



South East Essex Friends of the Earth
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Kerry Freeman: Programme Officer

Dear Kerry,

**Rochford District Council/Southend Borough Council
London Southend Airport and Environs: Joint Area Action Plan: Examination Hearings**

1. Thank you for kindly agreeing to extend the deadline for submission of these additional comments. This group has more evidence to submit which emerged after the initial JAAP 3 consultation phase. We also have comments to make on the inspectors issues paper and the responses so far received from the councils.

Public inquiry and scrutiny denied

2. Before presenting the additional information, I firstly must address an issue of huge concern to local people.

3. Public examination and scrutiny of council decisions on major infrastructure development are essential in any democratic society. Public examination also provides an opportunity for poor decisions and thinking to be challenged. The decision to expand the local airport, in the heart of such a densely populated area, was hugely controversial and ought to have been subjected to a public inquiry before the councils gave approval for the planning application to extend the runway and build other infrastructure. This is the most important planning decision to have been taken locally in at least 30 years and yet the public were denied the right to a full public inquiry. This is a grave injustice and we wish to protest in the strongest of terms.

4. The two councils sought and then ignored the views of residents. It was very clear from the responses to phase 1 of JAAP consultation that 75% of respondents were opposed to the High Growth scenario, but this was the only one developed in phase 2 of consultation.

5. Many people now feel that the JAAP process has been made redundant by events; Councils suspended the consultation while the airport expansion took place.

Yours sincerely,

Jon Fuller: Group Coordinator

Additional evidence

This is the additional evidence we need to submit: -

6. New evidence published by the British Medical Journal demonstrates a serious threat to public health to those living within the 50dB noise contour.

<http://www.bmj.com/content/347/bmj.f5432>

7. This crucial new evidence suggests that many thousands of people suffer an increased risk of strokes and cardiovascular disease around Southend Airport. The logical conclusion of this is that the Councils should now be working to provide noise insulation grants to far more households and work towards the eventual closure of Southend Airport.

8. The two 2014 IPPC reports (See <http://www.ipcc.ch/>)

9. These can be accessed here: -

http://ipcc-wg2.gov/AR5/images/uploads/IPCC_WG2AR5_SPM_Approved.pdf

http://report.mitigation2014.org/spm/ipcc_wg3_ar5_summary-for-policymakers_approved.pdf

10. It is abundantly clear from these reports that all nations and governments must immediately reduce polluting activities from all sources, including aviation, if mass loss of human life is to be avoided. This stark warning to the world's governments demonstrates that the pace of climate change is now so fast that it is inconceivable that the expansion of polluting industries will be acceptable in any sector within the next 15 years.

11. Incidents of extreme weather events are predicted to become ever more frequent and we must expect to see more flooding, such as that experienced in August 2013 when large sections of the area suffered flooding. This YouTube video (and others like it) demonstrates the inability of the local drainage network to cope with the additional demands being placed upon it.

<https://www.youtube.com/watch?v=GMNTFIGJDCo>

12. Please note the attached copy of the letter the local residents campaign group SAEN (Stop Airport Expansion & Noise) sent to every member of the two Councils and the reply received (Appendix 1). The letter sent on 17th July 2013 raised a number of issues the Inspector will be interested in, but please particularly note item 2 on page 2, when SAEN asked the Councils to research the aviation tourism deficit worsened by expansion of Southend Airport. The attached reply received from the Head of Planning & Transport at Rochford District Council demonstrates (Appendix 2) that they are not willing to confront the catastrophic policy failure that expanded operations at the airport represents and will delay as long as possible any evaluation of the merits of its planning decision.

13. Reply from Environment Agency to Councillor Peter Wexham (Southend Council) concerning the alarming decision to permit the release of treated de-icing chemicals into the water courses (Appendix 3).

Submission on issues raised by Inspector

Issue 1

14. iv) We note the responses received from the Councils to the Inspector's questions and would challenge paragraph 4 of page 2 of their response to his initial questions. The two 2014 IPCC reports referred to in the "Additional Evidence" page (para 8 – 10) above make it abundantly clear that policymakers must reduce emissions of CO₂ from polluting industries if mass loss of human life is to be averted. It is inconceivable that the public and government will continue to support the expansion of aviation as the rapidly-worsening impacts of climate change are felt over the next 15 years. It is irrational to conclude that aviation will be permitted to expand further after 2030.

15. We appeal to all levels of government, bodies and officers to end the practice of ignoring scientific opinion on the dangers posed by climate change and to adopt new policies that are soundly based upon hard scientific evidence. Evidence based policy dictates that polluting industries, like aviation must now be significantly reduced.

Issue 2

Passenger numbers

16. We note the Inspector's reference to 2 million passengers per annum, but need to ensure he is aware that an airport terminal designed to handle 5 million passengers per annum has been built. We do not believe that the local infrastructure and more importantly, the local residents, could cope with all the misery that is associated with this number of passengers. This news item confirms the position: -

<http://www.echo->

[news.co.uk/news/10431994.More than 5 million passengers could use Southend Airport/](http://www.echo-news.co.uk/news/10431994.More%20than%205%20million%20passengers%20could%20use%20Southend%20Airport/)

Noise

17. Since our initial response to JAAP phase 3, new alarming evidence has been published on the adverse health implications for people living within the 50dB noise contour near Heathrow Airport (See para 6 & 7 above within "Additional Evidence") above. While the population in Southend will be lower than at Heathrow, it is nevertheless clear that many thousands of people in this area are now at increased risk of stroke and cardiovascular disease. It must also be noted that housing is far closer to the runway at Southend Airport than at any other UK airport.

18. In the light of this new evidence, the local Councils should be working to improve the noise insulation grant scheme to cover thousands of additional homes and work towards a medium term aim of closing Southend Airport. It poses an unacceptable risk to public health and the decision to expand the airport was both callous and immoral.

19. Please also note the request made in the letter issued by residents group "SAEN" to all councillors (see para 12 on page 2 above ("Additional Evidence") (Appendix 1) requesting that the councils negotiate a better noise insulation grant scheme with LSA. "SAEN" asked the Councils to undertake a survey to establish the number of local people who are suffering real distress as a result of extreme noise but the Councils refused to do so (Appendix 2).

20. It should be noted that Gatwick Airport recently raised the prospect of offering an improved noise insulation grant scheme if it were to be given permission to build a new runway, so this is an issue which a responsible local authority would be pursuing with the local airport owner.

21. Since making our original submission to JAAP phase 3, we have heard from one local employer who has said that the noise has convinced him to move his business out of the Southend area. There must be others who are in a similar position. What ought to be clear is that there will be some employers who will want to relocate close to an airport but there are many others who will move away.

Flooding

22. On page 8 of the response of 21st March from the Councils, reference is made to the BREEAM rating system, but the August 2013 flooding incident in Rochford demonstrated the inability of the infrastructure around the airport to cope with the types of extreme weather event we must now expect as a result of climate change.

23. At para 11 of page 2 above ("Additional Evidence"), we provide a link to a 'YouTube' video which demonstrates the scale of flooding experienced. It should also be noted that the new road diversion, St Laurence Way, flooded on that occasion. This strengthens the points made in our original JAAP phase 3 response, that it would be foolhardy to build new business parks intended for non-aviation use, in an area that is liable to flooding.

24. Many businesses and insurers are well aware of the growing threat of increased extreme weather events and will not want to locate in a high risk area. In the light of this evidence, the Councils should focus plans for expanding industrial areas elsewhere in the area, e.g. Progress Road.

Water Pollution

25. At para 13 of page 2 above ("Additional Evidence") (Appendix 3), we refer to recent correspondence with local Councillor, Peter Wexham, in connection with the control of toxic de-icing chemicals. The attached email and letter from the Environment Agency show that it is intended that some chemicals will be treated and discharged into the local water courses. We want to ensure that the Inspector is aware that downstream of this point, shellfish are farmed for human consumption and local concern has been expressed about the danger this may represent.

26. With the increased likelihood of flooding, there is also a danger that surface runoff containing de-icing chemicals, jet fuel and so on will find its way into the water courses nearby.

Deliverability

27. We note para 2 of page 4 of the Councils' response of 28th February concerning the commissioning of a new piece of work. This serves to reinforce the impression we have gained over many years that the Councils first decide what they want to do and then arrange for a report to be constructed that will support their decision. In this case, they admit to having commissioned a report and before it has been written, state what its conclusions will be!

Issue 3

28. We note the Councils' comments commencing in the final paragraph of page 3 of their response to the Inspector's initial questions concerning employment policies. The Councils' comments are not evidence-based. They represent mere wishful thinking; indeed the language they use indicates that there is no certainty about their thinking whatsoever.

29. The comparison with Bournemouth Airport is highly relevant because it demonstrates the poor analysis underpinning the Councils' approach. The industrial estates around Bournemouth Airport are further away from the runway than will be the case for the estates proposed at Southend Airport. The business parks proposed for Southend are too close to the extreme noise and disruption that can be expected at a busy regional airport.

30. Both Bournemouth and Cambridge offer a cautionary tale. The primary business areas are likely to be more successful if they are over two miles away from an airport. In the case of 'Silicon Fen' - the Cambridge Science Park - it is 2.4 miles away from the airport (6.6 miles by road).

31. Whilst it is true that 'MRO' businesses will want to locate immediately next to an airport, other industries, such as those associated with the proposed MedTech and Eco Enterprise Centre, will almost certainly want to choose a location further away from the airport than that which the Councils are offering. There is plenty of capacity at other industrial estates in both Southend and Rochford, It is also notable that Rochford Council

were proposing to demolish the Eldon Way Industrial Estate and relocate businesses to the proposed Saxon Business Park. Eldon Way has good public transport links (e.g. very close to Hockley station) whereas the Saxon Business Park will not.

32. We note the reference to Renaissance Southend Ltd. at item 4, page 3 of the Councils' response dated 21st March 2014. In response to Renaissance Southend's recommendations, we (South East Essex Friends of the Earth) drafted our own "Southend Regeneration Plan" which promoted job creation in eco-tourism in an intelligent and environmentally sound manner. Sadly, Councillors showed very little interest in reading this document, preferring to pursue job creation based upon unsustainable expansion of polluting industries. The report can be seen at - <http://old.seefoe.org.uk/regeneration>

Issue 4

33. As mentioned above at paras 8 – 10 of page 2 ("Additional Evidence"), the IPCC April 2014 reports for policymakers make it abundantly clear that Government must act dynamically to reduce unsustainable methods of transport like car use and aviation, and begin a radical shift to the far greater use of low carbon transport such as rail, bus, cycling and walking.

34. The Councils' obsession with high carbon, unsustainable development at Southend Airport is in danger of locking the area into further expansion of the road network to cater for greater car use. This folly is remarkable because it is now clear that very substantial change will be forced upon us over the next 15 to 20 years, compelling us to adopt low carbon modes of transport and economic activity.

35. The Councils are in danger of wasting huge amounts of public money on infrastructure that is unsustainable and will very quickly become redundant.

Issue 5

36. We note what the Inspector says and wish to reiterate what we have said above concerning the new evidence that has emerged that shows that extreme noise poses a serious public health threat and also that the pace of climate change is such that the current expansion of Southend Airport must be reversed with the aim of closing the airport in the medium term.

Issue 6

37. Much of the JAAP was implemented even before phase 3 of consultation began. We feel that monitoring has so far been extremely lax as both Councils have left it to the airport to do their own monitoring of passenger numbers, night flights, noise, transport, etc.

38. We need proper independent monitoring and meaningful enforcement when conditions are breached. For example, at present, if the airport breaches the limits on night flights, these are simply deducted from the following month's limit rather than fines, or other significant penalty being imposed.