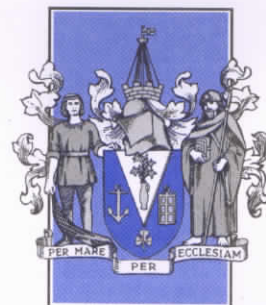


Southend-on-Sea Borough Council

Department for Place



[REDACTED]

Airports Commission
Sanctuary Buildings
Great Smith Street
London SW1P 3BT

Via Email to
estuarystudies@airports.gsi.gov.uk

Dear Sirs

Please find below Southend-on-Sea Borough Council response for the Inner Thames Estuary Feasibility Studies: Call for Evidence, May 2014.

It is important to state that the Council remains opposed to the concept of an Estuary Airport.

[REDACTED]

[REDACTED]

Inner Thames Estuary Feasibility Studies: Call for Evidence, May 2014

This response is prepared by Southend on Sea Borough Council to inform the "call for evidence" as part of the feasibility studies being carried out by the Airports Commission. It is important to state that the Council remains opposed to the concept of an Estuary Airport, as it has done from the outset of the Commission's work. The scale of impacts imposed on both sides of the Thames Estuary would radically alter both the character and appearance of the Borough of Southend, with the long period of uncertainty affecting the viability of current and planned economic and housing developments. This is in addition to the serious concern that the plans put forward are based on unrealistic costs, lack of consideration of the environmental disbenefits, the closure of London Southend Airport and the need for new housing, and transport infrastructure, without a credible plan for delivery.

Whilst this response seeks to make the Commission aware of sources of evidence and further information, it also reiterates some of the key points previously made at various stages of the Commission's work programme.

Study 1 – Environmental / Natura 2000 impacts

Specially protected areas:

The mouth of the Thames Estuary is a site listed with International and National designations and special protection areas (*globally - The Ramsar Convention, at a European level - The Habitats Directive (Special Areas of Conservation) and Birds Directive*) that the Government has committed to.

Altogether, the airport land and surrounding areas and waters include five separate Special Protection Areas for passing or over-wintering avocet, hen harriers, ringed and golden plovers, marsh harriers, little tern, dunlin and pintail, as well as hosting one of a new breed of marine sites, this one designated for its population of 6,000-8,000 red-throated divers. There is a Special Area of Conservation preserved for its species-rich estuaries, mudflats and salt meadows. Much of the area is also covered by the Ramsar international convention on wetlands, recognising how crucial the estuary is for birds travelling as far afield as Siberia, Canada and North Africa.

Each of the designations would have to be significantly changed for an airport in the Thames Estuary to go ahead, whilst destroying the habitat for over 300,000 migrant birds that rely on the area for feeding and roosting during the winter.

Local Fisheries:

The development of both the airport and associated infrastructure and changes to flood defences will have a significant effect on fishing. The effect on the estuary fisheries is not fully understood, either as a result of the completed airport or during construction. The fishery has a long tradition of providing both finfish and shellfish catches. Species such as sole, skate, bass, cod, herring and sprats are the most important species. The **cockle industry is one of the largest of its kind in the UK**. The majority of vessels are under 10m in length and, along with local fish merchants, are often owner occupied. Detailed analysis is required, which will no doubt conclude

that there will be effects not only to the fisheries but also the financial livelihood of those involved directly and indirectly in the industry. A “fishing disturbance scheme” would be required to assess and make compensatory payments as part of a financial support package. In the case of the DP World London Gateway Port development a number of fishing businesses have been identified as being very seriously impacted on by the construction. **There must be consultation with the Kent and Essex Inshore Fisheries Conservation Authority.** The cumulative effects of Gateway Port, the London Array, and Estuary Airport proposals would need to be tested with assessment of effect on key species and habitat re-creation. The Medway/Thames is a dynamic area for spawning and it has been very difficult to obtain survey information and retrieve information from reports (both published and unpublished). One effect is that changes in flow would alter the deposition of sediment with consequential effect on fisheries. Much of the fishing industry is local and supports other businesses. An important aspect is cultural and tourism aspects e.g. Old Leigh and Whitstable, which is vital to identifying local communities. [REDACTED]

Sea level rise and tidal impacts:

With global sea levels anticipated to rise and areas becoming susceptible to frequent flooding it is with great concern that we do not see significant research into the effects an estuary airport may have on low lying areas on the east coast.

The entire length of the frontage at Southend-on-Sea is at risk from tidal flooding and coastal erosion. Hydraulic modelling results show that large areas of land are at risk of overtopping in the far western extent of the Borough at Leigh Marsh and far eastern extent at Shoeburyness. In addition, a small section of land directly behind the flood defences is at risk under the 0.5% annual probability event to 2110 along the majority of the seafront. Due to ground levels rising steeply behind the flood defences in the Central Area, flooding due to overtopping is largely confined to the Esplanade; however, ground levels in the Southchurch Park make this area more vulnerable to overtopping. Southend-on-Sea BC falls into the Environment Agency’s Catchment Flood Management Policy Unit 2 where flood defence policy is for further action to be taken to reduce flood risk.

There are over 3,000 properties located within the 0.1% AEP tidal flood event zone. If the flood defences are overtopped or breeched due to erosion, the properties located behind them will be at a very high risk of tidal flooding. Key infrastructure assets are also at risk of coastal erosion. The seafront is heavily developed and focused on tourism and recreation. The vast majority of land within the vicinity of the pier which extends from the Town Centre is occupied by hotels, shops, restaurants and amusements. The area to the west of the pier is dedicated to residential housing with areas of open space. This area is also well served by trains, and the frontage between Chalkwell and Leigh is dominated by a railway line, which in itself is routed along a low revetment. The area east of the pier beyond City Beach is also mostly residential, but not as dense as the west as it benefits from more expansive areas of open space.

Any changes to the estuary by building artificial islands, dredging or constructing sea defences will have major consequences to the land lying on both sides and impose

significant and unacceptable mitigation measures to the Southend seafront, which is primarily protected by sand/shingle beaches and low lying sea defences. These are key assets to the Borough and support tourism and which currently attracts nearly 6 million day visitors every year. The new airport proposals, therefore, have the potential to significantly alter the tidal flows, worsen beach erosion and increase the flood risk. There may be loss of estuary storage capacity, which could have the effect of increasing water levels at all tides and especially on surge tide events. There is the possibility of reflective wave action (swell waves) entering the estuary from the North Sea. There has been no discussion or consultation on this matter with any of the airport promoters.

New flood defences will be required and significant modelling and testing of scenarios involving extreme events will be needed. The Environment Agency will need to consider the proposals in greater detail in terms of impact on flood management plans. The impact on Southend of having to raise sea defences and protect the tourist offer is of major concern, which is exacerbated by lack of detail in terms of the risks posed.

Study 3 – Socio-economic impacts

Wider economic issues related to housing and employment:

It is clear from the Mayor's three submissions to the Airports Commission for a new airport that there will be a massive requirement for land for housing, employment and integrated surface access for employees, freight, passengers and other road and rail users.

Combined with this are health and climate impacts from airport activity and road vehicles; changes to local employment (both positive and negative); issues around enabling travel while reducing carbon emissions; and, of course, more flights mean more noise. Interestingly, a number of the proposed housing sites surrounding the Estuary Airport proposals already fall within the predicted 55dB Lden average day noise contour.

All of these issues will need to be managed locally, with Local Authorities balancing the any economic and other benefits with the noise, congestion, air pollution, climate change and blight burdens of aviation.

Incorporating the Mayor's proposals within Local Development Frameworks, future planning horizons and LEP economic growth strategies cannot be understated in terms of complexity and level of local opposition.

A number of technical reports have been published that provide a greater level of detail about his proposals. This includes the Report "Impacts on the Local and National Economy, which sets out the anticipated scale of additional households required and number of jobs:-

www.tfl.gov.uk/cdn/static/cms/documents/impacts-to-the-local-and-national-economy.pdf

"In addition to the economic impact modelling, we have undertaken a preliminary assessment of impacts on the local population and labour markets. This suggests

the local area in which the new airport is located would need to increase its housing stock **to accommodate between 31,000 and 35,000 extra households**, above and beyond what is required under baseline population growth forecasts. This is a conservative estimate based on the effects captured within this part of the modelling. Incorporating other factors, such as the 'catalytic' impacts discussed above would be expected to further increase local employment, and the associated housing need".

"On a net local basis, the operation of a new hub airport at Stansted, the Isle of Grain or the Outer Estuary means **employment in the local area is 123,000-134,000 higher** than would otherwise have been the case in 2050".

Furthermore the Atkins report "Land and Housing Technical Note" considers already identified major housing development sites close to the new airport proposals, in particular 56,214 housing site units related to the Isle of Grain with a potential population increase of 129,292 over and above what may already be planned. www.tfl.gov.uk/cdn/static/cms/documents/land-and-housing-technical-note.pdf

This information is in respect of published figures in the old RSS documents and has not been updated to reflect the ambitions presented in the South East LEP Growth Deal and Strategic Economic Plan. This reflects the desire to create 200,000 sustainable private sector jobs up to 2021 and complete 100,000 new homes in the time period. Of course a substantial number of these new homes will be related to the sites identified in the Atkins report and represent the response to existing pressures and demographic changes and not further growth. It is unclear how this level of new homes and jobs will be distributed, but from the point of view of South Essex, the location of the new Estuary Airport will be within a one hour drive for journey to work purposes, so it is assumed that a proportion of the new homes would be required within the Thames Gateway South Essex Area.

A separate response has been submitted by the TGSE Partnership that puts these predicted figures in context of population numbers and planned growth.

It is clear, therefore, in terms of more local economic development the both the TGSE area and the South East LEP has a credible plan for economic growth in the South East without the need for a new airport. The ability of the local area and wider (including TGSE) to accept this level of employment growth cannot be justified and the evidence presented so far does not set out in any coordinated manner how this might be achieved, given also the opposition to this from Local Authorities.

The tremendous pressure that a new airport development would bring is simply not sustainable when considered alongside the well planned and deliverable Economic Plan that in itself envisages an investment of £1.2bn over six years and a revolving SEFUND of £5.2bn to create the right conditions for economic growth. This is extremely good value when the cost of the new Estuary Airport could be as high as £125bn by 2050.

Local Tourism Economy:

Aircraft noise disturbance remains one of the most obvious local environmental impacts associated with the proposals for an estuary airport. Controls and

operational management will give rise to capacity constraints, limiting the ability of an estuary airport to respond to demand when and where it arises.

The construction and operation of a new airport will significantly affect the nature and character of the Thames Estuary and in particular Southend and Castle Point. In contrast to the busy commercial parts of the urban areas and seafront, there are many opportunities to enjoy the tranquility that the parks and gardens in Southend offer. The estuary offers unrivalled opportunities to enjoy peace and quiet, particularly at locations such as the nature reserve of Leigh Marshes, the beaches, mudflats and at Southend Pier. This is part of the attraction that residents enjoy and it brings visitors to the Borough. There will be increased noise, visual intrusion, pollution, congestion and further demands on the services that the Borough provides due to the additional development. There is no ability to mitigate for habitat loss, which will lead to the destruction of many of the natural features, altering both the character and appearance of the Town and seafront.

Tourism has been a central pillar of Southend-on-Sea's economy for generations, and although the town is not wholly reliant on the visitor economy, the role played by tourism in publicising Southend-on-Sea, drawing visitor spend and introducing people to the town's varied offer is nonetheless crucial.

In 2009 Southend welcomed 5.5 million visitors. The total visitor spend has increased by 3.9 per cent between 2010 and 2011 to £357.9m. Despite a small decline in day visitor numbers, spend has increased by 3.9 per cent, while staying spend has decreased by only 3.9 per cent, significantly less than the decline in staying visitor numbers. Tourists spend money in restaurants, cafes, bars and shops, in cultural attractions and at events. Tourism accounts for 7,646 jobs in Southend-on-Sea and is therefore responsible for 12.3 per cent of all employment in the borough.

Source: Southend 2010 Local Economic Assessment

http://www.southend.gov.uk/downloads/file/2215/southend_local_economic_assessment_2013

Since the introduction of Aer Lingus, easyJet and FlyBe flights to London Southend Airport from an ever-increasing list of European destinations, and the USA via Dublin, tourism in Southend has grown. Not only that, but the airport has supported tourism in other locations in Essex and further afield – including air passengers for the Olympics given the airport's proximity to London and ease of travel to the city by train. The boost stimulated by the growth of the airport continues to be felt within the leisure-tourism industry but also for business tourists with businesses using LSA as a port of entry for overseas colleagues, customers, specialists and sales teams.

The impact of a new Estuary airport on the tourism economy could be devastating, with much of the tourism jobs and spend in the local economy disappearing. There is no certainty that this could be replaced or evidenced terms of research or evidence.

Implications for Historic Townscape:

Southend has a long history and association with the estuary and consequently 10 of its 14 conservation areas are located on the foreshore/clifftops facing south across the estuary and the north coast of Kent. There are also around 30 listed buildings in Southend Borough which look out over the estuary including the world famous Southend Pier. The views out from these historic areas and building are part of their special historic character and significance especially as, at present, the impact on their outlook is relatively low key with only a few intermittent chimneys and cranes breaking the skyline. It is considered that the proposed Estuary Airport would dramatically alter this outlook and would significantly impact on the historic relationship and associations these historic buildings have with the estuary.

Local impact of the closure of London Southend Airport and Airport Business Park:

As confirmed in the letter from Sir Howard Davies to the Chair of the Transport Select Committee on 21st March 2014, he has reiterated the conclusion that both London City Airport and London Southend Airport would need to close due to operational reasons. Further information on London Southend Airport can be found on their website, see the 2013 Airport Annual Report.

<http://www.southendairport.com/>

Since Stobart took on the lease of Southend Airport in 2008 they have invested over £120m in the site and in surroundings infrastructure, including a new railway station. This has been multiplied many times over in the local economy through local spend and recruitment. The airport now employs nearly 2,000 jobs directly and also indirectly through the Maintenance, Repair and Overhaul cluster located at the airport and through the supply chains and associated spend. A new Hotel on the site is also developing a conference and dining offer to compliment the growing appeal of Southend's destination credentials throughout the year. The recent publication of the Airport's Annual Report sets out the employment boost to the local economy with over 500 more staff working at the Airport in Summer 2012 than in Summer 2011.

Stobart has invested in London Southend Airport on the basis that it would provide a return on that investment over its full life. Asset life varies according to the type of facility, with runways and aircraft stands typically 100 years (although resurfacing is required at around 20 years), terminal and other buildings 30-50 years, with shorter lives for fittings and mobile equipment. If London Southend Airport closed in 2030, these assets would therefore be only part way through their lives, and compensation would be sought for their residual value. This issue must be factored into any economic appraisal.

It is noteworthy that the South East LEP carried out a significant research study to identify how the airports of the Greater South East can be used more effectively and efficiently and, where possible, grown to accommodate the anticipated increasing demands of air travel. The study concluded that airports in the south east of England make a significant contribution to the economy of the region and to the UK. The following is a link to this Study: www.southeastlep.com/publications/consultation-responses/149-airport-study

The expansion of Southend Airport has also boosted non-aviation industry with commercial agents reporting significant demand for premises in close proximity to the airport together with occupiers seeking to maximise the prestige and reputation of co-location. The land to the west of the airport is planned to become a hi-tech business park and it is anticipated that the demand currently being experienced will extend to this site and see over seven thousand jobs created. Part of this site is earmarked for the Anglia Ruskin MedTech Campus launched in the House of Commons in May 2012 by Earl Howe.

In taking this forward, both Southend on Sea Borough Council and Rochford District Council have commenced the Examination in Public for the Southend and Rochford Joint Area Action Plan (JAAP). Relevant documents can be found here:-

www.rochford.gov.uk/planning/policy/local_development_framework/london_southend_airport

Rochford District Council's 'Employment Land Study Final Update Report' (December 2009) recognises that the area will be attractive to companies and investors over the long term and that new development within the JAAP area will be a key economic driver for the surrounding area. It also states that the capacity growth at London Southend Airport is likely to be a catalyst for increased employment land demand within its surrounding area. The analysis shows that the JAAP area is well placed to serve the likely increase in demand for B class employment land arising from expansion of London Southend Airport.

The Local Development Frameworks have identified the need for development of a Business Park around Southend Airport which, in turn, is complementary to the provision of office space in Southend Town Centre. The Business Park will be designated for those organisations that do not wish to or need to be in a Town Centre location – and for particularly those businesses which require close proximity to the Airport with the maintenance and repair operations which are a key economic growth sector.

If the Estuary Airport were to be constructed and result in the closure of London Southend Airport (LSA) these benefits would be lost, with devastating effect. Southend has an unemployment rate above the national average and below average skills attainment levels so the loss of current and future employment opportunities would not only affect the workforce of today but also the aspirations of the workforce of tomorrow. The closure of London Southend Airport would also negatively impact on the wider aviation industry with many aviation businesses around the airport being reliant on the airport operation for their business and could trigger the relocation of these businesses to other sites – and potentially overseas losing the benefit to UK Plc. It would also risk compromising the development at the proposed airport business park through the removal of a major economic driver and attractor in south east Essex.

The combined economic benefits lost through a closure of LSA would not be recouped by the introduction of a Thames Estuary airport. The disruption caused by the changes would risk some airport-dependent businesses relocating overseas

rather than within the south east, particularly given the limited space available adjacent to the proposed Estuary Airport.

Similarly, due to the dense urban population and limited land availability along Thames Gateway South Essex, the area would not be accrue the benefits of a hub airport as seen along the M4 corridor when Heathrow was built and ample space was available.

Overall, the growth and vitality of London Southend Airport is seen as vital to the economic development and prosperity of Southend, Rochford and the wider TGSE. Local Plan policies support the growth of the airport; prioritise the safeguarding of the important Maintenance, Repair and Overhaul (MRO) sector; and require the provision of adequate employment land (in terms of quantity and quality) to accommodate future employment needs of the area.

The importance of the airport as a local employment generator is recognised in the Southend Core Strategy (2007). One Strategic objective within the Plan is to secure the regeneration of London Southend Airport to enable it to reach its potential to function as a local regional airport, providing for significant new employment opportunities and improved surface access subject to environmental safeguards. It is acknowledged that along with other locations the airport has the potential to contribute fully to local employment objectives and to provide for a quality environment. The 7,380 new jobs will provide significant employment opportunities for Southend residents, as well as some jobs within the Borough itself, both within the Airport and on nearby employment areas.

Clearly, the closure of London Southend Airport will significantly affect the viability of the Business Parks and associated industry and support companies. Of greater concern at this stage is the uncertainty that will prevail, should the Estuary Airport proposal proceed to the next stage of investigation alongside Heathrow and Gatwick. Whilst the site of the airport could accommodate housing and other industry, this would require a complete revision of the Local Plan and would be subject to consultation and inquiries. No work has been completed in this respect as this would also add to the uncertainty.

In summary, there is in place a credible and balanced plan for the growth of London Southend Airport and the implementation of appropriate policies. Paras 4.283 to 4.291 of the SELEP Strategic Economic Plan set out the aspirations for the A127 Growth Corridor (including the JAAP area). This is supported by SELEP and forms part of the overall plan for employment and housing

Study 4 – Surface Access impacts

The new infrastructure to support the Thames Estuary proposal would need to be in addition to that already proposed for the SELEP area and would add unrealistic levels of traffic congestion to an area, particularly Thames Gateway, which already identifies major road congestion at peak times on the principal roads and junctions and unreliable east-west access to the M25 (reliant on two strategic routes, A127 and A13). SELEP has identified over £130m in investment needed over the next five

years for the A13 and A127 to manage current planned growth, without adding in other factors and uncertainties.

The "Planning and Transport Strategy for Thames Gateway South Essex" sets out a longer term strategy for TGSE. The 2010 Essex Business Survey identified perceived barriers to growth, one of which was traffic congestion, with the strategic network acknowledged as being at or close to capacity. HGVs make up substantial proportions of road traffic on key sections of the strategic network, and rail freight is set to increase as the ports expand. The strategic rail network is also at or close to capacity with passenger numbers close to all time record levels.

Southend-on-Sea Borough Council and Essex County Council have jointly published the "A127 Corridor for Growth" Strategy, which sets out a joined up approach to improvements and maintenance for the A127 in the short, medium and long term. This recognises the importance of this corridor to Thames Gateway South Essex and is presented as one of the twelve growth corridors in the SELEP Strategic Economic Plan.

The strategy can be found at

[http://apps.southend.gov.uk/minutes/\(Cabinet Report 18th March 2014 Item 866\).](http://apps.southend.gov.uk/minutes/(Cabinet%20Report%2018th%20March%202014%20Item%20866).)

It is clear that with the current planned level of growth for TGSE, there is already a strong case for investment in infrastructure. Given the level of predicted employment and housing needs as set out by the Mayor, it is completely unrealistic to expect that the TGSE transport networks would be able to function to serve existing needs and therefore much of planned growth would cease or be lost.