



**LONDON SOUTHEND AIRPORT: PLANNING APPLICATION
SOS/09/01960/FULM**

COMMENTS BY CAMPAIGN TO PROTECT RURAL ESSEX

3 December 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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We have dealt here with some key issues. Because of the overlap with the on-going Joint Area Action Plan (JAAP) consultations, we have sometimes repeated our comments on the latter where they apply and/or where we believe they will apply to impacts stemming from this planning application. We suggest that our comments on other topics that we included in our response to the Issues and Options Report (IOR) –but not here – are, in part at least, also relevant and should be read alongside this response.

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 In our response to the Councils JAAP Preferred Options Report (POR) February 2009) we have objected to the loss of Green Belt land associated with the proposed runway extension. ²

The planning application by Stobart Air includes a much smaller Green Belt land-take. But it forecasts a similar increase in flight and passenger numbers (to 53,500 Air Transport Movements and 1.97 mppa by 2020). The application however identifies only “essential infrastructure” within the scope of its environmental impact assessment (EIA). These are shown on Fig 2.3 P 2-5 of the Environmental Statement (ES). A list of supporting infrastructure is also given (ES Section 2.4, p 2-2). These are shown on the Fig 2, 2 P2-4.

But some of the items are not listed/identified in the key. All associated works on both lists are within the airport boundary. Only the extended Maintenance, Repair and Overhaul (MRO) facilities and an item numbered ‘20’, but not identified on the Masterplan appear to be on Green Belt land. Whilst we consider the expansion of the MRO activity a positive development the use of Green Belt land for this expansion should only be considered if there is no other alternative. Even so this should not be taken as a precedent for any further alterations in Green Belt boundary. And the new facility should not interrupt the view from the south of the airport across open country.

We also question items 22 and a duplicate 26 against the southern boundary – neither identified on Fig 2.2.

If, as the JAAP Preferred Option suggests, the extensive Green Belt land-take is necessary to support the airport expansion proposed by Stobart, or is included to swell the ‘new jobs’ forecast it is misleading to have omitted it from the Masterplan (ES Fig 2.2).

It is disingenuous to say, as the application does, *“The majority of the undeveloped area surrounding the Airport is covered by Metropolitan Green Belt, but this does not include the area proposed for the runway extension”*. ³

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

² *London Southend Airport & Environs: Joint Area Action Plan Preferred Options; Comments by Campaign to Protect Rural Essex, 9 April 2009, P3*

³ ES, P 2

If the consequence of the extension will be the loss of a large area of MGB this should be acknowledged.

The JAAP POR, as quoted in the Environmental Statement⁴ says:

“The other employment proposals include a major new 99,000sq.m. business park on existing Green Belt land to the north of the Airport, a smaller (10,000sq.m.) new business park, and proposals for the intensification of use of the existing Aviation Way Industrial Estate. Together these are expected to create 6,200 additional jobs. Combined with increased airport jobs the employment proposals will make a significant contribution to the sub regional employment aspirations.”

We interpret the above as an indication that the expansion of the airport as per the planning application would be accompanied by the Green Belt land-take as set out in the JAAP POR. In which case we repeat our objections essentially as in our response to the JAAP POR.⁵

Loss of MGB is unacceptable, 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.

- We cannot accept the loss of MGB land to the north of aviation way, marked ii (a) and ii (d) on p14. [Of the JAAP POR}
- 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 that 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.
- 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. 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 on visual amenity would affect both recreational users of the Country Park and surrounding areas, and residents of Cherry Orchard Lane.

⁴ ES Section 5.4 P 5-4

⁵ *London Southend Airport & Environs: Joint Area Action Plan Preferred Options; Comments by Campaign to Protect Rural Essex, 9 April 2009, P3, Para 1.1*

- 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.

1.2 Agricultural Land

A strip of high-grade agricultural land lies immediately to the south, between the Airport and the A127. The runway extension would intrude into this. A park and ride is also proposed on this land. 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 the need to produce more at home. Destroying the means to do so in order to expand aviation is the wrong priority.

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.

As the ES says (Para 6.1 P 6-1)

"The best and most versatile agricultural land (Grades 1, 2 and 3a) is protected in Planning Policy Statement 7: Sustainable Development in Rural Areas. This supports the preservation of the highest quality agricultural land, and where significant development on agricultural land is unavoidable, areas of poorer quality land should be used in preference to higher quality land. However it also notes the presence of other sustainability considerations that may influence a final decision about loss of agricultural land. These themes are reiterated in the East of England Plan (policy ENV4)."

We cannot envisage how putting a runway and a car park on prime agricultural land could in any way be regarded as a justifiable "sustainability consideration". The ES offers no explanation. We do not accept the attempted justification in Para 6.3.3, P 6-5 that

"Land in the area of the runway extension and within St Laurence Park may previously have been, or may have the potential to support Grade I agricultural land. However, existing land uses have effectively sterilised these areas from agricultural production, and there is no likelihood of them being converted to agricultural use in the foreseeable future."

We also find the loss of an additional area (13.7 ha) of grassland beneath the extended runway (and the surrounding grading) and beneath the footprint of the road diversion through the park, and the impact on the park unacceptable. Mitigating offerings of other open space elsewhere is illusory. The lost land is still lost and the replacement land is not new land created from nothing.

1.3 Air Traffic Forecasts

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

In 2008 total aircraft movements at Southend were 37,227, of which 3410 were commercial and 33,817 were non-commercial. Of the commercial flights only 869 were air transport movements – the rest being air taxi, positioning and ‘other’. The total number of passengers was 44075.⁷ There were 16 freight movements. Non-commercial comprises aero club, private and business aviation plus a small number of ‘other’.

Avia solutions forecasts for 2020 53,520 total aircraft movements – 26,410 commercial and 27,110 other transport movements. Of the commercial flights 23,330 will be Air Transport Movements and 2080 cargo. The total number of passengers will, on this basis, be 1,928,200⁸. The composition of other transport movements is similar to 2008 plus air taxi and the commercial flights other than ATMs.

This is an increase of 44 times in passengers and 27 times in air transport movements (ATMs)

Increases on this scale are very large in relative terms and would inevitably have a significant adverse impact on the surrounding area.

Importantly, we note that the latest forecasts from the DfT Airport Allocation Model for Southend Airport are for 3.2 million passengers in 2020 and 3.6 million in 2030.

The discrepancy may well be attributed to the Councils’ intention to cap the passenger throughput at Southend at 2 million as referred to in the recent JAAP consultation documents.

Our concern would be that the attraction of much larger passenger throughput, with an extended runway and aircraft capable of using it, might overcome this good intention.

For example, at the time of the Masterplan consultation in 2005 CPREssex was told that there was no intention to increase the runway length.

The history of Stansted should make us doubly wary here. It seems that one increment of expansion always begets another some years down the line.

In 1984 Inspector Graham Eyre presided over an inquiry into BAA’s application to increase the capacity limit at Stansted to 25mppa. He considered this to be the maximum that should be allowed and eventually granted this but only after extracting

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

⁷ CAA: UK airport Statistics 2008 annual, Tables 03 and 05

⁸ CAA: UK airport Statistics 2008 annual, Tables 03 and 05

a promise from government that a second runway would never be built. Yet we have since seen the 25mppa raised to 35mppa and now there is an application for a second runway, with the tacit support of the government.

An extended runway at Southend could open the way for this incrementalism to take root and for prior laudable intentions to be overridden.

1.4 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 level⁹.

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%.¹⁰ This makes any increase in aviation activity fundamentally unacceptable from the climate change viewpoint unless it could be achieved on a carbon neutral basis.

According to DfT statistics Southend Airport's CO₂ output from aviation was 93,754 tonnes in 2008 and (based on forecast growth in flight numbers) would be 197,947 (plus 111%) tonnes in 2020 and 213,102 tonnes (plus 127%) in 2030.

The aviation industry likes to claim that by participating in the European Union Emissions Trading Scheme (ETS) it is meeting its climate change responsibilities. But this is a delusion. Aviation will not enter the scheme until 2012 – 3 more years lost in a race against time. And the scheme itself is currently judged ineffective by environmental groups and some leading industrialists because of the low carbon price currently set; this is \$13 per tonne whereas expert views consider at least \$30 or even \$50 per tonne is necessary for the scheme to have the desired effect.

The last thing Southend Airport should be doing, if it is serious about doing its bit to tackle greenhouse gas emissions is to propose doubling its CO₂ output in the next 10 years.

1.5 Noise

Noise is perhaps the most abhorred side effect of aviation. Over the longer term development may well lead to quieter aircraft and there are already aircraft quieter than those currently flying from Southend, which could be used on the longer runway.

⁹ 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.

¹⁰ Nick Ferriday in AEF *Flying Green*, Spring 2008 p2. Calculations from a UK Government report.

But merely flying quieter aircraft is only an advantage if flight numbers do not increase. It is aircraft that disturb people in their houses and gardens not average decibel levels. There is increasing acceptance of this – i.e. that measurements used to represent noise effects are only an approximation to the impact on people and places and that tranquil areas, open countryside being the prime example, are much more seriously damaged than areas with high ambient noise levels.

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 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.

1.6 Light Pollution

The Environmental Statement (ES) identifies numerous lighting impacts in the construction and operation phases. We cannot analyse these in detail at this stage but it is clear that the combined light pollution impacts would be potentially damaging. We cannot comment on possible mitigation at the detailed design stage – by adopting best practice and by fully applying ILE design standards - but doubt that adverse impacts could be eliminated. The prospect of 6m (19 ft) high runway approach lighting standards alone is an unwelcome prospect to say the least. There are already too few areas of Essex from which the stars can be seen in a dark sky. We would object to proposals that would make the situation worse.

2. ECONOMIC FACTORS

2.1 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 2007¹¹

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 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 2008.¹²

¹¹ CAA Airport statistics; 16 March 2009

¹² CAA; Airport Statistics: Aircraft Movements Table 3.2

Unless there is an unexpectedly quick reverse in current economic conditions, these trends are unlikely to alter in the next few years. And in the longer-term fuel prices, climate change and other environmental pressures will continue to adversely affect demand. Indeed the Department for Transport (DfT), on 31 March 2009, released its revised long-term forecasts for Stansted. 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.

As to Freight:

“Air freight felt its worst decline in September, since the technology bubble burst in 2001, with similar results or more decline [sic] 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%.”¹³

Surely, none of the above supports bullish forecasts for the economic gain from the airport development.

2.2 Contribution to the Economy

Southend airport would be operating as a small-scale version of Stansted, basing its expansion plans on the low-cost short haul leisure market model. This aviation business model in fact has a negative impact on the UK economy and would exacerbate the tourism deficit. Figures from the British Tourist Authority for 2005 showed that British Tourists abroad spent £35bn whilst foreign tourists spent £17bn in Britain – a deficit of \$18bn¹⁴ The UK trade balance in travel and tourism showed a record £19.5bn deficit in 2007¹⁵ (£18.4bn in 2006) Aviation accounts for a very large proportion of this (£17bn in 2007) and the low-cost short haul flight model is a major contributor.

This has the effect of exporting tourism jobs overseas.

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.¹⁶

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.

2.3 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

¹³ AirportWatch; Bulletin No. 22 November 2008

¹⁴ www.statistics.gov.uk/STATBASE - visits and spending by UK residents abroad and overseas residents in the UK.

¹⁵ www.tourismalliance.com/attach.pl/204/240/TA%20Aviation%20Duty%20Submission.pdf

¹⁶ ‘Traveling Light’, WWF-UK http://www.wwf.org.uk/filelibrary/pdf/travelling_light.pdf

employment by a factor of about 7 (910 to 140).¹⁷ 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 92¹⁸. The POR gives no figures for MRO employment.

The Economic Impact Assessment report by Optimal for Stobart¹⁹, dated September 2009 gives current employment on the airport site as 160 aviation-related, 890 MRO and 40 'other' – a total of 1090. These figures include part-time jobs at a ratio of 2 part-time = 1 full time equivalent (FTE).

Forecast growth in direct employment predicated on passenger growth is shown in Table 5.5 of the Optimal report. In the development case the direct employment at 2020 is shown as 2520, an increase of 1430 or approximately 715 per million ppa. This does not stack up against a study conducted for the aviation industry itself:

In 2005 the Airport Operators Association commissioned York Aviation to study future employment trends.²⁰ Their conclusion was that direct airport employment would increase from 185,900 in 2004 to 225,200 in 2030 assuming full expansion of all airports as in the Air Transport White Paper. The ratio of extra jobs to extra passengers is only 166 per million passengers. With current pressures on airport and airline costs even this figure may prove too high in the future. If the York Aviation finding were applied the direct employment forecast would be 1422 not 2520.

There is insufficient detail in the Optimal report to comment on its evaluation of indirect employment or induced employment except to say that there appears to be a 'pyramid' of ratios such that if the figure at the apex is too high then all are too high and vice versa.

An inherent problem is the assumptions involved. To quote from a recent paper:²¹

"Indirect employment has a certain validity as a statistical concept but has the fatal flaw that it means double-counting people employed in other industries. If every other industry used the same technique the number of people employed in British industry would far exceed the total population."

The same paper suggests that estimates of induced employment can involve some obscure assumptions that are potentially even more prone to overestimation.

We also 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 McCann²² 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.

¹⁷ London Southend Airport & Environs: JAAP – Halcrow: Evidence report June 2008; part 2: Economic study Table 6.1 P 74

¹⁸ London Southend Airport; Annual Report and Accounts 2008

¹⁹ Environmental Statement Appendix M

²⁰ Economic and Social Impact of Airports. September 2005.

www.aoa.org.uk/publications/Economic_Impact_Report.doc

²¹ Brendon Sewill, Airport jobs: false hopes, cruel hoax, 2009

²² A Policy Critique of Stansted Airport's Expansion to 25mppa; Hart D and McCann P, Reading University, 2004

Being generous, because Southend Airport is starting from a low base, a higher initial figure could perhaps be used (the growth curve is 'flattening' or non-linear, one). A 'best guess figure might be about 500 for the first 1 mppa (direct + indirect, catalytic and induced); for the 10-year period to 2020 the total new jobs would be less than 1000 for a 2mppa increase – an average of under 100 new jobs per annum in say the first 10 years. Note that Prof Whitelegg assessed induced employment forecasts as unreliable.

We noted that the council's resume of responses to the JAAP Issues and Options Report included 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".

In section 6.8 of its report Optimal considers surface transport emissions. As elsewhere the precise metrics used are unclear. But the basic premise is that by taking passengers away from Stansted and London City airport there would be an environmental gain in lower carbon emissions resulting from fewer 'car-miles' (shorter airport trips). This would indeed be true, although we find the monetary calculation would only be correct if the price of carbon had reached about \$50/tonne instead of the current \$13/tonne.

There is another side to this coin. The passengers concerned (it is not clear how many of the 1.97 mppa are expected to be siphoned away from other airports) are not 'new'. They merely represent market share taken from other airports. Hence the economic calculations above cannot be applied to them. Any jobs they are predicted to create are already in existence – counted by the other airports. All it would mean is that the jobs that are supposed to derive from their addition to Southend Airport's throughput will be lost from elsewhere – as would any related monetary contributions associated with them.

Optimal has adduced construction jobs to its economic case. This is erroneous. It cannot be argued that the runway extension and road diversion construction programmes are benefits delivered by the airport and are therefore arguments for supporting the application. They would merely be a consequence of the planning decision based on assessment of all the impacts resulting from the proposed expansion.

3. 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 that balance. 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 (Para. 13) [page 287];

The Government's position as set out, for example, in the Planning and Climate Change Supplement of PPS1²³:

"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.

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 unsustainable nature 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"*²⁴

4. CONCLUSION

We believe the above evidence argues conclusively against the extension of the runway and the associated works that would be required. We believe our assessment shows that the development would not be a significant economic driver and would degrade rather than enhance the local environment and quality of life for the local population. We ask that Southend council reject the planning application.

²³ 'Planning and Climate Change: Supplement to PPS 1', Dec 2007, paras 2 and 5, page 383.

²⁴ Report of the Sustainability Appraisal (SAR) Final Draft Oct 2004, p71-72