Country Protection Society**

#### **1. Introduction**

**1.1** The Society was formed on the 10<sup>th</sup> February 1972 with the object of improving, protecting and preserving for the benefit of the public, its area of benefit, which is that of the former Strood Rural District Council (now forming part of the Medway Unitary Authority and Gravesham Borough council areas). For this purpose, but not otherwise, the Society aims to :-

- (a) arouse, form and educate public opinion in order to ensure the promotion of the aforesaid object;
- (b) make representations at Public Inquiries or in such other ways as shall from time to time appear necessary, and
- (d) take such other lawful action as shall be considered appropriate to promote the aforesaid object.

The Society is a registered charity affiliated to the Council for the Protection of Rural England (Kent Branch), the Kent Federation of Amenity Societies and The London Green Belt Council. The Society currently has some 300 members.

**1.2** The Society has taken an active interest in Town and Country Planning for the last 40 years. Its activities in this area have included making representations at public inquiries into major developments, taking an interest in and regularly commenting on development control matters in general. The Society submitted evidence to the Review of the Development Control System undertaken by George Dobry QC. The Society has made representations on Local Plans for both of the districts in its area of benefit and appeared at local plan inquiries. The Society has also appeared at the examination in public into the Kent Structure Plan. The Society has had experience of parliamentary procedures having petitioned the Channel Tunnel Rail Link Bill in both Houses of Parliament.

**1.3** The Society made detailed representations in 2002 in response to the publication of the Consultation Document 'The Future Development of Air Transport in the United Kingdom; South East'. These followed the publication of specific proposals for the construction of a major new airport on the Cliffe and Cooling marshes. The consultation was supported by detailed studies into the environmental impact of the proposal, including wildlife, historical sites, noise impact etc. Following a very broad consultation and two high court actions, in the Society's view the Government of the day came to a logical conclusion.

**1.4** In the current situation, the Society is faced by a number of airport schemes, few of which have been developed in any detail, with no clear preferred option and no proper evidence or evaluation. There is clearly political pressure from the Mayor of London and his staff. It appears the Mayor is willing to support any airport proposal east of London from artificial islands to any area of open land.

- 1.5** The Society has taken note of the Airports Commission's Interim Report 2013 and the report of the House of Commons Transport Committee Report on Aviation Strategy 2013. Both have reached similar conclusions, that is, that the best option is to develop existing airports.

## **2 A New Airport East of London**

- 2.1** The concept of an estuary airport is based on the premise of the transfer of services from Heathrow to a new site somewhere in the Thames estuary. There follows from this a number of assumptions:-
- (a) That Heathrow can be closed and that the airlines and other businesses will be willing and able to transfer to the new site.
  - (b) That a new site with the development cost to repay can be competitive with existing airports in the U.K. and the near continent.
  - (c) That a substantial proportion of the existing workforce will be willing to relocate and suitable provision can be made to accommodate them near the new airport.
  - (d) That a suitable site can be identified where development is engineeringly feasible at a reasonable cost.
  - (e) That any environmental and other constraints can be overcome.
  - (f) That the development costs can be fully funded
  - (g) That new transport infrastructure can be provided so that journey times from central London can match those to the existing airports serving London, including Heathrow.
- 2.2** Disregarding any airport consideration, there are also issues related to the loss of employment west of London resulting from the closure of the Heathrow; the provision of replacement employment for the existing workforce; redevelopment of the Heathrow site and the provision of local employment for any expansion of the population in that area.
- 2.3** The advantages of an estuary airport are basically a reduction in noise nuisance west of London and a reduction in the risks of overflying central London; no physical disturbance of communities where potential expansion could take place.

### **3. Expanding Existing Airports**

**3.1** The alternative to a new airport is to expand the existing airports. This has the following advantages:-

- (a) Expansion of the existing airports is a low risk strategy in that it can be achieved by organic growth based on the existing facilities.
- (b) It can be achieved quickly at limited cost in that only a runway and taxi ways are required in the short term.
- (c) Expansion of the existing airports utilises the benefits of existing infrastructure.
- (d) Disruption of business except in the area of the expansion is kept to a minimum and there is less risk of losing airlines and other services.
- (e) The existing employment patterns and skill base can be maintained and enhanced.
- (f) The containment of noise and other nuisance to areas where it already exists.

**3.2** Existing airports have developed and adapted in response to rising demand. The communities around have adapted to them as they have developed and in terms of employment and the local economy often benefit from them.

### **4 General Conclusions**

**4.1** Constructing a new airport east of London would essentially move both the economic benefits and the environmental disadvantages from Heathrow to the new location. There may be some advantages in a fresh start in that it may benefit from the latest designs and technology and can to some extent be future proofed. In the process it would create a great deal of disruption and carry with it high risks to all concerned.

**4.2** Considering the national interest, assuming that airport expansion will benefit the U.K. economy, abandoning the previous policy and delaying a decision has already put the county at a disadvantage when compared with its continental competition. Reliance on the construction of new hub airport east of London with its long lead time, disruption and relocation costs would in the Society's view, because of the time delays, place U.K. aviation in a position from which is unlikely to recover.

**4.3** Most of the sites that have been identified for a potential new airport are in areas with a sensitive environment which would be seriously damaged by such development. Some sites are covered by UK international treaty obligations. Little has been discussed regarding the impact of associated development and the provision of new infrastructure.

**4.4** The proposals for a third runway at Heathrow and a second runway at Gatwick have been well publicised over a number of years and the communities in those areas have had an opportunity to be heard. With the exception of the Cliffe proposal, in the present situation, where there is no preferred option, communities east of London have had little opportunity to comment other than in general terms. Any of the proposals for a site east of London would have a significant impact and are likely trigger a strong public reaction.