



Examination of the London Southend Airport & Environs Joint Area Action Plan (JAAP)

Southend-on-Sea Borough Council & Rochford District Council's
written response to the Planning Inspector's Issues and Questions



24th April 2014

Issue 1

Is the overall strategy for development within the JAAP area sound having regard to the needs and demands of the area; the relationship with other plans, national policy and Government objectives and the evidence base and preparatory processes?

- i) Is the JAAP consistent with Government policy having particular regard to the National Planning Policy Framework, the Aviation Policy Framework (DoT, March 2013) and the Airports Commission: Interim report (December 2013)?

- ii) The JAAP has been prepared in line with Government policy, and has had particular regard to the National Planning Policy Framework (NPPF), the Aviation Policy Framework and the Airports Commission: Interim Report referred to above along with other relevant policies and plans.

The NPPF recognises in paragraph 6 that the purpose of the planning system is to contribute to the achievement of sustainable development. In paragraph 7 it states what the Government considers to be the three dimensions of sustainable development: economic, social and environmental. In paragraph 8 it outlines that in order to achieve sustainable development economic, social and environmental gains should be sought jointly and simultaneously through the planning system, and not in isolation. It is considered that the London Southend Airport and Environs Joint Area Action Plan (JAAP) addresses this fundamental requirement; it includes a suite of policies which seek to create jobs and boost the local and wider economy, ensure that there are appropriate environmental controls on new development to uphold the quality of life of residents, as well as enhance green space and public open space as well as the overall environment within the JAAP area to the satisfaction of all.

In addition, the JAAP also acknowledges the presumption in favour of sustainable development. The JAAP states that the Councils will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and secure development that improves the economic, social and environmental conditions in the area. Furthermore, it has had regard to paragraph 31 of the NPPF, which highlights the benefit of preparation of a joint plan for strategic infrastructure such as growth of an airport. Southend Borough Council (SBC) and Rochford District Council (RDC) have worked jointly throughout the preparation of the JAAP and have also worked with partner authorities throughout its development, in particular to ensure that the public transport system and road network will be appropriate to support sustainable development.

The Council also recognise, as stated in paragraph 33 of the NPPF, that airports are not subject to a separate national planning policy statement and that in preparation, plans should take account of future airport growth and role in serving business, leisure, training and emergency service needs. The need for local planning authorities to take account of the principles set out in the relevant national policy statements and the Government Framework for UK Aviation is

acknowledged, and strong regard is had to the Aviation Policy Framework (March 2013) and the Airports Commission: Interim Report (December 2013). It has already been recognised in the Future of Airport Transport White Paper (2003), to which the JAAP refers, that there are wider benefits from the expansion of air travel. The growing pressure on airports in the South East is highlighted, as well as the important role smaller airports have to play in the future provision of airport capacity in the region.

The JAAP also refers to the draft Aviation Policy Framework (July 2012), which sets out the overall objectives for aviation and how existing policies and additional policy options can achieve these objectives. Since then the final version of the Aviation Policy Framework has been released (March 2013) and the JAAP will reflect this. When comparing the draft and the final Aviation Policy Framework, the key objectives have remained the same and the reference to the role of smaller and regional airports has not changed. As such it is considered that the role of London Southend Airport (LSA) is consistent with this key national policy document, as well as the White Paper referred to above.

After this, and in the same month that the JAAP was submitted, the Airports Commission: Interim Report was published (December 2013). In terms of the Airports Commission's Interim Report, LSA continues to be defined as a "regional airport". In paragraph 4.70, the Report suggests that "aviation demand is likely to increase significantly between now and 2050, even when 2050 carbon emissions are capped at a level which is consistent with the UK meeting its legislated climate commitments" and that "this demand growth is likely to be concentrated in the South East, with sufficient demand to utilise 90% or more of available capacity across London and South East airports by around 2030". LSA contributes to this need for capacity, with evidenced forecast growth to grow to 2mppa by 2020, submitted with a planning application for a runway extension, which was subsequently granted permission and was operational from April 2012.

In paragraph 4.71, the Report concludes that there is "need for additional capacity to be provided in London and the South East, to alleviate the impacts of tightening capacity constraints on operational reliability in the period to 2030, and to accommodate additional demand growth over the period to 2050".

The Commission further concludes that "there is a clear case for at least one net additional runway by 2030 across a range of scenarios, including where the UK is meeting its climate change targets. This scale of additional capacity is compatible with a number of airport expansion proposals that have been put to the Commission and views held by some of the major airline stakeholders in the UK".

The Airports Commission's Interim Report has announced that it will be taking forward, for further detailed studies, proposals at Gatwick and Heathrow.

The Commission has not shortlisted any of the Thames Estuary options. It states that there are too many uncertainties and challenges surrounding them at this stage. However, the Commission is undertaking a further study (Inner Estuary

Feasibility Studies and Impacts Work) of the Isle of Grain option in the first half of 2014 and will reach a view towards September 2014 on whether that option offers a credible proposal for consideration alongside the other short-listed options i.e. Gatwick and Heathrow.

Paragraph 6.38 of the Report refers to the issue of an Isle of Grain airport, which would be likely to require the closure of LSA and London City Airport, reducing the options available to low cost carriers in the south east of England.

SBC has previously stated its total opposition to the development of an airport within the Thames Estuary, including the Isle of Grain, particularly in respect of the effect on LSA as well as the potential social and environmental impacts. SBC will continue to take the opportunity to fully contribute to the Commission's further feasibility and impacts work to safeguard the considerable investment in LSA and associated development within the JAAP area; and hence the future prosperity of Southend and the surrounding area.

The Commission will, therefore, focus for now on the challenge of appraising the Gatwick and Heathrow options, further assessing the case for a new airport in the Thames Estuary, and delivering a robust final recommendation to government in summer 2015. The JAAP will be mindful of this outcome and the Councils will consider what actions may be necessary in respect of planning policies to reflect any future changes to national aviation policy, and whether these will trigger a review of the JAAP in line with the NPPF.

- ii) Is the JAAP consistent with existing development plans, especially the Rochford and Southend Core Strategies?

SBC and RDC consider that the JAAP has been prepared in line with existing development plan policies, and that there is clear consistency in the policy approach within the adopted plans for both local planning authorities to prepare a plan for LSA and its environs to support growth at the airport and development of new employment opportunities.

For the adopted Southend Core Strategy:

- Strategic Objective (11) seeks 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.'
- Policy KP3 'Implementation and Resources' states that 'In order to help the delivery of the Plan's provisions the Borough Council will...prepare Area Action Plans and Supplementary Planning Documents to ensure development of an appropriate scale, mix and quality for key areas of opportunity and change, including...London Southend Airport (joint Area Action Plan with Rochford District Council);'

- Policy CP1: ‘Employment Generating Development’ states that ‘to promote economic regeneration, development will be expected to... support the future potential of London Southend Airport’.
- Policy CP3 ‘Transport and Accessibility’ states that ‘Improvements to transport infrastructure and services will be sought in partnership to secure a ‘step change’ in provision to achieve a modern integrated transport system necessary to unlock key development sites and to secure the sustainable jobs led regeneration and growth of Southend. This will be achieved by... improving accessibility to key development opportunity sites, including improved access to Shoeburyness and London Southend Airport to support the potential of the Airport to function as a catalyst for economic growth... providing for the development of high quality transport interchanges at Southend (Southend Regional Transport Node*) and the key urban interchanges at...London Southend Airport’.
- Policy CP5 ‘Community Infrastructure’ states that ‘New development should demonstrate that it will not jeopardise the Borough’s ability to improve the education attainment, health and well being of local residents and visitors to Southend. This will be achieved by... supporting improvements to existing, and the provision of new, facilities to support the needs of education, skills and lifelong learning strategies particularly by...providing for an academy of educational/training skills in aviation at London Southend Airport.’

Rochford Core Strategy

The Rochford Core Strategy was adopted in December 2011 and sets the overarching policies for development of the District, including in relation to London Southend Airport and its environs. Policies in the Rochford Core Strategy seek to realise the airport’s economic potential, whilst having due regard to local amenity and environmental issues.

In setting out the issues and opportunities for the District, the Rochford Core Strategy notes at paragraph 2.54 that London Southend Airport “has the potential to be a focus for economic growth, not simply in terms of aviation-related industries, but also as a catalyst for wider forms of employment which would benefit from being in proximity to a thriving airport”.

The Rochford Core Strategy sets out the vision for the District and at paragraph 3.11 includes how the airport and its environs are envisaged to be in the short term:

“The potential of London Southend Airport and its environs is beginning to take shape through the provision of a Joint Area Action Plan in partnership with Southend Borough Council. This provides a unique opportunity for employment development delivering jobs that reflect the requirements of aviation industries”.

At paragraph 3.15, in relation to the vision for the District in the medium term, the Core Strategy states:

“The London Southend Airport and Environs Joint Area Action Plan supports and regulates the operations of London Southend Airport taking into consideration environmental and social effects, and residential amenity. This is an important sub regional airport that is supporting new aviation related employment opportunities and including an Airport skills academy delivering training for aircraft engineers and other trades. A new airport terminal building and railway station complex has been completed and is operational following the implementation of an agreed surface access strategy”

The long-term vision for the District set out in the Core Strategy includes the following:

“Road infrastructure through the District has been secured and improved with easier access to the A127 and A130. Basildon, Chelmsford and Southend continue to be significant attractors – although the strength of their spheres of influence on the District has been reduced by enhancement of the District’s town centres, employment areas, and development in and around London Southend airport.” (paragraph 3.24); and:

“Over 3000 net additional jobs have been provided [in the District] which meet local employment needs. A balance has been struck between the local workforce and jobs through the aviation-centred skills training academy providing local workers with high-value, transferable skills. London Southend Airport’s potential as an economic catalyst for the sub-region has been realised” (paragraph 3.25).

The Rochford Core Strategy sets out a range of policies to deliver the vision for the District. Those of particular relevance include the following:

- Policy ED2 is concerned specifically with London Southend Airport and environs, and includes a commitment to working with Southend-on-Sea Borough Council to prepare a Joint Area Action Plan for the area which will see the airport’s economic potential realised, whilst regulating operations in the interests of the environment and residential amenity.

As such, Policy ED2 supports the concept of a JAAP for London Southend Airport being prepared by Rochford District and Southend-on-Sea Borough Councils. In addition, it supports the employment related policies in the JAAP; as well as the JAAP’s residential amenity and environmental protection policies.

- Policy ED1 states the Council will support development that enables the economy to diversify and modernise through the growth of existing businesses and the creation of new enterprises providing high value employment, and states that enhancement of London Southend Airport will be supported. As such, this policy supports the direction taken by the JAAP.
- Policy T2 identifies improvements to surface access to London Southend Airport as one of the highway improvement priorities. Accordingly, the JAAP – in particular policies T1 and T7 – conform to, and are supported by, the Rochford Core Strategy.

- Policy ED4 states that the Council will direct the majority of future employment development to the west of the District and in proximity to London Southend Airport. Policy ED4 also states that land to the north and west of London Southend Airport will be allocated for employment uses; and that the Council will work with the private sector to seek the delivery of an Eco-Enterprise centre.

This policy supports the direction taken by the JAAP, as well as providing justification for the allocation of land for employment through the JAAP.

Rochford Allocations Plan

In addition to the Rochford Core Strategy, the Development Plan for Rochford District includes *inter alia* the Rochford Allocations Plan (adopted February 2014). This allocates land in accordance with the Rochford Core Strategy. It includes the allocation of land to be addressed by the JAAP (Policy NEL3). This area is consistent with the area of the JAAP that is within Rochford District.

- iii) Is the boundary of the JAAP area appropriate?

SBC and RDC consider the boundary of the JAAP to be appropriate for the vision and policies it intends to deliver for the local and wider area. The boundary has been refined during the preparatory and consultation stages of the JAAP to reflect current and future land uses and proposal sites within its boundary. The policies map, which defines the boundary, illustrates policy designations, land uses and proposals sites and has taken into account representations made. The JAAP has used features such as roads, junctions, green belt and the location of proposals to plot an appropriate marker for the extremities of the area. It is understood that there is no specific policy or national guidance which defines what should or should not be included in an area action plan boundary or what should specifically define that boundary.

There are also sites and areas within the JAAP boundary, which will not have a designation or proposal related to the policies contained within the JAAP, but which have been or will be covered by other planning policy documents such as the Southend Core Strategy, Local Plan or Development Management Development Plan Document (DPD) or Rochford Core Strategy, Allocations Plan or Development Management Document and associated policies map. As such all property and land uses within a local planning authority boundary will most likely be included within at least one planning document or more, whether there are specific policies related to a particular property or not.

Furthermore, as noted in responses to Issue 1 (ii) above, in addition to the Rochford Core Strategy, the Development Plan for Rochford District includes *inter alia* the Rochford Allocations Plan (adopted February 2014). This allocates land in accordance with the Rochford Core Strategy. It includes the allocation of land to be addressed by the JAAP (Policy NEL3). This area is consistent with the area of the JAAP that is within Rochford District.

- iv) Does the JAAP strike the right balance between economic, social and environmental considerations?

As stated in Issue 1 (i) it is considered that the JAAP has been prepared in accordance with the NPPF which states that the purpose of the planning system is to contribute to the achievement of sustainable development, and that the three dimensions of this are economic, social and environmental. In paragraph 8 it states specifically that in order to achieve sustainable development economic, social and environmental gains should be sought jointly and simultaneously through the planning system and not in isolation. It is considered that the JAAP does strike the right balance between these three dimensions of sustainable development. The policies in the JAAP have been subject to objective and independent sustainability appraisal (SA) which includes strategic environmental assessment (SEA), in accordance with the requirements of the European Directive EC/2001/42.

The purpose of the SA is to review the JAAP to assess whether it would have any significant impact on delivering sustainable development at the airport site and its environs. All iterations of the SA report also make recommendations for possible changes to the JAAP or other measures that may be used to secure the delivery of sustainable development. The SA also considers whether the approach taken in the JAAP is likely to be successfully implemented, and therefore actually achieve the anticipated benefits for sustainable development.

The SA acknowledges that the JAAP can have a positive role in helping to manage the airport expansion to deliver benefits to the local economy, reduce as far as possible the local environmental impacts of development and co-ordinate access improvements to the airport and business parks that reduces car reliance and promote walking and cycling as sustainable transport in general.

The major positive impacts of the JAAP, the SA acknowledges, will be from securing economic growth with benefits for the economy of the wider South Essex area. Identifying land for employment in this area will help retain businesses in the area as they grow, as well as providing attractive space for inward investment. The JAAP also allows control policies to be put in place that will help manage the effects of airport expansion and continued operation. The SA also identifies several ways in which the sustainability performance of airport expansion and employment development proposals could be enhanced and impacts mitigated against.

The SA, at paragraph 12.1.12, suggests ways that an additional JAAP policy or a site-wide Masterplan could help achieve sustainability benefits and mitigate adverse impacts.

As confirmed at paragraph 1.1 of the JAAP, a masterplan will be produced following on from adoption of the JAAP. This masterplan will be in conformity with the JAAP, and will provide further details to guide development of the area. The SA of the JAAP, including recommendations, will be used to inform this masterplan.

Addressing each of the recommendations at paragraph 12.1.12 of the SA in turn:

SA suggestion	Comment
<p>“Details on how surface water drainage could be used to avoid increasing flood risk, as well as a way of managing pollution impacts of surface water run-off”</p>	<p><i>The JAAP includes Policy ENV7 which inter alia states that development within the JAAP area will be required to incorporate SUDS. Details will be considered through the masterplan for the area.</i></p> <p><i>A Flood Risk Assessment & Drainage Strategy was included with the planning application for the runway extension (Jacobs: Sept 2009).</i></p>
<p>“Unified design codes for new buildings to fit the surroundings to benefit the urban fringe area”</p>	<p><i>This is an issue that will be considered through the masterplan for the area.</i></p>
<p>“Measures for nature conservation protection and enhancement, such as protection of green linking features and habitat enhancement measures identified through the ecological assessment”.</p>	<p><i>The JAAP will integrate with other neighbouring areas which are subject to significant habitat enhancements, i.e. Cherry Orchard Jubilee Country Park. Furthermore, the JAAP includes Green Buffers and Policy T1 states that a Green Link through the site will be required as part of the master planning and linking into the surrounding network.</i></p> <p><i>However, the JAAP area itself is not identified as an area for significant habitat enhancement in either Councils’ Core Strategies.</i></p>
<p>“Implementation of measures to protect internationally designated wildlife sites, as recommended in the HRA report”</p>	<p><i>The HRA report recommended that the Submission JAAP should include the requirement for all new development to meet the BREEAM rating of ‘Excellent’. It should also encourage the use of rainwater harvesting and water recycling systems throughout the JAAP area. Accordingly Policy ENV7 of the JAAP states the following:</i></p> <p><i>“All new development must meet at least the BREEAM rating of ‘excellent’. Both Councils will expect to see active use of rainwater harvesting and water recycling</i></p>

	<p><i>systems and SUDS through the JAAP area as well as the use of renewal technologies, where appropriate and the application of other techniques such as green roofs and walls to further contribute to sustainability.”</i></p>
<p>“Protection of heritage features and their settings wherever possible, including listed buildings”</p>	<p><i>Specific measures to protect heritage assets within the JAAP include the proposed allocation of a green buffer between the proposed employment site and grade II listed building, Cherry Orchard Farm. The JAAP also states that the Masterplan for the site will be required to incorporate a green buffer zone and landscaping around the building to preserve the rural character of its setting.</i></p> <p><i>In addition, it should be noted that both Councils’ Core Strategies include policies protecting heritage assets and promoting good design that protects local character (Policies CP1 and CP 4 of the Rochford Core Strategy and Southend-on-Sea Core Strategy, respectively).</i></p>
<p>Setting an area-wide renewable or low carbon energy target, this could include requiring all new development to be built for future connectivity to a district combined heat and power system.</p>	<p><i>It is considered that this issue is addressed through the Councils’ Core Strategies which both require developments to secure at least 10% of their energy from decentralised and renewable or low-carbon sources.</i></p>
<p>Operational controls to manage noise from MRO activities and/or site specific noise mitigation measures.</p>	<p><i>The JAAP includes specific policies to address noise in relation to aircraft. In terms of the issue of noise more generally, policies in the Southend-on-Sea Core Strategy (Policy CP4) and Rochford’s emerging Development Management Document (Policy DM32) also require proposals for employment development to include measures to mitigate potential noise issues.</i></p>

SBC and RDC also commissioned a Habitats Regulation Assessment (HRA) Report (January 2013) which addresses the Screening and Appropriate Assessment stages of HRA process. The purpose of HRA is to assess the impacts of a land-use plan, in combination

with the effects of other plans and projects, against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. The Habitats Regulations require the plan making/ competent authority [Rochford District Council and Southend-on-Sea Borough Council] to consult the appropriate nature conservation statutory body Natural England (NE).

The screening found that the plan, both alone and in-combination with other plans, had the potential for likely significant effects at five of these European sites through increased water abstraction, increased wastewater discharge and increased surface water run-off. The five European sites were carried forward to the next stage of the HRA process, Appropriate Assessment, to determine if the plan has the potential for adverse effects on site integrity through the impacts identified above.

After gathering additional information the Appropriate Assessment (AA) first considered the potential for the plan to have adverse effects on site integrity through increased abstraction of water resources. It was determined that due to the low vulnerability of the interest features (to changes in salinity as a result of increased abstraction) and mitigation provided by other plans and programmes that would help to minimise the effects of proposed development on water resources, the JAAP will not have adverse effects on European site integrity either alone or in-combination through increased levels of abstraction.

The AA then considered the potential for the plan to have adverse effects on European site integrity through increased wastewater discharge. Given the findings of the South Essex Outline Water Cycle Study Technical Report (Sept 2011), it was assessed that the increased discharges (consented) as a result of development proposed in the JAAP will not have adverse effects on the integrity of European sites.

As well as wastewater discharges, the AA considered the potential for increased surface water run-off from proposed development due to an increase in hard surfaces. The JAAP Preferred Options DPD expected all new development to incorporate sustainable drainage systems (SUDS). In response to the JAAP Preferred Options consultation the Environmental Agency commented that incorporating SUDS in all new developments 'would not only ensure reduction in surface water run-off but would also improve the water quality'. Furthermore, any planning application within the JAAP area is also required to meet the requirements set out in the Core Strategies of both local authorities, where relevant, which contain a number of policies that will help to minimise the contribution of proposed development within the JAAP plan area to the adverse in-combination effects on water quality resulting from other plans. As a result the AA concluded that the JAAP will not have adverse effects on European site integrity either alone or in-combination through increased surface water run-off.

Based on the assessment outlined above, the AA made a number of recommendations, which included the following:

- That the Submission JAAP DPD should set a challenging policy to restrict additional water use within the plan area.

- That the monitoring of Chemical and Biological quality of the Rayleigh, Eastwood and Prittle Brooks is incorporated into the Annual Monitoring Reports for both Councils. Incorporating these indicators will allow the Councils to monitor any changes in the water quality of the brooks during the life of the plan. If the Annual Monitoring Report (AMR) identifies that water quality has deteriorated, then the Council should consult with EA and NE to determine the most appropriate course of action.

The HRA concludes that SBC and RDC have considered the conclusions arising from the HRA process and the advice provided by Natural England.

To ensure that the requirements of the Habitats Regulations are met, all the proposed recommendations detailed in the HRA have now been incorporated into the JAAP Pre-Submission. At this stage, the AA, therefore, concludes that the JAAP will not result in adverse effects on the integrity of European sites.

It is, therefore, considered that the JAAP does strike the right balance between the three dimensions of sustainable development. The potential of LSA as an economic catalyst for the sub-regional economy is already recognised and the benefit of airports for economic development is acknowledged in the associated plans and policies, the evidence base and wider literature. The potential benefit of the business park for growth of the local economy, further inward investment and the benefit that it may provide for local people with access to jobs and training is documented. In addition, the JAAP will provide improvements to the transport infrastructure and public transport walking and cycling as well as create new areas of public open space and green space.

The SA acknowledges that there are some potential environmental and social concerns that are associated with the growth of an airport, however, measures that will help mitigate this have been incorporated into JAAP policies and controls associated with the planning permission for the runway extension. It has also been evidenced that there will be no adverse effects on the integrity of European sites through the HRA and associated AA. As such it is considered that the JAAP creates an appropriate policy base to balance economic, social and environmental gains simultaneously and jointly to deliver sustainable development.

Issue 2

Are the airport policies justified, deliverable within the Plan period and consistent with national policy?

- i) Is the growth of the airport to 2 million passengers per annum justified and realistic?

An early reference to growth to 2 million passengers per annum at London Southend Airport was included in 'The Future Development of Air Transport in the United Kingdom – South East: A National consultation' (DfT: July 2002). This regional based document was published along with six others in advance of finalising the 2003 Future of Air Transport White Paper in order to help inform its conclusions.

Chapter 12 of the South East consultation document noted the role of smaller South East airports. At each site, including Southend Airport, the document considered the scale of possible development, the potential capacity and the main impacts and constraints and an overall assessment was made of the potential contribution of the London Southend Airport at 2030. This assessment made an assumption that maximum use would be made of the existing runway i.e. without the extension at the major South East airports and that no new runway capacity would be provided in the region.

Specifically for Southend it assumed a capacity of 2 million passengers per annum (2mppa). It also identified constraints as being the ability to lengthen the runway and noise impacts on residential areas of Southend. It states that the evidence to inform the 2mppa was taken from 'Small Airports – Demand and Impact Appraisal' (Halcrow: August 2001), which was referenced as a footnote to the consultation document.

Once published the White Paper 'The Future of Air Transport' required airport owners and operators to prepare masterplans for future growth and development. Whilst Government did not list Southend as one of the airports requiring a masterplan, it suggests that such airports may wish to consider preparing masterplans in order to provide a mechanism which would enable future development to be given due consideration in local and regional planning processes. The London Southend Airport Masterplan (2005) was, therefore, a voluntary publication to help understand the potential for growth and provide information about future development opportunities.

The masterplan stated that in the medium and long term London Southend Airport (LSA) was expected to grow to become similar in size in terms of passengers and aircraft movements to London City Airport (1.7 million passengers per annum). The masterplan assumes that London Southend Airport would grow to around 1 million passengers per annum by 2015, which would result in a daily flow of around 1,500 arriving and 1,500 departing passengers per day.

In the longer term (to 2030) the masterplan indicated that passenger numbers would grow to 2 million per annum, in line with the potential identified in the Government's White Paper (2003). The masterplan confirmed that the forecasts for future growth at London Southend Airport were consistent with its intended role as a small regional airport. The 2005 Master Plan passenger traffic forecasts were prepared in November 2004 by AviaSolutions.

The significance of the development of LSA has been acknowledged at the regional level of planning and its status was reflected in the former East of England Plan (2008). The East of England Plan stated that regional airports, like Norwich (first tier) and Southend (second tier), have considerable scope to meet demand for air services.

The JAAP Issues and Options Evidence Report (June 2008) considered forecast information from a York Aviation Report entitled 'Socio-Economic Impact of the Expansion of Activities at Southend Airport' (January 2006). The forecasts in the LSA masterplan were reviewed by York Aviation, who concluded that Southend could attract around 1.8 million passengers by 2030, close to the 2 million estimated in the 2005 Masterplan. York did stress that there was a relatively high degree of uncertainty attached to the passenger forecasts for the Airport, as there was no recent track record of commercial air services. It would depend on how successful the LSA was in attracting airlines. York concluded that LSA had a potentially strong local market, but its ability to penetrate the wider London market was less clear in the face of competition from Stansted, London City, and to a lesser extent Luton Airports, even with a rail link. It states that high frequencies of service would be critical.

In 2009 LSA submitted a planning application to extend the existing runway and divert a section of Eastwoodbury Lane along with a number of other works to the immediate surrounding area. The officer report to Southend Development Control Committee stated that the planning application (SOS/09/01960/FULM) principally sought permission for an extension to the runway in order to facilitate growth of up to almost 2 million passengers per annum (2mppa) by 2020, which equated to 53,300 aircraft movements per year. A limit to total air traffic movements (ATM) was set to 53,300 and cargo related ATMs to 5,330 per annum or 10% of the total number of ATMs.

The application stated that the runway extension would enable larger aircraft (such as Embraer 195, Airbus 319 and Boeing 737, which can hold up to 160 passengers) to use the airport giving the potential to accommodate commercial passenger airlines. The application proposed that this would likely consist of regional airlines flying to UK and Ireland (13,600 movements per annum), budget European flights (10,700), cargo flights (2,100) and 26,900 other aircraft movements, made up of business/private planes, aero clubs, training and military.

The AviaSolutions' Report: 'London Southend Airport Traffic Forecasts' (2009), in support of the runway extension, was informed by previous forecasts also undertaken by AviaSolutions (to inform the masterplan). It assumed, among other

things, that there would be (i) inbound services from Central Europe, which may include an airline moving its operations from elsewhere in the London area and (ii) outbound services to major Mediterranean destinations.

By 2020, it envisaged substantial growth to 1.97m passengers, principally made up of:

- Regional airline(s) flying 60+ weekly services on 6 UK Domestic and Irish routes, with 0.4m annual passengers in total
- Low cost carriers developing a substantial network of services to Southern / Central European destinations, generating a total of 1.2m annual passengers.
- A regional low cost airline (potentially Flybe) developing a network including potential destinations such as Edinburgh, Glasgow and Amsterdam where there is sufficient demand for 2 daily (12 weekly) services.

It also provided a volume and mix of aircraft movements associated with such growth. By 2020 the forecasts assume a total of circa 53,300 aircraft movements:

- 26,400 commercial ATMs, comprising:
 - 12,600 Regional movements, primarily made up of 70 - 80 seat Dash 8 Q400 / ATR72 type aircraft
 - 10,700 LCC movements, using the Airbus A319 or similar (e.g. Boeing B737-300/700)
 - 1,000 Ford RJ100 aircraft movements
 - C.2,100 Cargo ATMs using a mix of Bae 146 and smaller aircraft types
- 26,900 non commercial movements, including:
 - 14,000 Business Aviation, Air Taxi and Private movements
 - 7,500 Aero club movements. These are assumed to decline as commercial movements increase

It is considered that the evidence base discussed herein demonstrates that there is considerable consensus among government bodies, aviation professionals and LSA that forecast passenger growth to 2 million passenger is justified and realistic, and may be achieved by 2020 with the runway extension.

Furthermore, passenger information from LSA demonstrates that there has been a substantial increase in passenger numbers. From commercial flights commencing in April 2012 passenger numbers have steadily increased and cumulative passengers for 2012 were 617,000, and 970,000 in 2013, and for the first two months of 2014 the passenger numbers were higher than the figures for the equivalent previous two years; and passenger numbers have now reached 1

million passengers on a rolling 12 months basis. This is slightly ahead of the forecasts produced by AviaSolutions.

- ii) Are the policies regarding noise, a noise compensation and purchase scheme, airport surface access strategy, operation of the new runway and air quality monitoring effective?

SBC and RDC acknowledge that the policies related to the matters listed in (ii) i.e. LS3, LS4, LS5, LS7 and LS8 may need to be re-examined and revisions to the wording made to ensure that they are effective and provide clear indication of how a decision maker should react to a development proposal. These will be incorporated in a schedule of modifications submitted by the Councils prior to the examination in public.

- iii) Are adequate environmental controls in place having regard to existing planning conditions, planning obligations and other regulatory controls?

The 'Environmental Controls Schedule' in the JAAP reflects the requirements of the S106 agreement for the runway extension at LSA. The Councils consider that the environmental controls put in place allow for airport growth and for it to fulfil its potential as an economic catalyst for the sub-region, whilst also ensuring that residents maintain a decent quality of life, but also have the opportunity to benefit from the development of the airport, jobs opportunities at the business parks, improved transport infrastructure (including public transport, cycling and walking) and new areas of public open space which the JAAP policies seek to deliver. The controls will ensure that there is appropriate monitoring and review of Airport operations in relation to noise (and compensation), air quality and water quality among other things.

- iv) Is Policy LS6 regarding the public safety zone (PSZ) as shown on the Proposals Map effective in the light of the review by the Civil Aviation Authority?

Since publication of the JAAP and its Proposals Map in February 2013, a review has been undertaken by the Civil Aviation Authority (CAA) of the public safety zone for LSA, which included a consultation which ended on 6th March 2014. The Councils are minded that the PSZ is not a land use proposal but a designation made by Government in conjunction with the CAA and will be updated. If it helpful to include the PSZ on the Proposals Map the Councils will update this once the final version has been published to accompany Policy LS6. However, if it is consider that it is covered by Department for Transport Circular 01/2010, then there is an opportunity to review the requirement for the policy within the JAAP.

- v) Are the policies to allocate land for maintenance, repair and overhaul (MRO) justified and deliverable?

The Issues and Options Evidence Base Report (2008) highlights that, according to a forecast prepared for 'Overhaul and Maintenance' (O&M) magazine in April 2007, the worldwide Maintenance, Repair and Overhaul (MRO) for commercially operated jet aircraft is worth US\$ 41 billion, and is set to grow at a compound

annual growth rate (CAGR) of 4.8% over the next five years, and then will slow to 4.0% CAGR from 2012 to 2017. By 2012, the value of the MRO market for western-built, commercially operated jets is expected to increase to \$51.8 billion, and then to \$62.9 billion by 2017.

The Southend Employment Land Review (SELR) (May 2010) states that LSA and a number of industrial estates already support some very high tech manufacturing and engineering companies. It recognises that the proposed expansion of London Southend Airport is one of the most significant economic developments in Southend. It considers that the existing MRO activities related to the airport are critical to the Southend economy. It also identifies that over 1000 jobs in MRO are supported by the airport, many of which are highly skilled, well paid professions unique to the local area. It claims that it is vital that these jobs are retained in Southend and that this cluster is encouraged to develop through the JAAP. It also states that growth in jobs directly related to the airport will not require additional land.

The Rochford Employment Land Study Update Final Report (December 2009) states that one of the functions of Southend Airport that is expected to grow significantly are MRO. It identifies that this sector currently provides high skilled jobs in the area and considers that the JAAP is in full support of consolidating and expanding this role.

It is noted that whilst the majority of the JAAP area falls within Flood Zone 1, there are some locations within the development area that fall within zones identifying higher probability of flooding, including extension of the Northside MRO area, and parts of the existing Northside MRO area and Aviation Way industrial estate.

A Flood Risk Sequential Test (December 2009) was carried out for the JAAP and identified that there were not any other more suitably located sites, either within the JAAP area or beyond, that meet the requirements for the MRO operations proposed, and that consequently it would be necessary to apply the *exception test* to the MRO sites as part of a flood risk assessment for a development application on this site. It states though that whilst it is accepted that certain land uses, e.g. the MRO, may need to be located in Flood Zones 2 or 3, if they are to serve the existing airport, at the planning stage all attempts to minimise this should be sought prior to accepting the need for flood mitigation measures.

The evidence base for the JAAP demonstrates that the MRO operation at London Southend Airport is a very important and growing sector of the economies of Southend and Rochford, and is a key component in the growth of LSA and the associated business parks. It has also been identified as a lucrative global business sector, important to economic regeneration and growth within the sub-region, providing high quality jobs for local people, and it is forecast to increase these over the delivery of the JAAP.

It is essential that MRO operations are located within or next to the operational boundary of London Southend Airport to be viable and feasible, and this has been

acknowledged in the sequential test, and subsequent need to apply the exception test. Furthermore it is noteworthy that the Environmental Agency has now withdrawn its objections to JAAP Policy in relation to floor risk which further assists the deliverability of the MRO functions.

- vi) Do the policies for the MROs have sufficient regard to flooding, noise and other environmental issues?

London Southend Airport and Environs Flood Risk Constraints Report (December 2009) states in areas where it is not possible to entirely avoid the flood risk (for example, because of the need to locate the MRO facilities close to the airport), any development in the floodplain will require alternative management solutions to ensure that it remains safe during a flood event.

It considers that there will, therefore, be a requirement to provide compensatory floodplain storage and suggests that a variety of Sustainable Drainage Systems (SUDS) are available for use on site. It states that the proposed SUDS solutions for the JAAP area will require significant space provision to mitigate the increase in flows from the new impervious areas and to provide pollution control. The approach will need to meet water quantity and water quality criteria and the different criteria for surface water collection, storage and disposal from each source.

It states that as the site layout evolves in the future (through the masterplanning and planning application process), it is important that allowances are made for the land take for associated surface water drainage features, which will need to be located between the development and the identified watercourses. It recommends that development in these areas is set back from the edge of Eastwood Brook to reduce flood risk and loss of floodplain storage. It considers that such a revision to the development proposals in this area would also provide other positive benefits by providing an opportunity for creation of a green corridor along the Eastwood Brook and allow for future improvements to the conveyance of flood flows. As well as reducing flood risk, providing an undeveloped corridor along the brook would improve the environmental habitat and biodiversity provided within the development area.

Policies specifically related to MRO development (MOR1, MRO2 and MRO3), as mentioned, would require a flood risk assessment as part of a planning application, and a planning application would be required to consider measures that have been identified herein, and in the wider JAAP evidence base.

In addition, matters related to environmental sustainability are also considered in Policy ENV7 of the JAAP. It states that developments will expect to incorporate rainwater harvesting and water recycling systems and SUDS throughout the JAAP area. Furthermore, other planning policies within the Southend and Rochford development plans, which should be read in conjunction with the JAAP, require consideration of *inter alia* flood risk, noise, air quality, lighting, water quality, biodiversity and heritage asset as part of a planning application. It is considered,

therefore, that there is sufficient regard to environmental concerns that may result from development within the JAAP area, through a framework of policies and controls associated with any planning application. Again these matters will also be addressed through detailed masterplanning work for Saxon Business Park, which is being progressed.

- vii) Are the detailed site boundaries of the airport policies appropriate?

It is considered that the detailed site boundaries are appropriate, as they have been accepted by LSA through the consultation process on the JAAP as meeting their requirements for operation.

- viii) If any of the specific zones are found to be unsound, then what are the alternative options?

The specific zones identified are either located within the operational boundary of LSA, having been agreed after consultation with the operators, or are located on the operational boundary of LSA, in the case of the extensions to the MRO facilities; which for operational purposes need to be within or annexed to the Airport, despite being in a higher risk flood zone. As such, it is considered that these locations are the only justified, effective and deliverable ones for these facilities, which meet the needs of LSA and MRO businesses. It is considered that the mitigation measures proposed will help ensure that the most sustainable development is delivered in the circumstances.

Issue 3

Are the employment policies justified, deliverable within the plan period and consistent with national policy?

- i) Are the individual areas proposed justifiable compared to any reasonable alternatives? Should brownfield sites in Southend be released first?

It is considered that the areas proposed for employment development within the JAAP are justified for the purposes that they will serve in accordance with the evidence base. It has been established that the Maintenance, Repair and Overhaul (MRO) facilities will need to be located within the operational boundary of the airport or annexed to it to allow businesses to practically and feasibly function. It has been acknowledged in the evidence base, and in the JAAP, that a number of areas where MRO facilities are proposed are in areas of higher flood risk. However, the results of the Flood Risk Sequential Test (2009) demonstrate that there were no other more suitably located sites within the JAAP area, or beyond, that meet the requirements of the MRO operations proposed. Furthermore, intensification proposed at Aviation Way Industrial Estate, which will improve the quality of the public realm, buildings and the amount of floorspace available, must be delivered in situ, and it has been established in the evidence base that there is little or no room for expansion at surrounding estates.

The Southend Employment Land Review (SELR) (May 2010) states that London Southend Airport (LSA) and a number of industrial estates support some very high tech manufacturing and engineering companies. It also recognises that the proposed expansion of LSA is one of the most significant economic developments in Southend. It acknowledges that there is a unique opportunity for development within the JAAP area, but considers that this needs to be complementary to other policy objectives to ensure that it does not undermine the take up of employment space in other locations. It adds that, given the constrained nature of Southend, the JAAP will provide a major contribution to the town's economic growth, but it should be phased appropriately. It reiterates that there is a fine balance to be had with the regeneration of existing employment areas and the promotion of central Southend as a major employment destination and the opportunity presented by the JAAP.

The SELR considers the JAAP area will take a pro-active role in encouraging employment development for both aviation-related growth (associated with airport growth) and targeting the delivery of accommodation for high-tech industries and offices (specifically in planning use classes B1 and B2). Given the current constraints of the local property market, this opportunity will give Southend the greatest chance of creating employment capacity and attracting investor demand for new business park premises. The market analysis affirms that the area will be attractive to companies and investors and that new development within the JAAP area will help to provide an offer that is currently lacking in Southend and the wider the sub-region.

Table 6.4 in the SELR identifies the gaps in floorspace and land requirements by 2021. It calculates that the Regeneration Framework (2007) (the town centre proposals which will be delivered through the Soutend Central Area Action Plan) and JAAP proposals will result in a shortfall in supply of 19,880 sq m. This includes 12,555 sq m of floorspace within the Town Centre/Seafront area, 1,574 sq m in a business park location and 5,751 sq m within the district and local centres. Overall it states that future employment proposals

could provide 157,050 sq m of floorspace of future requirements. Based on projected demand this will leave a requirement of 19,880 sq m within Southend.

This reveals that, even with delivery of the all the JAAP proposals, there is still a supply shortfall in Southend, according to the SELR. Furthermore, it identifies that the business parks within the JAAP area will provide a unique offer that will be complimentary to other developments within Southend, and will also act as a catalyst for future inward investment. As such they will not prejudice the development of brownfield sites in Southend, as these sites are planned to deliver a different but complimentary offer with a focus on the town centre.

The JAAP and Southend Central Area Action Plan are both recognised as part of the strategic delivery of development sites and proposals, as part of the adopted Southend Core Strategy. Indeed the Inspector's Report for the Southend Core Strategy revealed that during the Examination in Public, Southend Borough Council and Rochford District Council resolved to prepare a Joint Area Action Plan for the Airport and that this would help facilitate further development at the Airport and assist in the regeneration and growth of Southend's economy; and endorsed the JAAP as a 'priority urban area' for Southend. This recommendation was reflected in the adopted Southend Core Strategy, with recognition of the importance of LSA and the JAAP employment areas to regeneration and growth of Southend and to provide local jobs.

- ii) Are the individual areas proposed deliverable within the plan period given the various constraints that exist?

It is considered that the site constraints identified and discussed under other issues such as flood risk, site access and assembly and potential contamination within part of the JAAP site will not prevent the proposals from being delivered within the 15 year timeframe of the plan period. Listed below are the measures it is considered will demonstrate and ensure deliverability of the individual areas within the JAAP.

The Saxon Business Park masterplanning work is underway and other work supporting the delivery includes:

- Southend Borough Council (SBC) having approved a fund of £10m to progress and support the development of the Saxon Business Park
- An experienced Business Park Co-ordinator and an external professional procurement team assisting SBC to find the best and most appropriate development partner before the end of 2014
- Masterplanning of the Saxon Business Park is being progressed, alongside four work streams that will ensure the enablement of the 70 acres can be progressed without constraints; these include the planning and relocation of a rugby club, archaeology studies, ground and soil studies, and finally how best to find and secure the most appropriate energy source. Integrated work with other significant neighbours, such as London Southend Airport, are also being progressed, so that the best long-term solution for the area are found.
- A more detailed demand study of the MedTech sector is now underway
- A delegation from Anglia Ruskin University are programmed to visit China in April on the potential development of MedTech campus in Essex

Supporting delivery of MedTech Campus within Saxon Business Park:

- European Regional Development Fund (ERDF) programme launched and Southend MedTech businesses have accessed the support available with grants pending
- Assisted Living workstream developed, which has involved colleagues from the Department of People at SBC, to join up this project with the delivery challenges of adult social care and identify where this can make a difference - now looking for test projects
- Inward investment - SBC have assisted an international tech company to locate in Southend. Some of its products have a MedTech application so they are now exploring the ERDF programme and hopefully will be able to make use of the PMI network in due course
- Engaged with a Southend precision engineering company, not specifically MedTech related, in the project as a possible occupant
- Introduced the Technology Strategy Board to MedTech campus in Southend to explore opportunities of working together in the future
- Secured funding from Essex County Council for innovation centre feasibility study which is nearing completion
- Relationship with existing interested parties maintained

Nestuda Business Park is well located next to the A127 on a greenfield site and funding is secured and work is already underway to redesign the key junction (Tesco roundabout) that would create access needed to open up this site. Nestuda is not scheduled to be developed until after Saxon Business Park, but the necessary infrastructure will be in place to support it if a suitable occupier was identified earlier than proposed, and it did not prejudice the delivery of Saxon Business Park and was not a use more suitably located in a town centre.

The upgrading and intensification of uses at Aviation Way Industrial Estate will occur on an on-going basis, as and when planning applications are submitted. It is expected that the Saxon Business Park will act as a catalyst for inward investment and development of this well located estate, which is already earmarked for access improvements as part of the JAAP proposals. This will include upgrades to the highway network as well as realising the potential to be served by public transport and better walking and cycling opportunities.

South East Local Enterprise Partnership (SELEP) – Strategic Economic Plan:

The Strategic Economic Plan and Growth Deal, was submitted to Government on 31st March 2014. It sets out how SELEP plans to achieve growth of 200,000 new jobs and 100,000 new homes in the SELEP area by 2021. It builds on the economic strengths of

Kent and Medway, East Sussex, Essex County, Thurrock and Southend. The SEP has four components:

- Investing in Our Growth Corridors;
- Boosting Our Productivity with our Universities Driving Growth;
- Enhancing Our Wealth: Improving Our Skills;
- Accelerating Investment in Housing

The investment in the “A127 Growth Corridor” includes the JAAP area, with the Growth Deal making the case for investment in transport infrastructure of c.20m to serve the A127 growth areas, together with funding and support for a number of specific assets to support innovative growth in key sectors, including:

- The Anglia Ruskin MedTech Campus in Southend - providing one of the world's largest health innovation spaces for companies of all sizes with on-site business support services.
- Saxon Business Park - incorporating part of the Anglia Ruskin MedTech Campus and providing business accommodation with a focus on aviation, advanced engineering and servicing businesses connected to the airport.

The funding proposed from the single local growth fund through the Strategic Economic Plan will provide considerable investment to ensure that strategic infrastructure is in place to support the development of the proposals within the JAAP area. In addition, viability work for the masterplanning of Saxon Business Park and the JAAP Viability Statement has shown that development is deliverable in the wider area when considered against potential constraints.

iii) Are the expectations for new job creation realistic?

The JAAP Evidence Base (2008) states that employment land requirements within the JAAP will fit within the wider requirements of the joint local authority area. It adds that to understand the future demand position a ‘strategic’ demand assessment was undertaken based on achieving the East of England employment targets i.e. 13,000 in Southend and 3,000 in Rochford.

Based on these adopted employment forecasts and intervention in the market to remove obstacles to growth, it states that the Regeneration Framework (2007) presents an ambitious Southend office requirement of an additional 57,000 sq m to 2021 and about 40,000 sq m of other B-class floorspace. This is supported by requirements of up to 11,000 sq m of offices and 35,000 sq m of general industrial in Rochford. Within the JAAP area it also identified demand for at least 88,000 sq m of floorspace.

The JAAP Evidence Base (2008) notes that this equates to a total demand of 68,000 sq m of offices in the sub-region and 75,000 other B-class floorspace (143,000 sq m between 2006 -2021). This compares with 122,000 sq m for the same period estimated using the ‘Halcrow methodology’ in the JAAP Evidence Base Report (2008). It affirms, therefore, that given the strategic nature of the analysis, this variation is acceptable and gives confidence in using the analysis in the evidence base to provide some development parameters for the JAAP area.

The 2008 Evidence Base Report also includes a survey of the study area. It revealed that at the time of the survey that the employment land within the JAAP was fully utilised apart from a vacant unit and what appeared to be under-used land around the former location of the Southend Flying Club. Overall it confirmed that there was very limited scope for expansion within the existing employment land. In summary, it states that within the JAAP area the current employment land allocations are generally of good quality, well occupied and vibrant. It highlights that the survey area is home to a diverse mix of businesses and not just B-class uses; the stock is generally modern (78% of sites) and condition is either good (42%) or average (48%).

It stated that, while there are around 21 units vacant at the time (from business survey walk-over), there were a limited number of vacant sites providing development opportunities, but there does appear to be some opportunities for intensification of employment land around the airport (for example Aviation Way). However, the overall conclusion is there was limited opportunity for expansion within the existing employment areas. Aviation Way Industrial Estate was identified as presenting the greatest future potential for intensification.

The 'high growth' option in the Issues and Options JAAP (2008) proposed 94,000 sq m of employment floorspace based on the evidence compiled for the JAAP Evidence Base Report (2008). For Saxon Business Park this resulted in 79,000 sq m of employment floorspace i.e. areas ii (a) and ii (d) in the 'Areas for Change' map in the Submission JAAP (2013) and 15,000 sq m for the intensification within Aviation Way Industrial Estate. At the issues and Options Stage, the proposal for Nestuda Way Business Park was identified as a potential area for change, and the additional 10,000 sq m of employment floorspace was considered further for the Preferred Options stage. It was envisaged that Nestuda Way would be developed after Saxon Business Park. Development of the brickworks site (Area for Change (i)) for 20,000 sq m of employment land was considered further at the Preferred Options stage. Thus at Submission stage the employment floorspace equated to 99,000 sq m at Saxon Business Park (79,000 sq m and the additional 20,000 sq m at the brickworks site) and 10,000 sq m at Nestuda Way Business Park and 15,000 sq m of intensification at Aviation Way Industrial Estate.

For airport development, the JAAP Evidence Base (2008), assumed that that the employment supported by the airport would in 2021 be 2,400 FTEs. This includes 2,110 direct FTEs (910 air side and 1,200 MRO); 100 indirect and 190 induced FTEs. In terms of additional numbers over 2005 baseline employment, this amounts to 1,350 FTEs including 1,180 direct FTEs and 170 indirect/induced FTEs. This was included in the JAAP and has been accepted by LSA during the consultation process.

The Rochford Employment Land Study Update (2009) considered that the growth of Southend Airport to 1 million passengers is likely to be a catalyst for further employment land demand in the area according to their analysis of commercial market trends, and business number increases of Bournemouth Airport (used as a case study in the update). Their analysis of similar growth at Bournemouth Airport showed an increase in business numbers by 25% between 2003 and 2007. It also showed that Bournemouth Airport has around 100,000 sq m more B Class floorspace than LSA currently has. It considers that these two factors combined suggests that the allocated of additional B Class supply proposed within the JAAP area would be sufficient to meet this increased demand.

In addition, the Southend Employment Land Review (2010) highlighted that, given the current constraints of the local property market the opportunity within the JAAP area will give Southend the greatest chance of creating employment capacity and attracting investor demand for new business park premises. It states that the market analysis recognises that the area will be attractive to companies and investors; and that new development within the JAAP area will help to provide an offer that is currently lacking in Southend and the wider the sub-region. The research considers that there will be demand for the types of development proposed in the JAAP area at the scale proposed.

The JAAP Submission document (2013) explains the rationale for the job densities which result in the job numbers proposed. It applies the guidance outlined in the Homes and Communities Agency (HCA) 'Employment Densities Guide - 2nd Edition 2010'. The Councils has also applied a vacant factor to these calculations and also rounded the figures down to provide a more conservative estimate than would be shown if the HCA Guide was applied absolutely.

It is, therefore, considered that the employment floorspace requirements are in line with the findings of the evidence base, and that the density figures have been applied appropriately and provide a tempered and realistic estimate of the amount of jobs that may be created within the JAAP area, based on the types of uses that will be attracted to the employment areas in association with the stimulus that the growth of the airport creates.

- iv) Are the detailed site boundaries appropriate?

It is considered that the detailed site boundaries are appropriate to deliver the amount of employment floorspace required, and will make the most efficient use of the available land to create two high quality business parks, whilst also taking account of the environmental constraints and the need to create well-designed and landscaped developments that are sympathetic to the location, neighbouring uses and surroundings.

- v) If any of the specific areas are found to be unsound, then what are the alternative options?

It is not considered that these proposals are inappropriate considering the detailed and proportionate research carried out to ensure that it will be possible to deliver the development within the site boundaries specified in the JAAP. The Rochford Employment Land Study Update (2009) considers that there are no issues with regards to the quality of the sites, indeed it affirms that for most of the assessment carried out that the sites in the study area fared well in comparison to the other allocated employment sites.

Nevertheless, there is additional land within the boundary of the JAAP which may be utilised for employment purposes, if required, if it is considered to be more deliverable or other sites have insurmountable constraints. Even so, the preparatory work being carried out for the master planning of Saxon Business Park has shown that the development of the business park is viable and feasible within the current boundaries and this is supported by the Viability Statement for the JAAP.

- vi) Do the policies contain sufficient detail regarding the achievement of high quality and inclusive design?

The JAAP states that advice on the detailed development principles and design of the new employment areas will be contained in a masterplan/design framework published

separately. Policy E1 states that the general principles for the development of the business parks will be set out in design briefs to be prepared and published prior to any development commencing. The design briefs will set out a framework for the general layout, appearance and design principles of the business parks. Furthermore in Policy ENV7 'Environmental Sustainability' outlines the requirements for BREEAM and sustainable building design.

Design matters will also be addressed in other Council documents, depending on the appropriate authority. Each Council has detailed policies for design and sustainability as part of their respective development plans. These will be applied to planning applications within the JAAP area. As such it is considered that sufficient detail has been included in the JAAP with regard to the achievement of high quality design in developments. Both Councils wish to see the development of high quality environments; this has already been demonstrated with the delivery of the railway station, new terminal building, control tower and airport hotel.

- vii) Is the differentiation between the various Use Classes and the proposed phasing of development within the policies justified?

Analysis from the JAAP Evidence Report (2008) reveals that, based on former regional Spatial strategy employment growth targets for the period 2001-2021, 43% of all future employment growth will come from the B-class sectors and that the trends within this show a strong growth in B1 uses supported by more constrained growth in the B8 market. It reveals that B2 industrial is set to continue declining.

The Evidence Report (2008) profiled employment uses in the study area (which also included employment areas close to the JAAP area) revealed that approximately 78% of all uses were either industry or ancillary uses such as offices, training or car parks. Light Industry (B1) accounted for 32% of all uses within the study area. Also offices (B1) accounted for 15%, making a total of 47% or nearly half of the employment land. General Industry (B2) accounted for 11%. Together retail, restaurants and offices (A1, A2 and A3) accounted for 17% of the total. Interestingly, B8 only made up 3% of the uses.

Based on the survey work and analysis of the trends and future demand, the JAAP Evidence Report (2008) proposed a breakdown of employment floorspace by use class. This is presented in Table 11-3. It proposed at the time of the preparation of the JAAP Issues and Options Report (2008) that the primary use class should be made up of around a 60:40 B1 (office) and B1 (light industrial).

The JAAP Issues and Options document (2008) highlighted that case studies have shown that office provision around smaller airports can attract occupiers and that Royal Bank of Scotland's Head Office being positions close by demonstrates the potential of the JAAP location for offices. The document also suggests that new and improved industrial-related property offering around the airport would be a strong proposition and attract current and potential future demand.

The Rochford Employment Land Study Update (2009) also put the potential increase in B Class employment demand from airport expansion into context using Bournemouth Airport as a comparator. It highlighted that B Class employment floorspace provision in the area adjacent to Bournemouth Airport is around 190,000 sq m.

The Employment Land Study (2009) highlights that the majority of the proposed employment land is planned to be delivered in three stages at Saxon Business Park and the remaining major employment land site will be located at Nestuda Way, the plans for which include 10,000 sq m of employment land. It states that evidence suggests that a significant growth in the size of LSA would be required to drive up demand for additional B Class commercial floorspace. It considers that the nature of this is likely to be more office based rather than high technology clustering related to the Airport; this is according to local agents. Looking at the comparison with Bournemouth, it reveals that commercial floorspace within the locality of LSA equates to approximately 84,000 sq m in comparison to 186,000 sq m of commercial floorspace in the locality of Bournemouth Airport. It considers that this is an indication of the potential increase in commercial floorspace demand that may result should LSA expand to a size similar to Bournemouth Airport. It concludes that an expansion of Southend Airport may support additional demand for B Class floorspace of 100,000 sq m, which could be met by the JAAP proposed provision at Saxon Business Park and Aviation Way Business Park.

The Southend Employment Land Review (SELR) (2010) highlights that London Southend Airport and a number of industrial estates support some high tech manufacturing and engineering companies. It adds that the proposed expansion of LSA is one of the most significant economic developments in Southend. The SELR considers the JAAP area will take a pro-active role in encouraging employment development for both aviation-related growth (associated with airport growth) and targeting the delivery of accommodation for high-tech industries and offices (specifically in planning use classes B1 and B2).

It considers, however, that is important that this unique opportunity is complementary to other objectives and does not undermine the take up of employment space in other locations. Given the constrained nature of Southend, the JAAP will provide a major contribution to the town's economic growth and should be phased appropriately.

In addition, the Submission JAAP (2013) recognises the need to provide a certain level of phasing of development. Policy E4 addresses the phasing of Saxon Business Park which is programmed to be developed prior to the smaller Nestuda Way Business Park that is planned for post 2021. The supporting text acknowledges a need to ensure a balance of development between development of the Saxon Business Park and regeneration of Southend town centre as such the business parks will be phased. The proposed sequence of development commences with Area 1A initially with triggers for Area 1B and then Area 2 according to the policy approach. It is acknowledged that since the preparation of the Policy that opportunities related to MedTech and other potential occupiers may require a review of approach to allow for these development options and for more flexibility in general of phasing. It is considered that the masterplan may provide a more appropriate vehicle to determine the phasing of development within the Saxon Business Park.

The evidence discussed herein suggests that the use classes stipulated in the various policies in the JAAP will provide an appropriate mix of B class development in line with identified demand from various market appraisals. It is acknowledged that within the business parks, which are primarily for B1 development, that there will be a need to provide for supporting and ancillary uses and the JAAP will need to provide enough flexibility to accommodate the future needs of business. It is not considered that the current policies preclude this from occurring and each planning application would be appraised according to the needs of a business which, for example, may be primarily B1 but has associated B2 and some requirement for supporting B8 uses (albeit the elements of B2 / B8 would be ancillary to the B1 use with which they are associated).

- viii) Are the policies sufficiently flexible to accommodate needs not anticipated in the JAAP and to allow a rapid response to changes in economic circumstances?

It is considered that the policies are informed by a robust evidence base and cater for the future growth and regeneration of Southend and meet the needs of Rochford. The various studies and reports demonstrate that there is a potential future demand for the types of business and quantum of employment floorspace proposed in the JAAP.

The policies provide a degree of flexibility in approach to the business needs but will ensure that the right type of primary development is delivered to meet the vision and objectives of the JAAP and the development plans for Southend and Rochford. The forecasts for LSA are in line or even slightly ahead of those outlined in the evidence base. It is considered that the Airport will become a significant economic catalyst and be the stimulus to create a platform for new levels of inward investment and growth that will fuel demand for the new employment area, as has been experienced at comparison airports.

This position is supported and demonstrated by the level of infrastructure investment that is proposed in the Strategic Economic Plan (SEP) by the South East Local Enterprise Partnership (SELEP) for the JAAP area, the A127 strategic corridor and other complimentary and associated regionally strategic projects such as the development of the DP World Port.

Nevertheless, if there are rapid changes in economic circumstances that cannot be accommodated by the JAAP, there would be opportunities to make revisions to the masterplan for the Saxon Business Park and, if indeed appropriate, through a targeted review of the JAAP. The JAAP will also be monitored to ensure that policies continue to be effective and relevant.

- ix) Is there sufficient detail regarding the funding of infrastructure?

The Submission JAAP details of funding for infrastructure necessary to support the development of the JAAP proposals. This includes:

- A successful bid to Government which will assist with schemes to deliver more sustainable forms for transport in the form of the Local Sustainable Transport Fund (LSTF). The main Government objectives of this project are to create economic growth and revitalise the economy and reduce carbon emissions to help tackle climate change.
- The Integrated County Strategy (ICS) provides a shared vision for Essex, Southend, and Thurrock, to identify the priorities needed to achieve increased economic growth. The ICS will ensure that available funding is invested towards priorities which are most likely to generate long-term economic growth.
- Significant funding of major schemes through the SELEP via the Strategic Economic Plan (SEP), which has been submitted to Government with a package of schemes that will be delivered in the JAAP area and on the wider networks to improve significantly access to it (further details of this is presented in 'Issue 4' and 'Issue 6')

The Transport Policies and Employment Policies within the JAAP provide information on the infrastructure requirements to support the delivery of the proposals sites. It is also addressed through the 'Implementation and Delivery Plan' section, where each project is outlined and the infrastructure required are detailed along with the delivery mechanisms including S106 agreements where appropriate, and also where delivery may be funded by the appropriate local authorities, for example, Southend Borough Council in relation to the access road to Saxon Business Park.

It is considered that the JAAP provides the necessary higher level detail and necessary references to supporting reports and papers, which document the specific funding arrangements for individual schemes that will then be delivered by the appropriate authority. It may be necessary for these links and signposts to be strengthened in the final version of the JAAP to reflect the prominent role that the SEP will have in detailing the infrastructure that will be delivered through the single local growth fund.

Further detail about the SEP and the single local growth fund is provided under 'Issues 4' and 'Issues 6' of this Statement.

Issue 4

Are the transport policies justified, likely to be effective and consistent with national policy?

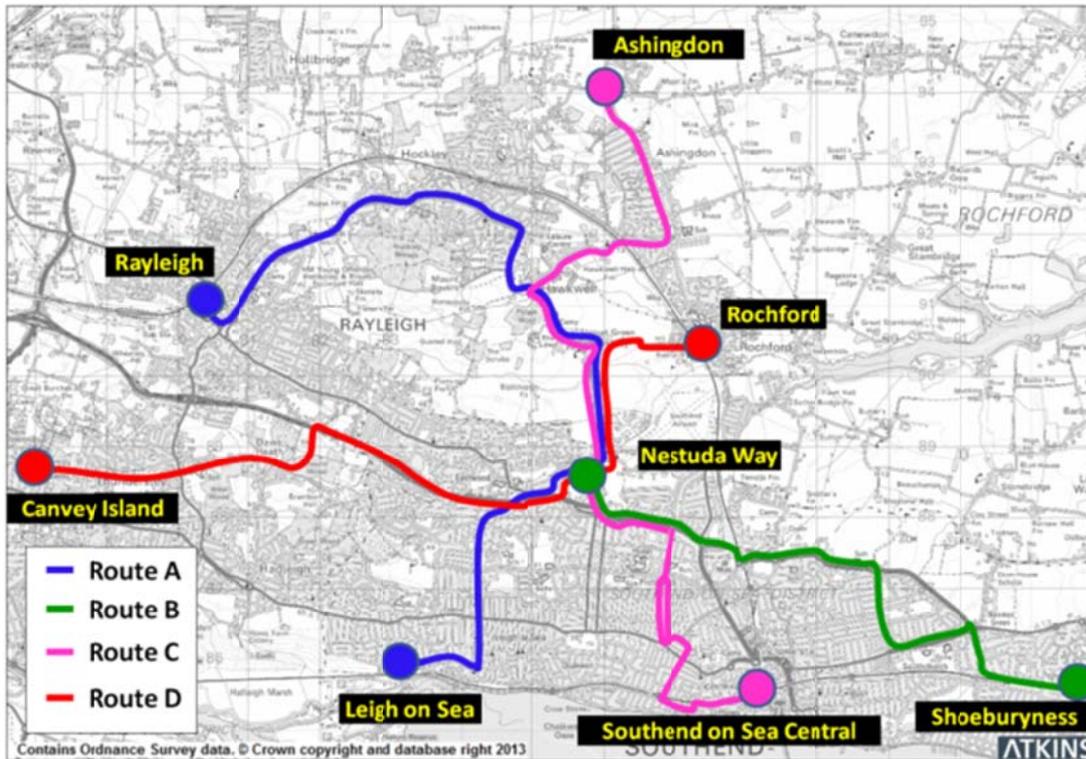
- (i) Is sufficient emphasis given to promoting the use of means of transport other than the car?

The Transport Issues section of the JAAP contains two policies that directly reference public transport, walking and cycling. Policies T4 and T5 aim to establish quality, safe, secure and reliable networks of routes integrated into the local networks.

These policies are underpinned to a large extent by the Local Transport Plans (LTP) for both Southend and Essex, which encourage and support access to new developments and sites by non car modes. For example, Policy 6 of the Southend LTP3 supports appropriate improvements in sustainable transport, accessibility and facilities to London Southend Airport (LSA). LTP3 is currently being reviewed to update policies and they will be consistent with the JAAP transport policies.

Table 2 of the modelling assessment report ("London Southend Airport & Environs Joint Area Action Plan - Modelling Assessment Report": Atkins, dated 11th April 2013) presents a summary of the transport scenarios that have been tested including new bus routes (Note: the table refers to five new bus routes, this includes the High Quality Public Transport (HQPT) route mentioned and therefore the routes number four, A – D). The HQPT route essentially links the Airport with the Town Centre and already has three services running at between five and ten minute frequencies. The detail design of new routes and possible changes and improvements to existing bus routes forms part of the on-going discussion with bus operators and Essex County Council.

Section 5.4 of the modelling assessment describes the positive impact of the provision of new bus services to the JAAP area, especially the Saxon Business Park location. Four new routes are shown which link with the existing bus networks. These routes have been discussed with the bus operators and positively received. The plan below, which is Fig. 21 from the modelling assessment, shows the new bus route proposals.



The existing services running from the Town Centre to the Airport are:-

- Service 9 runs from Shoeburyness to Rayleigh Station via Eastwood with a frequency of up to twelve minutes in each direction
- Service 7/8 runs from Shoeburyness to Rayleigh Station via Rochford with a frequency of every ten minutes in each direction

The concept of a HQPT Corridor is relevant to the Town Centre/Airport Route and will focus on bus stop/interchange improvements and use of the AVL system to improve reliability at the signalised junctions. This is similar to the A13 London Road Passenger Transport Corridor concept with good quality shelters, lighting and information and real time display screens. Combined with marketing and promotional activities, the Corridor has seen an annual increase in passenger numbers of around 5% per year since 2005/6.

The up to date bus map of local services can be found at www.ideasinmotionsouthend.co.uk/wp-content/uploads/2013/07/Southend-Bus-Map.pdf

A significant element of the transport strategy for the JAAP area will be the development and implementation of robust Workplace Travel Plans. A well coordinated area wide Travel Plan will help the Business Parks achieve their full potential and facilitate economic growth in the local area.

The Travel Plan will contain details of the promotional activities, staff benefits and site centred mapping and public transport information for businesses and visitors. The use

of the “ideas in motion” behavioural change campaign website (www.ideasinmotionsouthend.co.uk) and marketing/promotion tools together with travel information electronic kiosks will also be encouraged.

Other public transport investment/initiatives/promotions directly relevant to JAAP:-

- Improved bus interchanges are proposed at both London Southend Airport and the Saxon Business Park site. Southend Council has approved 2014/15 investment in the redesign of the Harp House Roundabout that directly accesses the Airport Terminal – this will make it easier to change bus services at this point and also link better with the Airport railway station. New bus lay-bys are being constructed as part of the A127/B1013 Tesco Scheme improvement to serve future demand at the Nestuda Way Business Park location.
- Proposal for a new east – west bus link with Sumpters Way and a new bus access from Aviation Way to link with the Saxon Business Park (both with cyclist and pedestrian access provision)
- The joint Essex/Southend/Thurrock AVL system (automatic vehicle location), will provide real time information both on street and via websites and mobile smartphone apps. This will also allow the development and use of travel smartcards.
- Two applications have been made to the 2015/16 LSTF (Local Sustainable Transport Fund), which will directly benefit sustainable transport access to the JAAP area (see www.bettersouthend.gov.uk):-
 - A joint Southend/Essex/Thurrock application to promote the wider bus network that links the key centres for growth in Thames Gateway South Essex, including better interchanges, smartcards, promotion and marketing.
 - Southend LSTF application to continue and expand the current LSTF work into Rochford and the JAAP area, particularly in areas of promotion, walking and cycling.
- Southend Council has recently invested over £1.5m in bus infrastructure improvements in the Borough to improve bus reliability and punctuality. The current LSTF has funded the development of a behavioural change campaign called “ideas in motion Southend” supported by key businesses (including Stobart/London Southend Airport, public transport operators, education institutions and the voluntary sector. This award winning campaign will be used to promote sustainable transport and provide a resource supporting bus travel, walking and cycling and travel planning.

(ii) Are the various transport improvements adequately linked to the proposed growth of the airport and the development of the employment areas?

Detailed transport modelling work has been carried out using the “Southend on Sea Multi Modal Transport Model” to analyse the impacts of the journeys resulting from the proposed housing and employment growth and to identify solutions to ensure future capacity and reduce congestion.

This work is presented in the Atkins report “London Southend Airport & Environs Joint Area Action Plan - Modelling Assessment Report” dated 11th April 2013, jointly commissioned by Southend on Sea Borough Council, Essex County Council and Rochford District Council.

This assessment combines the most recent planning estimates for land use development (by development quantum) outlined within the JAAP document coupled with forecasts for the airport to reach 2mppa. Proposed housing sites within Rochford District are also included, as these will contribute to traffic volumes within the study area.

The assessment assumes a single land use scenario for 2021 with all JAAP development realised and the LSA reaching capacity. This development is tested under two infrastructure scenarios which are outlined below:

- A ‘do minimum’ (DM) scenario: Existing highway and public transport provision, and
- A ‘do something’ (DS) scenario: as above but including a number of specific proposals:
 - Proposals to increase public transport provision through additional bus routes and supporting infrastructure including a new proposed interchange at Southend Airport
 - Improvements to increase capacity at a number of highway junctions at locations in close proximity to the airport, and
 - Improvements to increase capacity at key junctions along the A127 corridor which is the primary access route to and from the JAAP site/LSA.

The relevant “Table 2: Scenario Summary from the Modelling Assessment Report” is shown below. The 2021 DS column sets out the transport schemes that have been modelled in the “do something” case.

Highway				
Location	Transport Element	Description	2021 DM	2021 DS
JAAP Site	Sutton Ford bridge	Signalisation to increase capacity		✓
	Hall Road / Cherry Orchard Way Junction	Capacity Improvement at the Hall Road / Cherry Orchard Way through additional lanes/roundabout circulatory capacity		✓
	The Ann Boleyn roundabout	Capacity Improvement at the Southend/Sutton Road roundabout through additional lanes/roundabout circulatory capacity		✓
	Sumpter's Way	Introduction of Bus Only Link/Walk & Cycle Link		✓
	Airport Multi Modal Interchange	To provide a convenient interchange between bus series serving Rochford/Southend, the new business parks, airport terminal and the railway station		✓
A127 Corridor	Kent Elms Junction	A127 Corridor Improvement scheme, designed to increase capacity through additional lanes/signal optimisation and improve pedestrian and cycle movements		✓
	Tesco Roundabout	A127 Corridor Improvement scheme, designed to increase capacity through additional lanes/signal optimisation and improve pedestrian and cycle movements – includes proposed link to Nestuda Way Business Park		✓
	Bell Junction	A127 Corridor Improvement scheme, designed to increase		✓

		capacity through additional lanes/signal optimisation and improve pedestrian and cycle movements		
Accesses	JAAP Sites	Access to the JAAP Sites	✓	✓
	Rochford Housing Schemes	Access to the Housing Schemes	✓	✓
Public Transport				
Location	Transport Element	Description	2021 DM	2021 DS
Study area wide	Five New Proposed Bus Corridors (routes A to E, see figure 18) Update note: Corrected to four bus corridors A-D	Introduction of new bus corridors to connect the Southend & Rochford residential areas with the employment zones and housing sites near the JAAP area.		✓
Southend	High Quality Public Transport (HQPT) Corridor	Mass transit system running from London Southend Airport to Southend Town Centre Update note: Scheme will take the form of an improved and co-ordinated corridor building on current high frequency services (similar to A13 Passenger Transport Corridor)		✓

These schemes are included in JAAP Network Capacity Improvements section and referred to in Policy T7. The modelling conclusion states that:-

The proposed junction improvements along the A127 and Rochford district are key to fully unlocking development at the Airport and JAAP site. Evidence from this assessment suggests these schemes will achieve the following:

- *Journey time savings of approximately one minute along the A127 corridor This is evidenced by the reductions in delays at the Bell and Kent Elms junctions shown in Figure 12, Figure 13, and Figure 14.*
- *Reduced levels of rat running along parallel routes such as the A13 but also through Rochford Town Centre as evidenced through Figure 10 to*

Figure 11 which demonstrate lower flows along Southend Road and Hall Road through Rochford Town Centre.

The conclusion then states that:-

An outline economic assessment for the do something package of proposals assuming a broad £20M capital cost suggests a benefit to cost ratio of 5.62. This value is likely to be higher once the benefits for public transport users are also included i.e. through additional journey time savings through reduced highway congestion.

- (iii) Does the JAAP adequately address issues of east-west connectivity in the vicinity of the airport?

The “do something” transport scenario sets out the schemes that would be appropriate to the JAAP area, taking account of the future increase in trips. In this respect east-west connectivity is reliant upon the existing transport network, principally the A127, with enhancements at appropriate junctions. Southend 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).

Future improvements to east-west connectivity, would be subject to further modelling of land use scenarios and a level of growth that exceeds that currently proposed for Southend and Rochford.

It is likely that a review of land use, planned development and infrastructure requirements would take place within five years of adoption of the JAAP. At that time it may be appropriate to revisit the issue of connectivity based upon the wider development needs of Southend.

- (iv) Is Policy T4 regarding the provision of a quality bus service realistic?

The first question “(i) is sufficient emphasis given to promoting the use of means of transport other than the car” sets out the rationale and case for the provision of new bus services to serve the JAAP area.

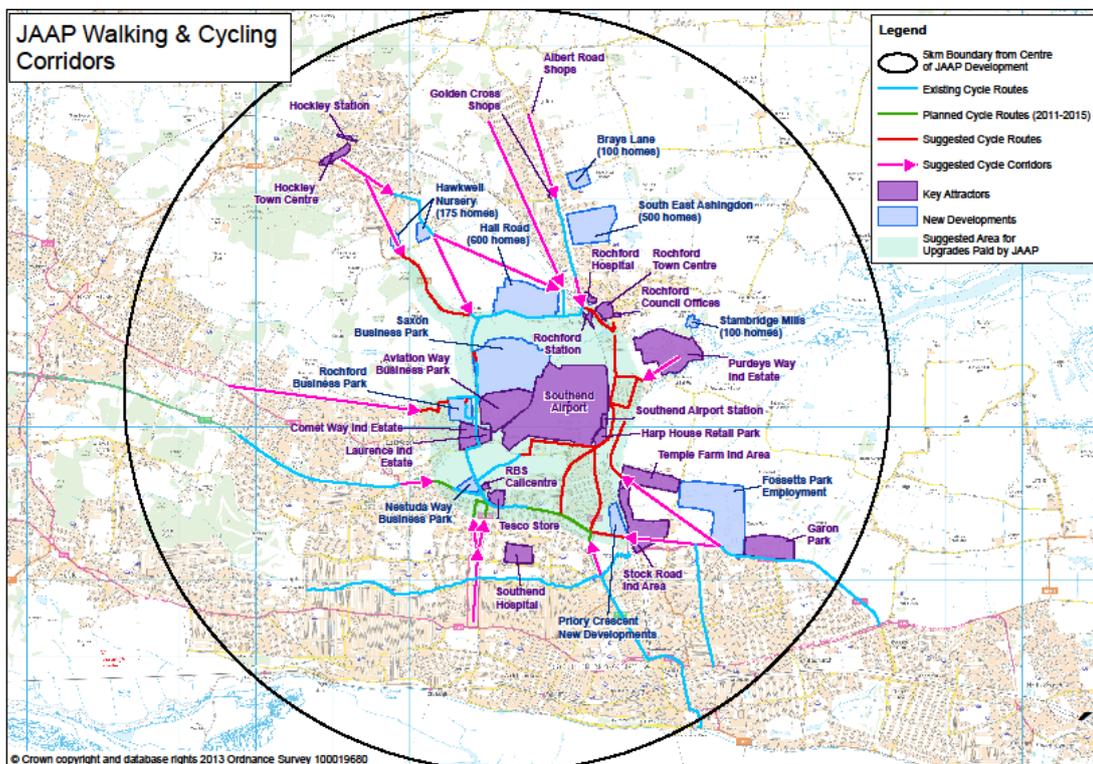
Local investment in new buses by Arriva, the concentration of existing services serving the Airport and successful delivery of £1.5m of DfT Better Bus Area schemes demonstrates practical examples of investment in buses, when the Council works in partnership with the operators. Bus operators have provided letters of support for the 2015/16 LSTF applications and agreed to work with both Essex and Southend Councils on the provision of better services across the TGSE area. This also forms part of the ongoing bus AVL system jointly supported by Essex,

Southend and Thurrock Councils to deliver real time information, smartcards and more reliable services.

Therefore, it is realistic to put forward a policy that sets out the case for quality bus services.

- (v) Does Policy T5 provide sufficient detail about improvements for walking and cycling?

In terms of walking and cycling, there are several existing footways, footpaths and cycle routes that connect to the perimeter of the JAAP area, particularly along Cherry Orchard Way and Hall Road. Nestuda Way and the newly constructed St Laurence Way have separate off road shared pedestrian/cycle facilities. The map below shows the existing cycling and walking routes in the JAAP area and the wider, outline proposals for routes that can be developed. A working group has been set up comprising ECC, Southend Borough Council, Rochford District Council and the sustainable transport charity, Sustrans to identify the potential to join up these routes to create a “cycle ring” around the Airport and linking “spokes” from development and existing residential areas. This plan has been submitted as part of the Southend LSTF 2015/16 bid to Government for revenue funding and the SELEP Strategic Economic Plan as part of the package of sustainable transport schemes.



The Southend Travel Map showing existing cycle routes and designations of streets can be found at

<http://www.ideasinmotionsouthend.co.uk/wp-content/uploads/2014/04/Travel-Map-PDF.jpg>

In terms of facilities to provide secure cycle storage and changing facilities, this will be a requirement of any subsequent planning applications, as per Policy T5 of the JAAP. The layout and design of the Saxon Business Park will include as far as possible segregated cycling routes and may form an independent network to the internal roads. Appropriate training and promotion of cycling forms part of the support service provided by Cycle Southend and will link with the development of Travel Plans.

Issue 5

Are the environmental policies justified, likely to be effective and consistent with national policy?

- i) Is the proposed Green Belt boundary appropriate?

Rochford and Southend Core Strategies support revisions to the Green Belt boundary to accommodate employment development within this location. In particular, policy ED4 of the Rochford Core Strategy states that land to the north and west of London Southend Airport (LSA) will be allocated for employment development.

The changes proposed to the Green Belt boundary would enable the delivery of employment development within proximity to the LSA to meet potential demand as identified in the Rochford Employment Land Study Update (2009), and thus aiding the realisation of LSA's role as a catalyst for economic growth in the sub-region.

Secondly, the revised Green Belt boundary would enable the accommodation of development needs for the locale up to 2031 and beyond. There is no evidence of any additional development above that which could be accommodated within the land to be allocated through the JAAP being required in the future. As such, the proposed Green Belt boundary complies with paragraph 83 and 85 pt.5 of the NPPF.

Furthermore, as far as practicable and without allocating more Green Belt land for development than required to meet demand, the proposed Green Belt boundary follows existing physical features likely to be permanent, including Cherry Orchard Way to the west; as well as making use of proposals that will create new, permanent features, such as the new access road to Saxon Business Park. It is also relevant to note that revisions to the Green Belt boundary prioritised the allocation of previously development land where possible, e.g. the Cherry Orchard Brickworks Site.

- ii) Is the creation of a green buffer to the east of the railway line (Policy ENV6) justified?

Sustainability Appraisal of the JAAP supports the green buffer proposed through Policy ENV6, noting (Appendix 4-23) that protecting the buffer between existing houses and the railway line should help maintain the noise protection this provides; and (Appendix 6 – 6) that landscape buffers set out in policies ENV3, ENV5 and ENV6 may help reduce some of the impact of new development on existing residential areas.

The Councils consider it important that development proposed through the JAAP relates to the strategic road network as far as practicable, where there are opportunities for improvement. It is not considered to encourage access to the

JAAP development proposals or the airport itself through the local highway network – something that development of the site at ENV6 would have the potential to engender.

The green buffer proposed through Policy ENV6 is on land currently allocated as Green Belt. The NPPF makes clear at paragraph 85 that in defining Green Belt boundaries, Local Planning Authorities should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development. In addition, paragraph 83 states that, once established, Green Belt boundaries should only be altered in exceptional circumstances. Whilst the Southend Core Strategy and Rochford Core Strategy (in particular, policy ED4 of the latter) provide justification for the reallocation of existing Green Belt land for development to the north and west of the airport, there is no such steer for allocating land to the east of the airport. In the absence of any additional evidence that specifically suggests land needs to be allocated at this location, there is not considered to be justification to remove the site addressed through Policy ENV6 from the Green Belt. As such, its retention as a green buffer is considered appropriate.

Issue 6

Does the JAAP have clear and effective mechanisms for implementation, delivery and monitoring?

The JAAP states that the intention of the Plan is to integrate land use, transport, environmental and regeneration proposals with clear mechanisms for delivery; this includes detailing the options for funding of projects and schemes to support development of the business parks, controls on the operation of London Southend Airport including monitoring procedures. It is important to ensure arrangements are in place for regular reporting of activities and progress on the delivery and implementation of the various proposals in the JAAP, including a quiet operations plan, airport surface access strategy (ASAS) and the preferred runway procedures plan.

One example of this regular reporting is the bi-monthly liaison meetings held between planning, transport and development officers from Southend, Rochford and Essex Councils including representatives from London Southend Airport and the Thames Gateway South Essex (TGSE) Partnership.

Progress with the JAAP is also reported at the annual Airport Transport Forum, the Airport Consultative Committee and at meetings of the TGSE Planning and Transport Board.

Outside of this Plan, but nevertheless of relevance to the JAAP, is the monitoring of the s106 that accompanied the planning permission for the runway extension (ref. [09/01960/FULM](#)).

The JAAP also includes a specific Section (5) which sets out the 'Implementation and Delivery Plan', which details each proposal and the infrastructure required to deliver. It also considers risks to delivery identify mitigation measures, suggest potential delivery mechanisms and proposes suitable monitoring indicators.

(i) London Southend Airport: Implementation of Controls and Monitoring

Controlling aircraft noise is particularly important as the airport is situated close to the residential areas of Southend, Rochford and Castle Point. The environmental controls schedule specifies the arrangements for controlling noise and operations at London Southend Airport. The Environmental Control Schedule includes the following to ensure that the operational constraints are implemented and adhered to:

- The airport will monitor airlines and levy fines on operators who consistently fail to comply with the agreed procedures. Regular reports will be presented to the Airport Consultative Committee, to include details of any fines collected and how the funds will be used;

- The airport operator will be required to fund the installation of fixed noise monitoring stations to enable the appropriate monitoring and control of the preferential routes and night time noise, and to prepare annual reports;
- The introduction of an air quality monitoring programme, and a carbon and environmental management plan.

The airport operator is required to publish for scrutiny an annual statement reporting on the performance of the airport. Details of the matters to be included in the annual statement are set out below and may be included in the joint planning authorities respective Annual Monitoring Reports:

- The effectiveness of Airport Surface Access Strategy (ASAS) and associated travel plan;
- Details of local employment initiatives and the effectiveness of arrangements to give priority to local workers;
- The effectiveness of the quiet operations policy and performance of noise monitoring procedures, as per the details set-out in this plan;
- A summary of any noise complaints received within the preceding twelve months from the public associated with the airport and any action taken to mitigate adverse effects identified;
- A summary of air quality monitoring results from an air quality monitoring programme;
- Details of progress on the implementation of a carbon and environmental management plan;
- A summary of progress on sustainable procurement;
- The number of ATMs falling within the exceptions allowed for in the airport controls set out in this plan, including reasons why such flights were considered as exceptions;
- The performance of the preferred runway procedures;
- Details of any breaches of ground noise, night operations or other restrictions on operations.

The Southend Airport Surface Access Strategy (ASAS), including an Airport Travel Plan (ATP), has been developed as a condition of the Planning Approval granted in 2010 for the extension of the runway at Southend Airport. The ASAS has been developed in detailed consultation with ECC, RDC and SBC and the Airport Transport Forum to provide a strategy which focuses on improving public transport and encouraging passengers and new and existing staff to use sustainable modes

for their journeys to and from the airport. The document provides details regarding the key targets, commitment and actions required to help achieve appropriate levels of passengers and staff travelling sustainably as the airport develops and expands. The ASAS provides the strategy whilst the ATP provides the measures and actions to achieve the strategy.

Further information on the above can be found at:

London Southend Airport Annual Report 2013

http://ripassetseu.s3.amazonaws.com/www.southendairport.com/_files/documents/jun_13/SOUTHEND_1372322711_Annual_Report_V4_Digital_Versi.pdf

London Southend Airport Surface Access Strategy

http://ripassetseu.s3.amazonaws.com/www.southendairport.com/_files/documents/feb_12/SOUTHEND_1328091215_LSA_ASAS_-_December2011.pdf

In addition, the Stobart Company has invested over £130m into London Southend Airport which includes the delivery of an extension to the existing runway, a new control tower, a new railway station, new hotel and new terminal building.

(ii) Transport Measures and Infrastructure Provision

Better transport infrastructure and connections, improved accessibility and frequency of public transport services as well as greater transport choice are vital components for, and key to, the successful delivery and implementation of the JAAP policies and proposals.

A significant element of the transport strategy for the JAAP area will be the development and implementation of robust Workplace Travel Plans. A well-coordinated area wide Travel Plan will help the Business Park achieve its full potential and facilitate economic growth in the local area as well as minimise travel demand (through the implementation of travel plans). In addition significant improvements to public transport services, walking and cycling facilities to the employments area and the implementation of company/area wide travel plans together with a package of mobility management measures (smarter choices) will ensure that sustainable travel options are a real and feasible alternative to the motor vehicle.

Policies in the JAAP will ensure that travel plans are submitted alongside all qualifying planning applications, and that they are developed in consultation with Essex, Southend and Rochford Councils and local transport providers (bus, rail and taxi operators). Travel plans will outline the range of infrastructure and initiatives to be provided to ensure that they have agreed objectives as well as have measurable outputs, and targets, which will have been agreed with the Highway Authorities. Plans will also set out the arrangements for monitoring the progress of the travel plan to ensure that agreed objectives are met.

Policy T3 'Travel Planning' states that all applications for development within the JAAP must be accompanied by a comprehensive travel plan explaining the

arrangements for car parking and for managing the journeys of staff to and from the area, and also include stretching targets and details of arrangements for monitoring and review.

Both Southend and Essex Councils have considerable expertise in this area with dedicated workplace travel planners. In particular, Southend Council has worked closely with and supported the Airport travel plan coordinator to develop and implement their plan. This is consistent with the Local Sustainable Transport Fund work currently underway in Southend.

It is important to keep the network around the development area flowing both for the optimum functioning of the Airport, businesses and for local residents. Junctions which are forecast to be at or over capacity will require improvements to ensure that the area remains accessible and traffic flows are managed accordingly in terms of journey time experience and reliability.

Policy T6 'Freight and Network Management Development' states that development will be expected to contribute to the delivery and implementation of joint network management plan. The plan will include interventions to provide information and manage incidents. It will expect businesses, where possible and appropriate, to adhere to designated routes and times for freight movement in order to minimise the impact on local residents and peak time operation of the area.

Furthermore, Policy T7 'Network Capacity Improvements' states that Development will be required to contribute to measures to improve affected junctions and provide the capacity required to ensure that the junctions work effectively during the peak period. In addition, the three Councils will take every opportunity to seek investment from other sources to deliver network capacity improvements.

(iii) Delivery of Business Parks and associated infrastructure

The masterplanning work and development brief will assist with delivery and implementation of the business parks, and particularly Saxon Business Park where a considerable amount of preparatory work has already taken place.

The masterplanning will set out the general principles for the development of the business park will be published prior to any development commencing. The Masterplan/design brief will set out a framework for the layout, appearance and design principles of the business park. It will also inform decisions as to the most appropriate access arrangements and detailed location for junctions into Saxon Business Park so that phasing of development and the requirements of potential occupiers may be taken into account. In addition it will also detail the most likely location of new development within the JAAP area, in relation to the existing and proposed transport links to optimise accessibility.

Policy T2 'Access to Saxon Business Park' states that the location for the junction and access road to the Business Park will be developed through the Development Brief/Masterplan.

Policy E5 'Development of Area 1A –Saxon Business Park' specifies that the initial section of the new access road and green corridor from the new junction required to enable access to the development may be funded by Southend Borough Council or via other mechanisms such as the Growing Places Fund, but the cost will be recouped as development progresses.

Subsequent to February 2013, the South East Local Enterprise Partnership has produced a Strategic Economic Plan with reference to the JAAP in terms of the infrastructure "ask" of Government, through the Growth Deal process. The A127 Corridor section sets out the transport and non transport asks including £4.5m for site access and infrastructure for Cherry Orchard Way and Aviation Way. The Department for Transport has recently awarded a "local pinch point" grant of £3.263m (co-funded by SBC with £1.491m to give a scheme value of £4.754m) to improve the A127/B1013 Tesco Roundabout, in readiness for the additional trips generated by the JAAP area growth, including a short access spur into the Nestuda Way Business Park location.

Southend Council has also resolved to put forward a sum of £10m for consideration as part of the current Council Capital Programme profiled over 2015 to 2018 to support the development of the Airport Business Park, particularly to fund any up-front infrastructure, enabling works and renewable energy and to address any existing tenancies. The link to this report can be found at:

<http://minutes.southend.gov.uk/akssouthend/images/att23729.pdf>

Furthermore, Policy MRO1 'Northern MRO' states that applications will be required to make a financial contribution towards the upgrade of the junction at the southern end of Aviation Way and improvement of Aviation Way in accordance with Policy T4 'Public Transport', which Developers will be required to make a contribution to the establishment of quality bus services and related infrastructure to meet the needs of those working at or visiting the JAAP area.

Other sustainable transport measures and the potential funding sources for them are described in the JAAP. The JAAP highlights that development of Saxon Business Park and Nestuda Way Business Park will be required to contribute to enhancements to walking and cycling provision alongside public transport. Policy E1 'General Development Considerations' outlines the general principles for the development of the business parks. It states that design briefs will set out a framework for the general layout, appearance and design principles of development within the employment areas.

(iv) Environmental Improvements

Policy ENV2 'New Public Open Space' describes how the north Section 2 will be laid out as informal public open space, and include the enhancement of the area of land at the southern end for nature conservation. It states that 'Section 2' will be funded by the development of the Northern MRO extension (see Policy MRO2).

(v) Funding Sources

SEP and Single Local Growth Fund

In JAAP transport terms, Essex County Council, Southend on Sea Borough Council and Rochford District Council have adopted a joint approach to strategic transport modelling and network analysis in order to identify the potential increase in vehicle and passenger movements into and through the JAAP area. This supports the development of transport solutions and measures to address them over the medium to long term in the immediate and wider area affected.

There is also an agreed joint approach by the highway authorities to bid for for major scheme funding opportunities in order to deliver the necessary transport solutions. This has been addressed through the South East Local Enterprise Partnership (SELEP) in the Strategic Economic Plan (SEP) to achieve single local growth fund to delivery key pieces of infrastructure in the JAAP area. There is strong SELEP and TGSE wide support for the JAAP as a priority.

The SEP forms the basis of the Local Growth Fund bid to Government and the subsequent "deal" which SELEP will negotiate. The full document can be found at:-

www.southeastlep.com/about-us/activities/262-developing-a-growth-strategy-and-prioritising-investment-in-the-south-east

The South East Local Enterprise Partnership (SELEP) has identified twelve transport "growth corridors" in the Strategic Economic Plan (SEP).

The TGSE Area has two corridors comprising the A13 and A127. The A127 corridor section of the SEP includes the investment in transport "ask" for the JAAP area. SEP Table 4.35 includes the following transport investment proposals supporting development within the JAAP area and other background growth (this is in addition to the funding for the A127/B013 Tesco Scheme improvements):-

- Local JAAP transport schemes investment and sustainable transport £20.68m
- A127 Corridor improvements in TGSE area (Southend and Essex) £42.00m
 - Including £10m for Kent Elms Corner and The Bell junctions
 - Including £8m for essential highway and bridge maintenance schemes

Non transport "asks" are included in SEP Table 4.36 comprising:-

- Medtech Campus Innovation Centre and Business Support
 - Stobart “Studio School”
 - Business Park enabling works
- Total ask £8.75m

The £20.68m transport “ask” is subdivided into the following schemes from 2015/16 to 2020/21:-

JAAP Development of Saxon Business Park near London Southend Airport – Site Access and infrastructure	£4.50m
JAAP and Airport Sustainability Access Package Improvements – walking, cycling and public transport	£2.93m
Rochford District JAAP/Pinch Point and housing delivery transport infrastructure schemes -	£12.00m
Supporting the Growth Area with a package of LSTF type sustainable transport and mobility management measures	£1.25m

Note: the Local Authority contribution to the transport schemes is £3m

The Saxon Business Park masterplanning work is currently underway. Other work supporting the delivery includes, the £10m SBC fund mentioned above, appointment of an experienced business park coordinator and ongoing studies and investigations together with close collaboration with MedTech.

Local Authority Funding for Sustainable Transport

Southend Borough Council’s successful bid for £4.82m from the Department for Transport (DfT) funding for the Local Sustainable Transport Fund (LSTF) was announced in June 2012.

The main Government objectives of LSTF are to create economic growth and revitalise the economy and reduce carbon emissions to help tackle climate change. This funding has provided SBC with opportunity to continue working in partnership with their local businesses, including Southend Airport, and communities to identify the right solutions to meet the economic and environmental challenges.

The Southend LSTF comprises a package of sustainable travel measures boosting access to the growing employment areas of London Southend Airport/Business Park and Town Centre, designed to reduce the current and future demand for short distance car journeys and CO2 emissions. These contain a series of interdependent measures building on quality cycling and walking routes, marketing and communications, partnerships, travel planning, and complimentary Integrated Transport Management Systems. Developed with widespread support from the community and local businesses, it is taking forward the significant results achieved by the second Local Transport Plan, the MoveEasy Network and Cycle Southend in supporting and encouraging sustainable travel.

Two further LSTF applications have been made to the DfT for funding for the period 2015/16. This will support ongoing investment in sustainable transport, principally walking and cycling network improvements and the development of a TGSE bus network, linking the JAAP area with wider south Essex.

In consultation with the local bus operators, Southend's Better Bus Area Fund (BBAF) bid to DfT for a grant of £1.577m was successful. This finance has been used to start the development of the smart card system, improve key bus interchanges in Southend and tackling local congestion at reliability hot spots.

The Integrated County Strategy (ICS)

The Integrated County Strategy (ICS) provides a shared vision for Essex, Southend, and Thurrock, to identify the priorities needed to achieve increased economic growth. The ICS will ensure that available funding is invested towards priorities which are most likely to generate long-term economic growth. In South Essex, the ICS recognises the need to, in particular, promote and maximise potential benefits at key sites for employment and further economic development. This includes the opportunities presented by development in the London Southend Airport and Environs JAAP.

Conclusions

It is considered that the processes and mechanisms that the JAAP has in place for controlling the operation of the airport, and the monitoring that is required to be reported on an annual basis for such matters as *inter alia* noise, air quality and air transport movements will ensure that the growth of the airport is balanced against environmental issues and concerns to ensure that the quality of life of local residents is maintained. In addition the ASAS will address the needs to have sustainable forms of transport to reduce the carbon emissions resulting from trips to and from the airport through the operation of a travel plan. This includes a strategy, key targets and an action plan and monitoring framework. This will help to ensure that the aims and objectives of environmental controls schedule are maintained during London Southend Airport growth.

Furthermore, it is considered that the mechanisms in place to deliver the business parks, such as the preparation of masterplanning work and design coding/briefs which explore the opportunities for access and the most appropriate sites layouts will assist greatly the development of viable and feasible high quality employment areas which will have good access to public transport and operate travel plans to also reduce carbon emissions. In addition, there will funding available to deliver the transport projects required to access the Saxon Business Park and to future proof the immediate junctions in and around the JAAP as well as the wider road network on the A127. This will also co-inside with funding from development within the JAAP area to contribute to the upgrading of road and the public realms as well as the delivery of new public open space and green infrastructure around the sites.

The local authorities are confident that there are the appropriate measures in place to ensure that proposals will be delivered and infrastructure schemes implemented

along with comprehensive monitoring arrangements to ensure that sustainable development is delivered at the Airport and new business parks.

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Proposed Schedule of Changes to the Submission Document (February 2013)

The changes below are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text, or by specifying the change in words in *italics*.

The below proposed modifications relate to changes to the JAAP (February 2013).

The page numbers and paragraph numbering below refer to the JAAP Submission Document (November 2012), and do not take account of the deletion or addition of text.

Page	Policy/ Paragraph	Modification	Justification
36	Before Policy LS2	<p><i>Additional paragraph:</i></p> <p><u>An airport surface access strategy (ASAS) is considered to be an essential prerequisite to any scheme for development at the airport.</u></p> <p><u>The ASAS considers appropriate arrangements for all modes of transport, with a particular focus on modal shift and sustainable travel. In particular, it considers the implications of development for the road network, the opportunities for better public transport, and access for cyclists and pedestrians. The first version of the ASAS has been prepared, but this must be regularly updated in response to any new developments.</u></p>	Considered the appropriate point within the Plan to explain the surface access strategy, given changes to policies within this chapter.
36	Policy LS2	<i>Amend Policy as follows:</i>	Following issues raised by the Inspector in initial questions to the Councils (Examination Document

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Page	Policy/ Paragraph	Modification	Justification
		<p>Applications for planning permission will be welcomed provided they:</p> <ul style="list-style-type: none"> • are airport related; • deal with noise issues as set out in the controls appendix and other policies in this plan; • include measures to monitor air quality; • contribute to the transport infrastructure needs of the area; • incorporate sustainable transport measures that will make an appropriate contribution towards the targets for modal shift of passengers, visitors and staff travelling to the airport; • <u>include updates to the surface access strategy as appropriate</u> 	<p>EXJ002, 12 February 2014), this is considered a more effective approach than Policy LS5</p>
Page 36	Final paragraph	<p><i>Amend paragraph as follows:</i></p> <p>The airport has prepared a Noise Action Plan in accordance with the Environment Noise (England) Regulations 2006 and this covers noise reduction measures for the base case and development case scenarios. The Action Plan sets out the measures to be implemented over the next five years, or as relevant development schemes are completed. The policy airport operator – through the 106 that accompanied planning</p>	<p>Changes to supporting text to reflect Policy LS3 being redrafted.</p>

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Page	Policy/ Paragraph	Modification	Justification
		permission for the runway extension - is required to publish an annual statement to be published to explaining in full how the Noise Action Plan is performing, but also refers to the detailed measures for controlling noise, air quality, etc. set out in the controls appendix, part of this plan.	
37	Policy LS3	<i>Delete Policy LS3</i>	Following issues raised by the Inspector in initial questions to the Councils (Examination Document EXJ002, 12 February 2014), it is considered this policy should be redrafted.
37	Policy LS4	<i>Delete Policy LS4</i>	Following issues raised by the Inspector in initial questions to the Councils (Examination Document EXJ002, 12 February 2014), it is considered this policy should be incorporated into a revised Policy LS3.
37	Final two paragraphs	<p><i>Delete paragraphs as follows:</i></p> <p>Airport Surface Access Strategy (ASAS) An airport surface access strategy is considered to be an essential prerequisite to any scheme for development at the airport. This must be prepared in accordance with the guidance prepared by the then Department of Environment and Transport in July 1999, and include a travel plan.</p> <p>The ASAS considers appropriate arrangements for all modes of transport, with a particular focus on modal shift and sustainable travel. In particular, it considers the implications of development</p>	Supporting text regarding surface access strategy is moved to a more appropriate part of plan following changes to policies.

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Page	Policy/ Paragraph	Modification	Justification
		for the road network, the opportunities for better public transport, and access for cyclists and pedestrians. The first version of the ASAS has been prepared, but this must be regularly updated in accordance with the policy.	
38	Policy LS5	<i>Delete Policy LS5</i>	Following issues raised by the Inspector in initial questions to the Councils (Examination Document EXJ002, 12 February 2014), it is considered this policy could be addressed through an addition to Policy LS2.
38	Before Public Safety Zone section	<p><i>Insert new section and Policy as follows:</i></p> <p><u>London Southend Airport Runway Extension</u></p> <p><u>Planning permission (09/01960/FULM) was granted for an extension to the runway at London Southend Airport in 2010. This application was subsequently implemented by London Southend Airport and the extended runway is operational. Planning permission to extend the runway was subject to a detailed S106 agreement which applied a number of environmental controls to the operation of the airport.</u></p> <p><u>The extended runway has an operational length of 1,799 metres as the declared maximum take-off distance available (TODA). This means that airport continues to be categorised as a Code 3 aerodrome. The extended runway is in fact 1,905 metres in length to allow for a take-off length on runway 06 equivalent to</u></p>	Following issues raised by the Inspector in initial questions to the Councils (Examination Document EXJ002, 12 February 2014), it is considered a revised Policy LS3 is required that addresses the issues previously covered by Policies LS3, LS4, LS5, LS7 and LS8

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		<p><u>that provided for runway 24.</u></p> <p><u>Effectively, this mean the runway is balanced to allow, subject to air traffic control, weather conditions, etc. the opportunity for better utilisation and take-off in either direction. The runway extension also incorporates a turning head.</u></p> <p><u>The extension to the runway results in the following operational changes:</u></p> <ul style="list-style-type: none"> • <u>for aircraft landing on runway 24, the runway threshold is displaced about 100 metres to the south-west. As a result the runway end safety area (RESA) extends from 90 to 150 metres with a width of 150 metres which means that aircraft will be slightly higher as they come into land over Rochford.</u> • <u>In the case of take-offs from runway 24, the start of the roll remains at the north-east end of the runway paved surface and finishes allowing sufficient space within the proposed airport boundary to provide a 240 metre overrun RESA in line with CAA requirements.</u> • <u>For aircraft landing on runway 06, the landing threshold is displaced about 420 metres further to the south west than the existing runway - aircraft using an instrument landing system (ILS) would approach with a slightly higher angle of descent.</u> • <u>In the case of take-offs from runway 06, larger aircraft will commence from</u> 	

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		<p><u>the turning head, and would be 380 metres further to the south-west when they start to roll.</u></p> <p><u>In summary, the runway extension allows airlines to operate larger aircraft with increased passenger seating capacity, such as the Embraer 195, Airbus 319 and smaller models of the Boeing 737.</u></p> <p><u>Whilst the operational benefits arising from the runway extension are important, it is the economic impacts of the development that provide the significant benefits for the community, with substantial benefits for people in the local area and the wider region, through income growth, economic structure, regeneration, skills and employment.</u></p> <p><u>The joint planning authorities consider it to be essential for strict operating conditions to be applied to the airport for operation of the new runway extension.</u></p> <p><u>The controls set out in the Environmental Controls Schedule listed in this Plan have been incorporated into the S106 that accompanied planning permission for the runway extension.</u></p> <p><u>It is not anticipated that further amendments to the planning consent for the runway extension will be sought by the airport operator within the plan period. Nevertheless, the planning authorities consider it appropriate to have a policy in place against which to consider any such planning application.</u></p>	

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Page	Policy/ Paragraph	Modification	Justification
		<p><u>If a future planning application were to be made in relation to the runway extension, strict operating controls would be applied in a similar manner to those that accompanied planning permission (09/01960/FULM).</u></p> <p><u>Noise controls would be applied as with the recently implemented planning permission, and the airport operator would be required to publish an annual statement demonstrating how the Quiet Operations Policy is performing against limits and what measures are being implemented to address noise.</u></p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p><u>Policy LS3</u></p> <p><u>It is not anticipated that planning applications for further alterations to the runway at London Southend Airport will be required within the Plan Period. In the event that planning applications in relation to the runway were to be made they would be considered having regard to Policies LS1 and LS2, and any approvals would be subject to strict operating conditions as per the Environmental Control Schedule within this Plan.</u></p> </div>	
Page 38	Before Public Safety Zone	<p><i>Insert text as follows:</i></p> <p><u>Air Quality Monitoring</u></p>	Supporting text regarding air quality monitoring moved from after section of plan regarding public

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Page	Policy/ Paragraph	Modification	Justification
	section	<p><u>It is considered that an essential part of the monitoring and controls for a modern airport must include careful monitoring of air quality. In relation to London Southend Airport, air quality issues have been addressed through the s106 agreement that accompanied the granting of the planning permission for the runway extension (09/01960/FULM)</u></p> <p><u>The airport operator will be required to maintain an air quality monitoring system to include:</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> <u>periodic measurement and publication of air quality data;</u> <input type="checkbox"/> <u>the preparation of an Air Quality Management Plan; and</u> <input type="checkbox"/> <u>A rolling five year review of air quality using the year that the runway extension becomes operational as the base year (2012).</u> <p><u>Should the increased operations lead to breaches of statutory air quality standards then the Councils will be required to consider introducing an Air Quality Management Area, notwithstanding any lease or s106 provisions.</u></p> <p><u>Emissions from surface transport will be tackled through the implementation of a travel plan.</u></p>	safety zone and amended to reflect the granting of planning permission for the runway extension, and revised Policy LS3.
39-40	Sections on Runway Extension;	<p><i>Delete sections on Runway Extension; Operation of the extended runway; and Air Quality Monitoring</i></p> <p><i>Delete Policies LS7 and LS8</i></p>	Sections replaced by supporting text for revised Policy LS3 and other modifications. Reflects granting of planning permission for runway extension, and

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Page	Policy/ Paragraph	Modification	Justification
	Operation of the extended runway; and Air Quality Monitoring		<p>issues raised by the Inspector</p> <p>Policies LS7 and LS8 part superseded by granting of planning permission for runway extension. Remaining issues addressed through revised Policy LS3</p>

