Having analysed the submissions to the commission, the parish council would like to make some general comments for further consideration.

The submissions vary dramatically in quality and detail, in particular their assessment of the impacts of their proposals. Even where the impact assessment is more comprehensive the mitigation of negative impacts tends to be brushed aside as insignificant. This response deals with some of the major impacts as well as additional indirect impacts which would also need to be taken into consideration. Much of this was part of our submission to the SERAS consultation into “The Future Development of Air Transport in the United Kingdom: South East in 2002.

The parish is located on the Hoo peninsula in North Kent, in the Medway Unitary Authority. It has historic links, with some evidence that the Magna Carta was drawn up here. Our submission is primarily driven by proposals in the Thames Estuary (inner and outer), on land or in the river itself that would affect our 5,700 residents (and many more in the surrounding area), but it is stressed that the principles apply to any significant development of an airport elsewhere as well. It is informed by discussions with local people and seminars/meetings/public meetings held which initially took place during the previous proposals for a 5/6 airport to the north and east of our parish in 2002 and then subsequently when proposals have been proposed and now form part of the current submissions.

1) Environment

It is accepted, by some submissions, that an area is much more than just an area on a map and may make a significant contribute to the environment of the local villages, towns and region i.e. provided vital green space and a lung for large urban conurbations.

The area’s contribution to nature will also be critical and form part of an ecosystem that serves not just the immediate area but is also of national and international importance.

Although we accept the principle that this can be disturbed for schemes in the national interest, there are duties to ensure that any disruption is mitigated to an even larger extent. In our area of interest, this would mean the creation of replacement environments that have never been seen before on the planet, and more importantly unproven. It is much more than just mud and rocks and a complete ecosystem would need to be established and operational before any major development was started (e.g. RAMSAR designation).

The environmental impact of off-site construction (roads, rail and further built
environment) is also underplayed in all submissions (especially complexity and cost).

2) **Carbon Generation**
   The provision of a large airport with a significant increase in overall capacity could lead to an over-provision (waste) or growth (more road/rail and air traffic) which would lead to a significant growth in carbon generation and against the UK’s reduction targets and agreements.

3) **Noise**
   There are some suggestions that water could dampen the spread of noise nuisance; however it is our experience that it is often spread further. We have examples of explosions at Foulness/Shoeburyness that have caused disruption to North Kent areas.

   Although there are agreed guidelines, the increase in noise should also be a significant factor; bearing in mind that 1db is a doubling of noise energy.

4) **Light**
   Light pollution from industrial developments (e.g. north bank of Thames) is also a significant problem and spreads to the south bank of the Thames; this could be exacerbated by developments in the river or on either bank.

5) **Surface Links**
   **Rail:** The use of rail to provide surface access to airports is welcome. It is not that long ago that even Heathrow did not have any such links. There was bus/coach interchange from stations in the area (even the Tube only extended to Hounslow West). The airport coach services from London were an added traffic problem for the area. However there is a suggestion that links into the wider national network are relatively simple and do not take account of the existing capacity constraints of other main lines into and out of London. It is a simple task to draw lines on a proposed network diagram but the integration of services is a much more complex (and costly) matter. Cost and complexity has largely been overlooked.

   **Road:** In many of the proposals a link to an existing road network is seen as sufficient. However the impact of airport traffic on an already congested road is often ignored. Where some additional relief is identified the cost and disruption of this is not taken into account sufficiently (e.g. further widening of the M25).

   The impact on local roads is largely ignored, and even if not primary routes, these are likely to be used by local people for work purposes. As an example some proposals either ignore the need for a crossing from Sheerness to Grain or leave this to a further, later phase although there would be significant impacts and the airport complex would be visible, there would be a 30-40 mile road journey to access it. In addition there would be an increase on North/South roads in Kent which is largely overlooked.

6) **Employment and Economic Development**
   A common theme is the number of jobs and associated developments that would be created in the area of a new major airport. However figures in submissions talk about up to 200,000 new jobs in the area (direct and indirectly linked to the airport). The practicalities of supplying and supporting this level of expansion are underplayed in all submissions. Even if the problem of relocating large numbers of specialised workers could be overcome, where could these people be housed? There is already a significant housing growth identified for the region. This is likely to lead to additional traffic on local roads as provision of rail links from all points of the compass is
extremely unlikely. In the example of Kent, this could lead to a significant growth of north/south traffic where currently it is primarily east/west (London/M25) centric.

The additional growth in population that this workforce would bring would add to the pressure on police, education, social services, health (especially hospital provision) and many other elements of community services, directly and indirectly attributed to the airport. How would this be provided in both capital and revenue terms?

7) Economic Impact (an airport is much more that runways and terminal buildings)

While focus is on the provision of the airport itself, there is little or no consideration of the wider impact and requirement for much more built environment in the vicinity driven by both the direct and indirect requirements of the airport.

Although an airport and the surrounding infrastructure would require specialised resources and could meet the cost of travel costs, this could be an inhibitor or severe constraint on the majority. We would suggest that there would be a need to establish large scale low cost housing developments in the vicinity (further encroaching on the un-built environment).

Along with requirements ranging for additional car parking and direct airport services, there is likely to be a need for further commercial and industrial space in the area.

There would be potential for overheating the economy in the region of a new airport, to a point that cannot be sustained, as either the workforce move from current local jobs to the airport (and leading to financial pressure on those local companies) or do not move and operations at the new airport are constrained due to lack of staff (and it becomes an expensive white elephant).

8) Economic Impact on West London

Heathrow has shown that regional, national and international headquarter buildings are likely to be located (or relocated) to be near the major airport. Although this has grown organically over many decades, the closure of Heathrow would suggest that this would be re-located to a new airport area. This would be a major hit on the economy of West London and the Thames Valley. Although a major housing development is suggested on the Heathrow site, where would these people work? Although some provision for jobs would be made, where would these companies come from?

9) Operational Issues

Air Traffic Controllers have indicated that an airport in the Thames Estuary area would cause operational difficulties in the South East and as far away as Amsterdam Schiphol. Even if local arrangements could be made, there is a real danger that London Southend and London City would be adversely impacted and could close. There could also be negative impacts on London Gatwick and London Stansted.

Many major airlines have centralised their operations at Heathrow (or other airports) over many years and the problem of trying to relocate these (and the staff involved) would be a major financial burden. Maintaining multiple airports would also mean a return to some of the inefficiencies of the past.

The cost of running a new airport would need to be passed on to the passengers. There are indications that this would mean a major increase in ticket prices.

Overall Summary

The provision of a major new airport (directly or in stages) comes with many major problems.
environmental, economic and operational. The SERAS consultation into The Future Development of Air Transport in the United Kingdom: South East in 2002 concluded that the proposed Cliffe airport was not practical and we cannot see anything in the current proposals that overcome these issues. In fact as some of these schemes have been developed further, additional issues have arisen.

There does not seem to be a business case for investing large sums to relocate Heathrow to another larger location. The direct and indirect cost of moving the facility does need to be considered assuming that major growth in aviation is required, which we would suggest is unproven, this still burdens the economy with huge costs which it seems difficult to justify.

We hope that the commission do consider the wider issues and impacts when it comes to forming their response to the long term options.

Yours sincerely

Chris Fribbins
Chair - Cliffe and Cliffe Woods Parish Council