

## **ECC's Response to the Airport Commission Consultation on the Four Inner Thames Estuary Studies – July 2014**

### **Section 1 – Introduction**

ECC's response to the Airport Commission's consultation concerning the four Inner Thames Estuary Feasibility Studies –

- **Section 1 – Introduction** - Provides an initial introduction to the ECC response to the four Inner Thames Estuary Studies.
- **Section 2 - Strategic Context** – Outlines the context for the ECC.
- **Section 3 – ECC Response to the consultation concerning the Inner Thames Estuary Studies** – Sets out the ECC response to any issues concerning the information presented within the Inner Thames Estuary Feasibility Studies.

### **Background Context -**

The Interim Report was published in December 2013 and set out the nature, scale and timing of steps needed to maintain the UK's status as an international hub for aviation, alongside recommendations for making better use of the UK's existing runway capacity over the next five years. The report concluded one net new runway will be required by 2030, with the probability of a further net new runway required in the 2040s. The Commission identified two existing airports as credible locations for the first net new additional runway; Gatwick and Heathrow.

The Interim Report highlighted the Commission's intention to undertake further analysis of the feasibility and impacts of an Isle of Grain airport. It also indicated that the Commission would reach a decision in the second half of 2014 as to whether the Isle of Grain Option would be short listed.

After the Interim Report in January 2014 the Commission published the Draft 'Introductory Note: Inner Thames Estuary Feasibility Studies'. The purpose of this note was to set out the Commission's current position on taking forward additional feasibility work for an Inner Thames Estuary proposal. It fulfilled the twin purpose of inviting comments on the draft terms of reference for the four research studies it will be progressing; and opening a call for evidence to inform the study outputs. The final Terms of reference were published by the Airports Commission in March 2014.

The Airport Commission appointed a series of consultants to undertake the four Inner Thames Estuary Studies, and the outputs from these studies have now been published. The Airport Commission is welcoming comments on the four Inner Thames Estuary Feasibility Studies. This consultation is specifically welcoming comments from respondents on the following two questions in relation to all four of the studies. The questions are;

- Is there information in the reports which is factually inaccurate?
- Is there any new information or evidence that you wish us to consider before making our decision?

### **Section 2 - Strategic Context**

#### **Overview of the County Council's Strategic Aviation Policy**

In September 2013 ECC produced "Flights of Fancy: Getting Real on Aviation" to articulate the organisation's position on airport capacity for submission to the Airport Commission.

The document clarifies that ECC supports sensible growth at Stansted in the short to medium term by maximising use of its existing runway to its operational capacity. It recognises that additional

runway capacity may be required at Stansted in the longer term, but that a robust business case would be needed and massive investments in road and rail infrastructure would be required.

'Flights of Fancy' highlights that the proposals to establish a new hub airport in the Thames Estuary is not supported by the County Council. ECC consider the Inner Thames Estuary airport proposals as unrealistic. The financial cost alone would be immense. The risk around such a project would be considerable and a project of such ambition and scale could vastly exceed its cost forecasts by a factor of 2 or 3 (the same has proven to be the case on major infrastructure projects elsewhere across the world, including on the original Channel Tunnel Rail Link project). The UK cannot afford to spend vast sums of money getting the solution wrong. ECC considers the Estuary Airport would also have a number of disadvantages. The Inner Thames Estuary Feasibility studies highlight some of these disadvantages. In short, ECC do not believe the Inner Thames Estuary airport idea is practical, desirable or viable.

### **Essex County Council – Interest in the Consultation**

ECC aims to inform and shape emerging spatial and aviation policy. This interest reflects ECC's role as a social, community and physical infrastructure provider for the local living, working, visiting and investing Essex community. ECC is eager to support and work collaboratively with the relevant stakeholders to deliver a shared vision for aviation within the Essex living, working, visiting and investing community.

### **Section 3 - ECC Response to the consultation concerning the Inner Thames Estuary Studies –**

ECC's response to this consultation focuses on the Inner Thames Estuary Studies that we are having an active interest in shaping. ECC is therefore keen to respond to –

- Study 1 entitled Environmental Impacts; and
- Study 4 entitled Surface Access Impacts.

Our response provides a brief summary of the terms of reference for each study, and then seeks to answer the two questions that the Airport Commission is keen to receive a response. The response to each study is set out separately and follows.

#### **Study 1 – Environmental Impacts**

**Aims of Study 1** – The Terms of Reference for study 1 include an assessment of the impacts on the Natura 2000 sites of constructing and operating a new airport at an inner Thames Estuary location, and the feasibility of meeting the legal tests for such development, including:

- assessment and field research as appropriate of the habitats and species affected, in particular identifying priority habitats and species;
- analysis of the impacts, issues and risks on identified habitats and species in the short and long term;
- consideration of any secondary impacts or unintended consequences to the overall stability of the eco-system and wider environmental conditions;
- analysis of the process and hurdles to developing on Natura 2000 sites including previous examples of successful and unsuccessful cases (particular focus on national infrastructure and transport projects, preferably airports), in the UK and other European Member States;
- analysis of the compensatory habitats necessary and costs involved for the species and habitats identified, particularly those at risk;
- risk assessment of successful cases and outcomes being achieved and estimation of best approach and costs involved;

- identification of possible compensatory sites or locations and the potential impacts on the habitats and species as a result of moving to new sites or locations and impacts on new sites and locations; and
- siting work as appropriate to assess historical and archaeological buildings and any potential prehistoric or medieval remains. Risk assessment, mitigation options and cost.

### **ECC Consultation Response to Study 1**

The Airport Commission is interested in two specific questions –

- 1) Is there information in the studies which is factually inaccurate? If so, clarify.
- 2) Is there any new information or evidence that you wish the Commission to consider before it makes its decision?

ECC is supplying further information and therefore answer question two above.

Question Two - Is there any new information or evidence that you wish the Commission to consider before it makes its decision?

Response – In reviewing the information presented within Study 1 ECC recommends that Greater Thames Nature Improvement Area be referenced. To assist the Airport Commission ECC is supplying a Planning Policy Advice Note produced by ECC (2013) to provide more detailed information concerning the Nature Improvement Area, and how it relates to planning and emerging spatial policies.

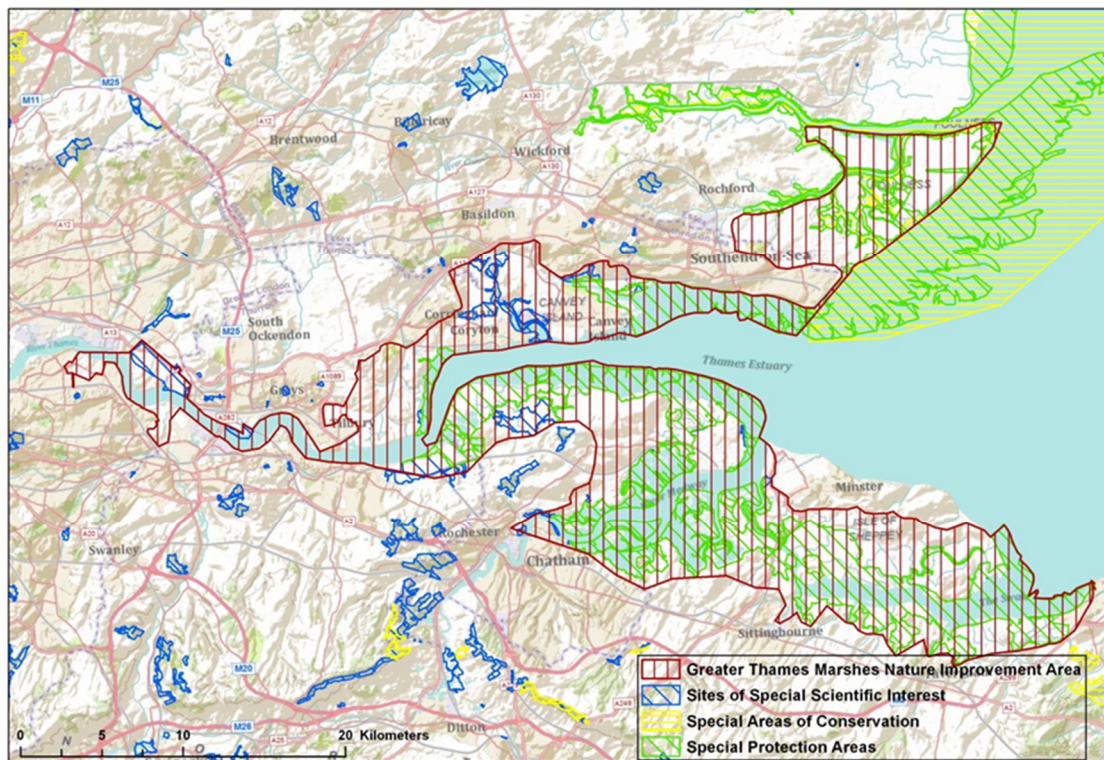
The Greater Thames Marshes Nature Improvement Area was formally recognised by Defra in April 2012, along with 11 others across England. NIAs are pilot schemes running from April 2012 – April 2015 funded by the Government, aiming to create ecological networks in strategic locations to benefit wildlife and people.

The vision for the Greater Thames Marshes Nature Improvement Area is for

“a living and vibrant marshland and estuary landscape where the skills and enthusiasm of residents, visitors, businesses and technical experts are harnessed to work in partnership, delivering more wildlife, more public understanding and enjoyment of the environment and greater resilience by the natural world to the changes brought about by development and climate change”

The Greater Thames Marshes NIA covers over 50,000ha of marshland and estuarine landscape in South Essex, Greater London and North Kent and includes many internationally significant sites for wildlife. The area plays a crucial role for UK biodiversity, as it contains one of the most important estuaries in the whole of Europe for wintering wildfowl, supporting 20% of the world's entire population of dark-bellied brent geese. It has some of the richest habitats in the UK, supporting rare invertebrates and plants found nowhere else in Britain along with many other protected and priority species such as Skylark and Water Vole. It is a highly designated landscape for biodiversity and because of this the majority of the coastline has European protection. There are particular challenges facing the area including pressure from development, invasive species and climate change. Figure 1 highlights the national and European Protected Sites.

**Figure 1 – National and European Designated Sites**



(Source – ECC, Planning Policy Advice Note (2013))

It is recommended that due consideration is given to the Greater Thames March Nature Improvement Area, and other important environmental designations. Study 1 should determine the impact an Inner Thames Estuary Airport would have on the designated Greater Thames Nature Improvement Area now and in the future.

### **Study 3 – Inner Thames Estuary Airport: Review of the evidence on Socio-Economic Impacts**

**Aims of Study 3** – The Airport Commission Terms of Reference for study 3 aims to ensure that it provides an understanding of the national, sub-national, local economic and social impacts of closing Heathrow and potentially other airports. It also assessing the regeneration potential of such an airport on east London and the south and east of England including –

- Economic impacts of a new hub airport in the Inner Thames Estuary;
- Identification of the redevelopment potential of airports (including Heathrow and London City and other airports as appropriate), for example the construction, supply chain, foreign investment, new homes;
- Economic assessment of the impacts of closing airports (Heathrow, London City, Southend and any other airports) and constructing a new airport at Inner Thames Estuary location;
- Social impacts of closing Heathrow and City airports, including regeneration on London, north Kent and Essex as a result of building a new airport in the Estuary (direct, indirect and catalytic);
- Potential of airport developments to drive change in the economic geography of London; and
- Competition impacts on aviation sector and potentially wider (where relevant, e.g. freight) in the South East of closures and redistribution of traffic.

### **ECC Consultation Response to Study 3**

Similarly to Study 1 the Airport Commission is interested in respondents answering the following two questions –

- 1) Is there information in the studies which is factually inaccurate? If so, clarify.
- 2) Is there any new information or evidence that you wish the Commission to consider before it makes its decision?

The County Council's views in respect of Study 3 focus on answering question 2, highlighting where further information should be included within the study.

Question Two – Is there any new information or evidence that you wish the Commission to consider before it makes its decision?

Response – It is important to note that ECC is supportive of the continued operation of Southend Airport. ECC welcomed that the Terms of Reference for Study 3 clearly indicates that this study is being developed to provide an “understanding of the national, sub-national, local economic and social impacts of closing Heathrow and potentially other airports” (Airports Commission, 2014, Terms of Reference Study 3). ECC is therefore concerned that within the study it states from the outset that “the report does not consider the potential impacts on London City and London Southend airports in detail due to the uncertainty about their closure” (Price Waterhouse Coopers, 2014, 2). ECC considers that given previous reports have highlighted that it is extremely likely that Southend airport would have to close, and there this study states there is uncertainty about whether it would have to close, the Commission should have an appreciation of the potential impact of Southend airports closure.

The closure of Southend airport would have a significant impact on the Essex and in particular South Essex economy and local community. The study clearly indicates that NATS have provided advice to the Commission which concludes that “even with improvements, the full operation of an Estuary airport would have a significant effect on London City and Southend, preventing them operating in an unrestricted manner” (Price Waterhouse Cooper, 2014, 21). Furthermore the study eludes to the significant impact the closure of Southend airport would have as it states “if closure was required this would have a considerable impact on the local area and the growth potential of surrounding business parks and industrial estates” (Price Waterhouse Cooper, 2014, 42).

The South East Local Economic Partnership Economic Plan indicates that the airport and is a driver for economic development and skills training in South Essex. If there is uncertainty regarding the future of Southend Airport this will have a significant impact on future investment. The adjacent business park is currently embarking on significant development to deliver over 7,000 jobs.

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](http://www.rochford.gov.uk/planning/policy/local_development_framework/london_southend_airport)

Furthermore 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 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 Business Park is designated for those organisations that do not wish to or need to be in a town centre location, but welcome the close proximity to Southend airport with the maintenance and repair operations which are a key economic growth sector.

The growth and vitality of London Southend Airport is seen as important to the economic development and prosperity of South Essex. Local 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 Commission should refer to work undertaken by the South East LEP 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. A link to the Study is set out below -

[www.southeastlep.com/publications/consultation-responses/149-airport-study](http://www.southeastlep.com/publications/consultation-responses/149-airport-study)

It is important to note that 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.

Clearly, the closure of London Southend Airport will significantly affect the viability of the Business Parks and associated industry and support companies. ECC considers that the study has failed to fulfil the Airport Commission Terms of Reference as it has not provided an understanding of the impact the closure of Southend airport would have for our local existing and future economy and growth. Further work is therefore required to ensure that Commission fully appreciates the impact the Inner Thames Estuary and potentially closure of Southend airport would have on our future economic growth and development.

#### **Study 4 – Surface Access Impacts Study**

**Aims of Study 4** – The surface access study focusses on four key elements as follows –

- Estimating airport passenger and employee surface transport demand;
- Identifying surface transport measures to meet airport-related demand, accounting for capacity implications related to background growth and non-airport travel demand;
- Assessing the engineering feasibility and high-level cost of the surface transport measures identified to meet forecast travel demand;
- Assessing the environmental cost of the identified surface transport measures.

The aim of the study is to provide guidance to the Airport Commission on feasibility and likely issues associated with the most viable package of surface transport measures. The terms of reference for the packages are defined as –

- An 'opening year' 2030 package consisting of surface access elements designed to provide a reasonable degree of service for airport passengers at a minimum cost;
- A 'mature year' 2050 package consisting of elements designed to provide a high quality degree of service for airport passengers, befitting a world-class 21<sup>st</sup> century hub airport operating at full capacity.

## **ECC Consultation Response to Study 4**

The Airport Commission is interested in two specific questions –

- 1) Is there information in the studies which is factually inaccurate? If so, clarify.
- 2) Is there any new information or evidence that you wish the Commission to consider before it makes its decision?

Question One - Is there information in the studies which is factually inaccurate? If so, clarify.

Response – ECC seeks to use this opportunity to clarify some of the factual inaccurate assumptions. Chapter 2 of study 4 provides a summary of the key proposals from the main Inner Thames Estuary proposals with regards to surface access. ECC wishes to highlight issues with the Metrotidal Tunnel and Thames Reach Airport Ltd proposals including –

- Section 2.3.14 refers to the duelling of the A130 it is important to note that this will have an effect on the A13, so an upgrade to the A13 between Pitsea and Saddlers Farm should also be considered.

The London Gateway Airport proposals refer to the recent improvements works on the A13 provided by DP World for the London Gateway Port and associated growth. The information presented by the promoters and outlined in the study assumes the use of this capacity improvement. ECC considers that the improvements that have been undertaken are to reflect the growth of London Gateway port; therefore an Inner Thames Estuary airport proposal would require additional investment and capacity improvements in excess of those already implemented and planned.

Question Two - Is there any new information or evidence that you wish the Commission to consider before it makes its decision?

Response – ECC wishes to draw the Airport Commission attention to the A127 – Corridor of Growth – An Economic Plan and also supply the final version of the paper. The purpose of the paper is to make a joint case from ECC and Southend Borough Council (SBC) to demonstrate the importance of the A127 corridor to the economic growth and financial well-being of the Thames Gateway South Essex region. ECC attaches the full paper for the Airport Commission's reference, but we think it is important that we outline some of the key messages expressed within the paper that may be of importance to the Commission.

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The A127 is one of the busiest 'non-trunk' roads in the entire country, and faces significant capacity issues which need to be addressed if it is to keep traffic flowing and sustain economic growth in the wider area.

As a vital link road between the M25, London Southend Airport, London Stansted, DP World Port and the wider Essex area, the A127 would be a major route connecting passengers and businesses in Essex with a new Inner Thames Estuary airport. Alongside Southend-on-Sea borough council, we estimate that the cost of improvements to bring the road up to a sufficient standard for current usage levels is around £76m. To support the operating requirement of an ITE Airport, new and

upgraded road and rail links would need to be established on both sides of the Thames, requiring an investment of billions of pounds on the strategic network, and hundreds of millions on Essex's local network.

While ECC has received £35.6m through SELEP for congestion and pinch point alleviation projects in the Thames Gateway area in 2015/16, there is still a funding gap which we would welcome the Commission's input on for providing this vital link from Stansted to London, and to the economic hub at the South of Essex. If an Inner Thames Estuary airport is to be investigated further, we therefore recommend that the Airport Commission work closely with Essex County Council and Southend-on-Sea borough Council to identify further funding for necessary improvements. This will include a catalogue of measures for junction upgrades and improvements, maintenance, signing, lighting and safety camera installation.

ECC would reiterate the approach set out in its paper, 'Flights of Fancy' of September 2013: that we do not believe the proposals for the Inner Thames Estuary airport are realistic or cost effective, and that the expansion of Heathrow offers a better solution to the need for additional airport capacity in the South East.

### **Key Issues to address**

Chapter 3 of the paper discusses the capability and capacity of the A127 route. It states that the A127 is an ageing corridor (originally opened in 1924), but one that is a vitally important primary route for the Thames Gateway South Essex (TGSE) area which connects the M25, Basildon and Southend (including London Southend Airport).

From the Fairglens junction to the east of Basildon, the A127 is the main corridor for traffic travelling west / east and from / to Southend. The Fairglens junction is the key link to the A130 and the North and the A13 and Westwards to London. This junction is over capacity and suffers from significant congestion at peak times, and at various intervals throughout the day. It is very sensitive to incidents, not only on the A127, but also the A13, A12 and M25.

The A127 is designated a PR1 Strategic Route, meaning any asset failure on the A127 is likely to have a significant impact on the local economy.

There is an unusually large number of Large Goods Vehicles (LGVs) on Essex roads (over 22% of all LGVs in the East of England are registered in Essex). Although the A13 may be the prime routing for freight deliveries accessing the new London Gateway and Tilbury container ports, with the important commercial destinations along the A127 corridor, freight traffic forms a significant percentage of the movements to destinations such as the Basildon Enterprise Parks and London Southend Airport.

Traffic operations information demonstrates that the Essex sections west of the Southend boundary carry similar flows, between approximately 55,000 and 73,000 vehicle per day, with flows declining towards the end of the route in Southend. There is not a strong trend in the data, but, on average, there is a growth in Annual Average Daily Flows of 0.39% per year, compared to almost no growth on other A-Roads in Essex.



Figure 2- Congestion Reference Flows

LOCATION	2011 Two Way AADT	FLOW/CRF	2036 Two Way Forecast	FLOW/CRF
LA Boundary to A128	65,214	0.97	90,419	1.34
A128 to A176	62,623	0.93	86,476	1.29
A176 to A132	72,888	1.08	100,651	1.50
A132 to A130	67,551	1.00	93,281	1.39
A130 to Progress Road	70,171	1.04	90,598	1.35
Progress Road to Kent Elms*	40,700	0.97	45,200	1.06
Kent Elms to Tesco Rndbt*	40,100	0.51	49,600	0.58
Tesco Rndbt to The Bell*	40,200	1.00	55,700	1.01
The Bell to Cuckoo Corner*	32,700	1.03	49,700	0.96

\* Sections in urban areas of Southend based on model results and show the worst of AM, PM peaks and either directions. AADTs estimated from base and forecast peak hour flows.

Figures 3 and 4 below show the data in diagrams. The change in Flow / Congestion Reference Flows at Kent Elms junction indicates the constraints of the signals at Kent Elms which hold back the flow of traffic.

Figure 3 - Current Congestion Reference

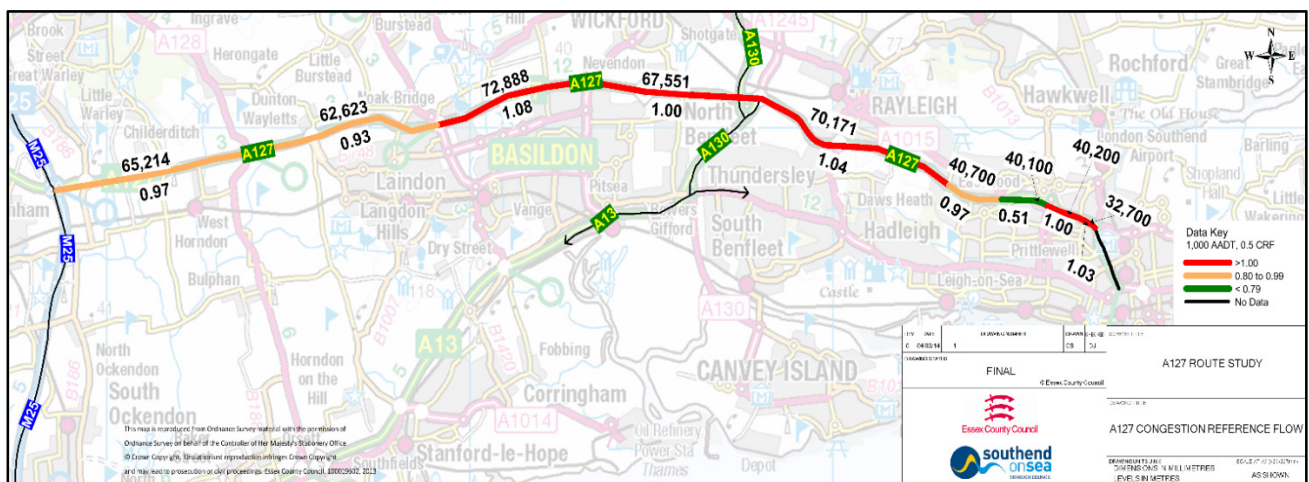
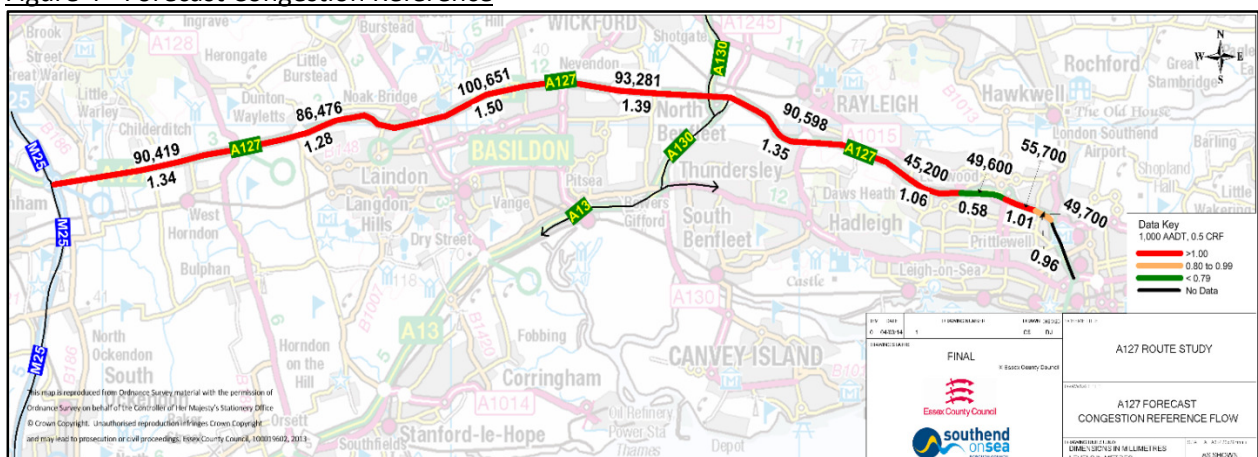


Figure 4 - Forecast Congestion Reference



The paper outlines the average travel speeds along the A127 east of the M25. It is important to note that:

- There is a significant reduction in speed over peak periods along almost the entire route. It is more marked in the PM period in the eastbound direction compared to the westbound direction;
- The slowing of traffic on the approaches to on and off slips and at the at-grade junction in Southend-on-Sea;
- The morning peak being concentrated in the 07:00 to 09:00 period and the afternoon peak more spread;
- Geometric delay at the Fortune of War junction and at the junctions in Southend-on-Sea.

ECC has evidence that indicates the A127 is operating substantially over-capacity and the collision types and rates are indicative of this problem. The A127 is generally free flowing in the morning peak flow period on the non-built up sections, but with delays at certain junctions due to the volume of merging traffic. In Southend, there are eastbound delays at Kent Elms in the morning peak. In the afternoon peak flow period, the A127 appears more congested, especially Southend-bound from the A176 to Rayleigh Weir. The coefficient of variation is relatively low, indicating that the A127, whilst it may be congested, is relatively reliably congested on a regular basis.

The route is also experiencing congestion for a greater proportion of the day than just the conventional peak times. This results in flow breakdown, which in turn causes delays and an increased risk of collisions. There is also no means of effectively managing traffic along the route, should the need arise. Managing demand and traffic between the A127 and A13 is required, as well as directing traffic to the most appropriate route in times of congestions and incidents.

ECC and relevant partners are currently researching information and data in relation to Saddlers Farm, and the Fairglen and A130 interchange. This information is currently being analysed and once available ECC is happy to share this with the Airport Commission. ECC considers that it is important that the Commission fully appreciates the current and likely future road infrastructure issues within Essex. Clearly if the Commission is seeking to understand the impact an Inner Thames Estuary Airport may have on surface access the impact it may have on the Essex surface access network is very important.

It is important to note that any future short, medium and long term plans for surface access improvements do not take into account the Inner Thames Estuary Airport, therefore surface access issues associated with this requires significant additional investment, funding and delivery to mitigate the impact on the Essex living, working, investing and visiting community.