



ENGLISH HERITAGE

EAST OF ENGLAND

Samuel Hollingworth
Planning and Transportation
Rochford District Council
Council Offices
South Street
Rochford
Essex
SS4 1BW

Direct Dial: 01223 582746
Direct Fax: 01223 582701

Our Ref:HD/P6040
Your Ref:

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Dear Mr Hollingworth

**SOUTHEND AIRPORT AND ENVIRONS JOINT AREA ACTION PLAN
(SUBMISSION) AND SUSTAINABILITY APPRAISAL**

Thank you for your letter dated 25 February 2013 consulting English Heritage on the Joint Area Action Plan (JAAP) for Southend Airport and Environs, and the accompanying Sustainability Appraisal.

General Comments

The boundaries of the JAAP area encompass some important heritage assets. Most notable among these are the church of St Laurence and All Saints (grade I), located close to the southern end of the runway, and Rochford Hall (grade I, with scheduled ruins), located on the north west edge of the JAAP area, together with the church of St Andrews (grade II*). The significance of these assets requires careful consideration of the potential impacts of the proposed development and future operations in their vicinity, which could impact upon their settings.

References to heritage assets, and how these will be protected, are few within the JAAP. This is an aspect that is identified in the accompanying sustainability appraisal report, and referenced in the conclusions in paragraphs 12.1.7 and 12.1.9. We hope that prior to submission of the plan additional references can be inserted to ensure that the setting of the heritage assets within the JAAP area can be protected. Where proposals for re-development of existing buildings on land close to St Laurence church come forward, opportunities should be taken to enhance its setting in accordance with paragraph 137 of the National Planning Policy Framework (NPPF).

BROOKLANDS 24 BROOKLANDS AVENUE CAMBRIDGE CB2 8BU

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Our specific comments on various sections of the plan are set out in the attached schedule. Where we express concerns these should be treated as formal objections to the soundness of the plan in terms of consistency with the advice in the NPPF. Paragraph 126 advises that local plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk from neglect, decay or other threats' and advises that the desirability of 'sustaining and enhancing the significance of heritage assets' should be taken into account.

We would welcome the opportunity to discuss amendments to the JAAP prior to its submission.

Yours sincerely

Katharine Fletcher
Historic Environment Planning Adviser, East of England

English Heritage response to the JAAP - Specific Comments

Chapter 1 Introduction

Para 1.4 What will the JAAP include? p5

While the reference to listed buildings here is welcome, their consideration in the JAAP is not evident. We note that there are policies in the Rochford and Southend Core Strategies and in the NPPF relating to the conservation of heritage assets, but we would expect the JAAP to address these matters at a detailed level in terms of the specific assets affected.

Para 1.6 Policy context, p6

The national planning policy context for the JAAP is now provided by the NPPF. We would draw attention to the definition of sustainable development within the NPPF which identifies the historic environment as an element to be addressed within the environmental strand of considerations (para 7, NPPF).

Chapter 2 Vision and Objectives

Section 2.2 Objectives, p13. It would be suitable to recognise the importance of protecting heritage assets within the JAAP area in bullet point 3.

Section 2.3, p14. What will JAAP area look like in future?

We recommend that a reference is included here to the successful continued use of St Laurence church and the enhancement of its setting, together with the conservation and enhancement of the other heritage assets within the JAAP.

Chapter 3 Development Proposals for the JAAP

Introduction

3 - Balancing development with environmental enhancement, p17.

Reference is made here to the sustainability appraisal (SA) process. The SA report makes reference to the need for greater consideration of listed buildings in the JAAP, and for the masterplanning of development to ensure a coherent and high quality outcome. English Heritage agrees with these recommendations, and would like to see amendments brought forward to reflect them.

5 – Areas of change, p18.

Areas of change iv (Aviation Way Industrial Estate) and vi (Northside/Northern maintenance zone) identified on the diagram on page 22 are those where careful masterplanning should ensure that the scale, disposition and design of buildings does not harm the setting of St Laurence church to the south, and that any opportunities for enhancement are taken.

Chapter 4 Policies

Introduction

NPPF Sustainability Policy, p24

We have highlighted above, in relation to section 1.6, the relevance of the historic environment within the definition of sustainable development.

Employment policies

Policy E1, p25. We would expect that the capacity of the JAAP area to have been assessed taking into account the need to respect any environmental issues, including its heritage assets. It is not clear, however, if this is the case. The references to design briefs are welcome, but we agree with the conclusions in the SA report that a comprehensive masterplanning approach is needed.

Policy E2 Aviation Way Industrial Estate, p26

We would recommend that development proposals here should be guided by key principles set out in a masterplan to ensure that the setting of St Laurence church to the south is respected. The policy should be amended to include such a commitment and to refer to 'up to additional 750 jobs' to ensure that the intensification is achieved within the environmental parameters of the masterplanning exercise.

Policy E7 Development Area 2 Saxon Business Park, p30

We welcome the references in the explanatory text to safeguarding land around the grade II listed building. This aspect could also be incorporated into policy E7.

Airport Policies

Policy MRO1- Northern MRO, p41

The terms and references used to describe the sites in the JAAP are not always clear. This policy appears to refer to 'Northside' on the JAAP Proposals Map. The need for sensitivity with respect to St Laurence church in the southern part of the area should be considered in any future development plans.

Environmental controls schedule, p42

We assume that there are already conditions attached to the relevant consents for the extended runway relating to the management of noise. Within this regime, we trust that the continued operation of St Laurence church has been taken into account to ensure that this important community and heritage asset remains viable. It would be desirable for this consideration to be explicitly referred to in the JAAP.

Environmental policies

Policies ENV2 and ENV3, p53

We recognise that these policies will assist in ensuring protection for the setting of Rochford Hall to the north.

Additional environmental policy – We consider that an additional policy is needed to refer to the protection and enhancement, where possible, of the heritage assets within the JAAP area. This should include reference to the assessment and potential investigation of archaeological remains.

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