

**LONDON SOUTHEND AIRPORT & ENVIRONS: JOINT AREA ACTION PLAN
PREFERRED OPTIONS
Response by Campaign to Protect Rural Essex**



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COMMENTS BY CAMPAIGN TO PROTECT RURAL ESSEX

9 April 2009

The Campaign for the Protection of Rural Essex (CPREssex) is the county branch of the Campaign to Protect Rural England. It exists to promote the beauty, tranquillity and diversity of rural Essex by encouraging the sustainable use of land and other natural resources in town and country.

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Note that we have referred throughout to the Issues and Options Report (June 2008) as the 'IOR' and the Preferred Options Report (February 2009) as the 'POR'

1. ENVIRONMENTAL IMPACTS

1.1 Green Belt

Preservation of Metropolitan Green Belt (MGB) is a fundamental tenet of planning policy, set out in PPG2.¹ There is a distinct lack of clarity in the consultation document – e.g the map on p14 has no key and it was necessary to refer back to the council and to the June 2008 Issues and Options report to get an adequate picture of the current land use plan.

Having done so and assessed the proposals, our response is:

- We cannot accept the loss of MGB land to the north of aviation way, marked ii(a) and ii(d) on p14.
- The land at iii(c) is also MGB and needs to stay as such. It needs no alteration to its use or classification. (The proposal for this site is unclear).
- The land at ii(b) likewise is MGB and should be preserved as such. It should not be re-classified. The preferred option includes the re-location of Westcliff Rugby Club and refers to policy ENV2 which in turn refers to policy E7. The proposed re-location of the rugby club facilities will have to be funded by the Saxon Park area 2 development. This is an unnecessary and interdependent chain of actions, which have no demonstrable link to expansion of the airport or its runway except to help fund them. The simplest and only environmentally acceptable answer is to retain the Green Belt land as such and leave the rugby club where it is.

We note the reference to revising Green Belt boundaries: Some Local Planning Authorities in Essex have been encouraged to reconsider their MGB > boundaries in the Regional Spatial Strategy. But Rochford is not one of these. PPG2 requires that Green Belt boundaries should only be altered in 'exceptional circumstances'.² (PPS2 Green Belts). The scale of alteration proposed here is very large and would be hugely detrimental to the value and purpose of the MGB in providing open and essentially unspoilt countryside dividing the conurbations of Rochford and Southend. The prospect of further encroachment of urbanisation is unacceptable.

CPRE is wholly against any loss of MGB, especially so in this part of the UK which is already becoming over-developed. The Green Belt prevents urban sprawl and the merging of nearby urbanisations. It provides openness and varying degrees of tranquillity and a habitat for wildlife. It contributes to quality of life, mental and physical health and well-being.

The industrial development (Saxon Business Park) proposed to the north of Aviation Way is totally unacceptable both in its scale and character on Green Belt land.

Also, situated directly to the west of the Brickworks' site, and the MGB land north of Aviation way lies the Cherry Orchard Jubilee Country Park, within a Special Landscape Area. This area is designated for its landscape and ecological quality.

¹ *Planning Policy Guidance 2: (PPG2) Green Belts Publ: January 1995 (Amended March 2001)*

² *PPG2 paras 2.6 and 2.7*

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Industrial development of land on the other side of Cherry Orchard Lane would have a negative impact on the landscape character and visual amenity of this landscape. The negative impact of visual amenity would affect both recreational users of the Country Park and surrounding areas, and residents of Cherry Orchard Lane.

This proposal in no way constitutes 'exceptional circumstances' for such a large incursion into the green belt. Only the small area marked (iii) on the 'areas for change' map might be considered for employment use for the MRO business (and only the MRO business) if there is no other alternative. Even so this should not be considered a precedent for any further alterations in Green Belt boundary.

A 'green buffer' and new public open space, referred to in the POR, are not planning gains. They in no way compensate for the loss of existing green belt land and would alter its classification making it less protected and more vulnerable to future development.

1.2 Agricultural Land

The document gives no information as to the agricultural quality of this land - areas (v), (x) and (xi). Whether or not this is currently used for agricultural purposes – crops or livestock the real and growing threat of food shortages (virtually inevitable with world and UK population growth) argues against any reduction of agricultural land. We have to preserve the means to produce as much as possible of our food in the UK. The increasing cost of 'food miles' also points to producing more at home.

In particular we regard any proposal to develop agricultural land in order to advance aviation activity and thereby contribute to climate change - which will further damage the UK's food security - as an unsustainable and perverse policy.

In terms of current usage we consider the proposed loss of recreational facilities for active exercise such as cricket, football or rugby or allotments would be detrimental to quality of life and, potentially, the health of those who use these facilities.

The preferred option for Area (v) is a case in point. Instead of the facilities now available this piece of land would be carved into two by a 'safeguarded' 'corridor' earmarked to become a link road. The implication is that both the allotments and cricket pitch would be lost and the amenity value of the two remaining strips of 'public open space' would be vastly devalued.

1.3 Noise

The POR has nothing material to say about noise. It makes no reference to previous acknowledgements in the IOR and other documents that there would be more noise both from increased surface transport (unless fully mitigated by a modal shift to public transport) and from increased air transport movements (ATMs).

Yet noise is perhaps the most abhorred side effect of aviation. Over the longer term development may well lead to quieter aircraft. But this gain would be drowned out by an increase from 863 Air Transport Movements (ATMs)³ in 2008 to at an estimated

³ CAA Airport Statistics; Southend Airport

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25,000 ATMs (assuming average aircraft occupancy increased from 49 in 2008 to 80 at the 2million passengers per annum (mppa) throughput level.

According to local opinion, a sizeable portion of Western Southend could be affected by noise from the increased numbers of flights. The greatly increased flights would be heard and seen over most of the town, and a large part of Westcliff, Leigh and Eastwood would no longer be able to enjoy a the quiet of their back garden on a weekend afternoon. There are also concerns about the several local schools that would be close to the flight paths.

Without projected noise contour maps no specific assessments can be made. But it does not take much imagination to realise the impact on the quality of life of local residents and the potential loss of tranquillity in the surrounding countryside to the north and east of Southend.

1.4 Light Pollution

There is no reference to lighting impacts – either light pollution or light nuisance. New airport buildings and car parks are potentially damaging sources of the former. If located near to residential areas they may also constitute light nuisances. New buildings in the industrial areas within the JAAP would be subject to the same comments. Lights on aircraft in flight, especially coming in to land, can also inflict light nuisance on residential properties near to the airport.

1.5 Surface Water-

There is no reference to potential impacts on surface water or to matters raised in the consultation on the IOR. We would refer to the Sustainability Appraisal (SA) provided at that time (June 2008), which says (appendix 1):

“The airport will continue discharging waste-water into the brooks within the site through the interceptor. Any natural growth of the airport activities is likely to decrease [sic] or maintain the current bad water quality in the brooks.”

We assume that ‘decrease’ as used here means ‘make worse’. This would be unacceptable in terms of potential impact on landscape and wildlife.

This statement applied to scenario 1 in the IOR – the lowest level of expansion. The scenario proposed in the POR, involving a much higher level of expansion is likely to make the impact on water quality worse.

We therefore concur with a later statement in the SA.

“It is imperative for the detailed development plans to set out strategies to ensure the water quality is maintained.”

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1.6 Public Safety Zone

Policy LS5 says:

It is recognised that the current Public Safety Zone for London Southend Airport will need to be reviewed when the runway is extended.

This review should be carried out before and be part of the planning application.

1.7 Other Environmental Issues

There is no mention of other important environmental issues – notably wildlife conservation, biodiversity and built heritage. These matters must be addressed in any planning application that may follow this consultation. We trust the councils have included the RSPB, Essex Wildlife Trust, English Heritage and the Society for the Protection of Ancient Buildings (SPAB) in the consultation process.

1.7 Climate Change

We appreciate that the increase in passenger numbers/aircraft movements proposed by Southend Airport, although very large in percentage terms is not large in absolute numbers. Nevertheless, aviation emissions are a significant contributor to climate change both via the amount of CO₂ emissions and through the radiative forcing effect that means a tonne of CO₂ at flight altitudes has more than twice the impact of a tonne at ground level⁴.

The UK has set targets for CO₂ reduction across industry. But aviation emissions – if allowed to increase on the ‘predict and provide model’ will negate this target. By 2050 it is claimed, aviation will represent 29% of UK carbon emissions, a calculation based on a 60% cut on 1990 levels of all emissions excluding aviation.

But if all our emissions, including aviation, are to be cut by 80% by 2050 as recommended by the Committee on Climate Change and accepted by the government in 2008, aviation's proportion will look very much higher than 29%.⁵ This makes any increase in aviation activity fundamentally unacceptable from the climate change viewpoint unless it could be achieved on a carbon neutral basis.

2. RUNWAY EXTENSION

The original Airport Master Plan (April 2005) envisaged, on a medium growth scenario, a little over 2.1 million passengers in 2030.⁶ This was without an extended runway. We understand the arguments that the runway extension might enable this level to be reached earlier and that it would allow larger and ostensibly quieter aircraft to be used; also that the 2 mppa might be carried with fewer ATMs if the right

⁴ The IPCC concluded that a multiplier of 2.7 is the best estimate. This has general acceptance as a working measure; however, some experts think a higher figure is more realistic.

⁵ Nick Ferriday in AEF *Flying Green*, Spring 2008 p2. Calculations from a UK Government report.

⁶ London Southend Airport Draft Master Plan for Consultation April 2005 para 38 p21

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routes, carriers and demand levels were achieved to enable major use of larger aircraft.

However, in our response to the IOR (4 August 2008) CPREssex argued that this option (Scenario 3) was unacceptable – as was scenario 2(b). We refer the councils back to this document. We said:

“The other two scenarios [scenarios 1 and 2(a)] – proposing large growth in passenger aviation activity - document progressively greater negative impacts (Tables 11.5.3 and 11.5.4). The results would be increasingly damaging and, scenario 3 would involve loss of about 50% of green belt currently outside the airport boundary but within the JAAP area.”⁷

Our position has not changed

We have referred to the net growth in noise impact of the increase in ATMs whether with the existing or extended runway. It should also be noted that merely flying quieter aircraft is only an advantage if there are no more of them. It is aircraft that disturb people in their houses and gardens not decibels.

No reference is made to potential impacts on All Saints Church - a Listed Building - or nearby residential properties. The current runway ends at Eastwoodbury Lane and so aircraft taking-off/landing do so some way from the church and houses. The extended runway would mean planes taking-off/landing beside the church and much closer to the houses. Noise and lighting impacts would be greatly exacerbated. We need far greater clarity on the possible consequences for the church and it's functioning.

We have also drawn attention to the unacceptable land-take proposals consequent on the runway extension.

The POR contains no reference to demolition of or impacts on residential or other properties. The impacts of the proposed new link road are not spelled out. In the absence of any specific information the most reasonable assumption is that there would be negative effects on communities in the area.

Policy LS7 - Operation of New Runway says that Planning permission for the runway extension will be supported subject to conditions on:

1. The restriction of scheduled passenger flights to between the hours of 06:30 and 23:00 local time Mondays to Saturdays and 07:00 to 23:00 local time on Sundays;
2. The operation of cargo flights, outside the hours specified above, will be controlled by an agreed noise quota;
3. The routing of aircraft on both take off and approach to reduce noise and environmental impact;
4. The operation of helicopters;
5. The restriction on operation of aircraft types for commercial and freight operations to aircraft specified in the ICAO Chapters 3 and 4 of Annex16 - Environmental Protection, Volume I - Aircraft Noise to the Convention on International Civil Aviation (International Civil Aviation Organisation);

⁷ CPREssex: Response to *Issues and Options Report June 2008. P4*

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6. Engine ground running; and
7. Aircraft training movements for aircraft with a seating capacity of over 50.

On point 1, night (sleeping) hours would reasonably be accepted to be 22:30 to 07:00, not 23:00 to 06:30. There should be no flights between these hours – either passenger or cargo.

With the exception of point 5 none of the other points tells us anything material. This is another inadequacy of the document. Comment is not possible unless we know *what* the conditions are.

3. SURFACE ACCESS

3.1 Surface Access Plan and Modal Share

We are not experts in this area. However we believe we can justifiably make the following comments.

We approve Policy LS4 - Surface Access Strategy, which says:

The airport operator will be required to prepare a Surface Access Strategy, the first version to be submitted in advance of any applications for planning consent, and thereafter an update of the strategy to be submitted every five years.

The impact of an additional 2 million passengers travelling to and from the airport in an already congested area of surface transport cannot be countenanced unless a very large proportion indeed travel by public transport. Any proposal for expansion of passenger aviation must be accompanied by costed and funded plans to achieve it.

Section 4.1 of Part 1 of the Evidence Base we considered in responding to the IOR refers to

“According to the Airport Surface Access Strategy, the staff survey carried out in 2006 revealed that 79% of staff drive to work alone, 7% car share, 11% use bicycle, 4% use motorcycles, 3% use the bus and 5% walk to work. 50% of car users say it is the quickest way.”

This is the only indicator given of the likely modal split under current circumstances. We found no forecasts in the evidence base at that time of future modal splits when with passenger numbers up to 1mppa and eventually 2mppa.

This is a vital issue given current road congestion in the area. Para 4.5.1 p 40 in the Evidence Base lists surface access recommendations. These were, and are, purely aspirational. We found it unacceptable that the development proposals in the IOR had no concrete accompanying surface access plan, nor any clear statement of who would be responsible for funding including the share to be borne by the airport owners.

Any growth in passenger numbers should be catered for by maximum use of public transport. Any development plan should seek to greatly reduce the number of journeys by car, without which it would be unsustainable and environmentally

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damaging. Together with the increased air traffic movements, hugely increased road traffic will damage air quality creating both a health hazard and potential damage to the natural environment.

A genuinely sustainable surface access strategy is required.

3.2 New Station

Conceptually this might contribute to improvement in surface access modal split. But this outcome appears largely aspirational.

We are however concerned that the proposed car parking for commuters at the new station would lead to increased car journeys – an unsustainable outcome. The council should prepare surface access forecasts for all scenarios, including this 'preferred option' to enable informed assessment of the contribution a new station might make to the aviation business.

Reportedly the investment by Stobart Ltd is in part dependent on the development of the station going ahead.

Under the present state of information we cannot see how POR would admit any informed assessment of surface access proposals by those with expert knowledge.

4. ECONOMIC FACTORS

4.1 Demand Trends

Rising fuel costs, other charges and the current economic climate have depressed passenger demand. UK airports handled 1.9 per cent fewer passengers in 2008 compared with 2007. Traffic declined most in the final quarter of the year, with four million fewer passengers handled from October to December 2008 than in the same months of 2007⁸

CAA statistics also showed that at the London airports - Heathrow, Gatwick, Stansted, Luton and London City - the fall was two per cent overall, with the largest decline in both absolute and percentage terms at Stansted (with a 1.4 million drop in passengers, representing a 6.0 per cent decline).

Stansted is arguably the best reference for Southend in terms of business model. Flight numbers there fell by 7% in 2008 – from 208,000 to 193,000.

Southampton Airport is, according to local by press reports, regarded as something of a 'role model' for Southend. Total flight numbers there have fallen for the past 3 years - from 58,000 in 2005 to 51,000 in 2008.⁹

Unless there is an unexpectedly quick reverse in current economic conditions, these trends are unlikely to alter in the next few years. Indeed the Department for Transport (DfT), on 31 March 2009, released its revised long-term forecasts for Stansted.

⁸ CAA Airport statistics; 16 March 2009

⁹ CAA; Airport Statistics: Aircraft Movements Table 3.2

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These show a forecast demand figure of 46.5m passengers per annum (mppa) in 2030. This is 25.5mppa lower than the forecast made only 5 months ago, in November 2007.

Economic analysts concerned with Stansted expect that the UK GDP forecasts, due in April 2009, will result in a further reduction to 43 mppa or lower.

This surely is not the time to be considering a major investment in developing Southend Airport.

Air Cargo

“Air freight felt its worst decline in September, since the technology bubble burst in 2001, with similar results or more decline expected over the coming months. International volumes were down 7.7% year-on year, with all regions except the Middle East and Africa reporting negative results, according IATA. Year on year air cargo grew just 0.1%.”¹⁰

4.2 Contribution to the Economy

The POR says (p20)

“It is expected that the airport will be used primarily for passengers supporting a number of Fixed Based Operators (FBOs). However, it is also expected that the airport will see growth in its maintenance, repair and overhaul facilities (MRO) supporting the provision of a range of high skilled jobs in the area. It is not considered desirable for the airport to handle significant volumes of freight due to its location and the pressure that this would place on the local highway network, although it is recognised that some growth in the handling of niche (high value low volume) cargo could be taken forward without compromising the airport's core passenger and MRO functions.”

Elsewhere (P8) the POR refers to destinations “as far away as the South of Spain.” and the use of 150-seater aircraft.

These statements confirm the inference in CPRESsex' response to the IOR that aviation growth would be based on the low-cost short-haul leisure-flight model, whereby Southend airport would be operating as a small-scale version of Stansted.

This aviation business model in fact has a negative impact on the UK economy: The UK trade balance in travel and tourism showed a record £19.5bn deficit in 2007 (£18.4bn in 2006) and will create tourism jobs overseas at the expense of jobs in the local, regional and UK economies.

Businesses are reported to be planning to reduce not increase air travel. The WWF-UK released a report in 2008, which shows that the majority of UK FTSE 350 businesses hope to cut business flights in the coming decade.¹¹

More such flights will exacerbate this adverse economic impact.

¹⁰ AirportWatch; Bulletin No. 22 November 2008

¹¹ Travelling Light', WWF-UK http://www.wwf.org.uk/filelibrary/pdf/travelling_light.pdf

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We find the aspiration to complete the expansion programme in time for the London Olympics somewhat irrational. This will be a short-term 'blip' that can in no way justify a 21-year development that will be irreversible and have a lasting impact on the community and local environment as well as on a wider scale.

4.3 Employment

In CPREssex' response to the IOR we expressed support for policies to safeguard and enhance the Maintenance Repair and Overhaul (MRO) business, its employment and skill base. We noted that MRO employment then outweighed aviation employment by a factor of about 7 (910 to 140).¹² However, the skill sets would be totally different and (with some exceptions) the aviation jobs would be lower-skilled.

We note that the LSACL 2008 annual report showed direct airport employment at the airport to be 92¹³. The POR gives no figures for MRO employment.

The employment increases that the POR claims will ensue all relate to the business parks – existing -Aviation Way (AWBP) - and proposed new – Saxon Business Park (SBP) and at Nestuda Way (NWBP).

On page 11, first paragraph, of the IOR it says:

"In economic benefit terms it is considered that under this preferred option, the airport would act as a driver for the local economy, providing direct employment as well as enhanced opportunities for wider aviation related and business employment."

There is nothing in the POR to substantiate this claim. There is no evidence adduced to link the creation of any of these jobs to the expansion of aviation activity or the lengthening of the runway.

But in all cases the new businesses assumed to be attracted to the SBP and the NWBP and to the revamped AWBP would be expected to contribute to infrastructure works necessitated, it would appear, primarily by the expansion of the airport.

The unsupported claim that aviation expansion will in some way increase employment in unrelated areas is repeated throughout the POR.

We noted that the council's resume of responses to the IOR reported the following from EERA:

"EERA also state that nearly a third of business surveyed were deterred from locating in the area because of the proximity of the airport and that this will be a significant factor deterring B1 (Office/light industrial) uses that, as the supporting evidence highlights, will be the most likely source of employment growth".

¹² London Southend Airport & Environs: JAAP – Halcrow: Evidence report June 2008; part 2: Economic study Table 6.1 P 74

¹³ London Southend Airport; Annual Report and Accounts 2008

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As to direct employment at the airport – we have looked at work done on Stansted. Professor J. Whitelegg, in his work for the 2007 inquiry into BAA's application to increase passenger numbers at Stansted quoted work by Hart and McCann¹⁴ that showed that for each 1mppa increase in passenger numbers direct employment would grow by 309 FTEs and indirect by 37. This is over a 10-year period – i.e an average of about 35 per annum. Starting from a low base, as in the case of Southend Airport), a higher initial figure should be used as the growth curve is 'flattening', non-linear, one). A 'best guess figure would be about 500 per 1 mppa (direct + indirect, catalytic and induced). Again this is over a 10-year period to 2020 (under 1000 for 2mppa – by 2030) – an average of 50 new jobs per annum in say the first 10 years.

(Induced employment forecasts are assessed as unreliable by Prof Whitelegg.)

Clearly some increase in MRO employment is likely to derive from growth in aviation activity (especially if one or more fixed base operators are attracted to the airport), although growth might well be achieved without expansion of the airport's aviation operations. The absence, from the POR, of any forecast for MRO employment growth leaves us unable to comment further.

5. NATIONAL POLICIES

The December 2003 Air Transport White Paper (ATWP) states:

"The Government recognises the benefits that the expansion in air travel has brought to people's lives and to the economy of this country. Its increased affordability has opened up the possibilities of foreign travel for many people, and it provides the rapid access that is vital to many modern businesses. But we have to balance those benefits against the environmental impacts of air travel, in particular the growing contribution of aircraft emissions to climate change and the significant impact that airports can have on those living nearby."

Developments since the publication of the ATWP have altered the context from that in which it was written. Notably:

The publication in February 2005 of PPS1 with the effect that Local Planning Authorities must promulgate and apply policies which drive down the need to use energy and so reduce emissions (at para. 13) [page 287];

The Government's position as set out, for example, in the Planning and Climate Change Supplement of PPS1¹⁵:

"The Government believes that climate change is the greatest long-term challenge facing the world today. Addressing climate change is therefore the Government's principal concern for sustainable development."[page 383]

The Climate Change Bill, setting legally binding targets for carbon emissions reductions received the royal Assent in November 2008. Although aviation and shipping will initially only be monitored, if they fail to meet targets further action will ensue.

¹⁴ A Policy Critique of Stansted Airport's Expansion to 25mppa; Hart D and McCann P, Reading University, 2004

¹⁵ Planning and Climate Change: Supplement to PPS 1', Dec 2007, paras 2 and 5, page 383.

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In relation to local plans, the Sustainability Appraisal Report (SAR) carried out by independent consultants for East of England Regional Assembly (EERA) prior to publication of its draft plan underlined the fundamental unsustainability of aviation expansion.

“But the acceptance of growth at all, and the reference to an ‘acceptable balance’ between economic benefits and environmental and other considerations, still fails to grasp the point that further growth in air travel provision is environmentally unsustainable”¹⁶

6. CONCLUSIONS

The POR contains little evidence to support potential demand for a 2000-fold increase in passenger numbers.

Conversely current trends, economic conditions and forecasts from the DfT point to decline rather than growth

There is no evidence in the report to underpin predictions for employment growth in the JAAP area. And, with the exception of the MRO business, which is directly related to the airport, no causal relationship is demonstrated between the new jobs predicted and increasing aviation activity at the airport.

In fact the report tends to point to the airport development being dependent on employment growth rather than the reverse.

The threatened loss of Green Belt land is wholly unacceptable – and is not (with a minor exception) likely to contribute to the proposed development of the airport.

Other potential environmental impacts – notably, at a local level; noise, light pollution, loss of agricultural land; and globally the contribution to climate change by CO₂ and other greenhouse gas emissions from aircraft in flight – would also be adverse.

We believe that the preservation and enhancement of quality of life of its residents is the most important responsibility of local authorities. Were this proposal carried through, we submit, on the basis of the assessment above, that the negative impact on quality of life in the area and beyond would far outweigh any direct or indirect benefits that might accrue from the growth in aviation activity.

We ask the councils to withdraw the proposal.

¹⁶ Report of the Sustainability Appraisal (SAR) Final Draft Oct 2004, p71-72

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CPREssex responded to the Draft Master Plan (April 2005) consultation and the Issues and Options Report (June 2008) consultation.

The final version of the Master Plan (July 2005) contained a very brief section on the responses to the consultation. However it showed little or no sign of having acted on or even responded materially to any of our comments or objections.

In our response to the IOR, CPREssex rejected scenarios (options) 2(b) and 3. We gave clearly argued reasons. We also noted information gaps in the IOR and were critical of the IOR's poor linkages to the Draft Sustainability Appraisal and Evidence Base Report, which made it sometimes difficult to locate relevant underlying information.

We have reviewed, but not analysed in depth, the summarised responses to the IOR. Even so it is clear that there was an abundance of reasoned objection to the higher-growth scenarios and a clear preponderance of views against scenario 3 (involving the extension of the runway).

Yet the POR pursues this scenario. We noted that even GO-East made adverse criticisms.

The POR contains no specific reference to these responses. CPREssex had to ask where they could be located. It has no clear or specific links to the evidence base other than bland statements to the effect that it has been informed by these and by the views of respondents to the prior stages.

The maps were inadequate (there being no colour-key to the Areas for Change map and no current land-use map for comparison).

The content is almost entirely aspirational and without supporting evidence or data.

Overall we found the POR inadequate as a consultation document and one that raises concern as to whether the views of respondents are being given due weight in the process.