

## **Response to Inspectors' Issues and Questions**

1. Further to the publication of the Inspectors' Issues and Questions, we write on behalf of Cogent Land LLP (Cogent) to address those matters of relevance to the issues of soundness raised by Cogent.
2. It is significant that the opportunity to enhance the potential of London Southend Airport is dependent on the delivery of further improvements to the strategic transport infrastructure network. The most significant existing constraint to the Airport's potential is surface access, particularly the capacity of the highway network.

### **Issue 1**

#### *Question (i)*

3. Paragraph 7 of the NPPF sets out the different dimensions to sustainable development. The economic role specifically highlights the need to identify and coordinate development requirements, including the provision of infrastructure. Furthermore, paragraph 31 of the NPPF states Local Authorities should work with neighbouring authorities to and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including the transport investment necessary to support strategies for the growth of airports.
4. The objectives of both Southend on Sea Borough Council and Rochford District Council to deliver improvements to the Airport are supported in general by Cogent. However, in our view it is not possible to achieve the objectives of paragraphs 7 and 31 of the NPPF without making specific provision to improve the east-west connectivity in the area surrounding the airport.
5. The JAAP acknowledges the need for east-west improvements in general (point iii on page 52). However, it is beyond the maximum capacity of the existing road system to accommodate adequately the projected growth of Southend or meet in full the aspirations and potential of the Airport as a regionally significant employment hub. It is not possible to solve the current surface access conditions in the area through junction improvements alone, instead it requires a combination of improvements and the provision of new surface access infrastructure.
6. Without specific provision being made, and in view of the fact that the junction improvements proposed are not sufficient, it is considered by Cogent that the JAAP fails to positively embrace the aims of paragraphs 7 and 31 of the NPPF and that changes need to be made to ensure that it can be found sound.
7. The Proposals Map should be updated to include specific acknowledgement that a new east-west surface access road is required, and indicate its potential route.

*Question (ii)*

8. The JAAP is broadly consistent with the existing development plans; however, these are both dated and require a full review. The JAAP should therefore reflect the fact that these review processes are likely to find that the objectively assessed needs of both LPAs are greater than is currently planned for, and therefore transport infrastructure needs to provide for this increase, as well as the identification of additional land for employment and housing.

*Question (iii)*

9. The boundary of the JAAP is considered to be too tightly drawn as it stands. It does not include the land that can play an important role in the in fulfilling a secondary or tertiary support role for the airport, instead identifying land with the potential to attract new businesses. Land such as that identified previously within tertiary employment locations.
10. Furthermore, it is considered that insufficient land is identified to meet the employment needs, both in terms of the over-estimate of job provision from the identified sites, and in view of the likelihood of the objectively assessed needs requiring an increased level of growth.

*Question (iv)*

11. The JAAP does not seek to maximise the potential of the Airport and should be revised to enhance its ambition.
12. This is particularly the case in terms of providing for improved surface access and the opportunity of reducing congestion in the area surrounding it. Furthermore, it is not ambitious enough in terms of the potential for employment growth. As identified above and in previous representations, more land surrounding the airport should be identified for employment provision directly related to the airport, and to make up the shortfall in employment generation due to the use of a higher density figure for the allocated land.