



*LONDON SOUTHEND AIRPORT & ENVIRONS: JOINT AREA ACTION
PLAN
PREFERRED OPTIONS*

REVIEW OF CONSULTATION RESPONSES

7 March 2011

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.

London Southend Airport & Environs: Joint Area Action Plan Preferred Options Review of Consultation Responses

1. Background

The Joint Area Action Plan (JAAP) Preferred Options Report (POR) was issued in February 2009 jointly by Southend-on-Sea Borough Council and Rochford District Council. It included policies for extending the runway at Southend Airport and associated works and proposed expansion, with claimed employment gains, at business parks adjoining the airport. It involved a large loss of Green Belt Land and other impacts on the local environment.

This stage of the JAAP process had been preceded, in June 2008, by a prior consultation – the Issues and Options Report (IOR). The IOR offered 4 scenarios¹ for airport development and sought comments and an expression of option preference from respondents. The consultation finished in August 2008 and the councils subsequently published a summary of the results². Throughout this summary run strong themes of opposition to key features of the IOR - most importantly an overriding opposition to the ‘High Growth’ scenario 3. The councils acknowledged this on p15 of their summary.

“Despite some support, the majority of respondents were opposed to Scenario 3. There was significant opposition to Scenario 3, particularly, but not exclusively, from members of the public.”

Yet when the next stage of the JAAP (the POR) arrived the so-called ‘Preferred Option’ was scenario 3, ‘High Growth’. In other words the results of the consultation on the IOR had been ignored.

The POR consultation ended 15 May 2009. Individual responses were subsequently recorded on the Rochford DC website verbatim over a period of time. No creation date is given under the file properties on the website. No analysis of the consultation response either qualitative or quantitative was carried out at the time.

On 15 October 2009 Stobart Ltd independently submitted its planning application for the extension of the runway and associated works. The deadline for comments was set at 12 November 2009, but was subsequently extended. The councils’ joint policies, as expressed in the JAAP, were in support of the application and Southend BC subsequently voted to support it.

When the application was lodged local campaigners and individuals complained that the councils had not issued and properly announced an objective report on the results of the JAAP consultation that would fairly inform public responses to the Stobart application.

Eventually, after an FoI request by SAEN, a brief report on the JAAP consultation was posted on Rochford council’s website. As far as we are aware no announcement was made. It is not easy to find. The file creation date was 5 November 2009 but the

¹ Numbered 1: Low Growth, 2(a): Medium Growth, 2(b): Medium Growth- ‘Aviation Cluster’ and 3: High Growth.

² http://www.saen.org.uk/wp-content/uploads/2009/10/JAAP_issues_and_options_summary_consultation_response.pdf

posting date is not quoted. This report consists of a statistical breakdown of respondents and responses with a few comments by (presumably) Rochford council. It has no attribution.

2. Introduction

The following analysis attempts to fill the gap at a time when legal processes on the Stobart application are still on going. In compiling this report, we have looked at the content of as many responses as was feasible. We have examined the content of the comments because, as the council wrote, *“the next version of the JAAP will be informed and shaped by the detail of the issues raised”*.

We have focused on the objections. We make no apology for this. Objections constitute the overwhelming majority of responses and it is important that the quality and content of these be illustrated because they appear to have been ignored following the consultation. We believe an easily accessible and objective digest of the results of the POR consultation – quantitative and qualitative - should have been published by the council during the consultation on the Stobart planning application and submitted as evidence to the Development Control Committee as a material consideration.

Examination of the content of responses showed the weight of reasoned and valid objections to the proposal. We have selectively included comments that make substantive points on key issues. The results support our contention that the councils should have done more to bring the nature and number of objections to its residents' notice. Many of the objections that were not included also show a strong commitment to keeping the airport as it is.

The analysis is organised by Policy Group

3. The Councils' Summary of Representations³

This is very brief and is essentially a statistical analysis preceded by a short piece of text consisting largely of the council's opinions.

Referring to paragraph 3 of Rochford District Council's (RDC) analysis:

We strongly disagree with this attempt to dismiss the overwhelming opposition to the JAAP Preferred Options Report (POR). Numbers do matter. At least 77% of respondents objected. There are no figures for 'support' or 'comment'.

But if we look at representations we find 79% (7861) were objections, 14% (1354) support and 7% (701) comments. We know from direct experience that it was quite easy to make the mistake – whether expressing an objection or support - for one's response to be classified as 'comment'. This is because of a weakness in the consultation mechanism whereby it was necessary to preface every response with the word 'Object' or 'Support'. If this were not done then both the most virulent objection and fulsome support would be counted as a comment. Indeed we have found 'comments' that on reading were found to be objections or support. If we assume all comments in fact express support or objection and that they break down in the same ratio as those properly classified and we re-allocate the 701 comments on this basis the result is 85% object 15% support (to the nearest 1%).

³ JAAP Preferred Options- summary of representations; Creation date 5 November 2009. . Posted on Rochford DC planning website.

In the tables preceding each section of the analysis we have used the figures from the councils' summary (see footnote 1). Representations differ from Respondents because each respondent may have made more than one representation.

RDC Para 4: This seems to imply that if an objection or support entered under a specific policy also contains an objection to/support for a different policy it will be ignored because it is in the wrong place. This is wrong. The respondents are predominantly lay people, in planning terms. They are expressing their reaction to what is being proposed and we consider it was incumbent on the council to recognize what is being said wherever it appears.

RDC Para 5: The statement in paragraph 5 – that the numerical breakdown of representations... *'is of little value on its own for determining a course of action'* is far too sweeping. Take ENV1 for example. Eighty –six percent of responses are against redrawing the green belt boundary as shown in the POR. The course of action for the next stage should be quite clear – *leave the GB boundary as it is*.

We acknowledge that in some cases the numerical breakdown may have a more complex relationship to the course of action that should follow. But we dispute the suggestion that it may be of little value. A large majority for or against does mean what it says. We agree that the content of the responses may strengthen the case and/or provide further guidance on the 'fine tuning' of the policy direction to which the quantitative response points.

We have included the council's statistics on responses against each policy/group of policies. It is quite clear to see that not a single policy is supported more than it is objected to. This is surely something to take into consideration. None of the policies are popular with the public that the councils represent.

4. Analysis by Policy Group

4.1 Employment (E 1 – 8)

JAAP Summary (from the Joint Area Action Plan Preferred Option Report):

The JAAP area will be developed as a strategic employment area to support the delivery of an additional 7380 jobs, including employment directly related to the airport. This total will contribute to the delivery of the jobs totals for Rochford DC and Southend BC allocated through the East of England Plan - the apportionment to each district will be based on a 50-50 split of the overall jobs total.

Respondent Statistics:

Policy	Respondents		Representations			
	Object	Total	Support	Object	Comment	Total
E 1	301	397	68	327	37	432
E 2	106	131	21	111	5	137
E 3	107	135	21	115	9	145
E 4	92	109	16	99	3	118
E 5	68	82	12	73	2	87
E 6	57	70	13	60	2	75
E 7	67	77	9	68	1	78
E 8	86	98	8	90	4	102
Total	884 (80%)	1099	168	943 (80%)	63	1174

Campaign to Protect Rural Essex (CPREssex) ⁴ :

Para 4.1

Rising fuel costs, other charges and the current economic climate have depressed passenger demand. UK airports handled 1.9 percent 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 2007.

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 at Stansted 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.

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 forecast 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.

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 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%.”

Para 4.2

The POR says (p20)

“It is expected that the airport will be used primarily for passengers and 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 pressure that this would place on the local highway network, although it is recognized 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.”

⁴ Excerpts from Comments by CPREssex, 9 April 2009. (Reference numbers are to paragraphs in CPREssex’ response to the consultation. The same format is used under subsequent policies in this analysis.

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 the 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.

More such flights will exacerbate this adverse economic impact.

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

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.

Para 4.3

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

We note that the LSACL 2008 annual report showed direct airport employment at the airport to be 92. 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 POR 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.

Mr J Holden - Indeed, the airport may well have a negative impact on local jobs and the local economy as it will encourage people to travel abroad for their holidays. The Council should be encouraging people to spend their money here in Southend instead of in France or Spain. It is not proven that these jobs will be new jobs for the unemployed residents of Southend. A number of these jobs will be taken by people outside the borough, by business within the borough re-locating to the new business park and by employed residents who currently commute to jobs out of Southend changing to work locally. The jobs being created are said to be "high-tech" jobs: what research has been done into whether the local unemployed have these high-tech skills?

Mr Peter Marrett - Employment Opportunities: the new jobs predicted will largely relate to nearby industrial estates (Aviation Way, Nestuda Way and Saxon Way) which need not be dependant on the airport's expansion. The airport expansion itself is unlikely to provide many lasting local employment opportunities. Local skills shortages mean that skilled personnel are likely to be brought in from other areas and only semi and low skill jobs (such as baggage handling and warehousing) will be available to the local population. This is of no great significance and does not compensate for the deterioration in quality of life for local communities caused by airport expansion. Indeed, the loss of quality of life could well be a factor, along with increased road congestion, which could deter new businesses from locating in South East Essex. In terms of the wider UK economy, more jobs could be provided by policies that support the UK leisure and tourism industry than those that promote more overseas travel.

June Symes – (excerpt) "Up to 4950 jobs", how is this figure arrived at? It is unsubstantiated and unsupported and meaningless. 'Up to' means just that – any figure (including a negative) lower than 4950 is 'up to'... In the area - is this the JAAP area, S E Essex? Are they JAAP related jobs and what are they - 'McJobs'? Same applies to the additional 750 jobs in Aviation Way. Non-specific, non factual and misleading.

Mr Jonathan Fuller - The JAAP figures are dishonest:

- You cannot possibly know how many additional jobs will be created;
- You are counting jobs that will simply move from other areas that are to be closed; A number of employers will opt to move away from the noise and filth associated with expanded airport operations; and
- The loss of Royal Bank of Scotland (RBS), due to noise disruption will result in the loss of hundreds of jobs.

South East Essex Friends of the Earth - As previously noted the job creation potential of the JAAP is a wild exaggeration. See Brendon Sewill's "Airport jobs: false hopes, cruel hoax" at http://www.aef.org.uk/uploads/Airport_jobs_false_hopes_cruel_hoax.pdf

I have also written a report specifically addressing the employment potential of the JAAP area, and this is available at http://saen.org.uk/reports/Employment_Report.pdf

*Note: South East Essex Friends of the Earth did not quote the text from Mr. Sewill's report. The following is the most significant text, taken from the executive summary:*⁵

⁵ UK residents took 41.5 million more return flights for leisure in 2005 than foreigners came here for leisure. The aviation tourism deficit is costing the UK about 900,000 jobs as a result of people spending their money abroad instead of here.

KJ Lucas - I strongly object to the expansion of Southend Airport and locality on account of the sizeable and indisputable increase in aircraft noise, air pollution and road traffic. As a resident caught beneath flight paths, this will significantly damage my quality of life and devalue house prices. JAAP provides paltry evidence that expansion will coincide with economic prosperity, indeed even the employment opportunities quoted relate almost wholly to Saxon Park - jobs merely transferred from Eldon Way.

Mr Ian Towler - Again if you just "expect" business in difficult economic times to make contributions, nothing will happen. This policy should make it a requirement that a visitor centre be provided before the business park can be opened.

Mrs Jennifer Abbey - Some of these job numbers are recycled from the Hockley Area Action Plan in which it is proposed to move Eldon Way Industrial Estate in Hockley to business parks at the airport and therefore not all these jobs mentioned here are creating new employment.

Kenneth Light - Issue 2 - I do not believe that most employment will involve local people within a 20 mile radius of Southend / Rochford. For instance could JAAP guarantee that at least 90% will go to local people within this radius.

The Leigh Society - Specific comments We, of course, welcome jobs, but at what price? We are skeptical regarding the figures stated - where are they to come from - are they displaced jobs from elsewhere in the area and therefore should not be counted as new jobs? Are a proportion of them specialist jobs whereby people will have to move to the area and put pressure on our already overloaded transport and utilities? Not to mention the need for yet more housing. After all Leigh is the most sought after area in the Borough so the intense pressure which the town is already under would be intensified. Our services and infrastructure are straining as it is.

Laura McDowell - 4950 jobs, this study was done before current economic situation of the country. Redo the study now and see what the actual figure would be, then offset this against job losses currently and I think you find that there wont be an increase in overall jobs created. 500 jobs, 750 jobs, 1180 jobs. Studies show that jobs expected never come to fruition.

.Aviation – direct employment at airports and by airlines – provides under 200,000 jobs in the UK. Thus at present air travel is costing the UK roughly a net 700,000 jobs.

.That is not a moral judgment that people ought to spend their holidays in Britain, merely a statistical fact that flying abroad creates jobs elsewhere, not in this country.”

Taken from: Sewill, B., Airport Jobs: False Hopes, Cruel Hoax. Aviation Environment Federation, London. 2009.

4.2 London Southend Airport (LS 1 – 7)

JAAP Summary:

The boundary of London Southend Airport will be as shown on the Proposal Map, and both Councils will support the growth of the airport to a capacity of up to 2 million passengers per annum as proposed in the Aviation White Paper and East of England Plan.

Respondent Statistics:

Policy	Respondents		Representations			
	Total	Object	Support	Object	Comment	Total
LS 1	1214	894	237	1263	187	1687
LS 2	592	493	76	592	31	699
LS 3	429	350	46	375	35	456
LS 4	136	117	16	121	7	144
LS 5	172	148	20	155	6	181
LS 6	572	437	119	480	20	619
LS 7	544	470	52	528	26	606
Total	3659	2909 (80%)	566	3514 (80%)	312	4392

Campaign to Protect Rural Essex

Para 2 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 is no more of them. It is aircraft that disturb people in their houses and gardens not decibels.

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.

Para 3.1 The impact of an additional 2 million passengers traveling 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.

Mrs J Plaister - What is the agreed baseline level on noise? Is it to be set by people living in Rochford affected by flight noise? This is something that should be set and agreed well in advance of the development and not just to be viewed by the annual noise evaluation statement. Residents need to be assured that if an effective 'no nighttime flights' agreement is reached, this cannot be broken whether through passenger or freight traffic.

Mrs Elizabeth Ireland - We already suffer from noise pollution from the airport and, while I am happy for the disturbance to remain at current levels, I am not willing to accept an increase in noise and pollution as outlined in the JAAP document.

Mr Glen Cattermole - 3. Environmental impact - noise pollution - Blenheim School currently has to stop teaching when a noisy plane goes overhead; with an average of 40 to 60 aircraft a day across Southend and Leigh, education will be severely disrupted. Twenty years ago, when the airport was managed by Airports UK on behalf of Southend Borough Council, there was an average of 26 night flights between 12am and 6am. I and many other residents were disturbed by the night

flights. Sleep deprivation can affect growth, increase stress levels, and lead to obesity and even stage one diabetes.

Mrs S Jefferies - Noise. Already Certain Schools in the area have to stop lessons while aircraft fly over. A measure that has been suggested is that double-glazing be installed. What happens on hot days, field trips, or using their own playgrounds and fields? Must all residents take such measures, and at who's cost? When the planes are taking off every 5-10 minutes does this mean we have to run indoors and shut all our double glazed units to get any peace?

West Leigh Junior School - The overhead noise caused by aircraft on approach for landing, take off and circling during the day will destroy the learning and teaching environment which West Leigh Junior School has successfully created over the past 50 years. The nighttime noise will have a detrimental effect on quality of sleep for our students, therefore affecting their learning potential. The pollution will adversely affect the quality of life for students, not only from the aircraft but from the resulting increase in traffic on the roads.

Peter Mack - We are informed that it is impossible for restrictions on flight times, air traffic volumes, etc to be imposed upon the current owners of the airport. If I chose to disrupt the peace and quiet of my neighbours, and to disturb their sleep, up to thirty times per night, I know that I would very quickly be under investigation by council officials, and would most likely face sanction under the law. I know that if I ran a legitimate business, from correct premises throughout the day and night, which subjected them to unacceptable levels of noise pollution and which filled the air with gaseous emissions. I would very soon receive a visit from the Environmental Health Officer I would also very quickly be prevented from continuing these anti-social activities, irrespective of the legality or validity of my business, or my lease.

South East Essex Friends of the Earth - It should not be left to the airport to monitor and evaluate their own noise as they will naturally present all findings as positively as possible for themselves. In the interests of transparency and public confidence, all noise and pollution monitoring should be conducted by an independent and unbiased third party.

Mrs S Dumbrill - The runway extension will bring bigger planes, which are claimed to be less noisy. There is no such thing as a quiet jet. Their use will not stop the use of the others or the older even noisier cargo planes. London City runway is shorter than the current one at Southend, the same planes can use Southend. So it is not needed.

Trudie Stowe - I think these times of 6.30-23.00 Mon-Sat and 7.00-23.00 on Sundays are unreasonable. NO FLIGHT'S on Sunday's. NO NIGHT FLIGHTS. Sunday is the only chance we get to have a lay-in. My husband works hard 6 day's a week in construction, he is a very light sleeper. I normally let him sleep to at least 10.30am; the whole family are in bed by 9.30pm, how are we meant to sleep with low flying aircraft overhead? How are you going to monitor the noise level from every plane? Also, we are in a recession, people are choosing to take their holidays in the UK, the local councils should be spending money on making Leigh on Sea more appealing for holidays. Not spoiling this beautiful peaceful area of Essex.

Douglas Copping – (excerpt) It is entirely inappropriate for Southend Airport to model itself on the airport in Southampton. Southampton is served by motorways from the north, west and east and the airport is adjacent to one of these. Southend already has congestion problems and certainly does not have the road infrastructure

to cope with the 1 million passengers a year going to and from the airport that Southend Airport would like to see by 2012, never mind the 2 million they want by 2030.

Mr Peter Marrett - Other concerns: I have concerns about the impact of runway lengthening on St Lawrence Church and other local buildings, which is not adequately considered in the JAAP.

Mr R Lazell - I believe an expansion of the existing runway is incorrect and either a total repositioning of the runway, away from the majority and most dense parts of residential should be sought, or ideally we should follow the, albeit more costly, but more beneficial method of other countries with newer airports; the relocation of the airport to an area outside of residential space. After all, the Rochford and surrounding areas have such land and flight paths over the sea would not cause residential suffering or damage.

South East Essex Friends of the Earth - If the runway extension goes ahead, the airport operator must bear the full cost of the road diversion. Without the runway extension, the diversion would not be necessary. If individual councilors are not allowed to declare their positions in advance, it is outrageous that the joint councils can declare unconditional support for a planning permission that hasn't even been submitted.

Mr Richard Barber - Stobart's man at the airport Mr Alastair Welch, said recently, 'We anticipate (freight) will play a small, but important part in the airports activities. This situation would not change in anyway even if the runway were extended and we do not anticipate it doing so at any time'. However, Mr Andrew Tinkler, Stobart's CEO, when announcing the purchase of Southend airport said, 'At one stroke, we have found our southern base and greatly enhanced our position as a leading point to point service provider for customers in the UK and Europe who require fast and efficient services by air as part of their logistics solutions. Stobart has the necessary skills including rail infrastructure to make a positive impact on the airports development plans'. These contradictory statements leave serious doubts about the direction in which the airport may develop in the years to come, in spite of what the Preferred Options document currently states regarding future development.

We consider that the two following comments illustrate an inappropriate attitude adopted by the councils. They suggest that the councils had already made up their minds about the impending planning application – that they would approve it regardless of the responses to this consultation:

Essex County Council – (excerpt) Nevertheless, the first sentence of Policy LS6 (Runway Extension) is felt to be an inappropriate form of policy wording in advance of submission of a planning application for the runway extension. It is suggested that the first sentence of Policy LS6, which currently reads, 'Planning permission for the extension of the runway to the south so as to provide an operational runway of 1,799 meters will be supported', should be amended by replacing the words 'will be supported' by the words 'is acceptable in principle'. This would better enable the joint authorities to consider a planning application on its merits without prejudice.

Go East - The policy wording suggests pre-determination, or pre-disposition towards applications for planning permission and limits the Joint Authorities' capacity to take wider spatial considerations into account. The JAAP may benefit from policy wording along the lines of, for example, 'Applications for planning permission will be welcome provided that...'

4.3 Terminal Facilities (TF 1)

JAAP Summary:

Planning permission for the expansion of terminal facilities will be supported in the area shown on the Proposals Map to enable growth to 2 mppa subject to conditions on:

- The restriction of scheduled passenger flights to between the hours of 06:30 to 23:00 local time Monday to Saturdays and 07:00 to 23:00 local time on Sundays;
- The routing of aircraft on both take off and approach to reduce noise and environmental impact;
- The operation of helicopters;
- 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 - Aircraft Noise to the Convention on International Civil Aviation;
- Engine ground running; and
- Aircraft training movements for aircraft with a seating capacity of over 50.

Respondent Statistics:

Policy	Respondents		Representations			
	Total	Object	Support	Object	Comment	Total
TF 1	275	212 (77%)	58	232 (77%)	10	300

The following response was classified as a comment but is actually an objection.

R Chaney - Aircraft Operations should be 'engine start-up to shutdown' not just scheduled passenger flights. NO flight operations outside of the specified hours. You are not being tough enough on noise. What you are really saying is that 'aircraft no noisier than those specified in the ICAO Chapters 3 of Annex 16 will be allowed'. You must not deceive people. In your policy as worded there is no compulsion to use the quieter Chapter 4 compliant aircraft. Also, as you know the noise criteria are dependant on aircraft weight. You should be more specific on noise levels. Define a limit and allow the operator to decide how they will comply with that limit.

The following , classified as a 'comment,' is partly support, mainly object.

Mr John Lidstone - I support the development of enhanced terminal facilities. However, if this investment compels wholly unsatisfactory levels of flying (1-2m PPA will necessitate departures every 10-20 mins at best, 5-10 mins at worst, with devastating noise impacts for huge areas of residential housing) - then I would not support this. A reasonable balance is called for.

4.4 Maintenance, Repair and Overhaul (MRO) Zones (MRO 1 – 3)

JAAP Summary:

Applications for airport related MRO developments (e.g. increased hangarage and aircraft maintenance facilities) will be supported in the Northern MRO Zone as shown on the Proposals Map. All applications will be required to make a financial contribution towards the upgrade of the junction at the southern end of Aviation Way and the provision of improved walking and cycling facilities within the JAAP area.

Respondent Statistics:

Policy	Respondents		Representations			
	Total	Object	Support	Object	Comment	Total
MRO 1	147	108	32	116	7	155
MRO 2	110	83	25	88	3	116
MRO 3	109	83	24	84	3	111
Total	366	274 (75%)	81	288 (75%)	13	382

KV Duke – (excerpt) We bought our house here knowing that the airport was not far away and have learnt to live with the fact that we have noise from the aircraft taking off and overhead, but the noise from the testing of engines in the maintenance side is a very worrying factor as when that is going on you cannot hear yourself speak and its deafening on the ears.

Mr Clifford Biddlecombe - There is no proposal to restrict flights not carrying cargo or passengers. As Southend airport is already used as somewhere to service and repair aircraft, this seems a strange omission! Irrespective of any alterations ultimately made to the runway, the whole policy needs complete revision to have real teeth in order to avoid the blighting of the value of many homes in Leigh, Southend and Rochford due to aircraft noise; and, even more importantly, to the lives of those that live in them!

Mr Anthony Brown - MRO should not be expanded at the airport. Jobs that are bought at the expense of servicing older noisier and probably more dangerous aircraft are not worth the risk and additional environmental damage.

South East Essex Friends of the Earth - The continued operation of the MRO would be acceptable provided that the focus is on activities that do not involve the testing of engines, which is very noisy and disruptive to local residents - indeed, I have heard engine tests from the southern part of Priory Crescent when walking my dog and the noise has been sufficient to worry him to the extent that I dare not let him off the lead for fear that he would run away. Such activities should not take place in densely populated areas such as Southend.

Mrs Karen Rourke - There will be an increased risk of serious air accidents over heavily populated residential areas if the repair and maintenance facilities are extended. There are already incidents where unsafe aircraft fly into Southend Airport and there have been small accidents with inexperienced pilots - the risk of more serious accidents will dramatically increase. There have already been crashes at overseas airports, Amsterdam (cargo flight) and Madrid (passenger flight). This would be catastrophic near Southend, particularly as several schools are already on the flight path.

Mr Chris Russell - Much of the current excessive Airport noise comes from the testing of engines, often from older freight Aircraft which do not meet the new low

noise passenger aircraft requirements. Any expansion of this activity should be strongly opposed. This is often late at night even now.

The following response, classified as a comment, is actually an objection.

Maureen Villa - I object to additional development surrounding the airport as increased hangarage and maintenance facilities will create noise and a bad environment

4.5 Airport Development Zone A (ADZ 1)

JAAP Summary:

Within the Airport Development Zone, applications for airport related development will be supported in principle, provided it can be demonstrated they will support the expansion of the airport to its capacity of 2 mppa or support the enhancement of the airport's MRO capabilities. This may include hotel development; however applications for retail development will not be supported.

Respondent Statistics:

Policy	Respondents		Representations			
	Total	Object	Support	Object	Comment	Total
ADZ 1	132	102 (77%)	28	111 (79%)	2	141

South East Essex Friends of the Earth - It is completely inappropriate for Southend Airport to expand to 2mppa and therefore, this policy is simply wrong.

Mr Eric Angell - The Councils should not be supporting any expansion at all. 2 million people per annum traveling to and from the airport on our congested roads is a nightmare scenario. If they think they'll travel by train I'm afraid they are sorely mistaken. The Councils should not be encouraging people to holiday abroad at the expense of the residents of this borough. In a recession who is to say the airport would be a success. Passengers were down 11% at Stansted last year

Mrs Siobhan Thomas - Southend desperately needs a good quality hotel with sizeable conference facilities that would generate real income - but not stuck out at an expanded airport where no one will be able to sleep or hear themselves speak due to the increased flights, maintenance and HGV movements in the close vicinity.

D Davies - One hotel will not support 2mppa. Further development of this kind will be required in the future. To accommodate further development land will be 'confiscated' from the surrounding area. Erosion of open space/green belt land must be avoided at all cost.

Mrs Shirley Emery - I object due to infrastructure already fully stretched/environment and the fact that there are already so many empty business facilities in and around Southend. Why lose more green areas? Regenerate what we have would be sensible for all our futures.

Mr David Thomas - Strongly object. We do not want to be like Southampton. Once planning permission was given they had no control. Despite protests and complains from people and councils they now have sleepless nights, drowned out days and property blight. Southampton Airport is now planning to increasing to 6million passengers per year, but only requires CAA approval not planning permission so local councils can do nothing to stop this.

4.6 Transport Within the JAAP (T 1 – 9)

4.6 Transport Within the JAAP (T 1 – 9)

JAAP Summary:

A significant increase in employment within the JAAP area, alongside an increase in passenger flows at London Southend Airport to 2 million per annum will require increased investment in the local highways network (providing greater connection to the A127), alongside enhancements to public transport and walking and cycling routes serving the area. In particular, the extension of the runway across the current route of Eastwoodbury Lane will require the provision of a new link to Nestuda Way (and thereby the A127) whilst development of the Saxon Business Park will necessitate improvements to Cherry Orchard Way.

All developments in the JAAP area will be required to demonstrate how they will minimise transport impacts and Green Travel Plans will be required where appropriate. Contributions will also be required to support public transport, walking and cycling provision both into and within the JAAP area.

Finally, the two local authorities are committed to enhancing the road network serving the areas to the east of Southend and Rochford to the JAAP area generally. Work is continuing to establish the best way of achieving this improved road connectivity and it is proposed, therefore, that a corridor be safeguarded between Nestuda Way and Warners Bridge until such time as detailed public consultation has established the preferred route for this link.

Respondent Statistics:

Policy	Respondents		Representations			
	Total	Objectors	Support	Object	Comment	Total
T 1	230	172	38	183	21	242
T 2	122	94	19	97	9	125
T 3	132	102	16	107	15	138
T 4	110	89	13	91	9	113
T 5	151	111	25	115	15	155
T 6	119	95	14	98	10	122
T 7	131	89	23	101	21	145
T 8	136	84	31	88	23	142
T 9	121	83	22	84	16	122
Total	1252	919 (73%)	201	961 (74%)	139	1304

South East Essex Friends of the Earth - The Saxon Business Park should not be developed - existing industrial and commercial facilities should instead be improved and fully utilised. Therefore, there will be no need to make any changes to the existing junctions.

Mr Roy Page - The vehicle use of the A127 is at present very dense with long queues into Southend especially at 'rush hour' times. Large extra loading of this road is not tenable.

Gordon Baker - The surface access plan will result in increased congestion. Main arterial routes (A127 and A13) are already very seriously congested. Airport expansion will make this considerably worse. The ridiculous concept that Eastwoodbury Lane should be rerouted through to the Tesco's roundabout is further evidence of the inadequate thought that has gone into this scheme. This will create nothing but further traffic chaos at the Strawberry Fields with the resultant knock-on effect being to deter potential visitors to Southend High Street, Tesco's and surrounding businesses. This is a very badly thought through proposal and there is

no way that a High Growth decision should have been reached as the preferred way forward.

Essex Police - The new link road will be excessively used by Park & Ride commuters and others using the route as a by-pass for the A127. It is therefore suggested that the traffic problems will not be addressed fully by this road alone. We suggest there needs to be a major commitment in the use of public transport for the majority of journeys to the airport.

Classified as a comment: Whilst not an objection to the runway extension per se, this is in effect an objection to road traffic proposals to enable the extension

Maureen Kelly The document contains no discussion as to why the existing Eastwoodbury Lane route cannot simply be replaced in a tunnel under the runway at the same site. We understand that there is concern that this route would be directly beneath the impact point of landing planes but there must be some merit in considering tunneling 100-150 metres distant. Given the amount of concrete being used for the new runway it would surely be cheaper to keep as closely as possible to the present route in this manner rather than creating a new road that involves a one mile detour for anyone accessing Aviation Way from the east. If Eastwoodbury Lane were tunneled it would also be an opportunity to expand the length of dual carriageway from the northern end of Nestuda Way. The new road as shown would terminate at a new roundabout only some 300 metres distant from the one at the southern end of Netsuda Way. This roundabout is already regularly gridlocked and so another new junction in such close proximity will only add to the existing traffic chaos. The document also says that a contribution for the construction will be sought from the developer but since the road is a direct replacement to enable the runway to be lengthened then the developer should pay the whole cost of construction.

Renaissance Southend - Whilst acknowledging the purpose of the policy is to protect local amenity, Renaissance Southend has reservations that the policy could prevent the effective and efficient use of the new station as a key element in the wider transport strategy for the area and its role as a key public transport node as indicated in the Southend Local Transport Plan. Concerns regarding amenity could be adequately covered by the imposition of appropriate conditions as part of any planning application to use this land in connection with the operation of the adjacent rail station in the future.

Although classified as 'Support' this response reads more like an objection – including reference to their objection to ENV 3.

Sport England (East Region) - Sport England is supportive of a new area of public open space being provided as part of the JAAP to accommodate a relocated Westcliff Rugby Club subject to the issues raised in our objection to policy E3 being satisfactorily addressed. It will be essential that the relocation of the rugby club is funded by the development of the business park and the northern MRO as it would be unacceptable to expect the rugby club to fund their relocation in view of their relocation only being necessary to facilitate the proposed business park. As part of Sport England's assessment of whether the replacement rugby club site will be at least equivalent to the existing facility, consideration will be given to access to the site by all modes of transport. The proposals to provide a footway / cycle way link between the business park and Hall Road are therefore welcomed in principle as it will be essential that the relocated rugby club is easily accessible for pedestrians and cyclists.

4.7 Environment (ENV 1 – 6)

4.7 Environment (ENV 1 – 6)

JAAP Summary:

There is no doubt that more activity at the airport and the allocation of land for a new business park will result in environmental impacts that must be carefully managed.

The new business park and expansion of the MRO offer at the airport have been related to the development of new public open space, to provide a green lung for the area, offer opportunities for leisure and recreation and to link to the Cherry Orchard Jubilee Country Park on the west side of Cherry Orchard Way.

The proposals for the new business park and the expansion of the airport mean there is a need to review the position of the green belt boundary and the revised boundary is designed to be sustainable and defensible to provide more flexibility for the area to accommodate growth.

All new development will be expected to deliver high levels of environmental efficiency and to incorporate energy saving technology, sustainable drainage systems, and to meet the requirements set out in the Core Strategies of both local authorities.

Respondent Statistics:

Policy	Respondents		Representations			
	Total	Object	Support	Object	Comment	Total
ENV 1	237	205	21	230	15	266
ENV 2	101	88	11	92	3	106
ENV 3	109	89	13	95	8	116
ENV 4	98	83	10	90	7	107
ENV 5	84	69	11	76	4	91
ENV 6	89	70	11	72	9	92
Total	718	604 (84%)	77	655 (84%)	46	778

Campaign to Protect Rural Essex (CPREssex) ⁶

Para 1.1

The land at ii(b)⁷ ... 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 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.

PPG2 requires that Green Belt boundaries should only be altered in 'exceptional circumstances'... 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 'area 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.

⁶ Excerpts from Comments by CPREssex, 9 April 2009

⁷ Southend Airport and Environs; Joint Area Action Plan, Feb 2009, p14

Para 1.2

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 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 allotment and cricket pitch would be lost and the amenity value of the two remaining strips of ‘public open space’ would be vastly devalued.

June Symes – Unacceptable loss of green belt (again) both councils seem to really object to green belt principles and look for any opportunity to develop such sites apparently seeing them as an inconvenience rather than a necessity and a desirable asset.

June Symes – This is not a green lung; the development is taking place on the green lung. Already, the developments along and of Cherry Orchard Way have eaten into this and I understand that the development will downgrade further land making it easier to develop the area in the future. The green belt boundary isn’t ‘reviewed’, it is obliterated. This is unacceptable.

South East Essex Friends of the Earth - Who, in their right mind, will want to use public open space that is immediately adjacent to what the joint councils hope will be a busy airport? This area should remain as farmland.

Chris Poole - No matter how its presented, there is loss of green belt land, which will get concreted over. St. Lawrence Park will be lost and this space was only created (made smaller) by council giving land to RBS.

Kevin Cutts - Funded by the business park? So if that stands empty this won't materialise anyway? Who wants public space by a busy airport? Are you people totally mad?

Miss Amanda Kitteridge - Any new green open spaces are to be welcomed but the provision of a new road has the effect of taking away even more green land. A road running through this space would surely come with associated pollution etc.

Mr Stephen Liberty - A new area with the potential for a road to run through it at a later date? Not a great public space. I think its use should stay as is.

South East Essex Friends of the Earth - To suggest that maintaining a small strip of grass between the airport and the houses on Southend Road will do anything

whatsoever to protect the amenities of the residential properties is to insult the intelligence of the occupants of those properties. Even the suggestion that the airport will expand has caused house prices in the Rochford area to fall by a substantial amount (we have been told of figures of between £25,000 and £30,000). If the expansion were to proceed, these houses would become unsellable.

Mr Peter Marrett – The preferred option plans stand in opposition to recent government policy statements regarding the need to reduce climate-changing emissions and improve food security. The proposals serve only the interests of some sections of the business community, not the interests of the environment not local communities.

Mrs Shirley Mayes - After all the work that has been spent on Cherry Orchard Jubilee Country Park will be wasted once the airport begins to operate. The beautiful atmosphere created here will no longer exist. Planes flying in and out all day will pollute the atmosphere and the noise will too great. There is already plenty of access we do not want more cars damaging our environment

Mrs Ellen Maria O'Hara - Southend is an area which is already heavily built up. Where do the emergency landings take place? The air and noise pollution will be a total nightmare for existing residents. Where will all the traffic go? In 1966 the government refused the proposed expansion of runway 15/33 on environmental grounds - surely this argument is even stronger today - we are ALL aware of the environment problems surrounding this!

Mr Ian Towler - While I would be happy for Westcliff RC to use this space, in environmental terms the area is already green as agricultural land so the net effect is a reduction through the loss of the existing pitches of the club.

Sport England (East Region) - Sport England has no objection to the principle of a new public open space being created on land to the south of Eastwoodbury Lane as this would be expected to enhance the recreational value of this area to the community. However, as this area accommodates a cricket pitch, it is essential that this pitch be retained or relocated within the open space area. No reference is made in the policy to the cricket pitch and consequently there is a concern that the new public open space would result in the pitch being displaced which is pertinent in view of the proposal for a safeguarded route through the open space which would bisect the site and may make it difficult to maintain a cricket pitch if the route was ever implemented. The loss of the cricket pitch would be unacceptable and would not accord with Government guidance in PPG17 (paragraph 15) or relevant development plan policy such as policy CP7 of the adopted Southend Core Strategy. To address this objection, it is requested that the JAAP makes it explicit that the cricket pitch would either be retained or relocated within the proposed public open space area. Opportunities to enhance the cricket pitch and its supporting facilities should be considered as part of the proposals for the open space and this should be referred to in the JAAP.

There are many comments that are actually objections. Examples are shown below:

Mrs Jennifer Abbey - Creating new public open spaces does not solve the fact that the rest of the area is going to be developed where once it was not. These spaces will not compensate for the loss of existing spaces currently used for leisure such as football pitches or make the noise and pollution created by the airport expansion and disruption to the area seem better just because new public open spaces have been created.

KJ Lucas – The designated green spaces are inadequate; the meager network of walk/cycle routes a preposterous sweetener. In this economic climate, the development is irresponsible.

Ms Tracey Gibson - This narrow strip of existing buffer (ENV6 – Green Buffer East of Railway Station) HAS to remain, it is not negotiable under Aviation Authority rules. Change it? How. To expand it would negate the entire plan; it can only be expanded by demolishing the essential railway and road that are so important. This plan is riddled with 'spin' and inconsistency designed to appease objection. Stobarts are working already. To what purpose would an objection serve

Ms Tracey Gibson - How can this green buffer be expanded? And what is the point of enabling either objections or support votes on a consultation that ends May 2009 when the building work has already commenced. Local residential areas would appear to be the buffer.

Mr Peter Carson - The Cherry Orchard country Park is in danger of becoming urbanized by light pollution from the airport and nearby proposed industrial areas. Strict planning control must be enforced to limit the detrimental effect on the night sky from light pollution. Increased light pollution will cause the loss of amenity of the night sky to residents for many miles around the airport and will have a detrimental effect on wildlife habitats within the country park.

4.8 National Policies.

Campaign to Protect Rural Essex (CPREssex) ⁸

Para 1.7

The POR makes no mention of climate change – probably the most contentious and potentially damaging impact of aviation growth.

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

Section 5.

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

“The Government recognizes 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:

⁸ Excerpts from Comments by CPREssex, 9 April 2009

The publication in February 2005 of PPS1 with the effect that the 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 PPS1:

"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 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."

5. Conclusions

Total Response Statistics – all policies

Respondents		Representations			
Total	Object	Support	Object	Comment	Total
2229	1718 (77%)	1354	7841 (79%)	701	9896

This analysis has shown that:

Overall 77% of respondents objected to the airport expansion policies of the JAAP POR. Collectively they made just fewer than 9900 specific comments, of which 79% were objections. We contend that the substance of many objections on key issues, added to the overwhelming majority against expansion, constituted an irrefutable case.

Although the raw material was logged on Rochford DC's website we believe the councils failed to properly assess and publicise the results of the POR consultation at the critical time of the Stobart planning application for the runway extension. The many valid objections raised against the expansion appear in fact to have been ignored.