

Airports Commission **Inner Thames Estuary: Feasibility Study 2**
Operational feasibility and attitudes to moving to an estuary airport

The Mayor of London's response

August 2014

1. Purpose of Paper

- 1.1. In July 2014, the Airports Commission published four draft feasibility studies, related to a new hub airport in the Inner Thames Estuary (ITE).
- 1.2. The Airports Commission have invited responses, and they have asked that respondents focus on i) the factual accuracy of the Commission's work, and ii) whether there is any new information or evidence.
- 1.3. This paper comprises the Mayor of London's response to the Commission's Feasibility Study 2, – Operational feasibility and attitudes to moving to an estuary airport, authored by Leigh Fisher ('the study').

2. Summary of the Mayor's response

- 2.1. The Mayor welcomes a number of the findings of Study 2 and feels that it provides a series of arguments which together make a clear and compelling case that a new hub airport in the Inner Thames Estuary is both credible and deliverable.
- 2.2. In response to the Commission's two questions, no notable factual inaccuracies have been observed or issue areas missed. However, the interpretation of the facts and the forecasting of how challenging particular aspects are likely to be is extremely important. That notwithstanding, there are many sensible observations, which are set out in this document.
- 2.3. In particular, the Mayor welcomes the Commission's recognition that potential issues associated with flood risk management, fog events, strong winds and crosswinds, bird strike risk, the SS Montgomery, airspace, and power generating infrastructure are either negligible, or surmountable, and therefore, do not ultimately pose an obstacle to delivery of a new hub airport in the Thames Estuary.
- 2.4. Though the Commission raises site availability and cost as issues for the relocation of the Liquefied Natural Gas (LNG) facility at Grain, neither is deemed insurmountable; in any case, a detailed study is required to fully understand the implications.
- 2.5. The study is, perhaps, weakest on its understanding of the potential transition

process. It does recognise that it is feasible to undertake the practicalities of the move. However it raises a number of concerns about the transition of workers to a new airport; the study underestimates the extent to which staff turnover is very high for low skilled roles, while highly trained staff tend to commute further and could have a comparable commute to the new airport. This will be enabled by the comprehensive surface access network, potentially supplemented by a staff Travelcard scheme, to enable heavily discounted travel to the new airport.

- 2.6. The study appears to take at face value submissions by Kent and Medway councils that the local area lacks the skills and experience, as well as the sites to meet housing demand. To observe that the ITE's immediate hinterland is not, today, ready to support the staffing needs of a new airport is to miss the point somewhat. A new airport, with excellent surface access links, has the potential to be transformative in terms of unlocking growth and regeneration locally, spurring housing development and helping address significant pockets of deprivation. The latter would be backed up by an active skills enhancement programme, in line with the Government's skills agenda, taking advantage of the 12-15 year project timeframe to prepare young people in the local area for the skilled job opportunities that the airport will offer.
- 2.7. The study declares the transfer of slots from Heathrow to ITE to be a substantial concern, through a misunderstanding of EU law. The examples of Munich and Athens demonstrate how this is not an issue. The study also raises concerns that the UK might be forced to renegotiate some of its bilateral air service agreements (ASAs) – yet fails to recognise a new ITE airport, by addressing the availability of slots at the hub, will remove a key obstacle to securing less restrictive ASAs.
- 2.8. Though the attitudes survey mostly covers well-trodden ground, its most notable finding is that Kent businesses welcome the “significant opportunities” presented by an Estuary airport; this stands in marked contrast to the narrative of Kent and Medway councils.
- 2.9. The study concludes by suggesting that, though a number of significant but not insurmountable challenges have been identified, taken together “they appear to present a substantial risk that would incur large costs”. But, given the lack of any unassailable obstacles to a new ITE airport having been identified, the logical conclusion would be to undertake further work to better understand the key risks raised – which, largely, have not yet been investigated in any detail.
- 2.10. In short, this study does not lend itself to a decision not to shortlist, but rather that it merits inclusion in the next phase of work; this would enable it to be compared in detail, on a like-for-like basis, against the other options. It is imperative that the ITE airport be shortlisted, and this study gives no cause for suggesting otherwise.

3. Key observations

3.1. *The recognition that flood risk is not an obstacle to an ITE airport is welcome.*

3.2. The study states that “it is entirely possible to construct a major international airport in low-lying coastal areas (including estuaries) and on land reclaimed from the sea and to provide it with effective measures for flood defence.” The examples of several major airports worldwide are cited as evidence for this.

3.3. We agree with the recommendation that hydrodynamic and wave modelling of the estuary is conducted at an early stage to identify and determine any mitigation which may be required.

3.4. *The study highlights that the Environment Agency’s Thames Estuary 2100 Plan (TE2100) impacts on the airport proposals. Yet an ITE airport could also improve the deliverability of TE2100.*

3.5. The study notes that the airport would impact upon two of the TE2100 ‘action zones’ on the Hoo Peninsula.

3.6. Yet the paper neglects to mention that the funding for the TE2100 plan has largely not been secured; a new ITE airport has the potential to enable, supplement and enhance proposed flood risk management in this area.

3.7. *The recognition that incidence of fog is not an obstacle to an ITE airport is welcome.*

3.8. The study states that “there is no evidence to suggest that the duration of...instances (of fog at Shoeburyness) is materially longer than at Heathrow or Gatwick.”

3.9. While the study indicates that an estuary location will experience occasional periods of severe fog, between 0400 and 0700, it goes on to identify the technological advances in aircraft navigation and radar that could negate any impact of low visibility on operations, and the benefit of spare capacity at a new airport in minimising any perturbation.

3.10. It is helpful that the Commission understands the flexibility that an ITE airport derives from being able to operate in the night period (11pm-7am) and the spare capacity that quickly allows it to recover from any disruption. Ultimately, it is sensible to dismiss any issues arising from the possibility that visibility might be lower between 0400 and 0700 at an estuary location, thanks to the technologies available.

3.11. *The recognition that incidence of crosswinds or strong wind is not an obstacle to an ITE airport is welcome.*

3.12. The study states that “there is no evidence to suggest that crosswind or strong winds in general would be significantly worse than at Heathrow or would be a material concern for an inner Thames Estuary airport, assuming that a broadly east-west runway alignment is adopted.” This is in line with the runway alignment that is at the core of all the proposals submitted for an ITE airport.

3.13. *The recognition that risk of bird strike risk is not an insurmountable issue for an ITE airport is welcome.*

3.14. The study states that “the (bird strike) problems are not insurmountable, as bird management on the airfield is a question of resources and manpower, but controlling the bird strike risk from sites off the airfield will require the management or removal of additional habitat or the imposition of additional off-airfield bird control, which will significantly increase the ecological impact of the development.”.

3.15. It is worth noting that a range of new bird management technologies are being developed and trialled; good use could be made of such innovations for a new ITE airport.

3.16. The study acknowledges that any impact on local bird populations requires detailed evaluation. This is considered as part of the compensation of habitats that would be required, which is discussed in Feasibility Study I.

3.17. *The recognition that the SS Montgomery is not an obstacle to an ITE airport is welcome.*

3.18. The study states that “the SS Richard Montgomery poses a low risk to people and property today, as it has done for nearly seventy years... The construction and operation of the airport itself is not thought to increase the risk to the SS Richard Montgomery significantly.”.

3.19. Though the risks remain small – even with an airport in the wider vicinity – given the wreck will at some point need to be dealt with, the suggestion that this treatment be done prior to construction is sensible.

3.20. *The recognition that airspace is not an obstacle to an ITE airport – and that London City and Southend airports do not have to close – is welcome.*

- 3.21. The study states that “many of the constraints that limit today’s operation will be far less limiting in the timeframe that a new hub airport in the Thames Estuary will be operational, with the advanced concepts being developed by SESAR being common place and used throughout Europe by 2030. Thus the proximity of a new hub airport in the Thames Estuary to the eastern part of the airspace boundary with resultant impact on neighbouring agencies should not be considered as insurmountable.”.
- 3.22. Potential difficulties in influencing the neighbouring European airspace agencies are identified, but these difficulties are rather overstated, given that Eurocontrol have identified UK airport capacity as a key constraint in the European air traffic system¹. It is therefore reasonable to assume that Eurocontrol and other European agencies will not wish to hinder the UK’s efforts in delivering such capacity.
- 3.23. The Commission had previously reported that London City and Southend airports would have to close in the event of a new hub in the Thames Estuary. It appears that this view is no longer endorsed, given the study’s observation that “simulations would be required to verify the extent to which London City and Southend could co-exist with a new hub airport.” The clarification that an ITE airport could co-exist with both London City and Southend airports is in line with the advice that TfL has previously received from National Air Traffic Services (NATS). The temptation to overstate the extent of any interaction between the airports – in the absence of simulation data – must also be resisted. It is important that the conclusion, that an Estuary airport is compatible with continued operations at London City and Southend airports, now be taken on board across the feasibility studies to eliminate the inconsistencies on this point.

3.24. *The recognition that the electricity infrastructure is not an obstacle to an ITE airport is welcome.*

- 3.25. The study confirms that the oil- and coal-fired power stations have been decommissioned and are being dismantled.
- 3.26. The study does indicate that the Grain and Medway gas-fired power stations could continue in situ, though acknowledging that TfL’s proposals would see them removed. The study mentions their role in electricity generation, contributing 2.5% of the UK total as well as the potential for future developments on these two sites. However, it is clear that no detailed work has been undertaken to understand the implications of closing and/or relocating the power stations, and as such the study is unable to claim that this would not be feasible.

¹ “Challenges of growth 2013: Summary Report”, Eurocontrol, July 2013

- 3.27. The nearby electricity interconnector to the Netherlands is also deemed compatible with an ITE airport.
- 3.28. *Though the study emphasises concerns about site availability and cost, it does not rule out the relocation of the Grain Liquefied Natural Gas (LNG) facility – this is welcome.***
- 3.29. The study states that the current HSE advice is inconclusive as to whether the LNG facility and airport could co-exist. However, TfL has proceeded on the basis that the facility would be relocated.
- 3.30. The study emphasises the strategic importance of the LNG facility and that “National Grid is not aware of another suitable site.” However, in the absence of detailed work being undertaken by any party to determine whether there are other suitable sites, it would be premature to declare that none existed (nor is this claimed by National Grid).
- 3.31. The Commission assume that any replacement facility would cost at least as much as the investment to date (£1.1bn) and as has been committed (£300m). It has also been inferred from this that the operational life of the infrastructure will continue well beyond 2029.
- 3.32. Again, detailed work needs to be undertaken to gain an understanding of the cost of relocation (to some extent dependent on the location identified). Such a study could also derive a full understanding of the operational life times of the different assets on the site. It is worth noting that the scale of cost envisaged by the Commission would be a relatively small proportion of the total airport cost.
- 3.33. Regarding timescales, the study stipulates that the new facility be reprovided before the old one is closed. The ten year lead time stated could be accommodated within the overall programme for a new ITE airport.
- 3.34. *The acceptance that the practicalities of the move of an airport from Heathrow to the ITE would be feasible is welcome.***
- 3.35. Several examples of airport moves are cited – though their smaller scale (in terms of distance and passenger numbers) is highlighted. It is worth noting that by 2020 three new mega-hub airports are scheduled to open: Dubai World Central (with capacity for up to 200 million passengers per annum (mppa), Beijing Daxing (130mppa) and New Istanbul (150mppa). These could each provide a useful experience of airport transition.
- 3.36. The study also discusses the relative merits of an overnight and a staged transition. A

staged transition is proposed as less risk, though the possible issues are listed. TfL's submission considered transition staging options, taking into account international experience, recent examples of 'soft openings' are instructive. This would naturally be worked out in greater detail as part of the delivery planning process.

3.37. If the ITE were to be taken forward, it should be noted that the Government would have a number of options for ensuring the institutional framework to support delivery of the new airport, the redevelopment of Heathrow and the transition between the two sites:

- A Mayoral or New town development corporation to guide and support development at the vacated Heathrow site;
- A construction-focused Estuary Delivery Authority, similar to the Olympic Delivery Authority, whose powers could include delivery of the new airport, delivery of the ancillary infrastructure and surface access, as well as planning powers and support for development in the corridor;
- A smaller transition-focused body, providing advice and support to companies and individuals, the latter including support for the Government's skills agenda.

3.38. *A raft of issues are raised regarding the transition of the workforce; these have been overstated and all can be credibly addressed.*

3.39. *Whether highly trained staff would be willing to relocate/commute:* highly trained staff tend to commute further (in the case of pilots, often by plane); based on the publicly available data, it is estimated that around 60% of Heathrow staff do not live in the immediate vicinity and travel more than 30 minutes to work. For many, commuting to a new airport might not entail an increase in journey time.

3.40. *The difficulties for low wage workers to relocate/commute:* the low-wage jobs at Heathrow tend to draw more on the local area but also have a high staff turnover – for example, almost a third of retail and catering staff at Heathrow have been working there less than a year². Many will be able to seek other employment opportunities in West London, not least in one of the new opportunity areas being developed.

3.41. *The inability of public transport to offer direct or affordable access to ITE:* the HSI - HS2 link and Crossrail will allow access to ITE from the Great Western Main Line; from the southwest London rail network access to ITE will be via Waterloo. This will ensure fast access to the ITE for those staff who wish to commute – in many instances, under an hour. Affordable staff access to the airport could be facilitated by adapting the existing "Heathrow Travelcard" scheme. This provides heavily

² "Heathrow: On-airport Employment Survey, 2008/09 Summary report", Heathrow Airport Limited, 2010

discounted travel for staff on several services – until recently, even including the Heathrow Express³. As such, there is a clear precedent for London airport staff to travel cheaply to work, including using premium rail services.

3.42. *Lack of relevant skills and experience in Medway/Kent and lack of sites to meet staff housing demand:* to observe that the ITE's immediate hinterland is not, today, ready to support the staffing needs of a new airport is to miss the point. An ITE airport, with good surface access links, has the potential to be transformative in terms of unlocking growth and regeneration. The airport would play a unique role in unlocking the full housing potential of the Thames Gateway, an area where development has repeatedly stalled, and will help to address significant pockets of deprivation. The 12-15 year project timeframe presents the opportunity for an active skills enhancement programme – delivered through the secondary and tertiary education system in Kent, Essex and east and southeast London. In line with the Government's skills agenda, this will prepare young people for the skilled job opportunities that the airport will offer.

3.43. *The acceptance that a commercial agreement could be struck with Heathrow is welcome.*

3.44. The complexities entailed in reaching a commercial agreement with Heathrow Airport are flagged. The need for considerable strategic and legal advice (at some cost) is highlighted; securing such advice would be the norm when the Government undertakes any sizeable commercial transaction.

3.45. Ensuring that investment in Heathrow does not cease has been a factor in TfL's consideration of delivery models; the existing regulatory framework will facilitate this.

3.46. *The study raises the spectre of existing Heathrow carriers being disadvantaged on slots. An absence of rules on slot transfers from old to new hub is mistaken for a prohibition on such slot transfers. There is every reason to believe there would be a smooth transition of slots from Heathrow to the ITE airport, alongside opportunities for new carriers.*

3.47. The study suggests that EU law does not allow for grandfather rights to be transferred across from old to new airport; it therefore concludes that Heathrow carriers could be placed at a disadvantage to new entrants (particularly in a transition period) – though, in their characterisation, all airlines would effectively be new entrants.

3.48. EU law does not specify any slot allocation process relating to the relocation of an airport – nor does UK law, nor, indeed, do the International Air Transport Association

³ The validity of the Heathrow Travelcard on Heathrow Express services was terminated on 12 June 2014.

(IATA) Guidelines. As set out in Supporting Technical Document: L accompanying the Mayor's submission in May⁴, this has not prevented a sensible approach being taken, underpinned by three core principles:

- Any airline that has to move is offered the same slots at the new airport;
- Any airline that wants to take the opportunity of a new airport with spare capacity and reschedule timings must request new slots in the normal way;
- Where a phased approach to transition is implemented, slots which are to be transferred across from the old airport are safeguarded.

3.49. The above approach is fair and complies with the EU slot allocation principles of non-discrimination and access for new entrants – not least thanks to the significant capacity available at a 4-runway hub. This approach has been used for the new airports at Munich and Athens and there is every reason to expect a similar approach be taken for a new ITE hub airport.

3.50. *The study claims that the closure of Heathrow will disadvantage the UK in forcing renegotiation of air services agreements (ASAs) with other countries where the airports are named. This is unlikely to be the case when set against the benefits of unimpeded access to an unconstrained UK hub; for the inability to secure slots at Heathrow has long marred UK bilateral aviation relations.*

3.51. One of the biggest challenges for Britain in negotiating ASAs has been the slot constraints at Heathrow; airlines from emerging economies in particular have complained bitterly that they cannot make use of frequencies allotted because they cannot secure the slots at Heathrow. In one notable case, the Nigerian authorities slashed the number of slots available to British Airways at Lagos airport in retaliation for Nigerian carrier Arik Air's inability to secure affordable well-timed slots at Heathrow for the continuation of its Abuja service⁵. British carriers are deemed to have the advantage in being able to draw on an existing pool of slots, making it easier to start a new service (albeit at the expense of another route).

3.52. The result of the slot restrictions at Heathrow has thus meant that many countries have negotiated relatively restrictive ASAs because they know they will only get limited access to the UK's hub airport. This will change dramatically with a 4-runway ITE hub airport, with a ready availability of slots for new entrants. It is worth noting that this is not the case for a 3-runway Heathrow, which, according to Commission

⁴ "Inner Thames Estuary Feasibility Study, the Mayor of London's Submission, Supporting Technical Document L: Planning for transition to a new hub airport", TfL, May 2014

⁵ "Federal Government slashes BA's flights to Nigeria", This Day (newspaper), 3 November 2011

forecasts, would effectively be full shortly after opening – with no slot availability at peak times.

3.53. It is true that in certain cases, where particular airports are specified in ASAs, an amendment to the existing ASA will be required. But it is quite likely that many countries will be willing to negotiate a more liberal bilateral agreement which permits more flights to and from the UK, in the knowledge that their airlines would be able to secure the slots they needed – without great expense – at a new, unconstrained, hub airport.

3.54. *The most noteworthy finding of the attitudes survey is that "Kent businesses see the development of an Estuary airport as providing significant opportunities." This is a welcome local perspective that stands in contrast to the narrative which Kent and Medway Councils have set out.*

3.55. In the face of the strident opposition of the councils, local businesses may have been reluctant to voice public support for an Estuary airport. So, it is significant that when their views are canvassed, businesses have said they “would relish the opportunities created by a scheme of this magnitude, particularly since historically few large scale investment opportunities have been concentrated in the Kent region.”

3.56. In general, the attitudes survey undertaken presents an interesting (albeit limited) snapshot of stakeholder views. The concerns raised correspond to those TfL has heard through its own programme of stakeholder engagement, with a particular emphasis on airport charges/financing and surface access. More often than not, the concerns arose from an (understandable) lack of awareness of what was being proposed; when the detail was explained – whether the comprehensive surface access network or the sensible approach to financing and charges, concerns were assuaged.

3.57. One particular issue arising from the survey that is often debated is the value of night flights to the aviation industry. It is instructive that “early morning arrivals were considered to be particularly advantageous” by airlines, these perhaps being the most significant aircraft movements in the 11pm–7am night period⁶.

3.58. An important theme raised by businesses was the issue of uncertainty, around not only the decision making process but also the delivery. This is an issue not limited to an Estuary option and it sends a clear signal to all political parties that they can no longer prevaricate on the subject of new aviation capacity; swift, decisive action, supported by a broad-based political consensus, is required.

⁶ The standard 8 hour night period applied for different types of noise (including road and rail traffic) is 23:00-07:00; this is in line with World Health Organisation guidelines and the EU Environmental Noise Directive and, as such, is used for most official purposes in the UK.

3.59. When the study concludes that most are concerned that the airport proposals “would carry significant risk, borne by airlines and businesses”, it is key that:

- the comprehensive work undertaken to date is continued, ensuring that any potential issues are fully understood and resolved – and that this is communicated to stakeholders; and
- Government acts effectively to minimise the uncertainty and takes the necessary steps to contain the risks to delivery of a new airport.

4. Summary table: Compatibility of the Study with the Mayor's view

Summary of the key observations made:

Issue	Feasibility Study 2	The Mayor's view	Is the Study compatible with Mayor's position?
Flood risk	"It is entirely possible to construct a major international airport in low-lying coastal areas (including estuaries) and on land reclaimed from the sea and to provide it with effective measures for flood defence."	The recognition that flood risk is not an obstacle to an ITE airport is welcome.	Yes
	The TE2100 impacts on the airport proposals because two of its action zones lie on the Hoo Peninsula.	The study neglects to mention that funding for the for the TE2100 plan has largely not been secured; a new ITE airport has the potential to enable, supplement and enhance proposed flood risk management in this area.	Yes
Fog events	"There is no evidence to suggest that the duration of...instances (of fog at Shoeburyness) is materially longer than at Heathrow or Gatwick."	The recognition that incidence of fog is not an obstacle to an ITE airport is welcome	Yes
Wind	"There is no evidence to suggest that crosswind or strong winds in general would be significantly worse than at Heathrow or would be a material concern for an inner Thames Estuary airport."	The recognition that the incidence of crosswinds or strong wind is not an obstacle to an ITE airport is welcome.	Yes
Bird strike	"The (bird strike) problems are not insurmountable."	The recognition that the risk of bird strike is not an insurmountable issue for an ITE airport is welcome.	Yes
SS Montgomery	"The SS Richard Montgomery poses a low risk to people and property today, as it has done for nearly seventy years... The construction and operation of the airport itself is not thought to increase the risk to the SS Richard Montgomery significantly."	The recognition that the SS Montgomery is not an obstacle to an ITE airport is welcome.	Yes
Airspace	"Many of the constraints that limit today's operation will be far less limiting in the timeframe that a new hub airport in the Thames Estuary will be operational, with the advanced concepts being developed by SESAR being common place and used throughout Europe by 2030."	The recognition that airspace is not an obstacle to an ITE airport is welcome.	Yes
	"Simulations would be required to verify the extent to which London City and Southend could co-exist with a new hub airport."	The acceptance that London City and Southend airports would not have to close is welcome. The temptation to overstate the extent of any interaction between the airports – in the absence of simulation data – must be resisted.	Yes
Energy facilities on the Isle of Grain	The oil- and coal-fired power stations have been decommissioned and are being dismantled. The electricity interconnector is deemed to be compatible. Though the Grain and Medway gas-fired power stations could potentially continue in situ, it is acknowledged that TfL's proposals would see them removed - no work has been undertaken to suggest that this would not be feasible.	The recognition that the electricity infrastructure is not an obstacle to an ITE airport is welcome.	Yes
	HSE advice is inconclusive as to whether the LNG facility and an airport could co-exist. Any replacement facility would cost as least as much as the investment to date (£1.1bn) and as has been committed (£300m). "National Grid is not aware of another suitable site."	TfL's proposals assumed the relocation of the LNG facility. No detailed work has been undertaken by any party to determine whether there are other suitable sites or the likely cost; until this is done, it would be premature to decide that no such site existed. The scale of cost envisaged by the Commission would be a relatively small proportion of the total airport cost.	Yes

<p>Moving the airport</p>	<p>Several examples of airport moves are cited, albeit smaller scale (in terms of distance and passenger numbers). The risks around the transition are also flagged.</p>	<p>The acceptance that it is feasible to practically move an airport from Heathrow to the ITE is welcome. A number of larger scale airport moves are scheduled to take place by 2020 which should provide useful experience.</p> <p>TfL's submission considered a number of transition staging options, taking on board international experiences, including recent examples of 'soft openings'. This would naturally be worked out in greater detail should an ITE airport be authorised.</p>	<p>Yes</p>
<p>Transition of workers to a new airport</p>	<p>It will be difficult for low wage workers to relocate/commute</p>	<p>The low-wage jobs at Heathrow tend to draw more on the local area but also have a high staff turnover; many will seek other employment opportunities in West London, not least in one of the opportunity areas.</p>	<p>The Commission overstate the issue</p>
	<p>Will highly trained staff would be willing to relocate/commute?</p>	<p>The highly trained staff tend to commute further (in the case of pilots, often by plane); for many, commuting to a new airport might not entail an increase in journey time.</p>	<p>The Commission overstate the issue</p>
	<p>Public transport will be unable to offer direct or affordable access to ITE from existing staff areas</p>	<p>The HSI-HS2 link and Crossrail will allow access to the ITE from the Great Western Main Line; from the southwest London rail network, access to the ITE will be via Waterloo. This will ensure fast access to the ITE for those staff who wish to commute – in many instances, under an hour.</p> <p>Affordable staff access to the airport could be facilitated by adapting the existing "Heathrow Travelcard" scheme, which provides heavily discounted travel for staff on several services.</p>	<p>The Commission underestimate potential surface access offering</p>
	<p>Lack of relevant skills and experience in Medway/Kent and lack of sites to meet staff housing demand</p>	<p>To observe that the ITE's immediate hinterland is not, today, ready to support the staffing needs of a new airport is to miss the point somewhat. A new airport, with excellent surface access links has the potential to be transformative in terms of unlocking growth and regeneration.</p> <p>The airport will help address significant pockets of deprivation; training would be targeted to ensure local people can take advantages of the opportunities created. The airport would also play a unique role in unlocking the full housing potential of the Thames Gateway, an area where development has repeatedly stalled before.</p>	<p>The Commission's view is based on world today – yet local planning and policy framework would change if new airport approved</p>
<p>Reaching agreement with Heathrow</p>	<p>The complexities entailed in reaching a commercial agreement with Heathrow Airport are flagged. The need for considerable strategic and legal advice (at considerable cost) is highlighted.</p>	<p>Acceptance that a commercial agreement could be struck with Heathrow is welcome. It is unclear why the strategic and legal advice is highlighted; securing such advice would be the norm when the Government undertakes any sizeable commercial transaction.</p> <p>Ensuring that investment in Heathrow does not cease has been a factor in TfL's consideration of delivery models; the existing regulatory framework will facilitate this.</p>	<p>Yes</p>

Transfer of slots	It is uncertain how slots will be allocated. With EU law not allowing for transferring of grandfather rights, the spectre is raised of existing carriers being disadvantaged.	EU law makes no provision for slot allocation in the event of an airport relocation, nor does UK law – indeed nor do the industry guidelines. This has not prevented a sensible approach being taken, where slots are grandfathered across (or safeguarded if the transition is staged). Both Munich and Athens followed this approach for the opening of their new airports. There is every reason to believe a similar approach will be followed for an new ITE hub airport.	The Commission misinterpret EU law; precedent of other airports suggests this is a non-issue
Air services agreements (ASAs)	The study claims that the closure of Heathrow will disadvantage the UK in forcing renegotiation of ASAs with other countries where the airports are named.	This is quite absurd when set against the benefits of unimpeded access to an unconstrained UK hub; the inability of new airlines to secure slots at Heathrow has been a significant factor in countries negotiating relatively restrictive ASAs with the UK. With a new 4-runway hub, countries will be willing to negotiate more liberal bilateral agreements with the UK, permitting more flights to and from the UK, to the benefit of UK airlines and passengers alike.	The Commission's analysis is incorrect – a 4-runway hub will be overwhelmingly positive for the UK's ASAs.
Attitudes survey	"Kent businesses see the development of an Estuary airport as providing significant opportunities."	The recognition by Kent businesses of the potential opportunity is predictable but no less welcome for that.	Yes
	More generally, the attitudes survey raises a number of concerns, notably airport charges/financing and surface access.	These mirror concerns relayed to TfL through its own stakeholder engagement and reflect an (understandable) lack of awareness of the proposals. More often than not, when the detail was explained – whether the comprehensive surface access network or the sensible approach to financing and charges – their concerns were assuaged.	Yes

Endnotes