

EXAMINATION OF THE LONDON SOUTHEND AIRPORT AND ENVIRONS JOINT AREA ACTION PLAN (JAAP)

INSPECTOR'S INITIAL QUESTIONS TO THE COUNCILS

Response to questions raised on under the headings of (i) duty to co-operate, (ii) consistency with national policy and (iii) deliverability

(i) Duty to Co-operate

"This is covered in section 7 of the Consultation Statement (SUBDOC5). However, the JAAP refers to the sub-regional impact of development. For example, on p24 it states that the policy approach is to make a 'significant contribution to the sub-regions employment aspirations'. In the light of this, are the authorities satisfied that they have engaged constructively, actively and on an ongoing basis with other relevant authorities and bodies as required by s33A of the 2004 Act? If so, it would assist to have further details of the steps taken including confirmation of what is meant by the 'sub-region' and which authorities and bodies would be significantly affected by the development proposed in the JAAP."

Southend Borough Council and Rochford District Council are satisfied that they have engaged constructively, actively and on an on-going basis with other relevant authorities and bodies as required by s33A of the 2004 Act. The JAAP, having been prepared over a number of years with some of these being prior to the Localism Bill and subsequent Act, has been subject to the requirements for active and on-going engagement with other relevant authorities and bodies under the direction of regional planning as well as the duty to co-operate. The regional significance of the development of London Southend Airport (LSA) has been acknowledged at the regional level of planning and its status was reflected in the former East of England Plan (2008).

Furthermore the JAAP has been recognised at the sub-regional level, which in this case refers to 'Thames Gateway South Essex' (TGSE) (known as 'Essex Thames Gateway' in the former East of England Plan) that comprises Southend Borough Council, Rochford District Council, Basildon District Council, Castle Point Borough Council, Thurrock District Council and Essex County Council as the highway authority representing the three lower tier authorities. The TGSE Partnership has a number of different formal groups which convene on various policy themes and matters. The Planning and Transport Board comprises councillors and officers from the named authorities as well as other relevant bodies such as Essex Chamber of Commerce and London LSA. This particular Board ensures that there is a formalised forum for constructive and active engagement which is on an on-going basis between relevant parties on matters such as the expansion of LSA and the development of the associated business parks and infrastructure. The minutes and actions of the Planning and Transport Board are also presented to the TGSE Leaders Board. It is considered that this Partnership and its various groups and boards ensure that those covered under the duty, that may be significantly affected by development proposed in the JAAP, are engaged with constructively.

(ii) Consistency with National Policy

"Since the publication of the JAAP the Aviation Policy Framework (DoT, March 2013) and the Airports Commission: Interim report (December 2013) have been produced. Are the authorities satisfied that the role of Southend Airport promoted by the JAAP is consistent with recent national policy? If so, a

short statement explaining this would be of assistance and the relevant section of the Introduction should eventually be updated. Confirmation as to whether or not the JAAP has had regard to para 33 of the NPPF would also be useful.”

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). When comparing these documents, 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 role of LSA is consistent with this key national policy document as well as the White Paper referred to above.

Since then, 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 approval to grow to 2mppa by 2021.

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 has further concluded 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 it has not shortlisted them because there are too many uncertainties and challenges surrounding them at this stage. However, it 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.

Southend Borough Council 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. The Council 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 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 Inspector also asked for comment on Paragraph 33 of the NPPF. It states that *"When planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency service needs. Plans should take account of this Framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation."*

Again the Councils consider that the JAAP has had regard to the NPPF in its preparation, including paragraph 33, and as stated above, deem that the Plan is consistent and does not conflict with the direction as well as intention and objectives of the Government's Framework for UK Aviation, as outlined in the current Aviation Policy Framework.

(iii) Deliverability

"What evidence is there to support the deliverability of the proposed employment and airport allocations during the Plan period including their viability? Has this taken into account issues such as market conditions, developer interest, land ownership, infrastructure contributions, contamination, flooding and achieving a BREEAM Excellent rating?"

The evidence base for the JAAP includes a document commissioned by Rochford District Council - the 'Employment Land Study Final Update Report' (December 2009). This document includes a market appraisal which, while accepting the current market limitations resulting from the credit crunch and recession, recognises that the area will be attractive to companies and investors over the long term and that new development within the JAAP area will be a key economic driver for the surrounding area.

It also states that the capacity growth at LSA is likely to be a catalyst for increased employment land demand within its surrounding area. The analysis shows that the JAAP area is well placed to serve the likely increase in demand for B class employment land arising from expansion of London Southend Airport. The Study uses Bournemouth Airport as a benchmark and determines that employment within the JAAP area may increase demand for B Class employment space by around 100,000m². The Study revealed that growth in business numbers at Bournemouth Airport, which was 25% between 2003 and 2007, coincided with exponential growth in passenger numbers. This

provides a good indication of the potential for a similar increase in employment demand relating to the expansion of LSA.

Southend Borough Council and Rochford District Council have also commissioned a further piece of work which will provide an additional statement on viability. This should take into account issues raised by the Inspector which have not been specifically highlighted elsewhere in the evidence base, and will support the submission of the JAAP. This work will assist with demonstrating that the cumulative impact of the policies contained in the Plan are not likely to make any future development on the site unviable, and that the indicative masterplan is viable.

Southend Borough Council has also appointed a project manager to bring forward the delivery of the Saxon Business Park and professional advisers to confirm existing and identify new occupier demand and interest, both within the MedTech sector and the wider market. This work is commencing in March 2014.

The Anglia Ruskin MedTech Campus is a Department of Health endorsed partnership and approach to enabling 'near market solutions' in the medical technologies sector recognising the high levels of innovation, but low levels of commercialisation in the sector in the UK. This was launched at the House of Commons May 2012, with the business network services launched March 2013 at the NHS Innovation Expo. This will provide both a suite of business support services for those businesses and entrepreneurs in the sector, including funding, access to experts, as well as physical locations for Medtech companies to locate recognising the benefits of co-locating synergies.

This space will include an innovation centre for start-ups, small businesses and those looking to have a 'foot in the door' as well as a mixture of grow-on and larger spaces for established companies. The partnership is in discussion with a number of potential occupants as well as venture capitalists, which might bring some of their businesses to the campus. A Higher Education Funding Council for England (HEFCE) bid has also been submitted to fund a facility on the Southend MedTech Campus via Anglia Ruskin University and its Post Graduate Medical Institute. Locally there is demand from Southend businesses, such as Surgical Holdings, which are looking for space to expand and grow. The proposed Stobart Studio School for Aviation, Advanced Engineering and Innovation, which, if successful, will be located within the JAAP area, will meet some of the workforce skill needs and raise aspirations locally pointing young people towards employment on the business park and/or starting their own related business.