



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

SA/SEA Adoption Statement



December 2014

1 Introduction

- 1.1 Rochford District and Southend Borough Councils adopted the London Southend Airport and Environs Joint Area Action Plan (JAAP) on 16th December 2014. As an integral part of the preparation of the JAAP, and in accordance with the Planning and Compulsory Purchase Act 2004, Section 19 (5), the JAAP has been subject to Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA) of the plan.
- 1.2 Good practice and national Planning Practice Guidance advises that the SA can include the SEA and this is the approach used in the assessment of the JAAP. Therefore, throughout the remainder of this statement reference to SA implies both SA and SEA. SA is a systematic process designed to evaluate the social, environmental and economic impacts of a plan to identify potential significant effect, the SA can then identify mitigation measures to avoid adverse effects and secure sustainability benefits.
- 1.3 This statement has been prepared in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004. The Regulations require that a statement be made available to accompany the Adopted JAAP in order to provide the following information:
- how environmental considerations have been integrated into the development plan document and the environmental report has been taken into account;
 - how the opinions and consultation responses received on the development plan document and sustainability appraisal reports have been taken into account;
 - the reasons for choosing the development plan document in light of other reasonable alternatives dealt with; and
 - monitoring measures.
- 1.4 Each of the above matters is considered in turn within this SA Statement. It should also be noted that further information on each SA process can be found in the SA reports, consultation reports and the Planning Inspector's Report. All reports can be found on the JAAP preparation website, hosted by Rochford District Council.

2 How environmental considerations have been integrated into the development plan document and the environmental report been taken into account

- 2.1 The SA was prepared on behalf of Southend-on-Sea Borough and Rochford District Councils by independent consultants. Initial stages, including the Scoping Report and Issues and Options SA, were undertaken by Halcrow and subsequent stages up to adoption were completed by Peter Brett Associates LLP; this means that the SA was produced independently from the JAAP itself, ensuring impartiality. SA reporting has been undertaken to inform all stages of plan preparation. This reporting and discussion between those undertaking the SA and those preparing the JAAP, have

allowed for sustainability matters to be incorporated iteratively into the plan as it has been prepared.

- 2.2 The following stages of SA have been undertaken in the preparation of the JAAP. More information on each stage can be found in each of the SA Reports referred to, which are available on Rochford Council's JAAP website.

SA Scoping Report (Halcrow, 2008)

- 2.3 The Scoping Report was the first stage in the preparation of the SA, it included:
- The policy context for the JAAP and the sustainability appraisal (SA);
 - A characterisation of the baseline environment, economy and social issues in the wider JAAP area;
 - Identification of the main sustainability issues in the area;
 - Derivation of a set of sustainability objectives in a sustainability framework containing objectives for use in each subsequent stage of the appraisal; and
 - Details of next steps.

2.4 The sustainability objectives of the sustainability framework form the basis of all stages of assessment, at each iteration options, policies and proposals are assessed against them. The coverage of environmental and sustainability issues in the objectives means that the JAAP has been systematically and consistently assessed to identify effects and ensure the matters identified are considered as part of the JAAP. Table 1 shows the full set of objectives:

Table 1: Sustainability objectives

Topic	Objective
Economy	
Local economy	To improve the vitality and viability of the airport, and to achieve sustainable levels of prosperity and economic growth
Employment and Wealth Creation	To maximise economic benefits of the thriving airport, enhance wealth creation factors and emphasise local strengths and qualities to attract investment.
Environment	
Biodiversity	To maintain and enhance areas of importance for wildlife and nature conservation including species diversity, as an integral part of economic and social development.
Water	To maintain and enhance the quality of ground water and sustain good quality water resources, wherever possible
Impacts of climate change	To reduce the effects of climate change
Flooding	To reduce the risk of flooding on and off-site
Material assets	To improve the quality of development through use of local sourced, recycled and efficient building materials
Soil	To protect greenfield land as well as enhance quality of soils, wherever possible.
Air and Noise	To ensure high quality environment for local communities and other sensitive receptors
Waste	To reduce the use of primary resources and the quantity of waste going to final disposal
Energy and climate change mitigation	To increase opportunities for renewable energy generation.
Accessibility and accessibility to key services Transport	To enable people to have similar and sufficient levels of access to services and promote sustainable transport measures
Landscape and Townscape	To maintain the quality and setting of landscapes and townscapes
Social	
Safety/ Health and Risk	To improve overall levels of health, create safe environments by creating healthy places to live and by reducing crime/fear of crime
Education and skills	To improve the education and to assist people to gain skills and fulfil their potential and increase their contribution to the community.
Community (cross cutting theme)	To nurture a sense of belonging in a cohesive community where

linked to accessibility to services) people live and work

Housing To provide opportunity for people to meet their housing needs

London Southend Airport & Environs Study JAAP – Draft Sustainability Appraisal Report (Halcrow, June 2008)

- 2.5 This was the SA for the first iteration of the JAAP, the Issues and Options (June 2008) JAAP. The SA assessed the various options proposed in the plan against the sustainability objectives of the sustainability framework, using the baseline information established through the Scoping Report.
- 2.6 At this stage, a range of options, as presented in this version of the JAAP, were assessed. These options were:
- Scenario 1 Low Growth (do minimum);
 - Scenario 2(a) Medium Growth;
 - Scenario 2(b) Medium Growth - 'Aviation Cluster'; and
 - Scenario 3 High Growth
- 2.7 In addition a 'do-nothing' scenario was assessed that would see the airport continue to operate as it was at that time without the JAAP in place to guide economic growth.
- 2.8 At this stage the SA did not make a recommendation on a preferred scenario (or option) in terms of sustainable development. However, the process did ensure that the relative sustainability impacts of each option could be compared side-by-side to assist decision making by the plan-making team, to inform the selection of their preferred alternative. In addition, the SA report included recommendations on how potential adverse impacts of implementing each scenario could be mitigated and benefits achieved.
- 2.9 The principal finding of the SA at this stage was that the scenarios build on an incremental basis from 1 to 3. Therefore the effects on economic and environmental objectives follow an incremental order of severity, either positive or negative. More information on the detailed findings of this assessment can be found in the SA Report.

2.10 The SA Report also included recommendations on how the JAAP could further aid the delivery of sustainable development. This included specific recommendations related to each scenario as well as general recommendations for the JAAP. Recommendations included ways that potential adverse impacts could be mitigated, for instance through additional policies, policy wording or through other plans and strategies. These assessments and recommendations were considered in the preparation of the next iteration of the JAAP – the Preferred Options

London Southend Airport & Environs Study JAAP – Preferred Options (February 2009) (PBA, June 2009)

2.11 The JAAP Preferred Options was published for public consultation in February 2009. SA Report of the Preferred Options was undertaken subsequently and an SA of the Preferred Options was produced in June 2009. The purpose of this report was to inform the plan-making team of the likely environmental and sustainability impacts of implementing the JAAP as was proposed at this stage. The timing of the report allowed the plan-making team to take the SA into account, alongside consultation responses, in preparing the Submission Version JAAP.

2.12 As at previous stages of the SA, the SA of the JAAP Preferred Options included recommendations on key mitigation measures to help the JAAP to deliver sustainable development. These measures included recommendations relating to the water environment, lighting, heritage and the quality of the built environment.

2.13 The SA of the JAAP Preferred Options also suggested the Plan should contain a detailed implementation plan that sets out issues such as phasing and the funding streams for new infrastructure, including public transport, road and open space delivery.

London Southend Airport & Environs Study JAAP – Submission Version (PBA, February 2013)

2.14 The JAAP Submission Draft was published in February 2013. It was accompanied by SA and was subject to public consultation.

2.15 Planning permission for the runway extension and terminal extension – two significant elements of airport growth – was sought prior to the publication of this draft, and consent was granted. The JAAP, as such, would no longer have direct control over this element of airport growth; but would still have an important influence over any further growth and on the development of the new employment land proposed.

2.16 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 and managing the airport expansion. 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 JAAP would also serve a useful role in co-ordinating access improvements to the airport and

business parks to reduce car reliance and promote walking and cycling as sustainable transport in general. 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.

2.17 Table 2 outlines how the recommendations contained in the SA of the JAAP Submission Draft and how these have been addressed in the JAAP or wider measures to manage development in the area.

Table 2: SA of the Submission Version recommendations and response

SA suggestion	Comment
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.	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. A Flood Risk Assessment & Drainage Strategy was included with the planning application for the runway extension (Jacobs: Sept 2009).
Unified design codes for new buildings to fit the surroundings to benefit the urban fringe area.	This is an issue that will be considered through the masterplan for the area.
Measures for nature conservation protection and enhancement, such as protection of green linking features and habitat enhancement measures identified through the ecological assessment.	<p>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.</p> <p>However, the JAAP area itself is not identified as an area for significant habitat enhancement in either Councils' Core Strategies.</p>
Implementation of measures to protect internationally designated wildlife sites, as recommended in the HRA report.	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: "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 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.”
Protection of heritage features and their settings wherever possible, including listed buildings.	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. 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 CP4 of the Rochford Core Strategy and Southend-on-Sea Core Strategy, respectively).
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.	It is considered that the 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.
Operational controls to manage noise from MRO activities and/or site specific noise mitigation measures.	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 the Rochford’s Development Management Plan (Policy DM32) also require proposals for employment development to include measures to mitigate potential noise issues.

London Southend Airport & Environs JAAP – Sustainability Appraisal July 2014 (RDC/SoSBC, July 2014)

- 2.18 Following consultation on the JAAP Submission Draft, the plan was submitted to Government for Examination in Public. The examination process resulted in a number of modifications being made to the JAAP Submission Draft, set out in the JAAP Schedule of Modifications. A number of these modifications were required to correct anachronisms resulting from development having already taken place.
- 2.19 These modifications that may result in new or different sustainability effects were subject to SA in the form of an Addendum to the SA of the JAAP Submission Draft.
- 2.20 The SA of the Schedule of Modifications found that they would have a relatively modest impact against the sustainability objectives. Overall, there were small positive

effects likely against the following sustainability objectives: to maintain the quality and setting of landscapes and townscales (particularly in respect of cultural heritage); to ensure a high quality environment for local communities and other sensitive receptors.

2.21 The Schedule of Modifications was found to have the potential to have a negative impact on the sustainability objective to maximise economic benefits of the thriving airport (in that it, for example, places additional controls on new MRO operations), but found that any negative impact would be nominal and certainly not undermine the JAAP's overall positive impact on this sustainability objective. Therefore, this stage of the SA did not contain any additional recommendations.

3 How the opinions and consultation responses received on the development plan document and sustainability appraisal reports have been taken into account

3.1 Consultation was undertaken on the SA at a number of stages. In accordance with the SEA Regulations, the JAAP and its supporting documents, including SA, were made available for consultation throughout the plan preparation process. At each stage consultation was used to inform the following stage of JAAP and SA.

Table 3: SA of the Submission Version recommendations and response

JAAP Preparation Stage	SA Stage	Date
Pre-production	SA Scoping Report	January 2008
JAAP Issues and Options	JAAP Draft SA Report	August 2008
Preferred Options JAAP		February 2009
	SA Preferred Options July 2009	Uploaded to website for review post Preferred Options consultation stage
Submission Version JAAP	SA Submission JAAP	February 2013
Post Submission	SA Screening and Modification Update	July 2014

3.2 In January 2008 the JAAP SA Scoping Report was consulted upon with the statutory consultees; Natural England, Environment Agency and English Heritage. Consultation was also widened to allow anyone to comment on the report, with the purpose of informing the following stages of appraisal. This consultation stage allowed statutory consultees and others to review the sustainability framework that forms of the core of the Sustainability Appraisal.

3.3 The JAAP Issues and Options version was published for consultation between 24 June and 8 August 2008. The SA was published for consultation alongside the Issues and Option document.

3.4 In total, 2210 consultation responses were received at the Issues and Options stage. A summary of the responses was prepared and published (available to view online via

www.rochford.gov.uk). The results of this consultation were fed into the preparation of the Preferred Options iteration of the plan.

- 3.5 The JAAP Preferred Options was produced and published as an additional, informal consultation stage. This was subject to public consultation between 16th February and 15th May 2009. A total of 9896 responses were submitted, a summary of which was prepared and published and fed into the preparation of the Submission Version of the JAAP (available to view online via www.rochford.gov.uk).
- 3.6 The SA of the Preferred Options iteration of the Plan was completed following the finalisation of the Preferred Options JAAP and its public consultation. The SA at this stage was prepared to aid the plan makers in preparing the submission JAAP, feeding into plan preparation alongside the consultation responses on the Preferred Options document. However, the SA Report of the Preferred Options was made publically available, allowing stakeholders and the public to review how the process of SA was informing the emerging JAAP.
- 3.7 The JAAP Submission Draft and its accompanying SA were published for consultation between 25th February and 26th April 2013. The Issues and Options and Preferred Options SAs were also published at this time as part of the evidence base demonstrating how options have been considered.
- 3.8 The results of this were considered through the examination process, culminating in the modifications to the Plan as set out in the Schedule of Modifications.
- 3.9 The Schedule of Modifications and its accompanying SA Addendum were published for consultation between 29th July and 25th September 2014. The results of this consultation were fed into the examination process, which concluded with a receipt of the Inspector's report confirming that the Councils could adopt the JAAP.

4 The reasons for choosing the development plan document in light of other reasonable alternatives

- 4.1 The inclusion in SA reporting of an assessment of the effects of 'reasonable alternatives' is required by the SEA Directive. 'Reasonable alternatives' should form part of both the SA and the plan, and the guidance notes that within Development Plan Documents this will take the form of options.
- 4.2 Options that were identified through the JAAP Issues and Options were appraised. The Preferred Options identified were subsequently appraised and refined, culminating in the preparation of the JAAP Submission Draft.
- 4.3 The Issues and Options (2008) iteration of the JAAP identified the following options:
 - Scenario 1: Low Growth (do minimum);
 - Scenario 2(a): Medium Growth;
 - Scenario 2(b): Medium Growth - 'Aviation Cluster';
 - Scenario 3: High Growth

- 4.4 It should be noted that the SA is not the only determining factor that influences the choice of options. The JAAP, and therefore the preferred option, is required to be consistent with other policies within the development plans covering the two areas¹. It also needs to be viable and deliverable.
- 4.5 The Southend Core Strategy was adopted in December 2007 and the Rochford Core Strategy was adopted during the JAAP preparation in 2011. Both plans have been subject to examination by a Government-appointed Inspector prior to their adoption and furthermore have already been subject to SA.
- 4.6 The Core Strategies both support economic growth and development in the vicinity of the airport. Therefore, it was not reasonable to pursue the 'do-nothing' option and the context for growth is already set. Relevant policies of the Southend Core Strategy are:
- 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.'
- 4.7 Rochford Core Strategy includes the following relevant policies to the JAAP:
- Policy T2 lists improvements to surface access to London Southend Airport as one of the highway improvement priorities.

¹ Regulation 8(4) of The Town and Country Planning (Local Planning) (England) Regulations 2012

- 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, having regard to environmental issues and residential, and states that enhancement of London Southend Airport will be supported.
- 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.
- 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.

- 4.8 In the original SA of the alternative scenarios, Scenario 1 (low growth option) scored positively against the soil and use of previously developed land sustainability objective (as identified through the SA of the JAAP Issues and Options). However, it did not perform as well as Scenario 3 (High Growth) in relation to economic and social themes such as economic regeneration, employment, improvements to existing community and social facilities and housing.
- 4.9 This low growth approach would not be consistent with strategic policies for the airport and economic growth generally set out in Rochford District and Southend Borough Council's Core Strategies. Furthermore the low growth scenario was overtaken by events, as subsequent to the production of the JAAP Issues and Options Plan, planning consent was sought and granted for extensions of both the airport runway and terminal. In addition, new terminal buildings and the railway station were delivered prior to completion of the JAAP.
- 4.10 The medium growth and medium growth 'aviation' cluster were better aligned with the strategic direction for the area set out in the Councils' Core Strategies than the low growth option.
- 4.11 The medium growth scenario was considered likely to bring incremental economic opportunities with less to no significant environmental impacts to the JAAP and wider area.
- 4.12 The medium growth scenario 'aviation cluster' option would bring positive economic and social benefits in the short to the medium term. It was considered likely to bring significant long term benefits provided the commercial operators would be inclined towards taking up the offer from this proposal. The environmental impacts were considered likely to alter based on the take-up and actual expansion of services in the long term i.e., the effect could vary between significant and mild negative depending on the occurrence of the predicted economic growth.

- 4.13 The high growth scenario was considered likely to bring significant positive economic growth, and therefore have positive effects on social and community objectives. It was considered likely to have significant negative impact on some environmental aspects, but it was identified that mitigation measures were possible. In addition, it related well to the strategic approach set out in Rochford District and Southend Borough Councils' Core Strategies.
- 4.14 The adopted version of the JAAP takes forward the High Growth scenario and includes policies to mitigate likely negative impacts on environmental objectives. This option for growth best reflects the Core Strategy policy objectives of the two Councils, is compatible with recent expansion of the airport, as well as presenting a good opportunity to secure sustainability benefits relating to economic growth.
- 4.15 The final adopted Plan performed well when assessed against sustainability objectives, was considered the most appropriate when compared with realistic alternatives and was consistent with the strategic approach set out in the Councils' Core Strategies, and was viable and deliverable.
- 4.16 More information on the appraisal and iteration of options is contained in the SA reports prepared at each stage of JAAP preparation, in particular the Issues and Options SA Report.

5 Monitoring Measures

- 5.1 Regulation 17 of the Strategic Environmental Assessment Regulations sets out the requirement for monitoring the significant environmental effects of implementing the plan as adopted. This is so that unforeseen adverse effects can be identified at an early stage and appropriate remedial action can be taken.
- 5.2 An Annual Monitoring Report (AMR) is currently prepared for each of the two Councils. This will monitor the implementation of policies and targets of development plan documents. Monitoring provides valuable feedback both of the decision making process and the performance of development plan policy in the two Council areas.
- 5.3 In addition, the airport operators are obliged to publish for scrutiny an Annual Statement reporting on the performance of the airport. Monitoring from this source may be included in AMRs for each Council, as set out in the JAAP. The annual statement will need to monitor impacts relating to a range of operational controls, those most relevant to the SA are:
- The effectiveness of Airport Surface Access Strategy 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 the 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;
 - Details of any breaches of ground noise, night operations or other restrictions on operations.
- 5.4 To avoid duplication of monitoring procedures it is proposed that the AMR and Annual Statement are used to fulfil the requirements for monitor the environmental effects of the JAAP as required by the SEA Regulations.
- 5.5 In addition, Appendix 6 of the SA Report sets out example indicators for each of the sustainability objectives. Where suitable, a selection of these indicators could be integrated into the AMR as necessary to monitor sustainability issues. It is intended that the SA monitoring be carried out annually and reported as part of the AMR for each of the two Councils.