

# Consultation Statement

**London Southend Airport and Environs Joint Area Action Plan Submission Document  
– the role of Community Involvement and Stakeholder Engagement**

This statement satisfies the requirements of Regulation 22 (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012

# Rochford District Council and Southend-on-Sea Borough Council – London Southend Airport and Environs Joint Area Action Plan: Consultation Statement

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## **1 Introduction**

- 1.1 The London Southend Airport and Environs Joint Area Action Plan (JAAP) is a Development Plan Document (DPD) which sets out detailed policies for the operation of the airport and the surrounding area, particularly to the north of the airport. The JAAP will manage growth and change in the area by setting out development and design principles, ensure the protection of areas and places sensitive to change and direct investment and form the basis for regeneration in the area.
- 1.2 The Joint Area Action Plan will form part of the Development Plan for both Rochford District and Southend-on-Sea Borough. The Development Plan for Rochford and Southend-on-Sea Borough currently includes *inter alia* the Rochford Core Strategy and Southend-on-Sea Core Strategy, respectively. Both Core Strategies include policies relevant to the JAAP.
- 1.3 Regulation 8 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires Local Plans to be consistent with the adopted Development Plan (unless the Local Plan contains policies which specifically supersede policies within the Development Plan). As such, the JAAP must be consistent with the strategic policies in relation to the airport and surrounding area set out in the Councils' Core Strategies. There was significant community involvement in the respective Core Strategies, the soundness of which has already been tested through examination. As such, this Consultation Statement does not revisit community involvement in the strategic policies in relation to the JAAP area that are set out in the two authorities' Core Strategies.
- 1.4 The production of the JAAP has been an extensive process involving several stages of community involvement. This Consultation Statement sets out how local communities and other key partners have been involved in its preparation. This statement has been prepared in accordance with Regulation 22 (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012, which requires the local planning authority to prepare a statement to accompany the proposed submission document, setting out the following:
- (i). which bodies and persons the local planning authority invited to make representations under regulation 18,
  - (ii). how those bodies and persons were invited to make representations under regulation 18,
  - (iii). a summary of the main issues raised by the representations made pursuant to regulation 18,
  - (iv). how any representations made pursuant to regulation 18 have been taken into account;
  - (v). if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and

(vi). if no representations were made in regulation 20, that no such representations were made.

- 1.5 As such, for each stage in the production of the JAAP, this document sets out: the methods the Councils employed to ensure community involvement; groups, organisations and bodies invited to make representations; a summary of the main issues raised; and how representations have influenced the plan-making process. It should be noted that this statement does not contain the detailed content of all the representations, but copies of all the representations are available online and paper copies of specific representations are also available on request.
- 1.6 There were three key stages where public consultation representations were invited: Issues and Options Document (2008); Preferred Options (2009); Pre-Submission Document (2013).

## **2 Statement of Community Involvement**

- 2.1 Both Rochford District Council and Southend-on-Sea Borough Council have adopted Statement of Community Involvements, which set out how the respective Councils will involve the local community and other interested parties in the planning process.
- 2.2 Since the adoption of Rochford's Statement of Community Involvement in 2007, new regulations came into force which amended the consultation requirements for Development Plan Documents, including the stages at which consultation is undertaken.
- 2.3 Although Rochford's Statement of Community Involvement was prepared when different regulations were in place, the principles for community involvement and consultation set out in the Statement of Community Involvement are nevertheless still relevant and have been adhered to.
- 2.4 Southend's Statement of Community Involvement was adopted in June 2013 following public consultation. Southend Borough Council first adopted a SCI in November 2007 and this document represents the second update that has been undertaken to reflect new planning legislation.

## **3 Consultation Process Overview**

- 3.1 The JAAP has been subject to an extensive process of consultation, leading to thousands of representations, which in turn have shaped the final plan.
- 3.2 The JAAP Issues and Options stage represented the first formal stage of consultation on the plan. The Issues and Options version of the JAAP was published in 2008. This initial version of the plan considered the range of issues for the airport and its surrounding area and potential options to address these.
- 3.3 Formal consultation on the JAAP Issues and Options Report took place between 24 June and 8 August 2008. A range of activities took place to advertise the consultation and encourage participation. Details of this consultation stage are explained in Section 4 of this statement.

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- 3.4 Taking account of the feedback from the public consultation, it was considered that an additional, informal consultation stage on the JAAP would be beneficial to the plan-making process. As such a Preferred Options version was prepared taking into account the feedback received, and was subject to public participation between 16 February and 15 May 2009. The initial deadline date was 9 April, but was extended to 15 May in light of the very high level of interest in the plan.
- 3.5 As with the Issues and Options, the Councils undertook a range of activities to encourage participation. Consultation on the JAAP Preferred Options resulted in 9896 representations being submitted. Details on this consultation stage are set out in Section 5 of the statement.
- 3.6 Delays in the production of the Rochford Core Strategy and a legal challenge to the grant of planning permission for development with a key bearing on the JAAP (extension to the runway) resulted in delays to the JAAP process. As such, there was a gap between Preferred Options and the next stage of the plan – preparation of the version of the plan proposed to be submitted for examination.
- 3.7 It is relevant to note that, although outside of the JAAP production process, planning permission for an extension to the runway at London Southend Airport was granted planning permission by Southend-on-Sea Borough Council on 30 April 2010. The application was submitted on 12 October 2009, and approximately 2400 consultation responses were received in response to the proposal. These were considered as part of the development management process. The application was determined by the Council's Development Control Committee at a meeting held on 20 January 2010, where it was resolved that permission be granted subject to a legal agreement which included inter alia controls over night flights, environmental controls, and a route preference scheme. The granting of the planning application and legal agreement were taken into account in the production of the iteration of the JAAP which followed them – the Submission Document.
- 3.8 The final stage of public consultation commenced on 25 February 2013 with the publication of the JAAP Submission Document for consultation. At this stage the Councils asked if the public and other interested parties believed the JAAP to be 'sound and/or legally compliant'. 474 representations were duly made.

## **4 Consultation on Issues and Options Document 2008**

- 4.1 The Issues and Options Document was made available for public consultation between 24 June and 8 August 2008.
- 4.2 The Councils consulted the community and other stakeholders using methods detailed in Table 1 below.

**Table 1** – Encouraging public participation on the JAAP Issues and Options.

<b>Consultation Method</b>	<b>Details</b>
Consultation letters / emails to stakeholders	<p>Letters/emails were sent to those on the Council's Local Development Framework mailing list – which comprises of general and specific consultation bodies; local representative groups, parties with an interest in the development of the District / Borough, and members of the public who have registered an interest in being involved in planning policy consultations.</p> <p>Groups written to inviting comment included those representing sections of the society who have traditionally been underrepresented in the planning process. Mindful that the over-reliance on electronic communication may exclude some sections of society, the opportunity to comment via written correspondence was also made available.</p>
Online consultation system	The Councils' online consultation system was utilised. Those on the mailing list were directly consulted via email, if an email address was provided, or by letter otherwise. The consultation was prominently displayed on the Councils' websites with links to the document, online system and other background information.
Rochford District Matters	A special edition of the Rochford District Matters – Rochford District Council's newsletter which is sent to all households in the District – was produced.
Press notices	Notices were published in three local newspapers.
Press releases	Press releases went out to local media. The Issues and Options document was widely discussed in local media.
Document availability	Paper copies of the Issues and Options Document were made available, including in local libraries and on request.
Public meetings	<p>The Issues and Options Document was presented and discussed at a meeting for local businesses – Business Breakfast – on 10 July 2008 in Rochford.</p> <p>The document was also presented and discussed at an East Area Committee meeting in Rochford on 2 July 2008 (Area Committee meeting were public meetings, the purpose of which was to enable discussion</p>

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between the Council and the public over current issues).

4.3 Table 2 provides a numerical break down of representations on the Issues and Options Document by subject.

**Table 2 – Numerical breakdown of initial consultation responses**

Section Name	Respondents	Objectors	Support	Object	Comment	Representations
London Southend Airport & Environs Joint Area Action Plan Issues & Options Paper	<b>567</b>	<b>310</b>	<b>235</b>	<b>562</b>	<b>1413</b>	<b>2210</b>
1.1 What is a Joint Area Action Plan (JAAP)?	5	1	3	1	9	13
1.1.1. The Evidence Base	9	1	0	1	11	12
1.1.2 Sustainability Appraisal	7	1	0	1	7	8
1.2 What will the Joint Area Action Plan (JAAP) include	7	4	0	4	3	7
1.3 The Issues & Options Report	9	3	0	3	7	10
1.4 Policy Context for the JAAP	8	4	0	4	5	9
1.5 Getting Your Views	10	6	1	6	4	11
2.1 The JAAP Area	9	2	0	2	7	9
2.2 London Southend Airport	11	5	1	5	6	12
2.3 Supply and demand for employment areas	4	1	1	1	2	4
2.4 Transport & Accessibility	14	5	0	5	10	15
2.5 Environmental character and assets	9	4	0	4	5	9
2.6 Conclusions	1	0	0	0	1	1
Q2.1 Are the assets of the JAAP area fully reported and understood?	53	3	6	4	44	54
Q2.2 Are there any important assets or issues missing from the assessment?	46	2	3	2	41	46
3.1 Vision	9	5	1	9	3	13
3.2 Objectives of the JAAP	5	2	0	2	3	5
Questions 3.1 – 3.3	1	0	1	0	0	1
Q3.1 Do you agree with the overall Vision for the JAAP?	71	11	10	11	51	72
Q3.2 Do the objectives set out above cover the key requirements from the area?	53	8	6	8	39	53
Q.3.3 Are there any other additional objectives that might help to guide the selection of the preferred option/options and JAAP?	41	0	3	0	38	41

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Section Name	Respondents	Objectors	Support	Object	Comment	Representations
4.2 Issue 1: The future development and role of London Southend Airport	14	7	0	7	7	14
Q4.1 What do you see as the role of London Southend Airport in the future?	96	19	15	19	64	98
Q4.2 How can the airport best be developed to drive and support the local economy?	112	6	10	7	97	114
4.3 Issue 2: The future of the JAAP as an employment area	4	1	1	1	2	4
Q4.3 What role should the JAAP play in supporting wider employment growth in the sub-region?	69	1	5	1	64	70
Q4.4 Is the area appropriate for significant growth in employment?	68	7	9	7	52	68
Q4.5 Will the area be attractive to investors?	63	5	7	5	52	64
Q4.6 Are there additional options to consider?	45	2	5	2	39	46
4.4 Issue 3: Balancing development with environmental enhancement in the JAAP	8	2	1	2	5	8
Q4.7 Should the Green Belt be considered for revision? If so how should it be revised?	91	19	7	20	69	96
Q4.8 What enhancements to the environment and amenity of the area should be made? What are the priority areas?	58	2	2	2	54	58
Q4.9 What do you see as the greatest potential impact of development in the JAAP and how can this be mitigated?	79	12	4	12	63	79
4.5 Issue 4: Transport and movement	4	0	0	0	4	4
Q4.10 What do you consider to be the transport priorities for the JAAP?	91	2	6	2	85	93
Q4.11 How can a shift from car use to other modes of transport be achieved?	64	2	6	2	59	67
4.6 Issue 5: JAAP 'Areas for Change'	4	0	0	0	4	4
Q4.12 Do you agree with the proposed areas for change?	79	19	15	22	47	84
Q4.13 Are there any areas that should be added or removed? Why?	40	4	5	5	31	41
5.1 Introduction	7	5	0	10	2	12
5.2 Scenario1: Low Growth (do minimum)	27	3	16	3	8	27
5.2.1 Details	8	5	2	5	1	8

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Section Name	Respondents	Objectors	Support	Object	Comment	Representations
5.2.2 Scenario Assessment	3	2	0	2	1	3
5.3 Scenario 2(a): Medium Growth	29	16	4	16	9	29
5.3.1 Details	5	2	1	2	2	5
5.3.2 Scenario Assessment	5	2	1	2	2	5
5.4 Scenario 2(b): Medium Growth – ‘Aviation Cluster’	27	15	1	15	11	27
5.4.1 Details	9	6	1	6	2	9
5.4.2 Scenario Assessment	6	5	0	7	1	8
5.5 Scenario 3: High Growth	48	25	13	26	11	50
5.5.1 Details	10	5	4	5	1	10
5.5.2 Scenario Assessment	4	3	1	3	0	4
Questions 5.1 – 5.3	2	2	0	2	0	2
Q5.1 Which is your preferred Scenario for the future of the Southend Airport area?	452	242	47	244	175	466
Q5.2 How could your preferred scenario be further enhanced?	45	1	6	1	40	47
Q5.3 Are there any other scenarios which you feel have not been considered?	49	3	4	4	43	51
6.1 The process for preparing the JAAP	3	1	0	14	3	17
6.2 Sending in Your Views	13	6	0	6	7	13

4.4 The comments received from specific and general consultation bodies as well as members of the public and other interested parties on the Issues and Options Document were taken into account when developing the Preferred Options Document and are summarised in Table 3 below.

**Table 3** – Issues arising from the consultation on the Issues and Options Document 2008

Brief Overview of Issues Arising from the Consultation
Expansion of London Southend Airport should not take place for environmental reasons.
Impact on residential amenity in terms of noise and air quality issues.
Impact on Listed Buildings in the local area, particularly St Laurence Church.
Impact on both the local and strategic highway network; particularly congestion.
Reviewing the Green Belt boundary to the north of the airport.
Reliance on the airport for job creation.

4.5 See Appendix 2 for the JAAP summary of representations on the 2008 Issues and Options Document. Details of all representations are available in full online via <http://rochford.jdi-consult.net/jaap/>. An explanation of how the issues raised have been taken into account in the preparation of the Preferred Options Document is set out in Appendix 3.

## **5 Preferred Options Document 2009**

5.1 The JAAP Preferred Options was prepared following consultation on the Issues and Options iteration. It was published for consultation on 16 February 2009.

5.2 Consultation was initially scheduled to run until 9 April 2009. Due to high levels of interest in the consultation, it was subsequently extended until 15 May 2009.

5.3 A range of activities took place to increase awareness of the consultation and encourage participation.

5.4 Press releases went out to local media, and the consultation was subject to significant discussion in the local press. Leaflets promoting the consultation were distributed to local doctors and dentist for display in waiting rooms. A series of public meetings were staged at various times in different locations.

5.5 Details of consultation methods utilised at the Preferred Options stage are listed in Table 4 below.

**Table 4 – Encouraging public participation on the JAAP Preferred Options**

<b>Consultation Method</b>	<b>Details</b>
Consultation letters / emails to stakeholders	<p>Letters/emails were sent to those on the Council’s Local Development Framework mailing list – which comprises of general and specific consultation bodies; local representative groups, parties with an interest in the development of the District / Borough, and members of the public who have registered an interest in being involved in planning policy consultations.</p> <p>Groups written to inviting comment included those representing sections of the society who have traditionally been underrepresented in the planning process. Mindful that the over-reliance on electronic communication may exclude some sections of society, the opportunity to comment via written correspondence was also made available.</p>
Online consultation system	<p>The Councils’ online consultation system was utilised. Those on the mailing list were directly consulted via email, if an email address was provided, or by letter otherwise. The consultation was prominently displayed on the Councils’ websites with links to the document, online system and other background information.</p>

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Consultation Method	Details
Leaflets	Leaflets were produced and placed in local doctors and dentist surgeries.
Press notices	Notices were published in three local newspapers.
Press releases/adverts	Press releases/adverts went out to local media The Preferred Options document was widely discussed in local media.
Document availability	Paper copies of the Preferred Options Document were made available, including in local libraries and on request.
Public meetings	<p>The Preferred Options Document was presented and discussed at an East Area Committee meeting in Rochford on 19 March 2009.</p> <p>Drop-in sessions were also held at the following locations during the consultation:</p> <ul style="list-style-type: none"> <li>• 2 April 2009 – Leigh Community Centre (afternoon/evening)</li> <li>• 6 April 2009 – Eastwood Community Centre (afternoon/evening)</li> <li>• 28 April 2009 – Arlington Rooms, Chalkwell (evening)</li> <li>• 5 May 2009 – Ecko Social Club, Southend (evening)</li> <li>• 11 May 2009 – Civic Centre, Southend (evening)</li> </ul>

5.6 Renaissance Southend also held a stakeholder workshop following the public consultation on 29 July 2010.

5.7 A total of 9896 representations were submitted on the Preferred Options. Table 5 provides a numerical break down of representations on the Preferred Options Document by subject.

**Table 5 – Numerical breakdown of consultation responses**

Section Name	Respondents	Objectors	Support	Object	Comment	Representations
London Southend Airport & Environs Joint Area Action Plan Preferred Options	2204	1697	1354	7841	701	9896
1. Introduction	116	92	14	184	14	212
2. Assets, Opportunities and Constraints	93	74	12	86	10	108
Issue 1	256	207	45	230	9	284
Issue 2	123	97	18	103	9	130
Issue 3	145	121	15	127	11	153
Issue 4	148	118	14	131	27	172
Issue 5	112	87	19	96	21	136

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Section Name	Respondents	Objectors	Support	Object	Comment	Representations
Policy E1 – General Development Considerations	397	301	68	327	37	432
Policy E2 – Aviation Way Industrial Estate	131	106	21	111	5	137
Policy E3 – Saxon Business Park	135	107	21	115	9	145
Policy E4 – Phasing of Saxon Business Park	109	92	16	99	3	118
Policy E5 – Development of Area 1A – Saxon Business Park	82	68	12	73	2	87
Policy E6 – Development of Area 1B – Saxon Business Park	70	57	13	60	2	75
Policy E7 – Development of Area 2 – Saxon Business Park	77	67	9	68	1	78
Policy E8 – Nestuda Way Business Park	98	86	8	90	4	102
Policy LS1 – General Policy	1205	886	237	1263	187	1687
Policy LS2 – Development at London Southend Airport	587	489	76	592	31	699
Policy LS3 – Noise Statement	428	349	46	375	35	456
Policy LS4 – Surface Access Strategy	136	117	16	121	7	144
Policy LS5 – Public Safety Zones	171	147	20	155	6	181
Policy LS6 – Runway Extension	566	431	119	480	20	619
Policy LS7 – Operation of New Runway	540	466	52	528	26	606
Policy TF1 – Expansion of New Terminal	272	209	58	232	10	300
Policy MRO1 – Northern MRO	146	107	32	116	7	155
Policy MRO2 – Northern MRO Extension	109	82	25	88	3	116
Policy MRO3 – Southern MRO Zone	108	82	24	84	3	111
Policy ADZ1 – Existing Terminal Area	131	101	28	111	2	141
Policy T1 – Link Road from Eastwoodbury Lane to Nestuda Way	229	171	38	183	21	242
Policy T2 – Safeguarded Route	121	93	19	97	9	125
Policy T3 – Upgrade to Cherry Orchard Way	131	101	16	107	15	138

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Section Name	Respondents	Objectors	Support	Object	Comment	Representations
Policy T4 – Upgrade/Improvement of Aviation Way	109	88	13	91	9	113
Policy T5 – Park and Ride	150	110	25	115	15	155
Policy T6 – Green Travel Plans	118	94	14	98	10	122
Policy T7 – Public Transport	130	88	23	101	21	145
Policy T8 – Walking and Cycling	135	83	31	88	23	142
Policy T9 – SERT	119	81	22	84	16	122
Policy ENV1 – Revised Green Belt Boundary	235	203	21	230	15	266
Policy ENV2 – New Public Open Space – North	100	87	11	92	3	106
Policy ENV3 – New Public Open Space – South	108	88	13	95	8	116
Policy ENV4 – Country Park; Access and Facilities	97	82	10	90	7	107
Policy ENV5 – Green Corridor to Business Park	83	68	11	76	4	91
Policy ENV6 – Green Buffer East of Railway	88	69	11	72	9	92
5. Implementation, Delivery and Monitoring	105	84	17	94	5	116
6. Timetable – Your Views	113	82	21	83	10	114

5.8 A summary of the issue raised through consultation on the JAAP Preferred Options Report 2010 can be found in Appendix 4.

5.9 An explanation of how the consultation responses to the Preferred Options influenced the production of the Submission Document is set out in Appendix 5.

## 6 JAAP Submission Document 2012

6.1 The JAAP Submission Document was published for pre-submission consultation on 25 February 2013.

6.2 Consultation was initially scheduled to run until 10 April 2013. As with the Preferred Options consultation, however, the Councils decided to extend the consultation period until 26 April 2013 due to the level of interest.

6.3 The Council consulted the community and other stakeholders through the actions set out in Table 6 below.

**Table 6** – Consultation methods for the JAAP Submission Document

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Consultation Method	Details
Consultation letters / emails to stakeholders	<p>Letters/emails were sent to those on the Council’s Local Development Framework mailing list – which comprises of general and specific consultation bodies; local representative groups, parties with an interest in the development of the District / Borough, and members of the public who have registered an interest in being involved in planning policy consultations.</p> <p>Groups written to inviting comment included those representing sections of the society who have traditionally been underrepresented in the planning process. Mindful that the over-reliance on electronic communication may exclude some sections of society, the opportunity to comment via written correspondence was also made available.</p>
Online representations	The Councils’ online consultation system was utilised. Those on the mailing list were directly consulted via email, if an email address was provided, or by letter otherwise. The consultation was prominently displayed on the Councils’ websites with links to the document, online system and other background information.
Document availability	Paper copies of the Preferred Options Document were made available, including in local libraries and on request.
Press releases/adverts	Press releases/adverts went out to local media.
Public notice	The Regulation 19 notice was published in four local newspapers (a copy of the Regulation 19 notice is provided as Appendix 6).

6.4 A total of 474 representations were made at this stage by 107 different respondents. Of the 474 representations made, 334 were objections to the JAAP Submission Document on the grounds of soundness / legal compliance. Table 7 provides a numerical break down of representations by subject.

**Table 7 – Numerical breakdown of JAAP Submission Document consultation responses**

Section Name	Respondents	Objectors	Support	Object	Comment	Representations
London Southend Airport and Environs Joint Area Action Plan Submission Document	107	90	140	334	0	474
3. Introduction	44	40	4	43	0	47
4. Vision and Objectives	23	18	5	23	0	28
5. Development Proposals for the JAAP	23	20	3	27	0	30
6. Policies	10	10	0	17	0	17

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Section Name	Respondents	Objectors	Support	Object	Comment	Representations
Policy E1 – General Development Considerations	16	12	4	14	0	18
Policy E2 – Aviation Way Industrial Estate	11	6	5	7	0	12
Policy E3 – Saxon Business Park	8	4	4	4	0	8
Policy E4 – Phasing of Saxon Business Park	6	1	5	1	0	6
Policy E5 – Development of Area 1A – Saxon Business Park	6	2	4	2	0	6
Policy E6 – Development of Area 1B – Saxon Business Park	3	0	3	0	0	3
Policy E7 – Development of Area 2 – Saxon Business Park	6	2	5	2	0	7
Policy E8 – Nestuda Way Business Park	6	4	2	4	0	6
Policy LS1 – General Policy	14	10	4	13	0	17
Policy LS2 – Development at London Southend Airport	9	8	1	8	0	9
Policy LS3 – Noise	20	17	3	17	0	20
Policy LS4 – Noise Compensation and Purchase Scheme	15	10	6	10	0	16
Policy LS5 – Airport Surface Access Strategy	8	6	2	6	0	8
Policy LS6 – Public Safety Zones	13	11	2	11	0	13
Policy LS7 – Operation of the New Runway	19	15	4	16	0	20
Policy LS8 – Air Quality Monitoring	11	7	4	7	0	11
Policy TF1 – Expansion of New Terminal	13	10	3	10	0	13
Policy MRO1 – Northern MRO	10	8	2	8	0	10
Policy MRO2 – Northern MRO Extension	6	5	1	5	0	6
Policy MRO3 – Southern MRO Zone	4	2	2	2	0	4
Policy ADZ1 – Existing Terminal Area	11	8	5	9	0	14
Policy T1 – Access to Development Areas	10	6	4	6	0	10
Policy T2 – Access to Saxon Business Park	4	1	3	1	0	4
Policy T3 – Travel Planning	6	1	5	1	0	6

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Section Name	Respondents	Objectors	Support	Object	Comment	Representations
Policy T4 – Public Transport	9	5	5	5	0	10
Policy T5 – Walking and Cycling	8	1	7	1	0	8
Policy T6 – Freight and Network Management	8	3	5	3	0	8
Policy T7 – Network Capacity Improvements	15	7	8	7	0	15
Policy ENV1 – Revised Green Belt Boundary	10	6	4	7	0	11
Policy ENV2 – New Public Open Space – North	5	2	3	3	0	6
Policy ENV3 – Green Buffer South	5	2	3	3	0	6
Policy ENV4 – Country Park; Access and Facilities	3	1	2	2	0	4
Policy ENV5 – Green Corridor to Business Park	3	1	2	2	0	4
Policy ENV6 – Green Buffer East of Railway	9	7	2	8	0	10
Policy ENV7 – Environmental Sustainability	9	6	3	8	0	11
7. Implementation and Delivery Plan	8	8	0	8	0	8
8. Risks to Delivery	2	2	0	2	0	2
Proposals Map	2	1	1	1	0	2

6.5 A summary of the issues raised by specific and general consultation bodies at the pre-submission stage is detailed in Appendix 7 Issues raised by other respondents during the consultation are set out in Appendix 8

6.6 A number of respondents remained opposed to the general direction of the JAAP and its objectives. However, it is relevant to note that the JAAP does not sit in isolation, but is shaped by other strategic policies that have identified London Southend Airport as having an important role to play in the economic development of the area, including as a catalyst for economic growth and employment generation. Such strategic policies included those contained in the now revoked East of England Plan, but also in the extant Rochford Core Strategy and Southend-on-Sea Borough Council Core Strategy.

## 7 Duty to Co-operate

7.1 Section 110 of the Localism Act sets out the duty to co-operate, which relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council. It requires councils to set out planning policies to address such issues, and consider joint approaches to plan making. It also requires councils to

## Making a Difference



- engage constructively, actively and on an on-going basis with other councils and public bodies in plan preparation.
- 7.2 The Localism Bill received Royal Assent on 15 November 2011. As such, more of the work on the JAAP predated it. Nevertheless, Southend-on-Sea and Rochford District Councils engaged constructively with each other and other relevant councils and public bodies in the production of the JAAP, as set out below.
- 7.3 The Joint Area Action Plan has been produced by the two neighbouring authorities working in partnership, recognising that development within this area had the potential to have a significant impact on both Rochford District and Southend Borough.
- 7.4 Highways are a key strategic issue for the JAAP. As a unitary authority, Southend-on-Sea Borough Council is a Highway Authority. However, in the case of Rochford District, the Highway Authority is Essex County Council. Essex County have been engaged throughout the JAAP preparation process, and are supportive of the transport policies in the Submission Plan.
- 7.5 It is relevant to note that policies in the JAAP and its strategic direction in particular were not formulated in a vacuum, but were in response to existing policies in the Development Plan, in particular Rochford District's and Southend-on-Sea Borough Council's Core Strategies. Both Core Strategies identify London Southend Airport has having the potential to be a catalyst for economic growth and employment generation, and both includes policies seeking to realise this potential.
- 7.6 The Core Strategies were produced in compliance with the now defunct Regional Spatial Strategy – the East of England Plan – which was approved by local authorities in the region.
- 7.7 The three local authorities have worked jointly on developing the JAAP transport policies, which are now being taken forward by making the case for funding to implement the transport infrastructure requirements. This is being coordinated by the Thames Gateway South Essex Partnership (TGSEP) and will form a key part of the South East Local Enterprise Partnership (SELEP) Strategic Economic Plan (SEP). The TGSE Planning and Transport Board provides a mechanism for joint working and has recently published an updated transport strategy for TGSE which fully supports the JAAP proposals.
- 7.8 Ahead of the start of the pre-submission consultation, neighbouring authorities and Essex County Council were written to, explaining that the Councils would shortly be commencing consultation on the Submission Document and offering representatives (Offices and / or Members) the opportunity to meet to discuss any potential cross-boundary issues in respect of the Plan. No authorities took up this invitation. Neighbouring authorities and Essex County Council were subsequently consulted direct on the Submission Document.

## **8 Summary and Conclusion**

- 8.1 Rochford District and Southend-on-Sea Borough Councils have worked in partnership in the production of the London Southend Airport and Environs Joint Area Action Plan, including in engaging with the local community, specific and general consultation bodies, and other stakeholders. Consultation has gone beyond the levels required by regulations.
- 8.2 Throughout the production of the JAAP, the Councils have sought to address concerns raised through the various consultation stages and the plan has developed iteratively having regard to consultation responses.
- 8.3 However, it should be noted that a number of respondents and groups remain opposed to the JAAP in principle, particular policies relating to activity at London Southend Airport itself. In this regard, it is pertinent to note that the objectives of the JAAP have been influenced by policies at a more strategic level, including those within the Rochford Core Strategy and Southend-on-Sea Core Strategy. Public participation played a significant role in the production of both councils' Core Strategies, and both Core Strategies were found sound – including in relation to community involvement – following independent examination.

### Appendix 1 – Specific and general consultation bodies

- Age Concern
- Althorne Parish Council
- Anglian Water
- Arriva Southern Counties
- Ashingdon Parish Council
- Association of Jewish Refugees
- Barling Magna Parish Council
- Basildon Borough Council
- Belfairs Gardens Residents Association
- British Hardware Federation
- Burges Estate Residents Association (BERA)
- Burnham on Crouch Town Council
- c2c Rail & National Express East Anglia
- Campaign to Protect Rural Essex
- Canewdon Parish Council
- Castle Point Borough Council
- Chalkwell Ward Residents Association
- Chelmsford Borough Council
- COBRA (Coalition of Borough Residents Associations)
- Conservation Association Westcliff Seaboard
- CPRE Southend Area
- CPREssex
- Crouch Harbour Authority
- Cycling Touring Club (CTC)
- Dartford Borough Council
- Defence Estates
- Department for Communities and Local Government
- DIAL Southend
- Disability Essex
- East of England Ambulance Service
- East of England Local Government Association
- East of England Regional Animal Health Office
- English Heritage
- Environment Agency
- Essex & Suffolk Water
- Essex Autistic Society
- Essex Badger Protection Group
- Essex Bridleways Association
- Essex Chambers of Commerce
- Essex County Council
- Essex County Council (Highways)
- Essex County Council (Schools Service)
- Essex County Council Public Rights of Way

- Essex County Fire & Rescue Service
- Essex Libraries
- Essex no 1 Circuit of Jehovah's Witnesses
- Essex Police
- Essex Racial Equality Council
- Essex Wildlife Trust
- Essex Wildlife Trust Rochford & Southend Area
- Essex Youth Service
- Estuary Housing Association
- Ethnic Minority Forum
- Federation of Small Businesses
- First Essex Buses
- Foulness Parish Council
- Futures Community College
- Great Wakering Parish Council
- Grove Park Residents Association
- Hawkwell Parish Council
- Hawkwell Residents Association
- Health & Safety Executive
- Highways Agency
- Hockley Chamber of Trade
- Hockley Hawkwell Women's Institute
- Hockley Parish Council
- Hockley Residents Association
- Hockley Townswomen's Guild
- Homes and Communities Agency
- Home Builders Federation
- House of Commons
- Hullbridge Parish Council
- Leigh Town Council
- Little Burstead Parish Council
- London Gypsy and Traveller Unit
- Maldon District Council
- Marine Management Organisation
- Mobile Operators Association
- National Federation of Gypsy Liaison Groups
- National Grid Gas
- National Wind Power
- Natural England
- Network Rail
- NHS Mid-Essex/Essex County Council
- NHS Property Services
- NHS South East Essex
- NHS South Essex
- Noak Bridge Parish Council

- North Fambridge Parish Council
- Paglesham Parish Council
- Purleigh Parish Council
- Ramsden Bellhouse Parish Council
- Ramsden Crays Parish Council
- Rawreth Parish Council
- Rayleigh Chamber of Trade
- Rayleigh Mount Local Committee
- Rayleigh Town Council
- Renewable UK
- Roach Fairways and Conservation Committee
- Rochford & District Chamber of Trade & Commerce
- Rochford & Rayleigh CAB
- Rochford Chamber of Trade
- Rochford District Access Committee
- Rochford District Council
- Rochford Hundred Amenity Society
- Rochford Hundred Golf Club
- Rochford Parish Council
- Rochford Police Station
- Royal National Lifeboat Institution - Southend Branch
- RRAVS
- Runwell Parish Council
- SAEN
- Sanctuary Housing Association
- SE Essex Organic Gardeners
- SEETEC
- Shoebury Residents Association
- Shoebury Society
- Shoebury Traders Association
- Society for the Protection of Undercliff Gardens
- SOS Domestic Abuse Projects
- South East Essex College
- South East Essex Friends of the Earth
- South East Essex Green Party
- South East Local Enterprise Partnership
- South Essex Area Health Authority
- South Essex Natural History Society
- South Essex NHS Trust
- South Westcliff Community Group
- South Woodham Ferrers Town Council
- Southend & District Aid Society
- Southend & District Pensioners Campaign
- Southend & Leigh Fishermans Association
- Southend & Rochford Community Command

- Southend & Surrounds Cycling Campaign
- Southend Adult Community College
- Southend and Surrounds Cycling Campaign
- Southend and Westcliff Hebrew Congregation
- Southend Area Bus Users Group
- Southend Association of Voluntary Services
- Southend Blind Welfare Organisation
- Southend Islamic Trust
- Southend Mencap
- Southend Mind
- Southend Ornithological Group
- Southend Primary Care Trust (PCT)
- Southend Properties (Guernsey) Ltd
- Southend Tenants and Residents Federation
- Southend Town Centre Business Group
- Southend University Hospital
- Southend West School Sport Partnership
- Southend YMCA
- Southend-on-Sea Arts Council
- Southend-on-Sea Borough Council
- Southend-on-Sea Guild of Help and Citizens Advice Bureau
- Southend-on-Sea Sports Council
- Southminster Parish Council
- Sport England (East Region)
- St Peter & Paul Parish
- Stambridge Parish Council
- Stephenson's of Essex
- Stow Maries Parish Council
- Sustrans
- Sutton Parish Council
- Swan Housing Association
- Tattersall Gardens Residents Group
- The British Horse Society
- The Hullbridge Village Community Group
- The National Federation of Gypsy Liaison Groups
- The National Trust
- The Planning Inspectorate
- The Rescuers Wildlife Sanctuary
- The Society for the Protection of Ancient Buildings
- The Southend Pier Museum Trust Ltd
- The Southend Society
- The Theatres Trust
- The Woodland Trust
- Together on Sunday Afternoon
- Traveller Law Reform Project

## Appendix 1

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- University of Essex Southend
- West Leigh Residents Association
- Westcliff & Leigh Neighbourhood Watch
- Woodham Ferrers & Bicknacre Parish Council
- Woodland Trust

### Appendix 2 – Summary of issues raised through consultation on Issues and Options Document

The following provides a brief summary of comments submitted as part of consultation on the Issues and Options document. It should be read in conjunction with the comments in their entirety, which can be viewed at <http://rochford.jdi-consult.net/jaap>

#### Section 1.1 What is a Joint Area Action Plan (JAAP)?

GO East reminded the Councils for the need to ensure the JAAP is prepared in line with the new PPS 12 and guidance. English Heritage welcomed the definition of JAAPs as ensuring the protection of areas and places sensitive to change. Concern was expressed that residents were not aware of consultation or would struggle to comment on the issues. Concern was also expressed that the proposed expansion of the airport was at odds with national, European and international targets to reduced carbon dioxide emissions, that the economic benefits will be short-lived and outweighed by the economic damage of climate change.

#### Section 1.1.1 The Evidence Base

CPRE expressed concern about the potential impact of proposals on Church of St Laurence and All Saints, citing the evidence base. CPRE also state that they find it unacceptable that the development proposals in the JAAP have no concrete accompanying surface access plan. CPRE expressed concerns about the impact of increased aviation activity and traffic on air quality.

CPRE stated they would support council policies to safeguard and enhance the Maintenance Repair and Overhaul (MRO) business, its employment and skill base. They note that MRO employment currently outweighs aviation employment by a factor of about 7 (910 to 140). Concern was expressed that the evidence base did not consider the environmental and quality of life impacts of proposals. London Southend Airport noted stated there were some minor errors in the evidence base, but these did not effect the soundness of the evidence submitted.

Comments claimed the evidence base indicated the expansion of the airport in its own right will do little to accommodate existing or new businesses. The evidence base does not detail what benefits there would be to Rochford or Southend residents.

The Environment Agency stated that the Flood Zones discussed in the evidence base should be the planning definitions, not the household insurance ones.



## Appendix 2

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English Heritage felt that cultural heritage issues had not been properly considered in the main issues and constraints. CPRE queried numerous aspects of the evidence base, including the omission of two listed buildings, and the lack of a genuinely sustainable surface access strategy.

Other comments queried whether the cost of fuel had been a consideration.

### **Section 1.1.2 Sustainability Appraisal**

GO East reminded the Councils for the need to ensure the JAAP is developed having regard to a sustainability appraisal that considers alternatives, and that it is accompanied by a robust evidence base. London Southend Airport believes there are a number of minor errors with the Sustainability Appraisal. The Environment Agency noted that sections of the JAAP are in areas of high flood risk, not medium as stated.

CPRE highlight a number of the negative impacts identified in the Sustainability Appraisal and express concern that the report is overly optimistic in terms of how these impacts can be mitigated.

Other comments claimed that sustainability was a moot point when considering the expansion of an airport and that there was a very weak case for expanding the airport, particularly given spare capacity at other airports.

### **Section 1.2 What will the Joint Area Action Plan (JAAP) include**

Respondents pointed out that Rochford Core Strategy is at an early stage and has not yet been adopted. Concern about impact on residents, particularly in terms of noise. Concern that the JAAP does not consider the environmental impacts of carbon dioxide emissions and the long-term economic impact of aviation expansion, given the economic impacts of climate change. Concern that the JAAP does not consider the negative impacts on communities to the south of the Thames, particularly Hoo Peninsula.

### **Section 1.3 The Issues and Options Report**

EERA note that there is a potential a conflict between the conformity of the RSS and the JAAP insofar as the need to remove some of the green belt for new industrial development has not been specifically included in the list of necessary strategic reviews of green belt boundaries. EERA claim that the proximity of the airport is not an important factor for the location of the existing businesses near the airport, and the domestic Maintenance Repair and Overhaul (MRO) industry faces pressure from less-costly labour pools of Asia, and Latin America, the justification for further expansion needed to review the boundary may be limited.

EERA also state that nearly a third of business surveyed were deterred from locating in the area because of the proximity of the airport and that this will be a significant factor deterring B1 (Office/light industrial) uses that, as the supporting evidence highlights, will be the most likely source of employment growth.

Other representations stated that the JAAP should include an option of gradual reduction of aviation capacity and that the JAAP had not addressed how obligations to reduce carbon emission had been met.

### **Section 1.4 Policy context for the JAAP**

GO East reminded the Councils of the need for an Appropriate Assessment under the Habitats Directive for any proposals that have the potential to impact upon the Natura 2000 network. They remind the Councils that it will be necessary to determine whether the JAAP has such potential.

Representations stated that the basic premise of the government's White Paper on aviation, that there will be a growth in air transport, may now be wrong given the current economic climate. The current ability of, or potential of improving, the transport infrastructure to cope with airport expansion was questioned. Representations stated the need for joined up working between tiers of government to prevent climate change. Other comments expressed concern over the impact of the JAAP on nearby ecological sites.

### **Section 1.5 Getting Your Views**

Comments stated that consultation was not wide enough and that not enough time had been given to respond. Other comments stated that it was not appropriate to stage consultation within the 'holiday season' and that it had been poorly advertised.

### **Section 2.1 The JAAP Area**

Concern expressed that St Lawrence Orchard, Rochford Hundred Golf Club and Rochford Tennis are not recorded. Objection to use of Green Belt land. Concern regarding impact on schools in the area expressed. Comments noted that much of the existing employment land is around the airport boundary and subject to aviation electronic navigation systems and which restricts new development .

### **Section 2.2 London Southend Airport**

The need for a new train station given the proximity of Rochford's was questioned. Concern was expressed over the lack of infrastructure.

## Appendix 2

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Objections to any expansion of the airport were made. Comments stated that the airport was not the be all and end all of employment issues in the area. Concerns were also expressed over inaccuracies and contradictions within the evidence base.

### Section 2.3 Supply and demand for employment areas

Representations queried what alternatives to an airport had been considered. Comments questioned the need for additional office space, claiming there is already an over supply in Southend. Respondents noted that there may be an opportunity to relieve congestion on roads by transporting goods by rail. Other comments included the observation that the mix of employment uses indicated that there was not a reliance on the aviation sector for employment.

### Section 2.4 Transport & Accessibility

Arriva Southern Counties expressed concern at the possible loss of the link via Eastwoodbury Lane.

Southend University Hospital NHS Foundation Trust were concerned that increased congestion would deter their staff from using the shuttle bus service transferring staff based in office accommodation in Comets Way, to the hospital. They also expressed concern that further obstructions for blue light ambulance access to the hospital could occur. Southend University Hospital suggest that airport passenger park and ride schemes would be an essential element of any development.

Southend University Hospital also expressed concern over the impact of increased noise from the high-growth option on patients

Concerns were expressed that airport expansion was not viable given current levels of congestion on the local highway network. Objections to expansion of airport made, with concerns expressed over noise, emissions and traffic. Concerns also expressed that airport may not be viable given the state of the global economy.

Respondents suggested that the use of the bus service should be encourage , but that the cycle routes are virtually non-existent and those that are in place are currently not fit for purpose.

### Section 2.5 Environmental character and assets

Comments stressed the need to ensure that environmental protection measures proposed at the policy stage were not diluted at implementation.

Concern was expressed with regards to increased air pollution and the impacts of this on health, particularly the health of local school children. Concern was also expressed about the impact of the expansion of the airport on the local housing market.

Noise is a concern, although it was noted that this may be mitigated by the use of quieter planes. Responses stated that clear reports on the increase in noise from aircraft and pollution levels need to be provided to all residents, especially those living by the airport and under flight paths. The question was asked, whether those that will be affected will be able to make the decisions.

Essex County Council noted that pedestrian access is quite well connected but would benefit from a link between the former brickworks site and St Andrews Church to provide a green traffic free path for the Roach Valley Way promoted route. They suggest that further routes and road/rail crossing facilities are required to connect existing paths which would also providing sustainable links to Purdeys Industrial Estate.

### **Section 2.6 Conclusions**

Comments included a suggestion that night flights be eliminated completely and concern expressed over the proximity of the railway line and the potential for a plane to come short of the runway onto this.

#### **Question 2.1 – Are the assets of the JAAP area fully reported and understood?**

The majority of respondents stated 'Yes' only 13% said 'No'. Environmental issues were raised in respect of house devaluation, traffic, noise and air pollution.

#### **Question 2.2 – Are there any important assets or issues missing from the assessment?**

Respondents were concerned with the number of flights planned along with the possibility of night flights, the relationship of the potential development to the existing strategic highway infrastructure and danger; as all areas surrounding Southend Airport are built up, unlike Stansted and Gatwick. Other omitted issues raised include a business jet handling agent, land contamination, water use/resource and water quality, waste issues during and after construction. It was also noted that the Church of St Laurence and All Saints, Rochford Hundred Golf Course, Rochford Tennis Club and an ancient orchard off Eastwoodbury Lane were not mentioned.

### Section 3.1 Vision

Concern expressed by GO East that the vision expressed was more of a statement of intent and description of characteristics, rather than a vision of how the area would look in the future.

Others expressed concern at the perceived lack of reference to quality of life.

### Section 3.2 Objectives of the JAAP

Concerns include lack of clear direction or business plan. Other concerns included lack of appreciation of environmental issues.

### Questions 3.1 – 3.3

#### Question 3.1 – Do you agree with the overall Vision for the JAAP?

One comment states – consider the vision for London Southend Airport to be inadequate and unfit for purpose, would like to see the Vision modified so that it highlights a commitment to developing the Airport into a small regional airport to serve the Essex Thames Gateway sub-region and a Vision that specifically highlights the need to provide first class infrastructure links for residents and workers. It was also noted that ‘at present, the vision is not consistent with Objective SO11 of the Southend Core Strategy which recognises that the regeneration of London Southend Airport should be subject to environmental safeguards’. English Heritage suggested the following amendment: ‘...employment opportunities while safeguarding the quality of life of its residents and workers. To achieve this, the area’s environmental assets will be protected and supported in tandem with the promotion of economic activity.’ 58% of the responses received agreed with the overall vision for the JAAP.

#### Question 3.2 – Do the objectives set out above cover the key requirements from the area?

An objection was raised to the lack of preservation of Rochford and the surrounding environment. Issues were raised with regard to the wider environment not being considered in the objectives. The improvement and enhancement of green space and biodiversity, limiting and adapting to climate change, reducing flood risk, minimising waste, improving land quality, improved water quality are not addressed. The strain on the police, hospital, fire service, schools and the general medical services was also raised. The Vision and listed Objectives suggest that the road access is adequate to serve a thriving airport and a major employment centre, this is not the case and amendments are required. The Environment Agency, English Heritage, Natural England and Leigh Town Council would like to see some minor amendments, however 59% responded ‘yes’ to this question.

### **Question 3.3 – Are there any other additional objectives that might help to guide the selection of the preferred option/options and JAAP?**

Rebuilding of Bradwell nuclear power station and any wind farms was suggested. One representation stated that Southend Borough Council Core Strategy, Rochford District Council Local Plan, RSL Regeneration Framework, the East of England Plan and the Regional Economic Strategy all have statements about the objectives for the airport which could be added to give a clearer picture of the context. Separate objectives on transport, biodiversity, cultural heritage and management were recommended.

### **Section 4.2 Issue 1: The future development and role of London Southend Airport**

Respondents included those who questioned why anything had to change at all, citing environmental concerns in particular as a reason for not developing the airport. Of the options put forward, views were mixed: some felt that low growth was the only sustainable option; others felt that medium growth was acceptable but high growth a step too far; some felt that greater expansion would be good for jobs and provide opportunities for the area.

### **Question 4.1 – What do you see as the role of London Southend Airport in the future?**

52% envisaged a regional airport for internal UK and European flights and a catalyst for major employment and business growth. 6% recommended the airport be redeveloped for housing/other use while 28% suggested it should retain its current status.

### **Question 4.2 – How can the airport best be developed to drive and support the local economy?**

Regenerating the area, infrastructure improvements, creating new jobs and offering access to other European destinations. Redevelopment to assist the entire community (hospitals/GPs/dentists) or another Lakeside retail/business park and sports complex.

### **Section 4.3 Issue 2: The future of the JAAP as an employment area**

Mixed views about the future of the airport as an employment area. Concern expressed at the reliance on the aviation industry for employment.

### **Question 4.3 – What role should the JAAP play in supporting wider employment growth in the sub-region?**

Providing cheaper business accommodation is an attraction. More advertising of Southend to European Countries, concentrating on the Olympics in 2012. Deliver many of the jobs required in the Regional Plan. Help shape the development, encourage support from business leaders, government, and market the great potential of growing the airport and improving road links.

### **Question 4.4 – Is the area appropriate for significant growth in employment?**

62% stated 'yes' in response to the question providing local road improvements are carried out to support sustainability of such growth. Objections and 'no' comments were with regard to the current financial climate and lack of road infrastructure.

### **Question 4.5 – Will the area be attractive to investors?**

78% of respondents stated 'yes' providing medium/high growth options were undertaken and improvements to infrastructure carried out. Concerns were raised with regard to the slowdown in aircraft industry and investors being put off by the limited potential to improve surrounding transport network.

### **Question 4.6 – Are there additional options to consider?**

The replacement of the airport with a giant retail/business park was suggested. As was the use of the land for good quality leisure facilities. An underpass to replace the road closure at Eastwoodbury Lane was suggested.

### **Section 4.4 Issue 3: Balancing development with environmental enhancement in the JAAP**

Concern expressed over environmental and health impacts of proposals to expand the airport. Some objected to the loss of Green Belt land. London Southend Airport claimed that the Green Belt boundary is arbitrary and does not relate to natural features.

### **Question 4.7 – Should the Green Belt be considered for revision? If so how should it be revised?**

26% replied 'Yes' provided the revision does provide the retention of as much Green belt as possible. 59% did not want the greenbelt to be revised and thought it should be left as it is to protect residents' quality of life.

### **Question 4.8 – What enhancements to the environment and amenity of the area should be made? What are the priority areas?**

Habitat enhancements such as planting of native hedgerows and tree belts, creation of green spaces as well as enhancement/creation of waterways, sustainable transport infrastructure such as improved public transport, cycle ways and footpaths to interlink airport buildings which makes travelling to and from the airport more accessible and environmentally friendly. Mitigation of noise impacts.

### **Question 4.9 – What do you see as the greatest potential impact of development in the JAAP and how can it be mitigated?**

Main concerns relate to the volume of flights, noise (particularly from night flights) and air pollution, lack of transport links to/from the airport and the reduction of existing greenbelt land. Positive comments included 'put Southend firmly on the map' and improved employment in the area.

### **Section 4.5 Issue 4: Transport and movement**

Southend Area Bus Users Group welcomes the proposed new station and suggest that the station incorporates a rail/bus interchange and that bus service operators are encouraged to divert their services to the proposed station. The need for a bypass for the A127 was expressed, as was concern at congestion and the current infrastructure.

### **Question 4.10 What do you consider to be the transport priorities for the JAAP?**

A number of representations expressed the need to improve the current highway network - concern over congestion was a recurring theme. Importance of the need to move away from reliance on private car was stated.

The implementation of a new rail station and access to it was a common priority. Improved public transport was seen as necessary. Impact of additional flights on residential amenity was also an issue raised.

### **Question 4.11 How can a shift from car use to other modes of transport be achieved?**

Many respondents were sceptical that such a shift could ever be achieved, often citing convenience as the main reason why cars would always be the preferred choice of transport. Better public transport, such as a more reliable and frequent bus service was cited as a way to reduce car dependency. A door-to-door bus link such as the 'Stansted Flyer' was suggested. The encouragement of cycling was put forward. A number of respondents suggested that better marketing and advertising of alternatives was required.

### **Section 4.6 Issue 5: JAAP 'Areas for Change'**



Concern was expressed at the level of development being proposed. Concern expressed over what impact the opening of the new car show rooms along Cherry Orchard Way may have on the highway network. Local amenity improvements questioned. It was noted that avionics technical advancement is consistently mentioned in the document with regard to potential noise and emission reductions, thereby not having a significant effect on the local area, but there is no proof of this.

### **Question 4.12 Do you agree with the proposed areas for change?**

Concern expressed about possible use of compulsory purchase. Many did agree with the proposed areas for change, but other felt that the green areas should be left undeveloped and that employment uses be directed to other brownfield sites. Environment Agency expressed concern regarding flood risk.

### **Question 4.13 Are there any areas that should be added or removed? Why?**

Objections to the development of Green Belt made. Suggestion of development for employment in alternative locations instead of the airport area. Many felt that the airport boundary should not be enlarged.

## **5.1 Introduction**

Minimum / no growth comments with concern drawn to increases in noise, traffic and pollution, and a medium growth comment. The sustainability aspect of the proposals should be included in the text with a clear link to the Sustainability Appraisal. Duplication of information should be avoided. The scenario diagrams should show the ownership of the land in question. The criticism was made that there is no 'no expansion' option in the report.

## **5.2 Scenario 1: Low Growth (do minimum)**

Comments suggested that airport activities would dwindle if growth is not achieved leading to a reduction in operations and thus employment. Concerns were expressed that industry would be discouraged from the area (in favour of areas with opportunities to expand). Low growth would also not benefit local sport and recreational facilities in the area. On the other hand, comments suggested that this was the only sustainable growth option with a

minimal negative impact; there should be no runway extension or development on Green Belt, adequate pollution control measures are required and any negative impacts such as increased traffic should be counteracted through infrastructure improvement in the surrounding area. However, it was noted that there is no 'no growth' scenario in the document, that the aviation industry is sensitive to economic impacts and growth goes against government targets for carbon dioxide reduction. Additionally part of Aviation Way Business Park is actually in Flood Zone 3. Southend Airport has commented that further evidence base work will be carried out at a later stage.

### **Section 5.2.1 Details**

Low growth would have the minimum amount of disruption and impact, but it would still have some impact, and there needs to be more environmental protection for residents. However, the MRO etc wouldn't grow in this scenario and the Brickworks site has not been identified for redevelopment. Other comments oppose any growth because of noise and pollution, the Green Belt should not be developed and it is the wrong time to expand. Southend Airport has commented that further evidence base work will be carried out at a later stage.

### **Section 5.2.2 Scenario Assessment**

One comment says that the scenario is acceptable; another says that low growth does not conform to policies e.g. the government's White Paper on airports or the East of England Plan. Another says that it is irresponsible to expand such a polluting industry.

#### **Section 5.3 Scenario 2(a): Medium Growth**

This scenario may not attract aviation related business, and any negative impacts should be minimised and counteracted. Expansion would be a good opportunity providing employment and holiday opportunities, and associated infrastructure improvements; there is legislation to control the negative impacts. Others commented that the park and ride scheme is needed but more information is required, no expansion is preferred but some development is needed, the brickwork site should be developed, adequate pollution control measures are required, and with the business park extension to the North of Aviation Way there is the chance to achieve environmental enhancements. Westcliff Rugby Club has also recommended that "the playing fields and adjoining land north of the proposed employment extension should also be released from the Green Belt and safeguarded for potential future use". However, other comments state that minimal / no expansion is preferred because of noise, pollution, traffic, and environmental damage etc against reducing carbon dioxide emissions; it is irresponsible to expand a polluting industry. There should be no expansion of the airport perimeter or the runway.

Another comment says that option 3 is the only scenario to bring the proposed economic benefits to the area. Additionally part of Aviation Way Business Park is actually in flood zone 3. Southend Airport has commented that further evidence base work will be carried out at a later stage.

### **Section 5.3.1 Details**

There are concerns over noise pollution arising from this scenario. Appropriate provision should be made for bridleway users who will be affected by expansion of the airport. This scenario would increase employment and the vibrancy of the airport with acceptable impact; greater expansion would affect infrastructure, and cause noise and environmental damage. Southend Airport has commented that further evidence base work will be carried out at a later stage.

### **Section 5.3.2 Scenario Assessment**

One comment stated that this scenario will support employment without significant adverse impact on residents; an increase in employment without a proportional increase in noise. However another comment says there will be less green belt, more noise and more traffic thus a lower environmental quality. The needs of pedestrians, cyclists and equestrians should be considered and provisions made to counteract impact of development. Southend Airport comments that this scenario has a “high strategic fit with the objective of ensuring a high quality environment for residents”.

### **Question 5.4 Scenario 2(b): Medium Growth - 'Aviation Cluster'**

Most representations objected to Scenario 2(b). There are concerns over environment impact - noise pollution, air pollution, climate change issue, flood risk, change in green belt boundary, etc. Some suggested that the expansion of a polluting industry like aviation in an already overpopulated and congested area is irresponsible and unsustainable, and this will have detrimental and negative effect on most people living nearby. Moreover, some pessimistically think that the passenger forecast of 2 million is not achievable. There are also worries about inadequate road network, increasing fuel price, and runway configuration.

However, some do think this is a positive scenario - infrastructure improvements would encourage business to the area; employment opportunities will be enhanced, legislation to control the negative impacts; increased choice of holiday destinations.

### Section 5.4.1 Details

Only one support comment received and one other says the scenario is acceptable. All other representations are strongly objecting to the key features suggested in this scenario, especially on pollution, safety and Green Belt issues.

### 5.4.2 Scenario Assessment

No support received. Concerns were raised with regard to the increased traffic and increased noise. Lack of information on noise level is also a concern. The probability of achieving the passenger forecasts is was questioned.

### Section 5.5 Scenario 3: High Growth

A number of respondents felt very passionately that the airport expansion should not go ahead, citing environmental concerns in particular. Noise, residential amenity and congestion were also frequently mentioned reasons why high-growth should not be favoured. Other respondents suggested that the high-growth scenario was the only option that would see the economic potential of the airport realised and would lead to the airport being an asset for the region.

### Section 5.5.1 Details

Essex County Council notes the need to ensure that any scheme for the replacement of Eastwoodbury Lane includes sufficient off road provision for pedestrians, cyclists and equestrians.

There was some support from those that felt that this allowed for growth whilst protecting habitats. Others felt that the long-term harm would outweigh any benefits.

### Section 5.5.2 Scenario Assessment

Some support due to it being inline with national and regional policies, although support was subject to environmental issues being carefully monitored and enforced. There were objections on the grounds of negative impact on the quality of life for residents.

### Questions 5.1 – 5.3

#### Question 5.1 Which is your preferred Scenario for the future of the Southend Airport area?

##### Low Growth Scenario Comments Summary

The responses contained a combination of objections to any expansion and support for the low growth scenario. There were numerous concerns raised particularly with regard to the increase in noise levels, increase in air pollution, the volume of flights, increased road congestion, increased pressure on the local infrastructure - congestion on main routes and the rail network - thus exacerbating inherent problems, the impact on property prices, effect on green open spaces and the overall environmental impact. Other concerns arose about runway extension and the diversion of Eastwoodbury Lane for example increased traffic diverted onto the A127, and the impact on the quality of life of local residents and the wider community, and on community facilities such as local schools, the golf course and St Lawrence Church. Some comments also emphasised the proximity of London-Southend airport to other major airports in the region, thus questioning its deliverability, and that the proposed expansion should be considered within the current economic climate. Several alternative suggestions for the airport were proposed, for example the creation of a new hospital on the site or the development of an organic argi-business. Some respondents felt that more detail was required around the impacts of the proposed scenarios on and the benefits for, the wider community. The level of public awareness surrounding the consultation process itself was also questioned.

##### Medium Growth (2a) Scenario Comments Summary

Respondents were concerned with the release of Green Belt, noise pollution, infrastructure and the airport and passengers forecasts. Generally, they support the Medium growth scenario, and object to the expansion of a larger airport, as Stansted airport is only miles away. It is akin to one of the comments suggested – ‘significant improvements can be made to the airport and surrounding employment area to enable a large number of jobs to be created without the need to the release of Green Belt land’. Although some major airports are not many miles away from Southend, some suggested that Southend Airport can take some pressure off these airports, and could benefit the local area in different aspects.

##### Medium Growth (2b) Scenario Comments Summary

Respondents were mainly concerned with the environmental impact and infrastructure improvement. Some had concerns regarding the locations of Southend Airport. Others suggested some increase in capacity could be beneficial but strict control will be necessary.

##### High Growth Scenario Comments Summary

This Scenario is supported by various organisations, including Ford Motor Company, Chamber of Trade and Commerce, EEDA, Westcliff Rugby Football Club, St. Lawrence

## Appendix 2

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Church. The economic benefit was the main reason for support, but other issues including the possibility of infrastructure improvements and the potential to deliver an airport that would offer a variety of travel destinations.

Many respondents believed Scenario 3 to be the only option that would make London Southend Airport a commercially attractive package, and could bring wealth and employment to the region. They highlighted the benefits of economic activities and job opportunities being created.

Some respondents would like to see Southend Airport become a fully functional regional airport, easing the pressure for the main hubs and giving an alternative airport for Essex residents to travel from.

For the negative issues like noise pollution that many other concern, the Essex Chamber of Trade & Commerce suggested research shows that modern planes are now designed to be more fuel efficient and make less noise actually need longer runways to operate than the current generation of planes that are noisier and less fuel efficient, suggesting that this could mean that Scenario 2b is actually noisier than Scenario 3.

Despite some support, the majority of respondents were opposed to Scenario 3. There was significant opposition to Scenario 3, particularly, but not exclusively, from members of the public. Objections centred around concerns over environmental impact, noise, pollution, impact on residential amenity, deliverability and inadequacy of infrastructure to cope with the proposed growth. The proximity of residential areas and current levels of congestion were often cited as reasons why Scenario 3 is not viable. Others representations stated that comparisons with Southampton airport were misleading given the two airport's differing circumstances, particularly with regards to highway connections.

### **Question 5.2 How could your preferred scenario be further enhanced?**

Comments included those stressing the need for improved public transport, including the implementation of a shuttle bus and / or park and ride scheme. The need to improve highway infrastructure was also frequently stated.

A number of responses suggested that the land be used for something completely different that would benefit local communities.

The potential to include residential development was cited by certain parties.

### **Question 5.3 Are there any other scenarios which you feel have not been considered?**

Views were split: some favoured no airport expansion and wished to see the land developed for an alternative use (the potential to use the land for sustainable employment uses was suggested, Rochford's housing requirement was also cited); whilst others thought that expansion would be good for the area.

### **Section 6.1 The process for preparing the JAAP**

A number of objections from GO East: concerns over the realism of some of the elements of the high-growth option; suggest that the JAAP should perhaps not be putting forward any options or scenarios, especially those relating to the expansion of the airport, that may be wholly unrealistic given the environmental constraints that exist in respect of the land within the plan boundaries and indeed beyond these; question whether it will be possible to mitigate some of the negative impacts of the high-growth option as stated; question whether the JAAP plan area has the environmental capacity to accommodate the growth in passenger numbers envisaged in the high-growth scenario; note that employment growth may be possible without expansion of the airport itself; the JAAP should include more detail on delivery.

Comments from other respondents expressed concern over lack of information on the impact of proposals on air quality, transport infrastructure and quality of life.

### **Section 6.2 Sending in your views**

Concern was expressed that questions were duplicated and that this may deter people from responding. Concerns were expressed over the perceived lack of communication and lack of opportunity to comment. Concern was also expressed that consultation was uneven, with Rochford District Council doing more to inform residents than Southend Borough Council.

### Appendix 3 - Summary of how the Councils responded to the issues raised through consultation on the JAAP Issues and Options

#### General Comments

The Preferred Options Document was prepared in line with the most up-to-date national guidance at the time, as recommended by GO-East.

The vision for the JAAP area in the Preferred Options Document has been expanded to include detail on how the area is envisaged to look in 2021, in response to comments expressed at the Issues and Options stage. The vision also includes reference to the airport having a regional passenger focus in the future, aspirations for the strategic and local highway network and sustainable transport connections to the area, improved links to the Country Park following suggestions during the Issues and Options consultation. In addition environmental issues such as noise and air quality have been addressed.

In response to concerns about the consultation procedures, the Preferred Options Document was prepared – affording further opportunities for public participation – and was widely consulted upon. Additional engagement techniques were employed to encourage participation from local communities as set out in the Consultation Statement.

#### Transport

The Preferred Options Document includes a specific policy on the requirement for the airport operator to prepare a surface access strategy for the airport (Policy LS4). This is in response to concerns raised at the Issues and Options stage about surface access to the airport and the need for a plan.

In response to concern about the potential to improve transport infrastructure, the Preferred Options Document proposes a number of modifications to the local highway network; specifically creating a link road from Eastwoodbury Lane to Nestuda Way (Policy T1), an upgrade to Cherry Orchard Way (Policy T3) and an improvement or upgrade of Aviation Way (Policy T4). Alongside such improvements the Plan also seeks to promote more sustainable travel patterns (for example Policy T6 – Green Travel Plans).

Additionally, a Transport Assessment (2009) was prepared to accompany the Preferred Options Document. This document follows on from, and builds on, the report which informed the Issues and Options Document prepared in 2008. It considers the potential impact of the policies and makes recommendations on how to mitigate these.

The Plan sets out the Councils' commitment to divert Eastwoodbury Lane by creating a new link directly onto Nestuda Way before the runway is extended (Policy T1) which would ensure that this key link retained. This is in response to concerns raised about the loss of the



## Appendix 3

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Eastwoodbury Lane link. The Plan also proposes to safeguard a route between Nestuda Way and Warners Bridge to improve east to west connectivity in this location (Policy T2).

In terms of concern expressed about congestion around the JAAP area, the proposed safeguarded route would improve east to west connectivity through the southern end of the JAAP area if required (Policy T2). The Plan also proposes to upgrade Cherry Orchard Way (Policy T3), upgrade/improve Aviation Way (Policy T4), develop a park and ride facility (Policy T5) and take advantage of SERT (Policy T9). This is in response to concerns about the need to improve the local highway network. The proposed new railway station would also encourage use of public transport to and from the airport.

The Plan seeks to encourage a modal shift for staff, visitors and residents around the JAAP area, in response to a suggestion to encourage use of the bus service, through promoting the preparation of green travel plans (Policy T6) and supporting public transport improvements including SERT (Policy T7). This is in addition to requiring improvements to walking and cycling facilities (Policy T8) in the locality. These policies aim to both ease congestion and encourage use of alternative modes of transport to and from the JAAP area.

In response to suggestions to improve pedestrian access, the Plan seeks to improve accessibility through proposing a new cycleway/footpath between the new business park and Hall Road to the north, as well as improved access and facilities at Cherry Orchard Jubilee Country Park to the west of the JAAP area (Policies ENV2 and ENV4). In addition, the new railway station would improve accessibility between the airport and the area to the east of the railway line.

A comment suggested that bus/rail interchange should be improved. Whilst improved public transport around the JAAP area is supported in the Preferred Options Document (Policy T7), it should be noted that land to the east of the railway line is proposed to be retained as a green buffer to protect the residential amenity of properties on Southend Road, to the east of the JAAP area (Policy ENV6).

### Environment

The Plan recognises that there is a balance to be struck between development within the JAAP area and the environment (issue 3), and that environmental issues, such as noise and air quality as a result of additional aircraft movements and traffic would need to be carefully managed. In response to concern expressed about noise and air pollution, the proposed policies discussed above relating to encouraging a modal shift to minimise vehicles movements, as well as controls on the operation of the airport, and opportunities to create new public open space seek to maintain residents' quality of life in both Rochford District and Southend Borough. The Preferred Options Document has also carefully considered the proposed location for new development and open space.

In response to concerns about increased noise levels and night flights, and suggestions that night flights should not be permitted, Policy LS7 sets out conditions for any planning application to extend the runway and the operational requirements of the airport. It sets out proposals for how noise from the airport would be managed and flight times would be restricted, for example scheduled passenger flights would be restricted to between the hours of 6:30 and 23:00 local time Mondays to Saturdays and 07:00 to 23:00 local time on Sundays. Cargo flights, outside of these hours, would be controlled by an agreed noise quota. Policy LS3 also sets out the requirement for the airport operator to publish an annual Noise Evaluation Statement to monitor noise.

Comments suggested that the evidence base for the JAAP does not adequately consider the impacts on the environment or residents' quality of life. However, the JAAP Evidence Report (2008) and Sustainability Appraisal (2008) to support the preparation of the Issues and Options Document considers a range of issues for the JAAP area, including environmental impact through noise and vibration and air quality, and impact on the landscape, recreation, and archaeology and cultural heritage for example. An Environmental Scoping Report (2009) was also prepared to support the Preferred Options Document and forms part of the evidence base.

As a result of comments received – including those which claimed that land contamination and water use and quality issues have not been considered as part of the preparation of the JAAP – and to support the preparation of the Preferred Options Document, additional evidence base documents (in addition to the Sustainability Appraisal) were undertaken to further consider a range of environmental issues (including updates to existing reports). This includes, but is not limited to:

- Contaminated Land Phase I Desk Study - (Jacobs) - 2009
- Ecological Phase 1 Habitat Survey (Jacobs) - 2009
- Flood Risk Constraints Report (Atkins) 2009
- Flood Risk/Surface Water Assessment 2009
- Hepworth Acoustic Report 2008
- London Southend Airport Initial Review of Proposed Environmental Controls 2009
- London Southend Airport Transport Assessment (Jacobs) 2009
- Southend Airport Environmental Scoping Report (Jacobs) 2009
- Southend Airport Sequential Test – 2009
- Habitats Regulations Assessment 2009

In addition, the JAAP has considered the planning definitions of the flood zones as detailed within the Sustainability Appraisal. This issue was raised by the Environment Agency during the Issues and Options consultation. In response to other concerns raised about flood risk within the JAAP area, a Flood Risk Constraints Report (2009) and a Sequential Test (2009) have also been undertaken; the drafting of which has informed the Preferred Options Document.

## Appendix 3

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In response to comments about the impact of development on the historic environment, and in particular St Laurence Church, an assessment of cultural heritage was undertaken to inform the preparation of the Preferred Options Document (the 2009 Cultural Heritage Desk Based Assessment).

In response to concerns about the wider impact of the JAAP, for example on the Hoo Peninsula, the Habitats Regulation Assessment considers the likely significant effect of the proposals on the integrity of European sites. Other impacts of the proposals in relation to sustainability have been addressed within the Sustainability Appraisal.

Alongside the revision of the Green Belt boundary in the area to the east of Cherry Orchard Way to facilitate the northern MRO extension (Policy ENV1), the Plan proposes the creation of new public open space on which to relocate Westcliff Rugby Club (Policy ENV2), and new public open space to the south of Eastwoodbury Lane (Policy ENV3) which also encompasses the safeguarded route (Policy T2). A new green corridor from Cherry Orchard Way to serve the new businesses park and retention of the green buffer to the east of the railway line are also proposed (Policies ENV5 and ENV6).

In terms of habitat enhancements, the Preferred Options Document proposes the development of new public open space in Rochford District (Policy ENV2) and in Southend Borough (Policy ENV3) in response to comments at the Issues and Options stage. Policies ENV4, 5 and 6 also promote improved access to, and improved facilities within, the Country Park, the creation of a green corridor to the proposed business park and the retention of the green buffer to the east of the railway. In relation to comments about sustainable travel and habitat creation, the Preferred Options Document also seeks to promote improved walking any cycling routes throughout the JAAP area (Policy T8), for example between the proposed business park and Hall Road to the north.

### Employment

Comments questioned what other options to the airport had been considered. The East of England Plan (2008) recognises that the airport (as identified in the 2003 Air Transport White Paper) has potential to meet local demand in the region, if expanded, and contribute to local economic development (Policy E7 of the Plan). The Issues and Options Document, based on this national and regional support, and support from adopted and emerging local policies, identified three different options for the growth of the airport. Consequently the Issues and Options Document did not consider a 'no growth' option. Preparation of the Preferred Options Document took into account the consultation responses received during the Issues and Options consultation alongside the policy support and other evidence as set out in the Consultation Statement.

The Councils Core Strategies set out the strategic approach to the location of employment land within Rochford District and Southend Borough. The identification of land around

London Southend Airport for additional employment land is supported by regional and sub-regional policy, and local policy. Both the Employment Land Study Update Final Report (2009) produced for Rochford District Council and Employment Land Review (2010) prepared for Southend-on-Sea Borough Council provide justification for the growth in employment land around the airport proposed in the Preferred Options Document. This is in response to comments that there are surplus office units in Southend, and claims that the evidence base indicates that the expansion of the airport in its own right will do little to accommodate existing or new businesses. This also follows comments questioning whether other alternative locations had been considered for employment development, and concern expressed that the Regional Spatial Strategy did not identify a need to release Green Belt in the proposed location for new industrial development.

The predicated impacts of the three options in the Issues and Options Document have been assessed within the Sustainability Appraisal (2008), including impact on the landscape and Green Belt in each case. Subsequently the Sustainability Appraisal for the Preferred Options Document considered the impact of the proposed preferred options in further detail. This included recommending that “to replace lost land new open space should aim to make a positive contribution to the natural environment, with suitable landscaping, public access and biodiversity enhancement to be a positive benefit to the urban fringe.” (paragraph 6.30).

### **Sustainability**

In response to comments about the Sustainability Appraisal, the appraisal throughout the JAAP preparation has been prepared in accordance with the guidance. The Sustainability Appraisal assesses the predicted environmental, economic and social implications of the proposals in both the Issues and Options Document and the Preferred Options Document. In particular the Sustainability Appraisal considers the predicted impact of the three different growth options set out in the Issues and Options Document, and makes recommendations to improve or address certain issues that have been identified. The appraisal does not recommend a particular scenario to take forward, but recognises that the assessment should be used as a guide to aid the decision-making process.

**Appendix 4 – Summary of issues raised through consultation on Preferred Options Document**

Section: Introduction

**Summary of Representations Received:**

- Objections to airport expansion per se
- Transport infrastructure cannot cope
- Negative impact on environment
- Undefined terms used
- Supporting documents not appended to Preferred Options Document
- Not clear how feedback has been taken into account
- It should not be assumed that the JAAP will provide a framework for the expansion of the airport
- It is not clear with which other Plans the JAAP should be read in conjunction
- Inadequate consultation
- Results of the Issues and Options consultation have been ignored
- JAAP is based on outdated, discredited information
- Olympus KeyMed continues to be supportive of the London Southend Airport and Area Development Plan which is positive in the context of both the local economy and regeneration of the wider area.
- Finally the airport is having the investment it should have had 20 years ago

**Representations received from specific and general consultation bodies:**

- Canewdon Parish Council - believe that the JAAP will not affect the residents of Canewdon so do not have any objections
- South East Essex Friends of the Earth - the "Report Summary of Responses to Consultation" for the first phase of consultation on the JAAP indicates that "Despite some support, the majority of respondents were opposed to Scenario 3." It is therefore utterly ridiculous for RDC and SBC to describe phase 2 as the "Preferred Options" while pursuing the least popular Scenario. Aviation expansion is inherently unsustainable due to limited resources (i.e. Peak Oil) and pollution emitted by aircraft (e.g. causing Climate Change). Any Sustainability Appraisal that supports the expansion of Southend Airport must therefore be wrong
- Coal Authority – confirm they have no specific comments to make

Section: Vision and objectives

**Summary of Representations Received:**

- Object to regeneration being centred around Southend Airport
- Lack of properly evaluated evidence
- Unacceptable loss of Green Belt
- Negative environmental impact
- Lack of transport infrastructure
- Negative impact on transport infrastructure
- Increased congestion
- Proposals will result in unacceptable levels of air, noise, water and light pollution
- References in the document to “quiet aircraft”, but all aircraft generate noise
- Other areas in Southend should be a priority for regeneration instead
- Expansion of the airport will not generate significant numbers of jobs
- Nottingham Declaration has been ignored
- The Public Safety Zone has not been properly evaluated
- Adverse impact on public health
- Negative impact on quality of life
- Negative impact on ecology, particularly birds
- Disruption at schools due to increased noise
- Southend is a commuter town plus summer holiday focus for day-trippers and the like all contributing in large part to the local economy. That contribution depends on a viable road and rail infrastructure which is increasingly congested particularly in the summer months and will worsen from people arriving to spend their money elsewhere. More noise, congestion and pollution must undermine the Southend Core Strategy concerning the quality of life for residents
- The area is fortunate in these troubled times to have a resource capable of generating employment and income

**Representations received from specific and general consultation bodies:**

- The Essex Chambers of Commerce – strongly support the JAAP Vision, as set out in 2.1, for the future development of London Southend Airport and its environs
- South East Essex Friends of the Earth – to describe the Saxon Business Park as "award winning" when it doesn't yet exist and therefore cannot have won any awards is self-evidently dishonest. Likewise, there is no way to know at this stage that the airport "will be a successful regional passenger airport".
- South East Essex Friends of the Earth – no mention of Peak Oil is made either in the "Preferred Options" or the "Sustainability Appraisal" documents. By 2021, it is likely that oil will be considerably more

expensive than it was in 2008, making aviation, which already has extremely tight margins, economically unviable. Note that globally, aviation currently has a profit margin of 1%.

- Environment Agency – that objectives include 'Ensuring a high quality environment for residents' with explicit reference to noise pollution and protection of green space but the wider environment is not considered in the objectives. The importance of improving and enhancing green space and biodiversity, limiting and adapting to climate change, reducing flood risk, minimising waste, improving land quality, improved water quality are not addressed. This objective could be expanded to consider protecting and enhancing the whole environment.
- EEDA – comment that the vision statement as set out is positive and the reference to the wider impacts on the Thames Gateway is welcomed. It is perhaps slightly surprising that there is no reference to the airport explicitly in the vision statement and this might be beneficially added. The objectives highlight the important economic role of the airport and para 2.3 onwards provides a real sense of the potential of the airport.
- Essex County Council – support the Vision for the future development of London Southend Airport and its environs to realise its potential as a driver for the sub-regional economy. Also supported are the six objectives relating to creation of sustainable high value employment; maximising economic benefits; improving sustainable transport accessibility; high quality environment; attraction of inward investment; and efficient use of employment land.
- Renaissance Southend Ltd – support the vision and objectives set out in the JAAP, as being in line with existing policy at national and regional level, and reflecting the importance of the Airport to Southend's economic regeneration and development, as set out in the Southend Regeneration Framework 2007 and Economic Development & Tourism Strategy 2008
- Go East – the Vision and Objectives of the JAAP are carried forward from the Issue and Options stage. They are supported by a new section. What will the JAAP area look like in 2021? (para 2.3) The new section provides descriptive specificity and is a positive contribution to the vision

Preferred Options Issue 1

**Summary of Representations Received:**

- Extending the runway may not make it more attractive to operators
- Support for new railway station
- Limited economic benefit – passengers will not spend locally
- Although the railway increases the catchment for the airport, it will still need to compete with Stansted
- No reference to cargo/freight flights or maintenance/training
- Objections to runway extension
- Impact on residential amenity and health
- Increased risk of accidents
- Negative environmental impact – noise, water, air and light pollution
- Support for new railway station, industrial estate and highway proposals
- Impact of noise on residents and schools
- Objection to flights over densely populated areas
- Lack of justification for the ‘preferred option’ – respondents at the Issues and Options stage did not support this option
- Unclear how many jobs will be aviation-related
- Suggestion that the runway should be realigned to south east/north west
- Impact on highways such as congestion has not been addressed
- Planes will not be quiet and fuel efficient
- Concern about the number of flights a day with the anticipated two million passengers
- Suggestion to close the airport and develop for other uses
- Affected residents should be fully compensated
- Decreased property values
- Loss of Green Belt
- Loss of sports pitches
- Objection to diversion of Eastwoodbury Lane
- Objection to safeguarded route through new public open space
- Concern about night flights
- Ignores the Nottingham Declaration
- Limited impact on local employment – jobs transferred from elsewhere
- Public Safety Zone has not been properly evaluated
- Inadequate new green spaces and pedestrian/cycling routes proposed
- Proposals are unsustainable
- Impact on the Hoo Peninsula needs to be considered
- Support for the proposed expansion
- Runway extension is not needed to increase passenger numbers
- More lorries on the highway network
- Unclear how network rail will increase capacity of the line to Liverpool Street and the frequency of the trains
- Inadequate consultation
- Support for employment expansion



### **Representations received from specific and general consultation bodies:**

- Go-East commented that it is unclear what evidence supports the assumption that passenger throughput can increase 'up to 1 million passengers by 2012 and up to 2 million passengers by 2030'. The Plan and policies need to have a robust and credible evidence base, and it needs to be clearer as to why this option is being pursued in preference to alternatives (linking to the evidence base, previous consultation responses and the Sustainability Appraisal).
- Leigh Town Council opposes the runway extension. They commented that there is no comparative noise assessment of current and likely future aircraft using the airport. Two million passengers is excessive. Noise and air pollution will be unacceptable.
- Renaissance Southend supports the conclusion that the Airport's potential to act as catalyst for the local economy can only be realised with an extension to the length of the runway to enable operators to use the most up-to-date and efficient aircraft to deliver a viable business model. Without the runway the evidence is that growth will at best be slower and could be put at risk.
- RSPB opposes the expansion due to the increased greenhouse gas emissions and the impact of climate change on national and international biodiversity. They recommended that the Plan includes a policy exploring the effects of the airport development on climate change.
- CPREssex are concerned that the proposed car parking for commuters at the new station would lead to increased car journeys. They recommended that a surface access forecast is prepared for all scenarios to assess how the station would contribute to the airport.
- Essex Chambers of Commerce strongly supports the expansion of the airport, which includes the extension of the runway, as this is considered vital for the future prosperity and economic regeneration of Rochford and Southend.
- SE Essex Organic Gardeners questioned what is in it for Rochford residents?
- South East Essex Friends of the Earth commented that the railway station will not make the airport more environmentally friendly. An additional stop will also increase journey times for those not using the station. They recommended that a minibus service between Rochford station and the airport would be a better solution.
- Hillside Road Residents Association generally support the Masterplan with the extension of the runway, but emphasise that there need to be constraints on increased noise levels and a easy to understand measure of noise levels, which should be included in the consultation.

### Preferred Options Issue 2

#### **Summary of Representations Received:**

- Unclear whether the anticipated jobs are likely to be new opportunities or existing jobs transferred from elsewhere
- Support for the proposals in the Preferred Options
- Anticipated employment growth resulting from the proposals is not evidenced
- Jobs will be low skilled and low paid
- Support for new railway station, industrial estate and highway proposals
- Unclear why the JAAP is considered to be the only key to employment and the connection to high-tech business
- Existing industrial units and office space in Southend/Rochford are under/un-occupied – these should be redeveloped for new industries
- Jobs will not be for Southend or Rochford residents
- Unclear what is meant by ‘classes B1 and B2’
- Loss of Green Belt
- Loss of agricultural land
- Job creation is outweighed by environmental impact
- Jobs should not be linked to airport growth
- Insufficient housing to accommodate new workers
- Local tourism should be encouraged
- Lack of infrastructure proposed to support employment growth
- Lack of justification for the location of the proposed business park
- Businesses will not want to locate next to an airport
- Airport should be redeveloped for other uses

Other comments related to issues of noise, night flights, air quality, climate change, green space provision, water quality, highway network and property devaluation which are not relevant to Issue 2 and have been addressed elsewhere. General objections to airport expansion.

#### **Representations received from specific and general consultation bodies:**

- Disability Essex commented that the encouragement of new industries will benefit employment opportunities for suitably skilled disabled people.
- Leigh Town Council only support low scale employment growth. The airport should not be a driver for the local economy. Employment levels should be limited to Maintenance Repair and Overhaul (MRO).
- Renaissance Southend commented that the level of employment growth needed goes beyond the direct job creation from expanding the operational side of the Airport. Land to support MRO expansion, create jobs and a business park are needed to help retain and attract investment and business.
- CPREssex commented that they have previously expressed support

for policies to safeguard and enhance the MRO sector. Aviation jobs will generally be lower-skilled. They commented that there is no evidence linking job creation to airport expansion. Passenger numbers have fallen at other airports.

- Essex Chambers of Commerce strongly supports the preferred option to pursue high scale employment growth within the JAAP area and to allocate sufficient employment land for this potential to be realised. The Chamber also welcomes the opportunity to create a number of unique highly skilled and high value jobs within the aviation maintenance, repair and overhaul sector and view this as a major benefit to the local economy.
- South East Essex Friends of the Earth commented that while modest employment growth at the site would be welcome, the growth proposed is both irresponsible and unachievable. Using Green Belt to expand an industrial estate is unnecessary given the vacant units in Southend.
- Hillside Road Residents Association agree that the pursuit of increased employment should be a major part of this action Plan, and so should the drive for increasing investment in the area. However, the acquisition of development land must be done sensitively with softer options also being considered. The balance is crucial in order to also preserve the residential and recreational character of our Seaside Town.

Preferred Options Issue 3

**Summary of Representations Received:**

- Objections to the proposed airport expansion
- Environmental impacts - noise, air pollution and congestion
- Impact on residential amenity
- Noise levels need to be restricted, monitored and controlled
- No night flights; limited flights during the day
- Airport expansion goes against the Government's targets to reduce CO2 and other emissions
- Water quality and loss of Green Belt have not been addressed
- New public open space is not being created – open spaces have been lost
- What controls are being considered, how will they be enforced and who will monitor them?
- Proposed controls on air traffic is inadequate
- Unclear how the Plan will address environmental impacts, particularly noise and air pollution
- Concern about impact on health
- Unclear how much more fuel efficient aircraft could be
- Lack of justification for the preferred option chosen
- Inadequate consultation; results of Issues and Options consultation ignored
- Increase in employment is not dependent on the airport expansion
- Jobs will not be new opportunities but transferred from elsewhere
- Jobs will not be for local people
- Loss of habitats for wildlife
- Brownfield sites around the town should be redeveloped first
- Loss of agricultural land
- An increase in freight flights at night will impact residents
- Inadequate strategic road network (A127 and A13)
- Most people will drive to the airport
- Contribution to climate change
- Inappropriate location for an airport – flights over densely populated areas
- Limited economic impact
- Other regional airports have falling air traffic movements
- Impact on property values
- Public Safety Zone should be revised
- Concern about the number of flights a day with the anticipated two million passengers
- New open space is in an inappropriate location
- Concern about the location of the proposed park and ride facility
- A study on the environmental impact of the proposals has not been undertaken
- Country Park should be extended into the area between the airport and Rochford

- Impact on train journeys for commuters
- Support for the proposals
- Impact of low flying aircraft
- London Southend Airport commented that noise and night operations will be mitigated by the imposition of conditions.

### **Representations received from specific and general consultation bodies:**

- Leigh Town Council commented that no details are given of new developments and opportunities for public open space, this cannot be supported if no proper information is given.
- Leigh Town Council support general recreational enhancements such as a Nature Park.
- Leigh Town Council commented that no details are given on controls on the airport operation or sustainable transport strategies. There must be a specified restriction on the types of aircraft used, the numbers of flights and restrictions on night flights.
- Renaissance Southend supports the Plan's intention to mitigate environmental impact and recognises that opportunities exist to achieve improvements on existing conditions in a number of areas. However, the evidence demonstrates that where potential for mitigation of environmental impact is limited that the overall economic benefit from the JAAP proposals outweigh the potential harm or impact.
- Essex Chambers of Commerce supports the approach proposed for balancing development with environmental enhancement.
- South East Essex Friends of the Earth commented that aviation growth is unsustainable, growth of business parks should be limited to existing boundaries, loss of agricultural land is unacceptable, and all brownfield sites should be used before agricultural/Green Belt land.
- Environment Agency commented that every opportunity should be taken to protect and enhance any existing habitats and protected species present in the JAAP area. Open space and SUDs can assist adaptation to climate change.
- Environment Agency want to see greater emphasis on managing demand for water, as well as using water more efficiently to help manage pressures on water resources.
- Environment Agency support using larger amounts of renewable energy from a wider variety of sources, helping limit greenhouse gas emissions. Development should seek to secure the highest viable resource and energy efficient standards and maximise sustainable transport options.
- Hillside Road Residents Association would like more information on how noise and air quality will be assessed and considered, and how quality of life will be maintained for residents.

### Preferred Options Issue 4

#### **Summary of Representations Received:**

- Inadequate bus-rail interchange
- Congestion on the strategic road network (A13 and A127) and local road network (B1013)
- Lack of public transport encourages car use
- No public transport linkage between Liverpool Street and Fenchurch Street train lines
- A bypass through the Green Belt between Hullbridge and Rochford is unwanted
- No mention of the railway
- No reference to the impact on residents if airport is expanded
- Support for SERT
- Unclear whether planned public transport improvements would be in Rochford or Southend
- Impact of congestion on emergency response times
- Majority of travelers/workers will drive rather than use the train station
- Inadequate road network and parking facilities
- A bypass to the north of the A127 is needed
- Concern about increased traffic (passengers and freight) on strategic and local routes
- Widening of A130/A12/A127 is not proposed
- Lack of input by Highways Agency
- Without adequate parking at the airport, vehicles will be left in residential roads nearby
- Impact of introducing a park and ride scheme on highway network
- Support a comprehensive transport strategy to encourage a modal shift
- Airport expansion combined with housing delivery will exacerbate the current situation
- Park and ride should be closer to London on the A127
- Unlikely travelers will walk/cycle to the airport
- Points (ii) and (iii) are contradictory
- Employment growth should be redistributed between Rochford, Hawkwell and Rayleigh
- Support for improved public transport
- London Southend Airport agrees with the description of Issue 4

Other comments related to issues of noise, night flights, air quality, climate change, green space provision, water quality, highway network and property devaluation which are not relevant to Issue 4 and have been addressed elsewhere. General objections to airport expansion. Support for airport expansion

### **Representations received from specific and general consultation bodies:**

- Highways Agency commented that although the JAAP states that an increase in freight movements as a result of the airport expansion is unlikely, it is possible that development of an aviation cluster will draw additional HGV traffic into the boroughs which could in turn create an impact on the trunk road network. The Highways Agency requests to be informed of any future proposals that would result in a substantial increase in HGV movements from the JAAP site.
- Highways Agency would be concerned about the potential impacts to the trunk road network if high growth proposals were pursued. They are also concerned that the proposed link road between the A127 and the airport could potentially generate a substantial increase in the number of car trips on M25, specifically junction 29. It is recommended that this is considered as part of the Transport Strategy development.
- Highways Agency is pleased that the JAAP will require all development within the JAAP area to contribute to the delivery of essential community infrastructure.
- Highways Agency request that the impact of development proposals on the local and wider road networks, including junction 29, is quantified and outlined within the JAAP. The outputs of this analysis should then be used to inform the Transport Strategy and then establish measures to manage demand.
- Highways Agency would encourage a balance of land uses within the JAAP area.
- Highways Agency commented that the Transport Strategy will need to demonstrate that public transport improvements proposed are sufficient to accommodate the expected increase in demand as a result of the JAAP development proposals. They request to be consulted throughout the development of the Transport Strategy.
- Disability Essex commented that all transport should be fully accessible. All taxis should be accessible for wheelchair users and coaches should be low floor and with an on board ramp. The encouragement of access by cycle should include mobility scooters for employees, visitors and passengers. Secure storage for mobility scooters should be available.
- Leigh Town Council commented that very few details are given about how a travel strategy will be introduced. They suggested a number of proposals including the need for a travel plan for airport staff and businesses, and a park and ride scheme along the A127.
- Renaissance Southend supports the need for a comprehensive transport strategy.
- Essex Chambers of Commerce considers it essential that improvements are made to the strategic highway network in South East Essex. It must be a major priority to reduce congestion and improve accessibility to enable the overall development proposals to realise their full potential.

- South East Essex Friends of the Earth commented that if points (i) and (ii) are dealt with correctly then this will remove a need for any road improvements or new routes (point (iii)).
- Hillside Rd Residents Association commented that an appropriate transport strategy is essential, and in addition to the points already listed must guarantee free moving traffic without holdups; be future proofed as far as possible from an inevitably increasing number of vehicles and lorries using the roads; provide sensible facilities for parking.



### Preferred Options Issue 5

#### **Summary of Representations Received:**

- Loss of agricultural land
- Existing houses will be demolished at the brickworks site but more houses are being built
- Business park is not needed; there are existing unoccupied units in the area
- Rugby club will be relocated to a more inaccessible location
- Green buffers/lungs are insufficient
- Loss of sports pitches
- Flying club will be lost along with a number of jobs – tis facility should be relocated (vii)
- Country Park should be extended
- Support for St Laurence Park (v) and green buffer east of railway line (ix)
- Green buffer to the east of the railway line should be made into a parkway access to the new railway station (ix)
- Manners Way/Rochford Road roundabout should be linked to Fosset's Farm/Eastern Avenue as an alternative to Cuckoo Corner/Priory Crescent
- Support for southern maintenance zone and passenger terminal area (viii)
- Area by railway station and terminal should be a car-free area (vii)
- Support for northern maintenance zone improvement (vi)
- Objections to safeguarded route through this existing area of open space (v)
- Support for improvement to Aviation Way industrial estate (iv)
- Support for MRO zone extension (iii)
- Rugby pitches should not be relocated
- Support for area ii(c)
- Objections to preferred options for area i, ii(a), (b) and (c)
- Park and ride is proposed within the Public Safety Zone and would result in the loss of playing pitches (xi)
- Unclear whether preferred option for area iv means compulsory purchase and whether businesses have been consulted
- Unclear whether the brickworks cottages are to remain (i)
- Loss of Green Belt
- The brickworks site is contaminated with asbestos (i)
- There are underused employment areas/brownfield sites in Southend and Rochford
- Objections to airport expansion – concern about noise and air pollution, highway impact, property devaluation, limited economic benefits and night flights in particular
- Support for the proposals
- Airport perimeter requires greater security
- Unclear why business park cannot be developed independently of the

proposed airport expansion

- Allotments along Rochford Road, Southend should remain
- Impact of new train station on viability of Rochford station, and impact on commuter train times
- Impact on St Laurence Church
- London Southend Airport Company Ltd has a number of concerns about the boundaries and descriptions of the areas
- Presence of tennis club has been ignored

### **Representations received from specific and general consultation bodies:**

- Essex County Council commented that there is an outstanding planning condition attached to Cherry Orchard Brickworks under the IDO consent. This would need to be addressed through the plan process.
- Leigh Town Council commented that area ii(a) North of Aviation Way is not suitable for employment expansion and should remain as agricultural land.
- Leigh Town Council commented that area ii(d) South of Brickworks site, currently playing pitches is not suitable for class B1 development and should not be changed.
- Leigh Town Council commented that area x RESA area safety zone to accommodate the runway extension, and that they oppose the extension to the runway.
- Leigh Town Council commented that area xi should remain as football pitches. The location of the park and ride facility would encourage cars to travel on congested roads to a parking area next to an airport.
- Renaissance Southend supports the broad thrust of the preferred options regarding the area of change subject to detailed comments elsewhere regarding specific policy areas.
- Essex Chambers of Commerce strongly supports the specific areas for change and the preferred development options for each area.
- Rochford Parish Council commented that any development should be within Airport boundaries and Green Belt land should not be developed.
- Rochford Parish Council commented that consideration should be given to retaining existing businesses.
- Rochford Parish Council commented that there should be no loss of amenity to the local community.
- Rochford Parish Council would prefer an underpass is constructed in Eastwoodbury Lane. They commented that a park and ride would impact on traffic flow at the Tesco roundabout.
- South East Essex Friends of the Earth commented that areas i, ii(a), ii(b), ii(c) and ii(d) should not change use, and that area v will have greater amenity value in the future.
- South East Essex Friends of the Earth commented that while a Park and Ride facility is to be welcomed, its location in Area xi is not as it

falls within the Public Safety Zone. They also commented that area vii should not be used as a station.

- Environment Agency commented that the former brickworks site (area i) has the potential for contamination that may affect controlled waters. As a minimum, a desktop study should be completed and a diagrammatical representation of the site produced (PPS23). If the desktop study identifies that contamination may be a problem, a full site investigation should be completed and submitted along with a risk assessment and remediation Method Statements.
- Environment Agency commented that the northern portion of area ii(b), adjacent to the boundary, falls with Flood Zones 2 and 3. The proposed open space allocation fits with the water compatible vulnerability classification (table D2 PPS25).
- Environment Agency supports the use of area ii(c) as a 'Green Lung'. Part of this site falls within Flood Zones 2 & 3.
- Environment Agency commented that the majority of area iii falls within Flood Zones 2 & 3. The plan proposes to allocate this area for MRO, but it is unclear whether this will result in development of this site or not. The PPS25 Sequential Test would need to be demonstrated otherwise they would question the soundness of the allocation. A Flood Risk Assessment would need to be prepared if development is deemed appropriate.
- Environment Agency commented that small parts to the south of area iv and vi, adjacent to Eastwood Brook, are within Flood Zones 2 & 3. The PPS25 Sequential Test would need to be demonstrated.
- Environment Agency commented that the northern part of area xi falls within Flood Zone 2. The remainder of the site is Flood Zone 1 and appropriate for the allocation of a new park and ride facility. Any new development must be designed with adequate pollution control measures to prevent potential pollution events arising. The use of Sustainable Drainage Systems (SuDS) can manage surface water runoff to reduce the risk of flooding and also create areas of open/green space that contribute to increased habitat and biodiversity, creating green links between sites.
- Hillside Road Residents Association commented that the implications of many of these Preferred options need closer scrutiny before decisions are made. They do not like the proposal to use the flying club strip as the passenger focus for the airport.

**Policy Number: E1 – General Development Considerations**

**Summary of Representations Received:**

Whilst a large number of representations have been submitted against this Policy area a significant number are related to the airport and not employment a summary of issues raised in relation to Policy E1 include:

- Need for additional employment land questioned, given the are unused commercial properties in the area.
- Questioned whether jobs would be for local people.
- Support for the creation of additional employment opportunities.
- Jobs would be displaced from existing employment areas.
- Job figures stated in JAAP unrealistic.
- Concern regarding impact of employment growth on highways, local and strategic.
- Rochford District's job figures would be better redistributed to the settlements of Rochford, Hawkwell and Rayleigh.
- London Southend Airport supports the policy.

**Representations received from specific and general consultation bodies:**

- Essex Chamber of Commerce – comment that they strongly support Policy E1 in that the JAAP area will be developed as a strategic employment area to support the growth in jobs and views this as an important economic driver for the local economy.
- Essex Business Consortium – support Policy E1, stating the location of the Airport provides the opportunity to develop clusters of businesses that are highly complementary to the rest of the Essex economy. This, together with the forward thinking educational investment taking place in South Essex for the transport industry, is therefore timely. They will combine to raise skill levels and help businesses survive and invest in preparation for better economic times.
- Hockley Residents Association – object, stating that there is no proposal in the plan to improve the roads through Hockley, which are already congested, and will be gridlocked following core strategy allocation of housing development in Rochford and Hawkwell plus the number of passengers and workers that will use Hockley as a through route to the expanded airport to avoid the A127 (note - passengers through Hockley have also not been considered by airport senior management)
- South East Essex Friends of the Earth – object, stating that the job creation potential of the JAAP is a wild exaggeration
- Leigh Town Council – object, stating that the job target of 7,380 is too high. There is no indication of where these jobs will come from or who will fund the new jobs, or what type of job will be created, or whether the jobs will create further in and out commuting. The proposed 50/50 split of new jobs between Rochford and Southend looks more like a

political imperative than a realistic assessment.

- The Leigh Society comment that they welcome jobs, but at what price? Sceptical regarding the figures stated - where are they to come from - are they displaced jobs from elsewhere in the area and therefore should not be counted as new jobs? Are a proportion of them specialist jobs whereby people will have to move to the area and put pressure on our already overloaded transport and utilities? Not to mention the need for yet more housing. After all Leigh is the most sought after area in the Borough so the intense pressure which the town is already under would be intensified. Our services and infrastructure are straining as it is.
- Renaissance Southend – comment that in allocating land for B1 uses Renaissance Southend would wish to ascertain the imposition of the necessary criteria based approach to development control decisions to ensure this does not prejudice the ability of the town centre to retain and attract B1 office users that do not require a business park location for operational reasons.
- EEDA comment that the Regional Economic Strategy (RES) recognises this area as a priority for regeneration and growth as it lies within the Thames Gateway Growth Area. Goal 8 of the RES - The Spatial Economy sets out the aspirations for the Thames Gateway South Essex 'engine of growth'. Importantly, this includes the need to realise and harness the potential of London Southend Airport as a key transport gateway by improving operational capacity, surface access and supporting business development, particularly in engineering and maintenance. The RES also identifies the importance of Southend as an urban driver for growth and the pressures on transport infrastructure that exist, with particular reference to the A130/A13 junction and the A127.
- Rawreth Parish Council question where the proposed new employees going to live, are jobs going to be given to residents of Rochford and Southend District and if so how will it be governed. If jobs are not restricted to residents of the Districts what will the effect be on traffic and housing in the Districts, will this have some impact on the Core Strategy and will it be taken into account when deciding sites and what infrastructure is needed.

**Policy Number: E2 – Aviation Way Industrial Estate**

**Summary of Representations Received:**

- Congestion and impact on both the local and strategic highways network with particular reference to the ability of the A127 to cope with increased traffic movements; a need for enhanced public transport to the area; and the specific impact on roads in the immediate area.
- Support for additional employment opportunities
- Need for additional employment land questioned, given the are unused commercial properties in the area
- London Southend Airport state that, as with the Areas for Change, there is concern that the boundaries shown on the Proposals Map, while not intended to show definitive land use, may be misunderstood and should be clarified. There are also some inaccuracies which should be corrected.

**Representations received from specific and general consultation bodies:**

- Environment Agency – object, stating that small parts to the south of this area, adjacent to Eastwood Brook, are within Flood Zones 2 & 3. In order to determine this policy as sound, the sequential test of PPS25 must be applied. In order for the allocation to be appropriate, this test should demonstrate that there are no reasonably available sites in lower flood risk zones for this type of development.
- Leigh Town Council – object, stating the number of jobs proposed is too high and that the reference to the eco-friendly business start up units sound like a sop to the environmental lobby
- Renaissance Southend – support the replanning and more efficient use of land at Aviation Way to secure additional employment
- Southe East Essex Friends of the Earth – comment that it seems unlikely that businesses will want to move into this area given the additional financial contribution required of them. However, if it is expected that 750 jobs will be created on this site, that is to be welcomed. As previously discussed, the job creation targets should be enforced by being included in the Section 106 agreement

**Policy Number: E3 – Saxon Business Park**

**Summary of Representations Received:**

Whilst a large number of representations have been submitted against this Policy area a significant number are related to the airport and not employment. In terms of those representations relating to the policy itself the main areas raised are as follows:

- Concerns relating to loss of green belt both in its own right and when empty units/brownfield sites are available on existing employment areas.
- Loss of green belt and supply of sites/premises elsewhere.
- Need for additional employment land in the current economic climate.
- Issue of terminology – are contributions ‘required’ or ‘expected’ as well as concerns over non-B1/B2 development and a specific concern relating to potential retail uses on the site.
- Congestion and impact on both the local and strategic highways network with particular reference to the ability of the A127 to cope with increased traffic movements.

**Representations received from specific and general consultation bodies:**

- Environment Agency – comment that the area is mainly greenfield land and SUDS should be incorporated for all new development.
- Sport England – object stating that whilst it is acknowledged that provision is made in the JAAP for relocating Westcliff Rugby Club to agricultural land to the north east of the existing site (area of change ii(b)), it has not been made clear that a replacement rugby club site would need to be at least equivalent to the existing site in terms of the quantity and quality of facility provision and at least equivalent in terms of tenure/management arrangements. In addition, no reference has been made in the JAAP to whether Kent Elms Tennis Club (which adjoins Westcliff Rugby Club and would fall within area 2 of the proposed Saxon Business Park) would be retained or replaced as part of the business park development. Without any specific reference being made to the tennis club being retained or relocated, there are concerns that the club would be lost without any replacement facility provision being made, particularly in view of all references in the JAAP only referring to the relocation of the rugby club.
- South East Essex Friends of the Earth – object, stating that it is wrong to build on this agricultural land when there are so many existing industrial areas (e.g. Prittlebrook Industrial Estate) and office blocks (e.g. Victoria Avenue) that are currently vacant. As world oil supplies diminish, it will become increasingly important that the UK is able to grow its own food and not rely on imports.

**Policy Number: E4 – Phasing of Saxon Business Park**

**Summary of Representations Received:**

Whilst a large number of representations have been submitted against this Policy area a significant number are related to the airport and not employment. In terms of those representations relating to the policy itself the main areas raised are as follows:

- Loss of green belt and supply of sites/premises elsewhere.
- Need for additional employment land in the current economic climate.
- Congestion and impact on both the local and strategic highways network.
- Objections in relation to loss of brickwork cottages.
- Objections to relocation of Westcliff Rugby Club.

**Representations received from specific and general consultation bodies:**

- Arriva Southern Counties – comment that there does not appear to be sufficient emphasis on access to the proposed areas of business development. Neither Aviation Way nor Cherry Orchard Way has a local bus service. Currently the nearest bus service is the 9 which serves Eastwoodbury Lane. The replacement of that section of Eastwoodbury Lane across the end of the runway with a new road to a new junction with Nestuda Way will result in the 9 omitting the section of Eastwoodbury Lane between Aviation Way and Nestuda Way which means a new bus service will be needed to serve the business parks
- South East Essex Friends of the Earth – object, stating it is wrong to build on this agricultural land when there are so many existing industrial areas that are currently vacant.



**Policy Number: E5 – Development of Area 1A – Saxon Business Park**

**Summary of Representations Received:**

The responses to this Policy Area reflect those issues set out against Policies E3 and E4. Whilst there are no specific comments relating to the loss of the brickworks cottages these are recognised as they are raised in responses against other policy areas. Summary of main issues raised in respect of this policy include:

- The policies and supporting text provide very little information on the mechanisms for delivery of site infrastructure works or the contributions individual developers will be expected to make towards them
- The Plan should confirm whether contributions will be by means of physical works, financial contributions to a communal pot or a combination of the two.
- The plan should also indicate how costs will apportioned, whether by means of site area/likely usage etc. and confirm what, if any, contribution is expected to be made from the public purse and whether there are any timing issues associated with this

**Representations received from specific and general consultation bodies:**

- Essex County Council – comment that specific reference to the inclusion of a landmark building and entrance feature is welcomed. Suggest that Policy E5, Policy E6 and Policy MRO2 could each incorporate the phrase 'The design and layout of development where it abuts the Green Belt will need to be carefully considered in order to achieve an appropriate edge to the urban area'.
- Renaissance Southend – support the policy, and state that Saxon Business Park should be the subject of a detailed Development Brief to deal with the provision of infrastructure and utilities prior to any detailed planning application

**Policy Number: E6 - Development of Area 1B – Saxon Business Park**

**Summary of Representations Received:**

- The responses to this Policy Area reflect those issues set out against Policies E3 and E4. The principal areas of objections are again traffic/congestion and loss of green belt whilst a number of objections/comments also question the need for additional employment land given vacant units elsewhere

**Representations received from specific and general consultation bodies:**

- Essex County Council – comment that specific reference to the inclusion of a landmark building and entrance feature is welcomed. Suggest that Policy E5, Policy E6 and Policy MRO2 could each incorporate the phrase 'The design and layout of development where it abuts the Green Belt will need to be carefully considered in order to achieve an appropriate edge to the urban area'.
- Renaissance Southend – support the policy, and state that Saxon Business Park should be the subject of a detailed Development Brief to deal with the provision of infrastructure and utilities prior to any detailed planning application

**Policy Number: Policy E7 – Development of Area 2 – Saxon Business Park**

**Summary of Representations Received:**

- The responses to this Policy Area reflect those issues set out against Policies E3 and E4. The principal areas of objections are again traffic/congestion and loss of green belt whilst a number of objections/comments also question the need for additional employment land given vacant units elsewhere.
- There are also a number of objections relating to the relocation of Westcliff Rugby Club and Kent Elms Tennis Club

**Representations received from specific and general consultation bodies:**

- Essex County Council – concerned about the effects of the proposals on the setting of the grade II listed building, Cherry Orchard Farm. This building is located to the east of Cherry Orchard Way and sits in quite rural surroundings in the Green Belt. It backs on to a Rugby playing field, with agricultural land and the golf course beyond. Suggest that a buffer zone around the building is necessary to preserve some of the rural character of its setting, and that this should be considered in the plan.
- Renaissance Southend – support the policy, and state that Saxon Business Park should be the subject of a detailed Development Brief to deal with the provision of infrastructure and utilities prior to any detailed planning application

**Policy Number: ENV8 - Nestuda Way Business Park**

**Summary of Representations Received:**

As with other employment policy areas a number of objections received relate to the airport and not to the Nestuda Business Park. However, the percentage on these objections is lower than, for example, Policy E3.

- As with policies relating to the Saxon Business Park, the main areas of objection raised relate to traffic impacts/congestion, demand and loss of green space.

**Representations received from specific and general consultation bodies:**

- Renaissance Southend – has concerns that unless strictly controlled this 10,000sqm may compete directly with potential B1 schemes for the town centre to the detriment of town centre regeneration. The phasing and criteria for the release of this land for B1 development require further examination.
- South East Essex Friends of the Earth – object, stating that the south-west Public Safety Zone shown on the Proposals Map is the current one. Were the runway to be extended, the Public Safety Zone (PSZ) would move further south west. Additionally, as the outer PSZ area is defined as the area in which there is a 1 in 100,000 chance of being hit by an aircraft over the course of a year, a significant increase in flights would expand this area. The Nestuda Way Business Park site is already very close to the boundary of the current PSZ - it would certainly fall inside the new one, breaching planning guidance

### **Policy Number: LS1 – General Policy**

It should be noted that a number of the representations made in respect of Policy LS1 deal with issues addressed by other policies in the plan. Nevertheless, the summary headings provided here include references to all the representations received to the policy.

#### **Summary of Representations Received:**

- no demand for a passenger airport in South East Essex
- expansion based on freight will be detrimental
- Noise, air pollution, congestion on the roads, safety
- Impact on the quality of life of residents
- Impact of night flights
- Air quality/pollution
- Value of residential properties
- Direction of take-off
- Impact of engine ground testing
- Carbon emissions
- Disruptions to TV signals
- Impact on schools
- No guarantee jobs will be local
- Controls necessary on cargo/night flights
- Once planning consent has been given there will be no controls
- Planes will land and take-off every five minutes
- There are four other alternative airports closer-by
- Damage and impact on the church
- Environmental damage outweighs economic benefits
- Road congestion – cars/HGVs/vans
- Impact of traffic on Hawkwell, Hockley and Rochford
- A127 inadequate – too congested
- MRO – defective aircraft flying over residential areas
- Noise pollution – noise levels –rail?/air/road
- Flight paths stacking
- Freight movements
- Size of aircraft not explained
- Runway length not explained – why 1799 metres?
- Increase in carbon emissions
- Poorer rail service –impact on train timetable
- Closure of B52 club
- People losing their homes
- Devaluation of house prices
- Will compensation be paid for environmental impacts?
- Inaccessibility of airport
- Air travel declining
- Why do Councils support government policy on aviation?
- How to deal with a disaster

- Police and customs controls at airport
- Use of railway for freight
- Traffic levels expected in and around airport
- Where is demand considered?
- Do not believe employment development will follow the airport
- Impact on peoples' homes
- Airport lease – implications
- Climate change/CO<sub>2</sub> etc
- Impact on usability of St Lawrence Church and on churchyard (but there is no change in the situation!)
- Needs to be robust and enforceable controls on the airport
- Loss of sports pitches
- Bird strike issues – Brent Geese?
- Airport cannot be financially viable
- Airport can only have a short life
- Other airports are available and therefore Southend is not required
- New train station will only be used by single people – not families
- Object, but certainly do not want any planes between 10pm and 7am
- Will there be any protection for homes located underneath the flight path?
- 2 million passengers per annum means x number of planes per hour (various suggestions provided about the number of planes per hour)
- Object on the basis that no proper consultation has been carried out
- Objections to the number of freight flights per night – different assumptions made - 30 plus?
- Concern about flight paths over homes – planes turning at random cover residential areas
- Substantial areas of land will be required for car parks
- Controls over freight planes
- More take offs to the north east to reduce noise over Leigh
- Improved road infrastructure should be in place before the airport is allowed to develop

### **Representations received from specific and general consultation bodies:**

- GO East – text of the policy is misleading in that neither the White Paper or East of England Plan refer to 2 mppa
- London Southend Airport – there are several inaccuracies evident on the Proposals Map
- EEDA – support
- Essex County Council – support

**Policy Number: LS2 – Development at London Southend Airport**

**Summary of Representations Received:**

- The traffic baseline is incorrect – too much traffic will be generated
- Noise impacts from high growth restrictions required
- Ban on flights between 11 p.m. and 7 a.m.
- Cannot estimate noise levels until the project is complete
- Object to the expansion of the terminal – pollution, noise, co2
- What is the agreed baseline for noise? Not possible to assess the noise impacts.
- Safety – impact of an accident on the local area.
- Impact on quality of life.
- Need to safeguard the environment, curb co2 emissions.
- Unlikely to achieve modal shift to public transport – no targets are specified
- Southend will not benefit from the extra jobs
- Who will monitor noise and enforce reductions?
- Allow airport to develop, but use the cross runway
- 2 mppa is unrealistic
- Will business parks be solely airport related
- Assurance required about the future of rochford station
- Traffic congestion – road infrastructure cannot cope
- Freight lorry movements resulting from air cargo
- Outer bypass required
- Air pollution and Carbon/climate change
- Noise contour limit should be established
- Railway infrastructure at capacity
- Majority of flights will carry freight and fly at night with no restrictions
- Planes will be larger and so there will be more noise at frequent intervals.
- Green spaces are inadequate.
- Boeing 737 – 600B and 700A converted for freight would be able to use the extended runway.

**Representations received from specific and general consultation bodies:**

- GO East – the wording of the policy suggests pre-determination and limits taking into account wider spatial considerations
- ECC – historic character assessment zones 17, 18 and 22 – impact needs to be carefully considered
- ECC – breadth of EIA should encompass impacts on schools, pre-schools, residential areas – identified and mitigated in full

**Policy Number: LS3 – Noise Statement**

**Summary of Representations Received:**

- Noise should be evaluated and the agreed baseline levels set prior to expansion, not afterwards
- Support proposals for an agreed baseline and annual statement
- Night time flights should not be permitted for passenger or freight traffic – disturbed sleep/quality of life
- Increase in noise pollution throughout the day
- Impact of noise on densely populated areas and in particular schools and the hospital
- Noise cannot be controlled with the anticipated increase in passenger and cargo flights
- Newer planes will not be quieter
- Runway extension will decrease the safety zone for take off and landing
- Impact of noise beyond Rochford District and Southend Borough boundaries – both residential areas and nature conservation areas
- Newer aircraft climb much faster and leave the area much more quickly, so the noise disappears much more quickly
- Time constraints for engine testing are needed
- Residents have not received accurate information
- The policy would not put controls on noise
- Information on the number of flights and type of aircraft is needed
- Noise and pollution monitoring should be conducted by an independent body rather than self-regulation
- Information is too vague – Unclear what the noise evaluation statement is, who will agreed the baseline position and what the baseline position actually is and whether residents would be consulted
- A map is needed showing the projected noise footprint
- Flight times should be shorter than proposed
- Proposal is inadequate
- Impact on Purdeys Way Industrial Estate has not been considered
- Residents are not informed of changing flight paths
- Unclear why freight flights are treated differently to passenger flights
- London Southend Airport Company Ltd supports this proposed policy.

Other comments related to issues of air quality, job creation, water quality, highway network, light pollution, property devaluation and Green Belt use which are not relevant to this policy and have been addressed elsewhere. General objections to airport expansion.

**Representations received from specific and general consultation bodies:**

- East of England Local Government Association commented that the JAAP lacks precise detail on how aircraft movements will be subject to environmental controls.



- Renaissance Southend supports Policy LS3.
- CPREssex the Plan does not acknowledge that there would be more noise from increased vehicle movements and flights. Much of western Southend could be affected by noise due to an increase in flights. Schools would be affected. Without projected noise contour maps no specific assessments can be made.
- Essex Chambers of Commerce strongly supports the proposed Policy LS3.
- Hockley Residents Association commented that a legally enforceable agreement on clearly defined engine testing noise control measures is in place prior to airport growth. Engine testing to be restricted to clearly defined times of the day.

**Policy Number: LS4 - Surface Access Strategy**

**Summary of Representations Received:**

- Policy needs to be more prescriptive
- Strategy would exacerbate existing congestion issues including local roads through towns, A127 and A13
- Unclear what a Surface Access Strategy is
- Those using the airport and business park will park on residential roads and industrial estate roads rather than pay to use the car park provided
- Road and rail infrastructure is inadequate – particularly to accommodate airport passengers and planned increase in housing in the surrounding areas
- Support for preparing a Surface Access Strategy
- JAAP could bring about improvements to the local road infrastructure
- Insufficient information provided
- Majority of passengers will use cars rather than public transport
- Strategy should be updated more frequently than every five years
- Support rerouting of Eastwoodbury Lane
- New railway station should not be developed so close to existing stations

Other comments related to issues of noise, air quality, job creation, water quality, light pollution, property devaluation and Green Belt use which are not relevant to this policy and have been addressed elsewhere. General objections to airport expansion.

**Representations received from specific and general consultation bodies:**

- Highways Agency is supportive of plans to develop an Airport Surface Access Strategy (ASAS) for London Southend Airport. The HA will expect the ASAS to include challenging quantifiable travel demand targets. It is recommended that JAAP area developers, as well as local and regional transport operators are included within the Airport Transport forum.
- East of England Local Government Association commented that the precise details on how the surface access strategy will significantly promote more sustainable travel patterns will be critical to the JAAP's sustainable development objectives.
- Renaissance Southend commented that a clearer commitment to the essential elements of the Surface Access Strategy and the means of delivery should be included within the JAAP Submission Document.
- CPREssex welcome the policy requirements to prepare a Surface Access Strategy for the airport.
- CPREssex emphasised the need to encourage a modal shift to ensure that's passengers travel to the airport by public transport.
- London Southend Airport Company Ltd supports this proposed policy.

**Policy Number: LS5 – Public Safety Zones**

**Summary of Representations Received:**

- Restricts usage of residents property
- Increased risks to local population of accidents with an increase in flights – safety concerns, particularly impact on schools
- Densely populated areas should not be under the flight path
- The Public Safety Zone is not shown on the Proposals Map.
- The Plan should show the extent of the Public Safety Zone should the extension take place
- Support for the policy
- Policy wording pre-judges the planning consent for the runway extension
- Impact on St Lawrence Church is uncertain – should be in Public Safety Zone
- Safety concerns – proximity of runway to railway line
- London Southend Airport Company Ltd supports this proposed policy.

Other comments related to issues of air quality, job creation, water quality, highway network, light pollution, property devaluation and Green Belt use which are not relevant to this policy and have been addressed elsewhere. General objections to airport expansion.

**Representations received from specific and general consultation bodies:**

- Renaissance Southend supports Policy LS5.
- CPREssex commented that the review of the Public Safety Zone should be carried out before and be part of the planning application.

**Policy Number: LS6 – Runway Extension**

**Summary of Representations Received:**

- Longer runway will result in more noise
- Excuse to bring in more cargo planes
- Operator will not make a contribution towards construction
- Safety and environmental impacts
- More cargo flights at night
- Impact on property prices
- Impact on St Lawrence Church – church will be isolated by change in road network
- Impact on schools resulting from noise
- Noise from planes taking off and landing - reverse thrust
- Loss of homes
- Not clear how the new road will be paid for
- Runway extension is simply not necessary
- Southend does not need to boost its economy
- Stansted is perfectly adequate for flights
- What about developing a cross runway
- Planes will be lower over housing
- Daytime hours are too long – various alternative options suggested
- Ban all night flights
- Planning consent will not improve controls
- Air pollution
- Impact of freight flights in daytime hours
- Safety
- The reasons for requiring a runway length of 1799 metres are not clear
- Too much additional traffic will be generated
- The airport should be relocated elsewhere
- Runway extension will allow larger planes and an increase in freight
- Southend should not be modelled on Southampton
- Demolition of houses to enable the runway extension to proceed is unacceptable
- Flight path over schools and houses
- Loss of green belt land
- Loss of high quality agricultural land
- CO<sub>2</sub> emissions and global warming
- Impact on the road network resulting from the closure of Eastwoodbury Lane
- The construction of the current runway is such that an imminent engineering failure is likely, particularly given its use by larger planes
- The airport operator should bear the full cost of road diversion
- A map of the flight paths should be provided
- Downturn in usage of regional airports, so no requirement for a runway extension

**Representations received from specific and general consultation**

**bodies:**

- RSPB – expansion of Southend airport would, via increases in air transport movements, significantly increase emissions of greenhouse gases, threatening biodiversity nationally and internationally. We strongly recommend that a policy be included exploring the effects of the airport development on climate change.
- GO East - the wording of the policy suggests pre-determination and limits taking into account wider spatial considerations
- Essex County Council - The Preferred Option for the future of the airport is supported, provided that the environmental implications of extending the runway to accommodate larger aircraft are fully addressed. The first sentence of Policy LS6 (Runway Extension) is felt to be an inappropriate form of policy wording in advance of submission of a planning application for the runway extension. It is suggested that the first sentence of Policy LS6 which currently reads, 'Planning permission for the extension of the runway to the south so as to provide an operational runway of 1,799 metres will be supported.', should be amended by replacing the words 'will be supported' by the words 'is acceptable in principle'. This would better enable the joint authorities to consider a planning application on its merits without prejudice.
- English Heritage - The Church of St Laurence and All Saints, listed grade I, lies some metres from the south-west end of the existing runway. English Heritage is pleased that the recent proposal to demolish the church has been withdrawn. The extension of the runway will, nevertheless, affect its setting, both visually, and in terms of the level of noise generated by aircraft. It is therefore vital that the AAP addresses these matters. It is of fundamental importance that none of the proposals would prejudice the future use of the church.
- Essex Chambers of Commerce - strongly supports the proposed Policy LS6.

**Policy Number: LS7 – Operation of the New Runway**

**Summary of Representations Received:**

- What will happen to the airspace over Southend if the airport does not expand?
- There should be a restriction on all night flights
- Planning consent will not improve controls
- Pollution
- Daytime hours are too long – various alternative suggestions provided
- How will routing of aircraft be controlled?
- Will there be penalties if noise quotas are exceeded?
- Environmental impacts
- Increased number of freight flights using older, noisier aeroplanes
- Safety
- Impact on St Lawrence Church
- Controls over routing of aircraft
- Noise impact of engine testing/ground running
- Impact of training aircraft
- Frequency and hence impact of flights will significantly increase – passenger flights will increase from 3,000 to 2 million per annum, with planes landing and taking off every five minutes
- Freight will be carried on the railway line
- An expanded airport will have no benefits for the local area
- Impact from un-burnt fuel
- Why is the runway extension limited to 1799 metres?
- Noise contour maps should be provided with the plans
- An extended runway is not required for passenger flights
- There is no passenger demand for a regional airport at Southend, particularly given the recent decline in passenger numbers
- Increasing the length of the runway will not make the airport quieter
- Noise quotas will not work

**Representations received from specific and general consultation bodies:**

- GO East - the wording of the policy suggests pre-determination and limits taking into account wider spatial considerations.
- London Southend Airport – concerned that the operating hours are too restrictive and would prefer hours to be adjusted to link to a noise management package, perhaps providing different hours for arrivals and departures. Also concerned about the arrangements for routing of aircraft and would request this element of the policy be reworded to, 'operational instructions on both take off and approach to reduce noise and environmental impact'.

**Policy Number: TF1 – Expansion of New Terminal**

**Summary of Representations Received:**

- Routing tracks for aircraft should be changed
- A terminal extension is not required if there is no increase in passengers
- Noise and pollution
- Road congestion
- Impact on quality of life
- Ground testing of engines is worse than flights
- No night flights no flights outside the specified hours
- Restrictions should be imposed on helicopters and cargo
- Daytime hours should be reduced – various suggestions made for alternatives
- Development is not required
- There are other airports that can be used
- Safety and emergency landings
- Object to cargo flights
- Increase in the number of flights is not acceptable
- Not an appropriate place for a large airport
- Work is already in progress – there a fait a compli
- Impact and noise from circling aircraft
- No information has been provided to show how the terminal will be accessed
- The terminal is in the wrong location

**Representations received from specific and general consultation bodies:**

- GO East - the wording of the policy suggests pre-determination and limits taking into account wider spatial considerations
- London Southend Airport – concerned to see the deletion of any elements of the proposed policy that relate to the operation of aircraft in the air, rather than linked to the new terminal apron

**Policy Number: MRO1 – Northern MRO**

**Summary of Representations Received:**

- If there is no runway extension, then no expansion is required
- Traffic congestion
- Impact on quality of life
- New building will be a blot on the landscape
- Increased MRO means more planes
- Older aircraft are noisier
- Storage warehouses are not acceptable
- Testing of engines is too noisy
- There is capacity at other airports for maintenance work
- Loss of green belt

**Representations received from specific and general consultation bodies:**

- Environment Agency – the site is within flood zones 2 and 3 and therefore the sequential test must be applied
- London Southend Airport – consider the policy should be more flexible to allow for airport related developments, such as the relocated control tower, the fuel farm and other ancillary uses. It should also be explained that developments may take place in a much larger area than those designated on the Proposals Map



**Policy Number: MRO2 – Northern MRO Extension**

**Summary of Representations Received:**

- MRO operation is not required
- Quality of life
- Noise impacts
- Traffic congestion
- Planning consent will not bring better controls
- Impact from older aircraft
- Loss of green belt
- Car parking inadequate
- Airport should fund all infrastructure

**Representations received from specific and general consultation bodies:**

- Environment Agency – site is within flood zones 2 and 3 – application of the sequential test required
- London Southend Airport – consider the policy should be more flexible to allow for airport related developments, such as the relocated control tower, the fuel farm and other ancillary uses. It should also be explained that developments may take place in a much larger area than those designated on the Proposals Map

**Policy Number: MRO3 – Southern MRO Zone**

**Summary of Representations Received:**

- Climate change should take precedent over the airport
- Impact from increased freight
- Noise
- Aircraft hangers should not be used for storage
- Night flights
- Noise from aircraft testing

**Representations received from specific and general consultation bodies:**

- London Southend Airport – consider the policy should be more flexible to allow for airport related developments, such as the relocated control tower, the fuel farm and other ancillary uses. It should also be explained that developments may take place in a much larger area than those designated on the Proposals Map

**Policy Number: Policy ADZ1 – Existing Terminal Area**

**Summary of Representations Received:**

- Objections to principle of airport expansion
- No need to enhance terminal
- Current terminal needs refurbishing and expanding
- Public viewing area should be incorporated into terminal
- There is enough retail in the area and development here should be airport related
- Objections to policy not supporting retail here
- Suggestion that provision should be allowed for limited, small retail development
- London Southend Airport supports the policy

**Representations received from specific and general consultation bodies:**

- Essex Chamber of Commerce strongly supports the policy

**Policy Number: T1 – Link Road from Eastwoodbury Lane to Nestuda Way**

The information below provides a summary of the representations received in relation to policy T1. Many of the representations received raised general issues as well as matters specific to other policies within the document and do not relate directly to this policy (T1), as such they have been recorded and taken into account elsewhere.

**Summary of Representations Received:**

- No direct access north or south from Tesco roundabout - needs to have a new southwest exit to provide a direct link from Rochford to the Leigh area, at present the only route is Kent Elms corner or the Bell Hotel crossing
- A127 and local roads will not be able to handle increase in traffic – need to be addressed impact on wider road network, future congestion
- Concerns about the amount of parking spaces required to service 2 million passengers
- Concerns about effect on pedestrians access to St. Laurence church or Eastwood (right of way)
- Consider that infrastructure improvements are inadequate, no reference to who will be paying for it
- Concerns over traffic noise and air pollution increases
- Railway will only cater for a small proportion of passengers
- Link road will go through an established badger set on Eastwoodbury Lane
- Wording regarding road and transport plans too vague
- Object as Orchard site will be under threat from road
- The link road without airport expansion would be an excellent idea
- Effect on St. Lawrence Park play area (given as compensation for RBS development)
- New road should go under existing runway
- Need to know the exact route to provide comment
- Concerns over effect on bus route for number 9
- Brand new road with cycle track will provide superior and safer road – excellent proposal
- New road essential for the whole JAAP vision
- New road will address congestion issues
- Road infrastructure is vital to growth of airport which supports town
- Will elevate congestion at other junctions and is needed to lengthen the runway
- Will avoid use of present road barriers so support
- Very minor road which capacity can be rerouted
- Still need a new road from the A130 to the far end of Southend running north of Rochford

**Representations received from specific and general consultation bodies:**

- Essex Chamber of Commerce – strongly supports proposal
- Renaissance Southend supports Policy T1
- Highways Agency - A transport strategy will need to demonstrate that public transport improvements are sufficient to accommodate the expected increase in demand as a result of the JAAP development proposals, and ensure that they are phased with development. Impact of development proposals on the local and wider road networks, including junction 29 of M25 quantified and outlined within the JAAP. The surface access strategy should include challenging quantifiable travel demand targets. It is recommended that JAAP area developers, as well as local and regional transport operators are included within the Airport Transport Forum
- Arriva Southern Counties - route would bring potential benefits with improved access to RBS, Tesco and the North Crescent and Feeches Road area service by number 9 bus service. Suggestion of bus stops and pedestrian links on the new road
- Hockley Residents Association – all transport infrastructure improvements need to be in place prior to growth and travel plans.
- South East Essex Friends of the Earth - were the runway extension to go ahead, all costs for this link road must be met by the airport operator
- Environment Agency - expect the airport to operate as a low emission zone, eg allowing only the lowest possible emissions vehicles to have access
- Robert Leonard Group plc - new link will take a lot of pressure off the existing "Bell" junction
- Go-East - It may be more appropriate to prepare a single policy, which is supported by actions in a Delivery Programme or which support an Implementation Framework
- Essex Police - traffic problems will not be addressed fully by this road alone. We suggest there needs to be a major commitment in the use of public transport to airport

**Policy Number: T2 – Safeguarded Routes**

The information below provides a summary of the representations received in relation to policy T2. Many of the representations received raised general issues as well as matters specific to other policies within the document and do not relate directly to this policy (T2), as such they have been recorded and taken into account elsewhere.

**Summary of Representations Received:**

- The idea of additional traffic in such a crowded area, regardless of proposals to try and improve the links, is not going to work. All roads are at or near 100% capacity and most are lined with housing along the routes
- Better to improve the existing roads, along with the proposed new road between Eastwoodbury Lane and Nestuda Way. The distance involved is comparatively short, cannot see a need for this road
- It appears from Nestuda Way to Warners Bridge a lot more demolition of homes will occur than is envisaged already for extending the runway
- Southend needs a proper bypass
- The impact of a new road (in addition to the re-routing of Eastwoodbury Lane) will have a devastating effect on local residents, particularly those who currently enjoy the existing 'low amenity' area
- The clear message seems to be that the development will take place and token gestures to the environment will be made if it is not too difficult or expensive
- All this talk about link roads, no one is answering the solution to the severe problems that this will incur on the A127 or A13
- This 'corridor' runs right through the middle of the only public open space that is feasibly accessible to local residents (the other being up near Hall Road) and will emerge in a densely populated area. And no mention of the compulsory purchase of some of the smallholdings
- Explanation of this proposal is not clear – safeguarded - helpful if this were explained in plain English
- More details be given on exactly what you propose and where it would run across
- Appears to be no attempt to offset this taking of cultivated land from the Borough, nor the allotments within this area nor the land deregulated from Manners Way allotments next to Warners Bridge
- Would be very good for both Rochford Town and Southend East access
- Sensible measure bearing in mind the long identified need to improve access to the east of Southend

**Representations received from specific and general consultation bodies:**

- Essex Chambers of Commerce strongly supports the proposed Policy T2
- Renaissance Southend supports Policy T2
- Go-East - It may be more appropriate to prepare a single policy, which is supported by actions in a Delivery Programme or which support an Implementation Framework
- Highways Agency - A transport strategy will need to demonstrate that public transport improvements are sufficient to accommodate the expected increase in demand as a result of the JAAP development proposals, and ensure that they are phased with development. Impact of development proposals on the local and wider road networks, including junction 29 of M25 quantified and outlined within the JAAP. The surface access strategy should include challenging quantifiable travel demand targets. It is recommended that JAAP area developers, as well as local and regional transport operators are included within the Airport Transport Forum
- Southend Friends of the Earth - this policy should not be adopted and attention should instead be focused on policies T5-T9 coupled with other traffic reduction methods, such as congestion charging on the A127 and A13 at peak hours with the alternative of a free park and ride scheme at the point of charging paid for by the congestion charge

**Policy Number: T3 – Upgrade to Cherry Orchard Way**

The information below provides a summary of the representations received in relation to policy T3. Many of the representations received raised general issues as well as matters specific to other policies within the document and do not relate directly to this policy (T3), as such they have been recorded and taken into account elsewhere.

**Summary of Representations Received:**

- Object to policies as they do not take account of current and future congestion
- Cherry Orchard Way is just a small link between two largely populated areas. It is already crowded with local traffic and the idea of putting non-local traffic onto this small stretch of road is a nonsense
- It will encourage even more traffic along Hall Road and through Rochford and also through Hawkwell and further on Rayleigh. These roads are unsuitable for the volume and type of traffic that will be generated by the movement of freight
- Negative environmental impact via noise, traffic, infrastructure, erosion of greenbelt, pollution, carbon footprint, long & short term impact
- Dual carriageway would not be required, the current single carriageway is easily able to take current traffic levels and proposed extra levels
- Link roads in Southend will not have a positive effect on the already overstretched A13 and A127
- If Cherry Orchard Way is to be dualled, what requirements will there be to further 'update' the remainder of b1013 between Rayleigh and Rochford
- Developer required to meet full cost of construction
- Only concerns relate to the capability of local roads to manage traffic. There will certainly have to be a link to Cherry Orchard way
- A junction from Cherry Orchard Way, into Aviation Way on the corner by the Westcliff Rugby Club would take much (northside airport/Aviation way) traffic away from the roundabout on the junction with Eastwoodbury Lane/Cherry Orchard Way (southern end)
- A short term answer, the only way to solve the problem of traffic around the area, a new by-pass
- Should have been built as a dual carriageway in the first place
- Safer, faster, designed for the purpose. Cherry Orchard Way could do with being made a dual carriageway whether the airport is upgraded or not
- A dual carriageway will be safer than the existing single carriageway

**Representations received from specific and general consultation bodies:**



- Essex County Council - concerns about the effects of the proposals on the setting of the grade II listed building, Cherry Orchard Farm. The Plan proposes, as I understand, to develop an industrial estate on the playing fields immediately behind the house and to increase the width of Cherry Orchard way to the front. I consider that either of these developments could have an adverse effect on the setting of the listed building. I suggest that some sort of buffer zone around the building is necessary to preserve some of the rural character of its setting.
- Go-East - It may be more appropriate to prepare a single policy, which is supported by actions in a Delivery Programme or which support an Implementation Framework.
- Highways Agency - A transport strategy will need to demonstrate that public transport improvements are sufficient to accommodate the expected increase in demand as a result of the JAAP development proposals, and ensure that they are phased with development. Impact of development proposals on the local and wider road networks, including junction 29 of M25 quantified and outlined within the JAAP. The surface access strategy should include challenging quantifiable travel demand targets. It is recommended that JAAP area developers, as well as local and regional transport operators are included within the Airport Transport Forum.
- Essex Chambers of Commerce strongly supports the proposed Policy T3
- Robert Leonard Group plc - will ease traffic flow between Southend & Rochford

**Policy Number: T4 – Upgrade/Improvements of Aviation Way**

The information below provides a summary of the representations received in relation to policy T4. Many of the representations received raised general issues as well as matters specific to other policies within the document and do not relate directly to this policy (T4), as such they have been recorded and taken into account elsewhere.

**Summary of Representations Received:**

- Pedestrians and cyclists will have to breathe in the aircraft fumes
- Contributions to the provision of improved walking and cycling facilities would be good, but not at the expense of loss of land
- No one is answering the solution to the severe problems that this will incur on the A127 or A13
- The road system round the airport is not adequate to cope with large traffic flows and the proposed park and ride scheme
- Provision for walking and cycling element is supported due to long term positive attributes
- Needs to be public transport provided to this area that at the moment is completely lacking
- Plans are just too unclear
- Developer should meet full cost of construction
- Feel that the option of a roundabout between Aviation Way and Cherry Orchard Way by the corner at the Westcliff Rugby club, might serve this aim better
- Block off aviation way and Eastwoodbury Lane - make new entrance along the new road at one of the roundabouts leave the church at the end of a cul de sac
- Fully support any measures that take into account people walking.
- Approve of the Upgrade/Improvement of Aviation Way and particularly like the inclusion of provision for walkers and cyclists
- Improvement to this road junction would seem necessary to cope with the traffic arising from the proposed expansion of the MRO operations on the North side of the airport. The provision of a footpath and cycle-track, neither of which is there at present, are both highly desirable.

**Representations received from specific and general consultation bodies:**

- Renaissance Southend supports Policy T4
- Essex Chambers of Commerce strongly supports Policy T4
- Go-East - It may be more appropriate to prepare a single policy, which is supported by actions in a Delivery Programme or which support an Implementation Framework.
- Highways Agency - A transport strategy will need to demonstrate that public transport improvements are sufficient to accommodate the expected increase in demand as a result of the JAAP development

proposals, and ensure that they are phased with development. Impact of development proposals on the local and wider road networks, including junction 29 of M25 quantified and outlined within the JAAP. The surface access strategy should include challenging quantifiable travel demand targets. It is recommended that JAAP area developers, as well as local and regional transport operators are included within the Airport Transport Forum.

- South East Essex Friends of the Earth – same objection as policy T2

### **Policy Number: T5 – Park and Ride**

The information below provides a summary of the representations received in relation to policy T5. Many of the representations received raised general issues as well as matters specific to other policies within the document and do not relate directly to this policy (T5), as such they have been recorded and taken into account elsewhere.

#### **Summary of Representations Received:**

- There does not appear to be sufficient parking facilities for the RBS, Tesco work force and surrounding industrial estates - fear roads will be further congested with people parking along the new roads
- Not the place for a Park and Ride facility - any park and ride should be well outside the area close to the airport
- Will not ease congestion on A127 and A13
- Park and ride will not benefit locals nor any of these supposed new passengers for the airport and will not be attractive to people
- The park and ride on the west side of Nestuda Way is on the Eastwoodbury Playing Fields, a very well used local sports amenity
- Park and rides never work
- Not in favour of tarmacing over an important piece of open land that could be used as a public open space - would be better to include a multi storey car park in an industrial area
- Pointless offering a park and ride scheme when the road network is totally inadequate and not capable of supporting the current traffic levels
- Feel it would be better placed on Cherry Orchard way or prior to Progress Road junction
- Insufficient details supplied regarding size of this facility and exact location of facility
- Would support a "Park & Ride" if it were to be a totally separate issue, serving Southend Hospital, or any of our town centres
- Department for Transport Circular 1/2002, outlining development guidelines within Public Safety Zones (PSZ), new Park and Ride schemes should not be located within a PSZ.
- Not necessary for the Airport but may be of use for the town and could encourage shoppers back to Southend
- Too far within borough - by the time you are here you might as well continue into centre
- A park and ride scheme may be of better use in reducing congestion/pollution levels if it was established further outside the urban area, ie: around the A130 junction area.combined with SERT buses, this could give better access into central Southend
- Support a park and ride facility for Southend, just not in conjunction with the airport expansion
- Regardless of expansion at the airport, a Park and Ride facility for Southend is long overdue in order to relieve traffic congestion in the

town centre

- Park and ride is a good idea especially if it goes by way of Southend Hospital
- Using a Park and Ride facility in Nestuda Way should be used for the benefit of Southend as well as the airport. With little adaptation to the road layout, buses could take car occupants down Westbourne Grove to Chalkwell, along the sea front to the Kursaal, up to the Town and the bus station then up Victoria Avenue and back to Nestuda Way
- Other airports have park and then get the bus to the airport so this is very necessary
- Fully support policy T5 for a Park and ride facility for Southend. Visitors, and shoppers going to Southend can use the facility, and it will reduce the amount of traffic continuing along the A127 and Victoria Avenue into central Southend. Park and ride schemes work well for other towns around England. Objectors should note that this is not for parking at the Airport - they already have parking onsite

### **Representations received from specific and general consultation bodies:**

- Renaissance Southend support Policy T5
- Essex Chambers of Commerce strongly supports the proposed Policy T5
- Robert Leonard Group plc - Will take a lot of pressure off A127 west of Nestuda Way providing better flows into Southend. Works well in Chelmsford
- South East Essex Friends of the Earth - Southend has been crying out for a Park and Ride facility for years. This would be very welcome. However, were the runway extension to proceed, the location allocated is unsuitable as it breaches Policy LS5. Indeed, a large proportion of the facility lies within the existing Public Safety Zone.
- Sport England (East Region) - No objection is made to the proposals for a park and ride facility on land west of Nestuda Way on the basis that the area proposed is restricted to the area identified as business use/park and ride on the proposals map. As the area of change referred to in the JAAP included the adjoining playing fields to the north, I would advise that Sport England would object if the area proposed for the park and ride facility was extended in the submission DPD to include all or part of this playing fields
- Arriva Southern Counties - It is unclear from the document if this proposal is intended to be a Park & Ride facility for the airport alone or as a means of access to Southend town centre. There would appear to be an opportunity here, subject to capacity, to provide a much needed facility for the latter. In either case it is important that the route followed by the Park & Ride bus service is, as far as possible, free of delay by other road traffic both to make the service attractive and to minimise the cost of provision

- Highways Agency - A transport strategy will need to demonstrate that public transport improvements are sufficient to accommodate the expected increase in demand as a result of the JAAP development proposals, and ensure that they are phased with development. Impact of development proposals on the local and wider road networks, including junction 29 of M25 quantified and outlined within the JAAP. The surface access strategy should include challenging quantifiable travel demand targets. It is recommended that JAAP area developers, as well as local and regional transport operators are included within the Airport Transport Forum.

**Policy Number: T6 – Green Travel Plans**

The information below provides a summary of the representations received in relation to policy T6. Many of the representations received raised general issues as well as matters specific to other policies within the document and do not relate directly to this policy (T6), as such they have been recorded and taken into account elsewhere.

**Summary of Representations Received:**

- Any use of the word green is ironic when relating to airport expansion
- What are green travel plans
- Seems to be a paying lip service to providing green travel after all there are few methods of transport that pump more pollution into the air than a jet
- Inevitably additional staff will use the roads to get to and from work and the roads are already far too busy
- Car parking and green travel plans is a contradiction.
- It is a fact that people want to travel by car to the nearest point they can get to their destination - RBS car parking issue should be an example.
- Ban all cars from parking any where except in office car parks. Use public transport with the full cost met by developer and provider.
- A travel plan is not a replacement for long term, co-ordinated investment in alternative methods of transport.
- Proposed operational times of the airport it is obvious that employees will not always be able to utilise public transport that ceases so early in the evenings
- Developers should be encouraged to adopt an integrated approach, whereby the resources of developments within the JAAP area are pooled and the measures and strategies of individual Travel Plans co-ordinated to provide increased levels of benefits to residents and employees of the JAAP area. This could be achieved through the provision of an Area Wide Travel Plan encompassing all development within the JAAP area. The adoption of a co-ordinated approach between the larger JAAP proposed developments of Saxon Way Business Park, Aviation Way Industrial estate and the airport itself is considered to be particularly important.
- Glad that even in today's economic climate, L.S.A. are considering spending funds to improve public transport and investing in 'Greener' option's
- might be useful if the Councils applied some sort of rating inducement, so that businesses that achieve certain levels of excellence in their green travel plans use and acceptance, are financially rewarded for doing so
- This could be a headache for some, but it makes sense and in this day and age it has to be in everyone's interest

**Representations received from specific and general consultation**

**bodies:**

- Renaissance Southend support Policy T6
- Essex Chambers of Commerce strongly supports Policy T6
- Highways Agency – supportive of the proposals – developers should be encouraged to adopt an integrated approach, whereby resources of developments within the JAAP area are pooled and the measure and strategies of individual travel plans co-ordinated to provide increased levels of benefit to residents and employees of the JAAP area. The adoption of a co-ordinated approach between larger JAAP proposed developments of Saxon Way Business Park, Aviation Way Industrial Estate and the airport itself will be particularly important.
- Highways Agency - A transport strategy will need to demonstrate that public transport improvements are sufficient to accommodate the expected increase in demand as a result of the JAAP development proposals, and ensure that they are phased with development. Impact of development proposals on the local and wider road networks, including junction 29 of M25 quantified and outlined within the JAAP. The surface access strategy should include challenging quantifiable travel demand targets. It is recommended that JAAP area developers, as well as local and regional transport operators are included within the Airport Transport Forum.
- South East Essex Friends of the Earth - In principle, green travel plans should obviously be supported. However in this case, this is nothing more than greenwash. As has been pointed out by other respondents, it won't make the slightest difference that people are walking to the airport (and is that really a likely scenario anyway?)



### **Policy Number: T7 – Public Transport**

The information below provides a summary of the representations received in relation to policy T7. Many of the representations received raised general issues as well as matters specific to other policies within the document and do not relate directly to this policy (T7), as such they have been recorded and taken into account elsewhere.

#### **Summary of Representations Received:**

- The strain on the network will be immense
- Any improvement in public transportation should not rely on any airport expansion
- Bus information is very vague and there is no input from the rail network providers
- Any new bus service would still have to travel via the congested roads.
- Public transport is unreliable at present with an influx of passengers the system would be made worse
- South Essex Rapid Transit" system won't be very rapid by the time all this extra traffic is generated
- Is there any substance or detail to these proposals?
- SERT system will not be beneficial to the existing road/current road users unlikely to use it as it will not be cheap to use
- The vast majority of people visiting airports will drive
- This scheme is vague beyond belief
- This type of investment in public transport should be mandatory
- All new infrastructure should be by rail
- Airport owners should be liable for all establishment costs, not just have to make a token contribution
- Far more detail is required regarding routes, frequencies and periods of operation
- Whilst in favour of public transport and SERT, these proposals will not be able to be implemented or work effectively without considerable improvement to the ailing road infrastructure in or around Southend generally
- Full cost to be met by developer and provider
- What provision is there going to be made for all these air passengers and their luggage on these trains
- Given that currently industrial parks in the area are poorly served by public transport has the Council considered specific bus services for the industrial estates
- SERT system is not guaranteed to be implemented and will struggle to overcome local prejudice against bus travel
- The statement "It is expected that development will make a contribution to the establishment of an appropriate bus service" is very vague. In planning a major project such as this the word "expected" should not be in a planning document
- Arriva are cutting services and run very limited services at weekends

and evenings. The last train out of Southend leaves before 11pm where do travellers go with delayed flights and no transport home?

- Principle of SERT is a good one. However I would see financial support of SERT as being more down to the Councils to support if this is required, rather than new businesses
- This is area that may cause serious problems as there is currently no commitment to providing genuine public transport services outside of perceived peak times
- Nothing short of statutory requirements for the provision of public transport as an integral part of the plan can mitigate for the detrimental impacts.
- Arriva - Previous discussions have suggested that the airport would be served by a minor rerouting of services 7 and 8 (Southend - Rochford - Hockley - Rayleigh) through the area immediately to the east of the proposed station. This area appears to be no longer available and clarification is needed as to how bus services will be able to serve the airport and station
- Airport should be fully integrated into local public transport system
- quicker service for Hawkwell via Nestuda Way
- Need to consider transport as a whole. Not as a wish list of headline grabbing schemes
- SERT is good but must be running when people are working
- Local bus company would jump at the chance of providing transport to the surrounding area as a way of raising revenue. In addition the new train terminal will bring in passengers fast and with no pollution

### **Representations received from specific and general consultation bodies:**

- Renaissance Southend supports Policy T7
- Essex Chambers of Commerce strongly supports Policy T7
- Castle Point Borough Council - pleased to see transport policies included in the preferred options document that indicate a modal shift towards more sustainable forms of transport. Improved public transport provision will be important for enabling people from within the sub-region to access the new jobs created
- London Southend Airport Company Ltd supports this proposed policy.
- Network Rail - should additionally include support for a new station, rather than only referring to bus services
- HA - A transport strategy will need to demonstrate that public transport improvements are sufficient to accommodate the expected increase in demand as a result of the JAAP development proposals, and ensure that they are phased with development. Impact of development proposals on the local and wider road networks, including junction 29 of M25 quantified and outlined within the JAAP. The surface access strategy should include challenging quantifiable travel demand targets. It is recommended that JAAP area developers, as well as local and regional transport operators are included within the Airport Transport

Forum.

- South East Essex Friends of the Earth - The SERT is an entirely separate project. As part of the JAAP scheme, multiple bus services (not just one as is suggested by the policy) should be provided in addition to SERT. It should also be noted that as this is \*public\* transport, it should be in public ownership. We have seen to our cost what happens when Southend's bus services are in private ownership - they are public services and should not be expected to turn a profit for the operator on every route

### **Policy Number: T8 – Walking and Cycling**

The information below provides a summary of the representations received in relation to policy T8. Many of the representations received raised general issues as well as matters specific to other policies within the document and do not relate directly to this policy (T8), as such they have been recorded and taken into account elsewhere.

#### **Summary of Representations Received:**

- A hollow gesture - Southend has a minimal number of cycle routes
- We don't need council designated walking/cycling paths
- Our roads are too narrow for cycle paths
- Of course we need to improve the opportunities for walking & cycling near the airport
- Good idea if this was part of a broader interest in the pedestrian and cyclist but once outside of the immediate areas of improvement does the walker/cyclist then have fend for themselves again
- Harden up this policy so that it reads "required to provide walking and cycling facilities".
- Investment in walking and cycling is helpful
- More facilities for these, preferably segregated from the roads
- An excellent policy, one which should be adopted right across Southend and Rochford
- For many reasons, the provision of walking and cycling facilities should be supported, regardless of expansion at the airport.
- Where cycle paths/lanes intersect with the road bicycles should have priority
- This should already be in place as a matter of course and has no relevance to the airport expansion
- Agree and showers in the new buildings
- It would be nice to see some cycle tracks in the Southend area that are continuous, and not intermittent
- Footpath from Eastwoodbury Lane to St Lawrence Church if runway extended from east
- This should be done regardless of the proposed airport expansion
- Beneficial on both health and safety, a positive affect on the environment
- This should be in place anyway for the locals - nothing to do with the airport expansion
- New cycle and walking routes are welcome. Existing footpaths and rights of way must not be lost nor compromised
- Cycling routes to the west of the airport also need to be considered. At present it is impossible to cycle safely from the borough boundary in Eastwood (either A127 or via Rayleigh Road)
- Complete proposal plan of the area should be published by JAAP showing exactly what will be provided for
- Essex Bridleways Assoc - We note there is a proposed footpath/cycle

link between Hall Road and the new access roads which will link up to the Cherry Orchard Jubilee Country Park. We request that provision is made to allow horse riders to use this route also

- Without careful integration into the surrounding area, high quality routes (not a few road markings) and local publicity and ongoing maintenance and support, such measure will fail completely
- All new perimeters of the extended airport should include access for all NMUs and improved links at existing and new junctions and roadways. Safety rather than cost should be the priority. In the existing areas where change of use is planned, existing Rights of Way (ROWs) should be upgraded for inclusivity for NMUs. In particular, the southern and western sides of the perimeter are most affected by the proposals and should include state of the art facilities for NMUs

### **Representations received from specific and general consultation bodies:**

- Renaissance Southend supports Policy T8
- South East Essex Friends of the Earth - Policy T8 is to be welcomed on the condition that cycling facilities do not take the approach at junctions that is seen at the Fossetts Way/Sutton Road junction, i.e. that cyclists have to give way to all other road traffic. Motorists need to get used to the idea that cyclists' and pedestrians' journeys have equal priority to their own.
- Essex Chambers of Commerce strongly supports Policy T8
- Highways Agency - A transport strategy will need to demonstrate that public transport improvements are sufficient to accommodate the expected increase in demand as a result of the JAAP development proposals, and ensure that they are phased with development. Impact of development proposals on the local and wider road networks, including junction 29 of M25 quantified and outlined within the JAAP. The surface access strategy should include challenging quantifiable travel demand targets. It is recommended that JAAP area developers, as well as local and regional transport operators are included within the Airport Transport Forum.

**Policy Number: T9 - SERT**

**Summary of Representations Received:**

Many of the representations received raised general issues as well as matters specific to other policies within the document and do not relate directly to this policy (T9), as such they have been addressed elsewhere in relation to the appropriate policies. A summary of the issues raised in relation to Policy T9 include:

- This transport system should be developed by the council anyway, not just a consideration for the expansion
- Council are unable to get the current bus operators to run a regular service
- Any increased SERT proposals will still need to use overcrowded roads - the infrastructure simply does not exist for such expansion
- Need to understand have more detail about difference between SERT and park and ride.
- Need proper motorway connections to the airport, the A127 and A13 are already heavily congested
- Overall access into and out of the town has not been addressed for the majority - car drivers. The airport will amplify the sever road congestion problems
- This policy is an irrelevance - SERT is only a glorified bus service
- Should be considered aside from airport expansion as part of our councils transport policies.
- Would to know more about it – more details
- Highly sceptical that an effective transport can be put in place given the current problems on the A127, which will be exacerbated if the high growth option is adopted
- Unless the SERT has its own lane throughout its entire journey then it is going to be like a normal bus service - why not just make more bus lanes and create a better bus service
- Road system will not support it
- Support better Public transport options in Southend, combined with out of town park and ride facilities, and incentives to use Public transport
- This would help to reduce the road congestion from private vehicle so many are unnecessarily afraid of, as well as linking other future developments in the area that may arise through the modest airport expansion
- Any viable and practical improvements to public transport should be encouraged
- Infrastructure of SERT (road widening, time tables etc) must be in place before development granted.

**Representations received from specific and general consultation bodies:**

- South East Essex Friends of the Earth - The SERT is to be welcomed,

but the JAAP can hardly take the credit for this. It should also be noted that there can be no such thing as "sustainable new development".

- Essex Chambers of Commerce strongly supports the proposed Policy T9
- Renaissance Southend supports Policy T9
- Highways Agency - A transport strategy will need to demonstrate that public transport improvements are sufficient to accommodate the expected increase in demand as a result of the JAAP development proposals, and ensure that they are phased with development. Impact of development proposals on the local and wider road networks, including junction 29 of M25 quantified and outlined within the JAAP. The surface access strategy should include challenging quantifiable travel demand targets. It is recommended that JAAP area developers, as well as local and regional transport operators are included within the Airport Transport Forum.
- EEDA - Goal 7 of the Regional Economic Strategy - Transport identifies the importance of increasing the economic benefits to the region of our international gateways whilst mitigating local impacts. Priority 2 of this Goal also identifies the importance of sustained economic investment for transport in key strategic corridors. Critically, this includes the A127 and A13. In addition, the recent TEES study carried out by EEDA also identifies this corridor as being of particular importance to the region in economic terms. EEDA broadly welcomes the approach to transport connectivity as set out in the JAAP. It appears to be a balanced response that marries the need for road investment with improvements to public transport, including a park and ride and SERT, and a commitment to green travel planning. However, the detailed implementation of the plan will be the test as to whether the sustainable travel patterns aspired to will be achieved. Importantly, the delivery of any rail improvements will need to be agreed with Network Rail

**Policy Number: ENV1 – Revised Green Belt Boundary**

**Summary of Representations Received:**

- Loss of Green Belt land
- Overdevelopment
- Extension only to fund airport expansion
- New office/factory accommodation is not required
- Statements about environmental efficiency and sustainability need clarification
- Development will downgrade the land
- No link between the employment land proposals and the airport – MRO needs to be on nearby land, but not other employment
- Loss of agricultural land
- Green buffers will not make up for loss of green belt
- There are vacant brown field sites available for employment land
- Impact on St Lawrence Park
- Air traffic will impact on populations of Brent Geese
- Increase in air and noise pollution
- Rochford Council cannot change Green Belt boundaries
- Changing the Green Belt boundary will make areas beyond more vulnerable to development

**Representations received from specific and general consultation bodies:**

- Go-East commented that it is unclear what revision to the Green Belt boundary is actually being proposed.
- Essex Wildlife Trust objects to the revision of the Green Belt boundary. This is contrary to Green Belt policy; compensatory land should be allocated as Green Belt to protect the natural environment.
- Essex Wildlife Trust would like additional wording added to the introduction (page 25) about new open space aiding habitat and species shifts due to climate change, and include a requirement for environmental efficiency of all new development.
- Essex Wildlife Trust would like further text added to page 26 to ensure that funding for open spaces comes from development of the business park.
- East of England Regional Assembly commented that the use of the Green Belt for employment should be an exception, but any removal must be offset by additions elsewhere.
- Renaissance Southend supports Policy ENV1.
- CPREssex commented that there is no mention of other important environmental issues - notably wildlife conservation, biodiversity and built heritage. A planning application would need to address these.
- CPREssex commented that aviation emissions are a significant contributor to climate change.
- CPREssex commented that there is no reference to lighting impacts -



either light pollution or light nuisance.

- CPREssex commented that there is no reference to potential impacts on surface water or to matters raised in the consultation on the Issues and Options Report. Expansion will have a detrimental impact on water quality in the brooks as recognised by the 2008 SA. Plans should ensure water quality is maintained.
- CPREssex commented that the existing Green Belt boundary should be retained and the rugby club should not be relocated. Rochford District has not been identified in the Regional Spatial Strategy for a Green Belt review. Reviewing the boundary is unacceptable, and the proposal is not an 'exceptional circumstance'.
- CPREssex commented that development to the east of Cherry Orchard Way would have a detrimental impact on the Special Landscape Area to the west of this road.
- CPREssex commented that the 'green buffer' and new public open space referred to in the Preferred Options Report do not compensate for the loss of Green Belt land.

**Policy Number: ENV2 – New Public Open Space - North**

**Summary of Representations Received:**

A number of the representations received to the policy simply repeat objections made to the proposals for the development of the airport.

- Open space is not new – the plan is factually incorrect
- Loss of sports pitches
- New open space is not sufficient compensation for loss of land to development
- Open space not required since airport expansion not required

**Representations received from specific and general consultation bodies:**

- Sport England supports the relocation of the rugby club to a new area of public open space subject to their issues with Policy E3 being satisfactorily addressed. The relocation should be funded by the development of the business park and northern MRO. It should be easily accessible for pedestrians and cyclists.
- EEDA commented that the proposals would require a revision to the Green Belt boundaries and a strong case will need to be made. The proposed open space would provide important green infrastructure links between key areas.
- EEDA are happy to see that the JAAP is seeking to mitigate environmental impacts.
- Essex Wildlife Trust welcomes the view that environmental impacts from development will need to be managed but would like additional wording added to pages 25 and 26.
- CPRESsex commented that the document gives no information as to the agricultural quality of areas (v), (x) and (xi) or its current uses. Agricultural land should be retained for local food production.
- CPRESsex commented that loss of recreational facilities would have a detrimental impact on health. Area (v), for example, would be split in two by the safeguarded route and the allotments and cricket pitch would be lost.

**Policy Number: ENV3 – New Public Open Space - South**

**Summary of Representations Received:**

- Open space proposed is inadequate
- Area is already designated as public open space – St Laurence Park will be lost
- Purpose of open space should not be to preserve land for future road building
- Open space will be divided if safeguarded route is built
- Open space will be too close to roads
- Green Belt land should not be used for airport expansion
- Open space will not be usable as a result of aircraft noise

Other comments related to issues of noise, air quality, water quality, highway network, light pollution and Green Belt use which are not relevant to this policy and have been addressed elsewhere. General objections to airport expansion.

**Representations received from specific and general consultation bodies:**

- EEDA commented that the proposals would require a revision to the Green Belt boundaries and a strong case will need to be made. The proposed open space would provide important green infrastructure links between key areas.
- EEDA are happy to see that the JAAP is seeking to mitigate environmental impacts.
- Essex Wildlife Trust welcomes the view that environmental impacts from development will need to be managed but would like additional wording added to pages 25 and 26.
- Sport England has no objection to the principle of new public open space on land to the south of Eastwoodbury Lane, but the safeguarded route would have an impact. The cricket pitch should be retained or relocated, and this should be mentioned in the Plan.

**Policy Number: ENV4 – Country Park: Access and Facilities**

**Summary of Representations Received:**

- Concern that financial contributions will not be forthcoming to enable the access to be provided
- Access to the Country Park should be provided regardless of the JAAP proposals
- The benefits of the Country Park will be negated by airport expansion
- Visitors Centre within the Country Park is not needed as it is a natural habitat
- Support proposals for Country Park
- London Southend Airport commented that this policy should also refer to the need for new footpaths to replace the existing footpath through the airport.

Other comments related to issues of noise, air quality, water quality, highway network, light pollution and Green Belt use which are not relevant to this policy and have been addressed elsewhere. General objections to airport expansion.

**Representations received from specific and general consultation bodies:**

- EEDA commented that the proposals would require a revision to the Green Belt boundaries and a strong case will need to be made. The proposed open space would provide important green infrastructure links between key areas.
- EEDA are happy to see that the JAAP is seeking to mitigate environmental impacts.
- Essex Wildlife Trust welcomes the view that environmental impacts from development will need to be managed but would like additional wording added to pages 25 and 26.
-

**Policy Number: ENV5 – Green Corridor to Business Park**

**Summary of Representations Received:**

- This is not new public open space
- There is a need for new footpaths to be identified to replace any lost London Southend Airport commented that this policy should also refer to the need for new footpaths to replace the existing footpath through the airport.

**Representations received from specific and general consultation bodies:**

- Essex Wildlife Trust welcomes the view that environmental impacts from development will need to be managed but would like additional wording added to pages 25 and 26.
- Renaissance Southend supports Policy ENV5.

**Policy Number: ENV6 – Green Buffer East of Railway**

**Summary of Representations Received:**

- No definition provided of what is meant by 'green buffer'
- Land should not be protected – it may be required for future development
- A green buffer would not be required if the airport did not expand
- London Southend Airport commented that the policy needs to be amended to note that this area should be designed to accommodate transport and access facilities to serve the already approved station layout and to prevent fly parking in adjacent residential areas, as well as significant landscaping to provide a buffer between the Airport and the residential area.

**Representations received from specific and general consultation bodies:**

- Essex Wildlife Trust welcomes the view that environmental impacts from development will need to be managed but would like additional wording added to pages 25 and 26.
- Renaissance Southend commented that whilst the policy would protect local amenity, it could prevent the effective and efficient use of the railway station. Amenity concerns could be addressed through a planning application for the land.

Section: Implementation, Delivery and Monitoring

**Summary of Representations Received:**

- Lack of detail
- Object to some works already being underway before JAAP finalised
- Annual monitoring reports are not an appropriate vehicle to monitor the JAAP
- Proposals are not realistic
- Implementation will have negative impacts
- Early implementation is essential for airlines and general aviation operators to see that this is a serious proposal after so many false starts in the past
- London Southend Airport Company Ltd supports this proposed implementation plan

**Representations received from specific and general consultation bodies:**

- Hockley Parish Plan - Hockley Parish Plan Group generally supports the proposal subject to the considerations listed in detail and summarised as: New roads and road improvements in place prior to development; Road improvements through Hockley in place; Traffic, transportation and parking infrastructure in place; Noise and air pollution controls in place; Clearly defined flight paths in place; Engine test noise control measures in place; No passenger night flights; Night flight quota for freight in place; New industry planning permission subject to legislated air quality and noise levels; Loss of greenbelt and open spaces controlled and offset by supplementary open spaces in the vicinity

### Appendix 5 – Summary of how the Councils responded to the issues raised through consultation on the JAAP Preferred Options

A5.1. A summary of how the Councils responded to the issues raised through consultation on the JAAP Preferred Options is set out here.

#### General Comments

- A5.2. In response to comments questioning the relationship between the JAAP and other documents, the introductory section in the Submission Document sets out the policy context for the Plan.
- A5.3. Some comments at the Preferred Options stage suggested that there has been inadequate consultation and results of the Issues and Options consultation have been ignored. The Consultation Statement sets out the consultation and engagement techniques undertaken at each stage of document preparation and how comments made at the Issues and Options stage have been taken into account in the development of the Plan.
- A5.4. In response to comments that the Plan is based on outdated, discredited information, the Submission Document has been prepared taking into account the most up-to-date information at the time, including the draft National Aviation Policy Framework (2012).

#### Employment

- A5.5. Concerns were raised that additional employment land was not required to be allocated for employment development. However, the proposal to release a portion of Green Belt in this location for employment use is supported by Rochford Employment Land Review Update (2009) and Southend Employment Land Review (2010). The principle of employment development in this location is also already established through the Rochford Core Strategy (Policies ED2 and ED4).
- A5.6. In response to concerns raised in respect of the relocation of Westcliff Rugby Club (including from Sport England in terms of the details of the new site) the Submission Document includes the requirement for the replacement to be least equivalent to the existing site in terms of the quantity and quality of facility provided and at least equivalent in terms of tenure/management arrangements.
- A5.7. In response to concern in respect of lack of clarity over the future of the Kent Elms Tennis club, the Submission Document states that the tennis courts at the northern end of the estate will remain in situ and do not form part of the JAAP area of change. This is reflected in the policies map.
- A5.8. Concerns were raised regarding the impact of new employment development on the rural setting of a Grade II Listed Building (Cherry Orchard Farm), the JAAP includes the requirement for an appropriate green buffer to be provided around the site, protecting the setting as recommended by Essex County Council. This is reflected in the policies map.



A5.9. The Environment Agency raised concerns regarding areas of proposed employment land being in Flood Zones 2 and 3, and stated that a sequential test needed to be applied in respect of this. The Submission Document is accompanied by an independently assessed sequential test, which concluded that, taking into account other planning and operational requirements, there are no reasonably available alternative sites for the proposed development less at risk of flooding. It should be noted that the JAAP area was addressed in the Strategic Flood Risk Assessments for both Rochford District and Southend-on-Sea Borough.

### **London Southend Airport**

A5.10. Concerns were raised in respect of the impact of airport activity on the environment and residential amenity. The Submission Document seeks to address concerns through an environmental controls schedule that is appended to the airport policies.

A5.11. This schedule proposes restrictions on times for passenger flights, the types of aircraft that can land (those with noise levels over QC2 for example would not be permitted, unless in an emergency). This is in response to concerns raised about noise and air pollution in particular. The airport would have daytime operating hours between 6am and 11pm local time, and there would be limit on the number of passenger flight arrivals each month between 11pm and 11.30pm. The schedule also proposes a cap on total aircraft movements and the number of air traffic movements outside of the airports daytime operating hours. This means that in response to concerns about night flights, the number of such flights would be limited to 120 per month. The schedule would also control the number of landings in daytime hours with fewer than 50% proposed to be from the south-west, in response to concerns about flying over densely populated areas. The airport would also be required to install fixed noise monitoring stations. This would enable the appropriate monitoring and control of noise.

A5.12. The Plan proposes to introduce a Noise Compensation and Purchase Scheme for affected properties over a certain noise threshold (Policy LS4). This entails either the airport purchasing specific properties affected by noise levels of 69dBL, or grants to install double glazing or other types of sound insulation for properties affected by lower noise levels at 63dBL.

### **Transport**

A5.13. Concerns were raised in respect of highway capacity. The Submission Document is accompanied by a transport modelling assessment report.

A5.14. The Submission Document recognises that highway improvements will be required and Essex County Council, Southend on Sea Borough Council and Rochford District Council have agreed 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. As stated in the JAAP, this will be followed by a joint approach by the highways authorities to the pursuit of funding opportunities in order to deliver the necessary transport solutions

- A5.15. Wider strategic transport issues, such as capacity, connectivity, movement and management of the A127, will be addressed through the Local Transport Plans for Southend and Essex County Council and opportunities for funding for Major Schemes via the South East Local Enterprise Partnership (SELEP) as well as appropriate contributions from developers. The JAAP will provide a vehicle for bidding for funding for such infrastructure improvements.
- A5.16. In addition, the Submission Document states that Transport Assessments will be required as part of the planning application process in line with Essex County Council/DfT TA guidelines. Developers will be required to agree the scope of the submitted material. All TAs will be required to demonstrate compliance with the Southend on Sea Multi Modal Transport Model.
- A5.17. The Submission Document provides more information on the focus of, and requirements for, the Airport Surface Access Strategy (ASAS) in response to comments questioning its purpose, requesting more detail and suggesting more frequent updating of the strategy. In particular, the ASAS would focus on a modal shift and sustainable travel. Policy LS5 requires the ASAS to be updated when the passenger throughput at the airport reaches three different thresholds (1, 1.5 and 2 million passengers per annum), rather than every five years as proposed in the Preferred Options Report. The policy also requires the ASAS to be reviewed as and when requested by the local or highway authorities to enable a response in a timely manner to any change in circumstances.
- A5.18. The ASAS would consider the implications for development on the local highway network, as well as looking at potential to improve public transport connections and cycling and pedestrian access to the airport, which would address issues raised during consultation on the Preferred Options Report in relation to impacts on the highway network and public transport use. In accordance with Policy LS5 progress on, and performance of, the ASAS is required to be reported on annually, which would enable monitoring of any change in travel patterns and the modal shift.
- A5.19. Concerns were expressed regarding the current adequacy of public transport provision. The policy on public transport in the Preferred Options has been significantly strengthened for the Submission Document (Policy T4) and provides more detail.
- A5.20. Whilst there was some support for a park and ride facility, concerns were expressed in relation to the scheme proposed in the Preferred Option. Concerns included its location within the Public Safety Zone, loss of a playing pitch its development would entail, impact on highways, and that its location would not make it attractive to users. A park and ride facility was not carried forward into the Submission Document.
- A5.21.

### Environment

- A5.22. The Plan acknowledges that air and noise pollution are environmental issues that need to be monitored as a result of increased aircraft movements. In response to concerns about the impact of noise on residential areas, education and healthcare facilities, Policy LS3 requires the airport to publish an annual statement which demonstrates how the Quiet Operations Policy is performing against limits and what measures are being implemented to address noise.
- A5.23. An environmental controls schedule has been prepared and appended to the airport policies in response to comments about the controls that would be in place to monitor noise. These controls are referred to Policy LS3. The airport would have daytime operating hours between 6am and 11pm local time, and there would be limit on the number of passenger flight arrivals each month between 11pm and 11.30pm. The schedule also proposes a cap on total aircraft movements and the number of air traffic movements outside of the airports daytime operating hours. This means that in response to concerns about night flights, the number of such flights would be limited to 120 per month.
- A5.24. The schedule would also control the number of landings in daytime hours with fewer than 50% proposed to be from the south-west, in response to concerns about flying over densely populated areas, and the schedule proposes restrictions on certain types of aircraft which exceed a specific noise level (Quote Count/QC2). The airport would also be required to install fixed noise monitoring stations. This would enable the appropriate monitoring and control of noise.
- A5.25. The Plan proposes to introduce a Noise Compensation and Purchase Scheme for affected properties over a certain noise threshold (Policy LS4). This entails either the airport purchasing specific properties affected by noise levels of 69dBL, or grants to install double glazing or other types of sound insulation for properties affected by lower noise levels at 63dBL.
- A5.26. In response to concerns about freight flights, as stated in the Plan, it is not desirable for the airport to handle significant volumes of freight. The southern Maintenance, Repair, and Overhaul (MRO) zone is proposed to handle a limited amount of freight (Policy MRO3). The environmental controls schedule would also limit the number of aircraft traffic movements for cargo to 5,330 per annum or 10% of the total number of aircraft movements, whichever is the lesser.
- A5.27. The Submission Document, in response to comments about the revision to the Green Belt boundary, provides clarification on the justification for the proposed amendment to the boundary within the JAAP area. The proposed amended boundary (Policy ENV1) would follow existing recognisable features, contrary to its current alignment, and enable the allocation of further employment land to the north of the airport. The proposal to release a portion of Green Belt in this location for employment use is supported by Rochford Employment Land Review Update (2009) and Southend Employment Land Review (2010).

- A5.28. In response to comments about environmental efficiency and sustainability, and in particular comments about water quality and a recommendation to include a requirement for environmental efficiency of all new development, the Submission Document provides more detail in this respect. It clarifies the sustainability aspirations for the Plan and sets out a new policy; primarily setting BREEAM requirements for all new developments in the JAAP area and ensuring that a range of SUDs are integrated into any development (Policy ENV7).
- A5.29. Potential impact of the policies and proposals in the Plan on habitats and wildlife has been considered within the Habitats Regulations Assessment which accompanies the Submission Document. Other plans which underpin the preparation of the JAAP – the Ecological Phase 1 Habitat Survey (2009) and Environmental Scoping Report (2009) – also acknowledge the presence of habitats which support wildlife such as Brent Geese, in proximity to the airport. This is in response to concerns raised at the Preferred Options stage about the potential impact of proposals on this particular bird. Green buffers are also proposed to the east of the railway line, to the west of Nestuda Way and around Cherry Orchard Farm.
- A5.30. In response to concerns about the protection and integrity of St Laurence Park in Southend Borough, the Submission Document proposes to safeguard this park as public open space. A slightly larger area of greenspace is identified on the Proposals Map in the Submission Document than that identified in the Preferred Options Document, and in response to concerns raised at the Preferred Options stage, the Plan no longer proposes to safeguard a route through this area of greenspace. The playing fields to the west of Nestuda Way are also proposed to be allocated as public open space in the Submission Document. A comment also noted that some of the new public open space identified in the Preferred Options Document is actually existing (Policy ENV3 New Public Open Space – South), and consequently the Submission Document excludes this policy but still identifies St Laurence Park to be retained as open space as set out on the Policies Map.
- A5.31. In response to concerns raised during Preferred Options consultation about the future of the allotments and cricket pitch to the south of Eastwoodbury Lane, the allotments and the cricket pitch, which are located within Area v are proposed to be retained as public open space in accordance with submission Policy ENV3. The allotments are identified on the Proposals Map in the Submission Document to be retained.
- A5.32. As suggested at the Preferred Options stage by several specific and general consultation bodies, the Submission Document clarifies the requirement for all phases in the development of Saxon Business Park and the northern MRO extension to contribute towards new public open space to the north and east of it (Policies E3, E7, MRO2 and ENV2). New public open space is also required to contribute to nature conservation (Policy ENV2).
- A5.33. In response to comments from CPREssex which noted the lack of reference to wildlife conservation, biodiversity and built heritage, the Submission Document proposes to allocate Area ii(c) – which is identified as including an area of high biodiversity – as public open space. Policy ENV2 also requires, within the new public open space to the north of the airport, enhancements for nature conservation. The Plan also notes that

bordering Development Area 2 – Saxon Business Park (Policy E7) – there is a grade II Listed Building, Cherry Orchard Farm. The Plan requires that a design brief is prepared to ensure that a green buffer preserves the rural setting of this heritage asset.

A5.34. Policy ENV4 of the Submission Document, in response to comments about the delivery of an improved access road to, and visitors centre at, Cherry Orchard Jubilee Country Park requires a new junction and access road to be funded by Area 1A of the Saxon Business Park but no longer requires contributions towards the delivery of a visitors centre at the park.

A5.35. In response to a comment which recommended that the policy should also refer to the need for new footpaths to replace the existing footpath through the airport, Policy T5 (Walking and Cycling) of the Submission Document sets out additional routes and requirements for walking and cycling facilities in the JAAP area.

A5.36. The Submission Document, particularly Policy ENV3 and ENV6 and supporting text, clearly explain the purpose of retaining specific areas of open space ('green buffers') within the JAAP area, in response to comments at the Preferred Options stage questioning their definition. In particular, justification for the retention of the green buffer to the east of the railway (Policy ENV6) is set out in the Plan.

### **Other issues**

A5.37. Submission Policy LS6 has been amended to clarify that development within the Public Safety Zone (PSZ) would be subject Circular 01/2010 in response to comments about restrictions within the PSZ.

A5.38. In response to a comment about Policy LS5 in the Preferred Options Report pre-judging the runway extension, the revised submission Policy LS6 has been reworded to clarify that following the extension it is expected that the PSZ would be reviewed. It is the responsibility of the Civil Aviation Authority, as clarified in the Submission Document, to undertake the review of the PSZ. As such it would be up to the Civil Aviation Authority to determine whether St Lawrence Church should be in the PSZ or not (on the Proposals Map it is currently just outside). This clarification is in response to comments about when the review should take place and what should be included within the PSZ.

A5.39. Comments about densely populated areas not being within the flight path have been addressed elsewhere in the Submission Document, within the environmental controls schedule and other policies in the Plan.



## **ROCHFORD DISTRICT COUNCIL AND SOUTHEND-ON-SEA BOROUGH COUNCIL**

### **NOTICE OF THE PUBLICATION OF LONDON SOUTHEND AIRPORT AND ENVIRONS JOINT AREA ACTION PLAN (SUBMISSION DOCUMENT)**

#### **Planning and Compulsory Purchase Act 2004 Town and County Planning (Local Planning) Regulations 2012: Regulation 19**

Rochford District and Southend-on-Sea Borough Councils have jointly prepared the London Southend Airport and Environs Joint Area Action Plan (JAAP) Submission Document, which it proposes to submit to the Secretary of State under Regulation 22 of the above Regulations.

The JAAP Submission Document and accompanying documents have been published in order for representations to be made prior to the submission of the JAAP Submission Document to the Secretary of State for examination.

The Plan provides the detailed planning policies and allocation of land for a specific area of land that comprises London Southend Airport and its environs. The precise area covered by the Plan is shown in the Plan itself. The Plan includes the proposals map for the area covered by the Plan.

Representations can be made during the publication period which begins at noon on 25 February 2013 and ends at 5.00pm on 10 April 2013. Only representations received during this time will be considered. Late responses will not be accepted. Consultation representations will only be regarded as duly made if supplied on the Representation Form or made directly via the online consultation system.

The online consultation system can be accessed via [www.southend.gov.uk](http://www.southend.gov.uk) and [www.rochford.gov.uk](http://www.rochford.gov.uk). Copies of the Representation Form are available from Southend Civic Centre and Rochford Council Offices, or on request by calling 01702 215408.

The Plan, alongside a statement setting out how representations can be made, is available online via [www.southend.gov.uk](http://www.southend.gov.uk) ; [www.rochford.gov.uk](http://www.rochford.gov.uk); at Southend Civic Centre and Rochford Council Offices; and in the District's / Borough's libraries.

## Appendix 7

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### Appendix 7 – Summary of issues raised by other respondents through pre-submission consultation

The following specific and general consultation bodies responded to the pre-submission consultation on the JAAP.

Chelmsford City Council	Environment Agency	Essex Chambers of Commerce	Essex County Council
Natural England	South East Essex Friends of the Earth	Sport England	

It should also be noted that as of 1 January 2012, the Coal Authority's response to any development plan consultations for Rochford District is 'No observation'.

	Specific / general consultation body	Issue raised
<b>Introduction</b>		
1	Essex County Council	Essex County Council states that the Sustainability Appraisal should consider JAAP impact on archaeology.
2	Essex County Council	Essex County Council states all references to SERT should be replaced by reference to 'High Quality Public Transport Corridors'.
3	Chelmsford City Council	Chelmsford City Council welcome the opportunity to comment on this document and has no objections or further comments it wishes to raise in respect of the proposals.
4	South East Essex Friends of the Earth	South East Essex Friends of the Earth state that the JAAP is fundamentally flawed, irrational, many of the objectives are undeliverable and it contradicts three of the four key objectives in the Government's Aviation Policy Framework. South East Essex Friends of the Earth state that the JAAP consultation process has been flawed from the start and it has been clear that the councils had made their minds up before seeking the views of the public. South East Essex Friends of the Earth state the plan will

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	Specific / general consultation body	Issue raised
		result in massive increases in greenhouse gas emissions, a deterioration in health of the local population caused by additional noise and it permits London Southend Airport to continue to ignore the views of local people.
<b>Vision and objectives</b>		
5	Essex County Council	<p>Essex County Council welcomes the production of the Joint Area Action Plan setting out policies and proposals for the future development of London Southend Airport and its environs.</p> <p>Essex County Council stated that the Plan should assist the Airport, with the proposed adjacent employment areas, to realise its potential as a driver for the sub-regional economy. The area covered by the Plan has consistently been identified as a key spatial driver for regeneration and growth within Thames Gateway South Essex.</p> <p>Essex County Council stated that the re-emergence of London Southend Airport as a fully functioning regional airport with scheduled passenger services is already having a catalytic effect on the image of Southend and South Essex. The Full Time Equivalent jobs to be created with the growth of the Airport are a key component for achieving sub-regional jobs targets. But, equally important the Joint Area Action Plan, by including proposals for additional employment land, affords the opportunity to achieve business retention and growth in the area. In particular, the Plan should assist the successful cluster of high-tech engineering and manufacturing sector around the airport which is important to the South Essex economy because of the number of highly skilled well-paid jobs that it brings to the sub-region.</p> <p>Essex County Council stated that expansion of the Airport and the development of additional employment opportunities should be accommodated with minimum environmental and amenity impact.</p>
6	Environment Agency	<p>Environment Agency suggest that the fourth objective would benefit from the following amendment to encompass the natural environment, in line with the Sustainability Appraisal.</p> <p>'Ensuring a high quality built environment whilst protecting and enhancing the natural environment'</p>



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	Specific / general consultation body	Issue raised
7	Essex Chambers of Commerce	Essex Chambers of Commerce strongly supports the JAAP area for develop as a strategic employment area to support the growth in jobs and views this as an important economic driver for the local economy.
8	South East Essex Friends of the Earth	<p>South East Essex Friends of the Earth objects stating:</p> <ul style="list-style-type: none"> <li>• Quality of life cannot be improved by subjecting people to more noise and pollution.</li> <li>• Job creation claims are misleading because many jobs are simply being moved from another business park a few miles down the road</li> <li>• Few employers likely to relocate next to an airport</li> <li>• Airport takes substantial money and jobs out of the local economy both directly and through loss of property value</li> </ul>
<b>Development Proposals for the JAAP</b>		
9	South East Essex Friends of the Earth	South East Essex Friends of the Earth object and state that the JAAP should be focussing on bringing jobs and wealth to the local economy, not taking ever more money out which is what facilitating further growth at the airport is doing.
10	Sport England	Sport England support reference to the tennis courts being retained.
<b>Policies</b>		

## Appendix 7

	Specific / general consultation body	Issue raised
11	Essex County Council	<p>Essex County Council would consider any co-location/joint working opportunities for Library provision that might arise from the proposals in the Plan. In particular any which would assist in promoting and achieving the document's objectives, especially in regard to enhancing career related training and development opportunities and improving quality of life/leisure.</p> <p>Essex County Council state that the Plan should acknowledge the potential impact on library services and public access to information in the Plan area and the surrounding area.</p>
12	Essex County Council	<p>Essex County Council state that the childcare sufficiency data suggests that there is a general need in several Rochford wards for additional childcare provision. An increase in jobs and wider employment opportunities would impact on the assessment of future need for provision. The Plan should note that there will be a need to provide additional childcare places and provision in the local area, although it is difficult to be precise on the scale and timing of additional provision at this point in time.</p>
<b>Employment Policies (Policies E1-E8)</b>		
13	Environment Agency	<p>Environment Agency state that small parts to the south of the area addressed by Policy E2 lie within Flood Zones 2 and 3; and there is no evidence that the sequential test has been applied at this stage</p>
14	Sport England	<p>Sport England supports the requirement that Area 2 of the proposed business park can only proceed once Westcliff Rugby Club has been relocated and is operational as this phasing requirement is necessary to ensure continuity of facility provision for the club. Without this there would be at least a temporary loss of playing field provision which is likely to prejudice the club's continuity.</p>
15	Sport England	<p>Sport England support the requirement in Policy E7 for the business park development to fund the relocation of the rugby club is supported as this is an essential pre-requisite. The requirement for the replacement facilities to be at least equivalent to the existing site in terms of quantity and quality of facilities provided and at least equivalent in terms of tenure/management arrangements is also supported. This is required to ensure that the replacement rugby club facilities are at least equivalent to the existing ones in practice and to accord with NPPF policy and Sport England's playing fields policy.</p>

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	Specific / general consultation body	Issue raised
16	South East Essex Friends of the Earth	The plan is unsound because there is no credible explanation as to how the number of jobs predicted will be created as a result of increasing the number of passengers at the airport to 2 million. In fact, this plan entails moving jobs from former industrial estates to new ones.
17	South East Essex Friends of the Earth	South East Essex Friends of the Earth state the document should acknowledge that aviation is inherently unsustainable.
18	South East Essex Friends of the Earth	South East Essex Friends of the Earth state that JAAP contradicts Southend Borough Council's Nottingham Declaration.
19	South East Essex Friends of the Earth	South East Essex Friends of the Earth object to Policy E8, stating that a change in the position of the Public Safety Zone (PSZ) could prevent use of at least part of the proposed Nestuda Way Business Park. The area designated as being the Nestuda Way Business Park should be revised to exclude any land falling within the PSZ.
20	South East Essex Friends of the Earth	South East Essex Friends of the Earth state that expanding aviation and greenhouse gas emissions dramatically increases the chances of flooding business and other property.
21	South East Essex Friends of the Earth	South East Essex Friends of the Earth challenge the assumptions made in connection with Bournemouth Airport and how these translate to the creation of jobs.
<b>Airport Policies (Policies LS1 – LS8, TF1, MRO1 – MRO3, ADZ1)</b>		
22	South East Essex Friends of the Earth	South East Essex Friends of the Earth object to Policy LS1, stating that it is based upon a series of incorrect assumptions.

## Appendix 7

	Specific / general consultation body	Issue raised
23	South East Essex Friends of the Earth	South East Essex Friends of the Earth state that the JAAP is irrational in assuming that aviation is sustainable: it is not. The JAAP should require reports annually on greenhouse gas emissions, the handling of contaminated effluent and on complaints relating to contamination of property and land around the airport. The JAAP should also include a policy to apply penalties against the airport if it offers services to destinations that could be reached by rail.
24	South East Essex Friends of the Earth	South East Essex Friends of the Earth state that the Councils should ensure that the thousands of householders who are entitled to compensation under the 1973 Land act are informed of their rights and what steps the two councils will take to help residents to make claims. The two councils must be required to accept responsibility for the serious financial harm they have inflicted upon the community and demonstrate what it will do to help people to secure compensation for loss of value of property.
25	South East Essex Friends of the Earth	South East Essex Friends of the Earth object to Policy LS5, stating that the Councils need a more effective strategy for tackling congestion caused by expanded airport operation
26	South East Essex Friends of the Earth	South East Essex Friends of the Earth object to Policy LS6, stating that the PSZs should be shown correctly on the plans and no development should be permitted within them. There should also be a policy to reduce existing occupation of the PSZs to zero. The Airport should be made to purchase all properties within the PSZs at 2010 value plus 10% as and when owners wish to sell. The JAAP ought also to make it clear that the runway is narrow, imposing crosswind restrictions on aircraft such as the Airbus A319. It is important that all understand the restrictions that exist upon operations at the airport
27	South East Essex Friends of the Earth	South East Essex Friends of the Earth object to Policy LS7, stating that the assumptions made about the aircraft that will use the airport in the future are incorrect and need to be corrected

## Appendix 7

	Specific / general consultation body	Issue raised
28	South East Essex Friends of the Earth	South East Essex Friends of the Earth object to Policy LS8, stating that in light of the significant threat to health caused by poor air quality the JAAP should be strengthened to ensure that air quality is effectively and accurately measured in the roads leading to the airport (in Rochford District and the Borough of Southend). The JAAP should detail what steps will be taken to reduce traffic if air quality standards are not met.
29	Environment Agency	Environment Agency object to MRO1: Small parts to the south of this area lie within Flood Zones 2 and 3; no evidence has been submitted to demonstrate the Sequential Test has been passed. Environment Agency also object to MRO2 as the majority of this area lies within Flood Zones 2 and 3 and no evidence has been submitted to demonstrate that the Sequential Test has been passed.
30	Environment Agency	<p>Environment Agency object to MRO1: JAAP policy does not consider the pollutive potential of this activity at all and Appendix 4 -10 of the Sustainability Appraisal stresses that care will need to be taken to ensure surface water management systems are in place to avoid this. Policy ENV7 expresses the Councils expectance to see the use of SuDS throughout the JAAP area, although their role in pollution control has not been acknowledged. This should be reflected in the policy. The Environment Agency suggest that the policy is amended as follows:</p> <p><i>MRO1 - Applications for airport related MRO developments (e.g. increased hangarage and aircraft maintenance facilities) will be welcomed in the Northern MRO Zone as shown on the Proposals Map. All 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. A flood risk assessment will be required to demonstrate any development will be safe, without increasing flood risk elsewhere. Surface water management systems, including pollution prevention measures such as oil interceptors, will be put in place and development set back from the watercourse to prevent pollutants entering the Eastwood Brook.</i></p>

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	Specific / general consultation body	Issue raised
31	Environment Agency	<p>Environment Agency object to MRO2: the JAAP policy does not consider the pollutive potential of this activity at all and Appendix 4 -10 of the Sustainability Appraisal stresses that care will need to be taken to ensure surface water management systems are in place to avoid this. Policy ENV7 expresses the Councils expectance to see the use of SuDS throughout the JAAP area, although their role in pollution control has not be acknowledged. This should be reflected in the policy. The Environment Agency suggest that the policy is amended as follows:</p> <p><i>MRO2 - Applications for airport related MRO developments (e.g. increased hangerage and aircraft maintenance facilities) will be welcomed in the Northern MRO Zone as shown on the Proposals Map. Access to the new MRO Zone will be from an extension to Aviation Way funded by the development. All 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. A flood risk assessment will be required to demonstrate any development will be safe, without increasing flood risk elsewhere. Surface water management systems, including pollution prevention measures such as oil interceptors, will be put in place and development set back from the watercourse to prevent pollutants entering the Eastwood Brook</i></p>
32	South East Essex Friends of the Earth	South East Essex Friends of the Earth object to Policy ADZ1, stating that what is needed is a comprehensive forward plan, not piecemeal development.
<b>Transport Policies (Policies TF1 – TF7)</b>		
33	Essex County Council	Essex County Council supports Policies T1, T2, T3, T4, T5, T6, and T7 stating that it has participated in joint discussions with the two authorities of Rochford and Southend-on-Sea at each stage of plan preparation in regard to the highways and transportation aspects of the Plan. As a result, the County Council welcomes the proposed approach to the delivery of infrastructure and transport interventions set out within the Plan. However, there will be a need to continue to clearly understand the phasing of these interventions and how the works will be funded as the proposed development progresses

## Appendix 7

	Specific / general consultation body	Issue raised
34	South East Essex Friends of the Earth	South East Essex Friends of the Earth object to Policy T1, stating that the Environmental Controls Schedule is not fit for purpose. The controls that it puts in place are grossly inadequate and fall short of those at other regional airports, which permit far fewer night flights. South East Essex Friends of the Earth state that the local authorities appear to be trying to reduce traffic by increasing road capacity. This is clearly unsound thinking and will not work
35	South East Essex Friends of the Earth	South East Essex Friends of the Earth object to Policy T4, objecting to a park and ride facility not being included in this iteration plan; Money should not be spent on major new road construction/widening in the area as this will undermine the resources needed to adequately fund public transport; too little has been said about the specific facilities needed to encourage bus and rail travel
36	South East Essex Friends of the Earth	South East Essex Friends of the Earth support Policy T5 but would like to see the addition of a commitment to maintain the Public Footpath network within the JAAP area, notably Footpath 36 which goes through the airport. South East Essex Friends of the Earth would also like to see a commitment to very low speed limits within the business parks and an outline of how safe cycle routes to and from the area will be provide.
37	South East Essex Friends of the Earth	South East Essex Friends of the Earth support Policy T6, but are concerned that no money should be squandered on road widening and/or a major new east-west link limits the funding that can be spent in support of public transport and therefore will undermine all efforts to reduce congestion and ensure that people travel sustainably
38	South East Essex Friends of the Earth	South East Essex Friends of the Earth object to Policy T7, stating that public money should not be spent on major new road construction, that what is needed is to ensure that the available funds are invested in public transport, walking and cycling. Only this solution can ensure that congestion is reduced
<b>Environmental Policies (Policies ENV1 – ENV7)</b>		

## Appendix 7

	Specific / general consultation body	Issue raised
39	Essex County Council	Essex County Council state that the Plan should be amended by inclusion of additional text which draws attention of potential future developers to the requirements of the Mineral Planning Authority in respect of development within the Brickearth Consultation Area
40	Essex County Council	Essex County Council state that the Plan should be amended to include appropriate consideration of the significance of the historic environment and its issues and impacts within the Plan area
41	Essex County Council	<p>Essex County Council state that, to reflect the provisions of the Flood and Water Management Act (2010), the following text should be added to ENV7:</p> <p><i>'Schedule 3 of the Flood and Water Management Act (2010) will make unitary and county councils SuDS Approving Bodies, responsible for approving surface water drainage and subsequently adopting systems serving more than one property. Schedule 3 is currently set to commence in April 2014. For any development sites within the JAAP area, the approval of Essex County Council or Southend-on-Sea Borough Council would therefore be required for any SuDS system, which will be determined in accordance with the SuDS National Standards and any local standards set out.'</i></p>
42	Sport England	Sport England support Policy ENV2, stating that they support the allocation in the plan of an area for relocating Westcliff Rugby Club. This provides some certainty in principle that the club has a suitable alternative site that it could be relocated to if its current site is redeveloped for the Saxon Business Park. Clarity that this will be funded by the development of phase 2 of the business park is also welcomed as this provides clarity that the relocation would be funded by the development of the existing site rather than the club itself or other bodies.
43	Natural England	<p>Natural England is mainly concerned with the potential for this JAAP to result in worsening water quality of the Crouch and Roach Estuaries SPA and the Essex Estuaries SAC, through increased occurrence of sewage discharge, and increased run off due to development on Greenfield. Natural England are happy that this issue can be resolved through the adherence of the following:</p> <p>The Appropriate Assessment (AA) concluded "that the London Southend Airport and Environs JAAP will not result in adverse effects on the integrity of European sites" and went on to make the following</p>



## Appendix 7

	Specific / general consultation body	Issue raised
		<p>recommendations:</p> <ul style="list-style-type: none"> <li>• The Submission JAAP DPD should set a challenging policy to restrict additional water use within the plan area.</li> <li>• 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.</li> </ul> <p>Natural England therefore welcomes the JAAP Policy ENV7 Environmental Sustainability: "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".</p> <p>However, Natural England cannot find the reference in the JAAP of the Annual Monitoring Report as recommended by the AA. The council must ensure that the AA recommendations are clearly worded within the JAAP, in order to conclude that the plan is not likely to adversely affect the integrity of the Crouch and Roach Estuaries SPA and Essex Estuaries SAC.</p> <p>The JAAP should set a challenging policy to restrict additional water use within the plan area.</p> <p>The monitoring of Chemical and Biological quality of the Rayleigh, Eastwood and Prittle Brooks should be 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.</p>

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	Specific / general consultation body	Issue raised
44	South East Essex Friends of the Earth	South East Essex Friends of the Earth object to Policy ENV7, stating that the policy does not get anywhere near meeting the environmental needs of the area. There is a grave risk of contamination from deicing chemicals and other toxic effluent from the airport. The Councils have thus far failed in the obligations to ensure that airport provide the necessary infrastructure to store, treat and dispose of the various categories of sewage and contaminated water.
<b>Implementation and Delivery Plan</b>		
45	South East Essex Friends of the Earth	South Essex Friends of the Earth state figures 5.2 through 5.4 should be updated to reflect the extended runway and altered PSZs. This would then show an increased number of buildings and proposed developments within the southern PSZ. Based on this information, the proposed developments should be reviewed and no new building should take place within the PSZ

### Appendix 8 – Summary of issues raised by other respondents through pre-submission consultation

In addition to representations from specific and general consultation bodies, representations were also made by individuals, groups and other organisations. A summary of the issues raised is provided below. Full text of all representations submitted is available to view online at <http://rochford.jdi-consult.net/jaap/>

- Airport expansion is not sustainable.
- The JAAP is not evidence based.
- Proposals in the JAAP are not deliverable.
- It is not clear how the area will benefit from JAAP.
- London Southend Airport is supportive of the overall direction of the plan.
- The economic benefits of the JAAP are overstated.
- The JAAP will only move existing jobs, create new ones.
- There is a shortage of affordable industrial premises is the main obstacle to generating employment and this should be addressed, rather than a new industrial estate where rent will be too high for start-up companies.
- The JAAP should make provision for an enduring and comprehensive solution to the enhancement of east-west connectivity in the area surrounding the airport.
- Not clear why industrial development could not be provided without the airport.
- Public transport needs to be improved.
- JAAP area should be expanded to include Purdeys Industrial Estate, Rochford.

## Appendix 8

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- It was difficult to respond to consultation / consultation was inadequate.
- Kent Elms Tennis Club supports Policy E1 in principal; however there are some concerns as to any impact on the club pre, peri and post works/development.
- Two businesses stated that a new, publicly accessible electricity supply was required, as the current system of supplying electricity to Aviation Way was not sustainable due to the cost to businesses.
- Westcliff Rugby Club support Policy E4 provided that the policy is adhered to, i.e. that Area 2 be reserved for development only at such time as the Westcliff Rugby Club has been relocated and is operational.
- Objection to Policy E4: the existing footpath F/P36 should be retained.
- Objections to developing greenfield, Green Belt sites, when brownfield sites are available in Southend.
- Westcliff Rugby Club support the requirement in Policy E7 for the replacement pitches to be at least equivalent to the existing site in terms of quantity and quality of facility provided and at least equivalent in terms of tenure/management arrangements.
- Concerns regarding the impact of noise, including objections to the existing level of noise.
- The airport should demonstrate how they expect to satisfy the claims for compensation and what reasonable time scale they expect to adopt.
- The increase in the length of the runway is totally inappropriate in this area. Larger aircraft to use the airport will result in more noise and air pollution, and is unjustified in this small densely populated residential area of Southend and Rochford.
- An independent body should be monitoring air pollution, not the airport itself.
- Rochford Hundred Golf Club object to MRO1, stating that the Atkins report clearly indicates that there is insufficient adjoining land within the airfield to incorporate SUDS. Reasoned flood prevention plans to be submitted as part of the JAAP process.
- Rochford Hundred Golf Clubs object to MRO1, stating that there is no appropriate provision to abate engine testing noise disturbance, with the exception of a 'day light hours, 7-day per week' permission, which is entirely unacceptable; there is no

provision for jet blast baffles or 'silencers'; there is no guidance on engine testing aircraft direction / wind direction.

- Too many roads all at capacity and a development like this in the middle. Perhaps an offshore airport would be better in actually releasing some of the pressure to build in a over-developed region.
- Park and ride was proposed in the preferred options – objections to it not being included in this iteration of the Plan.
- Money should not be spent on major new road construction/widening in the area as this will undermine the resources needed to adequately fund public transport.
- Too little has been said about the specific facilities needed to encourage bus and rail travel.
- The green buffer to the east of the Airport station is very low quality green belt, and should be utilised for a bus and rail transport interchange, as well as facilitating access to the station for car drop-offs and foot passengers obviating the need to enter the airport (as at present which adds to congestion at the shopping mall/airport entrance). 'SERT' style services would be better enabled, particularly if a service route to town centre established through Temple Farm.
- The JAAP should set out clearly what will happen to chemicals used when de-icing runways and planes.
- The JAAP should announce what measures are being taken to overcome the difficulties of adequate sanitary arrangements in the new terminal building.
- The JAAP should ensure that all infrastructure arrangements are made before any further developments are made to the airport or its surroundings