

# Southend Airport Joint Area Action Plan

## Flood Risk Sequential Test

**December 2009**

### Notice

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# 1. Introduction

## London Southend Airport and Environs Joint Area Action Plan

- 1.1 A Joint Area Action Plan (JAAP) is being prepared by Rochford District Council and Southend on Sea Borough Council to promote development opportunities for London Southend Airport and associated airport related employment. The following objectives have been developed within the national, regional and emerging local planning context and form the guiding principles underpinning the preferred options for the JAAP:
- Creation of sustainable and high value employment and other land uses;
  - Maximising the economic benefits of a thriving airport and related activity;
  - Ensuring appropriate improvements in sustainable transport accessibility and facilities;
  - Ensuring a high quality environment for residents;
  - Maximise return on public investment through attracting inward investment; and
  - Efficient use of existing employment land resources.
- 1.2 The Councils published the Preferred Options for the JAAP in February 2009. These included:
- Issue 1 – The future role of London Southend Airport**
- 1.3 It is proposed to grow the airport to a regional airport by providing new passenger infrastructure in the form of a new railway station and a passenger terminal. The run way will also be increased in length to 1,799 metres to make it more attractive to airline operators.
- Issue 2 – The future of the JAAP as an employment area**
- 1.4 A strategy for high scale employment growth contributing to meeting regional employment aspirations is being pursued. This will include aviation related growth linked to the airport and the provision of accommodation for high-tech industry and office uses. This involves the allocation of land to accommodate 109,000 sq.m of additional floorspace and providing a further 6,200 jobs.
- Issue 3 – Balancing development with environmental enhancement**
- 1.5 The environmental impacts of the proposals have been considered in the proposals and include opportunities for new public open space, operational controls to ensure quality of life for residents maintained and the development of sustainable transport strategies.
- Issue 4 – Transport and movement**
- 1.6 The transport strategy for the JAAP considers the location of new development in relation to the existing transport network and opportunities for improving public transport, encouraging modal shift and improvements to the road network to provide new routes and accesses to the development areas.
- Issue 5 – Areas for change**
- 1.7 The development areas where change is proposed is illustrated on the Proposals Map (see Appendix A).
- 1.8 Table 1.1 below lists the areas for change identified in the Preferred Options document, indicating the existing and proposed uses for each area. It also shows the Environment Agency Flood Risk

Zone in respect of each area. Where an area of changes partly falls within more than one flood zones the worst case has been indicated.

**Table 1.1 – Areas of changes (Flood Zones: Existing/Proposed Use)**

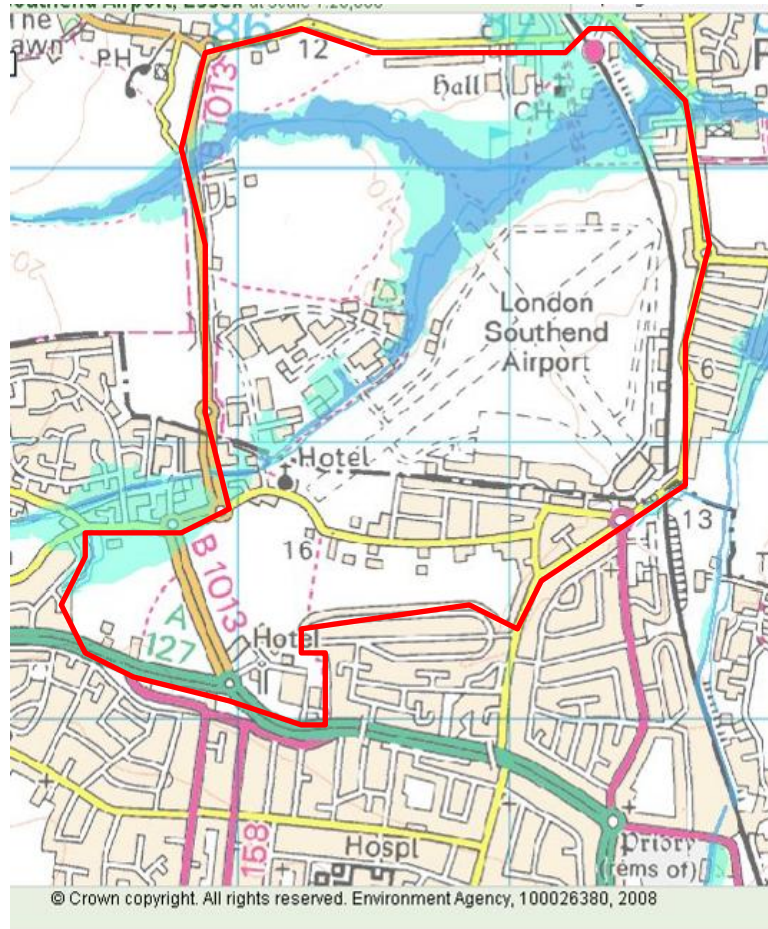
Area	Flood Zone	Existing Use	Proposed uses
i	3 (part)	Former brickworks/residential	Business
ii (a)	1	Agricultural	Business
ii (b)	3	Agricultural	Open Space/Sport
ii (c)	3	Agricultural/biodiversity	Open Space
ii (d)	1	Open Space	Business
iii	3	Vacant green space	Extension of Maintenance Repair Overhaul (MRO)
iv	2 (part)	Business	Business
v	1	Agricultural/amenity	Open Space
vi	3 (part)	Northern MRO	MRO
vii	1	Flying Club	Airport terminal/station
viii	1	Maintenance/passenger terminal	Southern MRO
ix	1	Amenity space	Amenity space
x	1	Airport Runway Extension Safety Area (RESA)	Runway extension/link road
xi	2 (part)	Recreation/agricultural	Park and ride





- 1.9 This demonstrates that part of the land proposed in the JAAP for new development falls within Flood Zones 2 and 3. Consequently in accordance with PPS25 it is necessary to apply the Sequential Test.

## Assessing and Managing Flood Risk

- 1.10 The majority of the JAAP area falls within Flood Zone 1 as defined on the Environment Agency's flood map. Within such areas there is a low probability of fluvial or tidal flooding and all uses of land are appropriate in such locations.
- 1.11 There are some locations within the development area that fall within zones identifying higher probability of flooding. These areas are indicated on the extract from the EA Flood Map below and effects land identified on the Proposals Map for the extension of the Northside MRO area, and parts of the existing Northside MRO area and Aviation Way industrial estate.
- 1.12 Figure 1.1 below provides an extract from the Environment Agency map and shows the location of the proposed development site in relation to the Flood Zones. The map indicates that large areas in the vicinity of the Eastwood and Rayleigh Brooks are considered to be at risk of flooding. Approximately 9% of the site is within Flood Zone 3 and is therefore classed by PPS25 as having a high probability of flooding (>1% annual probability). A further 10% of the site is within Flood Zone 2 and has a medium probability of flooding (0.1-1% annual probability).

Figure 1.1 – Environment Agency Flood Map



Legend			
	Flood Zone 3		Flood Zone 2
	Development Area (indicative)		Flood Zone 1

- 1.13 Paragraph 14 of Planning Policy Statement 25 – Development and Flood Risk requires that a sequential risk based approach to determining the suitability of land for development in flood risk areas should be applied at all levels of the planning process.
- 1.14 In accordance with PPS 25 (paragraph 16), where a local planning authority is proposing to allocate land for development in local development documents it will be required to apply the Sequential Test to demonstrate that there are no reasonably available sites with a lower probability of flooding that would be appropriate to the type of development proposed.
- 1.15 In areas at risk of river or sea flooding, preference should be given to locating new development in Flood Zone 1. If there is no reasonably available site in Flood Zone 1, the flood vulnerability of the proposed development (see Table D.2, Annex D) can be taken into account in locating development in Flood Zone 2 and then Flood Zone 3. Within each Flood Zone new development should be directed to sites at the lowest probability of flooding from all sources (see Annex C) as indicated by the SFRA.

## 2. Objectives

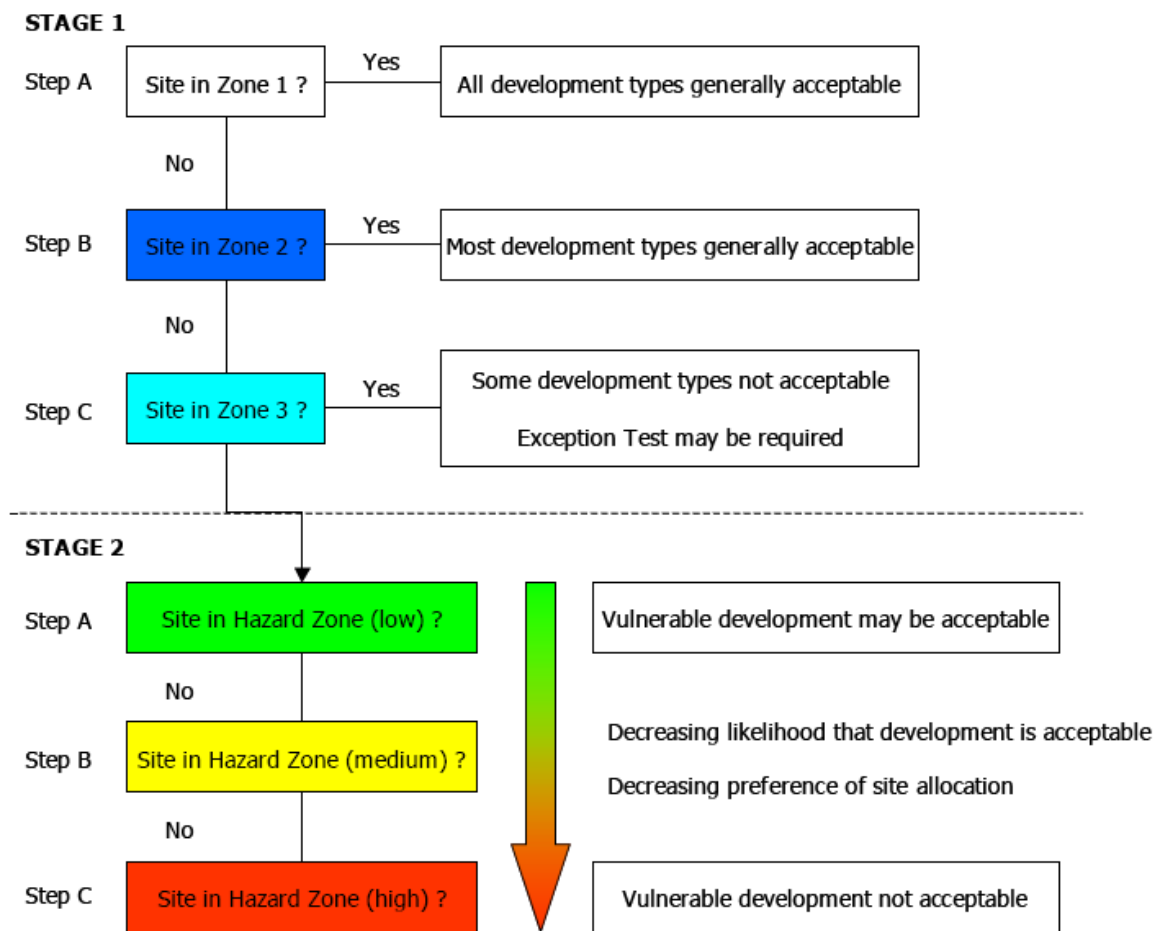
- 2.1 This report forms the Sequential Test that has been prepared to inform the preparation of the London Southend Airport and Environs Joint Area Action Plan. It will support the subsequent Flood Risk Assessment and subsequent decision making process.
- 2.2 PPS 25 (Development and Flood Risk) outlines the Government's policies in the area of flood risk and development, the aims of which are to:
- Ensure flood risk is taken into account at all stages in the planning process;
  - Avoid inappropriate development in areas at risk of flooding;
  - Direct development away from high risk areas; and
  - Ensure that new developments take climate change into account and do not increase flood risk elsewhere.
- 2.3 PPS25 specifies that a Strategic Flood Risk Assessment is prepared by local planning authorities to inform and support the preparation of local development documents and apply the information needed to apply the sequential test. The sequential test is intended to steer development to areas of lowest possible risk.
- 2.4 The background evidence for the Sequential Test is based upon the following information:
- The East of England Plan;
  - London Southend Airport and Environs Joint Area Action Plan (Preferred Options February 2009); Issues and Options June 2008; Evidence Report June 2008);
  - Thames Gateway South Essex Strategic Flood Risk Assessment (November 2006);
  - Southend on Sea Borough Local Plan (March 2004);
  - Draft Employment Land Review, Southend on Sea Borough Council (May 2009)
  - Rochford District Replacement Local Plan (June 2006);
  - Employment Land Study, Rochford District Council (October 2008);
  - Industrial Land Availability, Rochford District Council (March 2006);
- 2.5 The methodology for the test assessment is based upon guidance and best practice contained within the following documents:
- Planning Policy Statement 25 – Development and Flood Risk, 2006;
  - Development and Flood Risk – A Practice Guide Companion to PPS 25 'Living Draft', 2007;
  - Environment Agency Standing Advice Development and Flood Risk – England, 2007.
- 2.6 The Strategic Flood Risk Assessment for Rochford and Southend has been prepared by a consortium led by Thames Gateway South Essex on behalf of the local authorities in the sub region. The SFRA was published in November 2006. Whilst this predates the latest guidance contained in PPS25 and associated practice guidance the approach used by the SFRA is compliant with national policy in respect of undertaking Sequential Tests.

# 3. Sequential Test Approach

## Introduction

3.1 The methodology for the Sequential Test is based on the approach contained in the SFRA. Information on alternative available sites has been taken from documents identified above setting out the potential alternative employment sites within Rochford and Southend. The approach to applying a sequential test will follow that indicated in the SFRA. Figure 3.1 below is an extract from the SFRA setting out the steps to be taken in respect of the sequential test, which follows the guidance contained in PPS25.

Figure 3.1 – Suggested Staged Sequential Test for South Essex



3.2 Stage 1 of Figure 3.1 represents the PPG25/PPS25 Sequential Test. Steps A to C will be followed, with each, from a flood risk point of view, being less desirable than the previous for a given development type (i.e. Flood Zone 2 is less desirable than Flood Zone 1). In every movement sequentially through the steps, it needs to be demonstrated that no site of a lesser flood risk is appropriate for the specific development under consideration.

## Alternative site selection

3.3 Development and Flood Risk: A Practice Companion Guide to PPS25 states “All opportunities to locate new water-incompatible developments in reasonably available areas of little or no flood risk should be explored, prior to any decision to locate them in areas of higher risk”. However,



although a definition of ‘reasonably available’ is given for residential sites, there are no definitions available for non-residential development.

- 3.4 For the purposes of this assessment, “reasonably available” has been defined as the physical availability of other suitable employment sites capable of meeting the employment requirements of the JAAP. This considers the physical status of the land and premises, for example is the land undeveloped or premises redundant or vacant and therefore could, within a reasonable timeframe, be made available for JAAP purposes.

## Assessment methodology

- 3.5 The sequential test requires that sites that lie within an area that is at a lower risk of flooding than the proposed site (3A in this case) be assessed to determine whether they are reasonably available. The proposed site lies within Flood Zone 3A.
- 3.6 Each reasonably available site that is not contained entirely within Flood Zone 3 will be assessed as to whether it is suitable for the development. In order to assess whether each site is less suitable planning issues should be taken into account. The following criteria will be used:
- The site should be located within an area where it would have access to the strategic transport network;
  - The site should be in a location that will attract high-tech end users and is well located to the airport;
  - The site should be located within a predominately non-residential area where the character of the proposal would not conflict with the living conditions of existing residents;
  - The site/building should be able to accommodate the scale and character of the proposed development without conflict with the character of the built environment surrounding the site;
  - The site should be large enough to accommodate the development proposed;
  - The site should realistically available.

## 4. Sequential Test

- 4.1 The sequential test is set out in Tables B1 and B2 (see Appendix B). Table B1 relate to the sites identified within the Employment Land Reviews for both Rochford and Southend and the JAAP Preferred Options sites which fall within Environment Agency Flood Zone 1 and 2. Table B2 considers those sites falling within Flood Zone 3.
- 4.2 In the case of all the sites located within Zones 1 and 2 the sequential test demonstrates that there are no reasonably available sites elsewhere in Rochford or Southend that meet the planning, land and operational criteria for the airport and associated uses proposed in the Joint Area Action Plan. The principal reasons for this lack of availability are:
- Inappropriate location for airport related uses;
  - Poor access to primary route networks and rail services;
  - Uncertainty that site can be assembled;
  - Low value, secondary locations not suited to type of business uses being proposed in the JAAP.
- 4.3 The assessment of those sites in Flood Zone 3 reveals that there are few opportunities for alternative site locations to meet the objectives of the JAAP. Two sites at the former Garrison site at Shoeburyness do have some potential in terms the land available and the type of uses that



could be attracted. These however are located in an area identified in the SFRA as being “High Hazard” and consequently have been discounted.

4.4 Within the JAAP area the majority of the proposed uses are allocated in areas of flood risk appropriate to their use (see Table 1.1 above).

- Sites ii (a), ii (d), vii, viii and x are all proposed for new airport and business related development and located within Flood Zone 1 and consequently the development is appropriate;
- Sites ii (b) and ii (c) are located within Flood Zone 3 and allocated for open space and sport. This is considered to be appropriate forms of development. Part of Site ii (b) is within Flood Zone 1 and well related to other B1 development sites. Consequently consideration could be given to allocating this area for B1 subject to identifying an alternative suitable site for the relocation of the rugby club;
- In the case of Site i, only a small proportion of the site falls within the Flood Zone 3 and therefore it is considered that this can be suitable mitigated at the design stage.
- Sites iii and vi are located almost entirely within Flood Zone 3. The Sequential Test does not identify any other more suitably located sites, either within the JAAP area or beyond, that meet the requirements for the MRO operations proposed and consequently it will be necessary to apply the exception test to these sites as part of a flood risk assessment for a development application on this site.

4.5 Wherever possible, Sites i, iii, iv, vi, xi should be revised to avoid Flood Zones 2 and 3, possibly by substituting areas from the open space designated elsewhere in the JAAP area. Whilst it is accepted that certain land uses, e.g. the MRO, may need to be located in Flood Zones 2 or 3 if they are to serve the existing airport, at the planning stage, all attempts to minimise this should be sought prior to accepting the need for flood mitigation measures, in accordance with the principles of PPS25.

## Conclusions

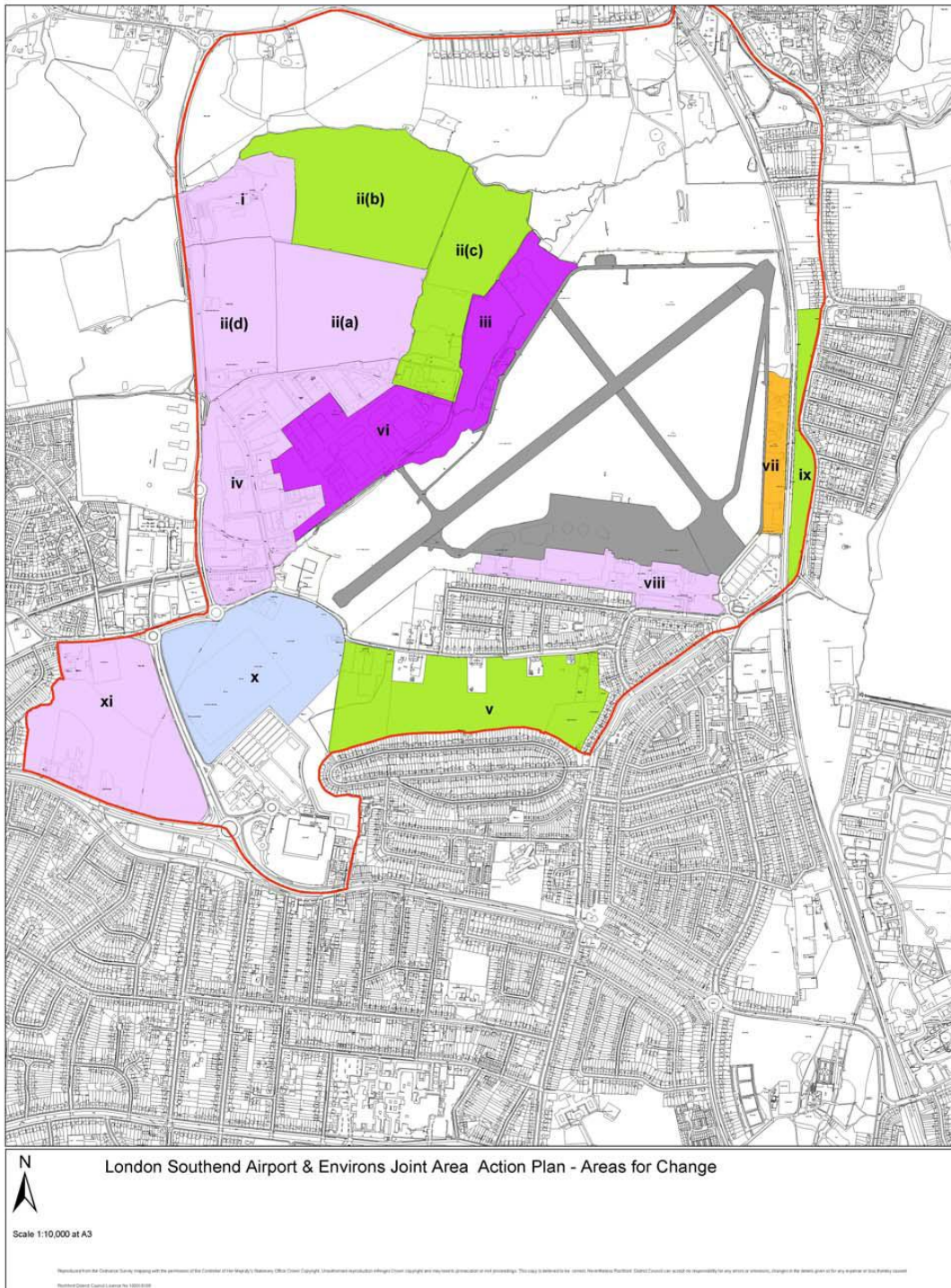
4.6 Rochford District Council and Southend on Sea Borough Council are preparing a Joint Area Action to promote development opportunities for London Southend Airport and associated airport related employment. The Councils have published the Preferred Options which include proposals for the development of land in and around the airport for a range of uses including business, airport related uses (MRO), open space and transport.

4.7 Parts of the site falls within areas at risk of flooding and in accordance with PPS25 it is necessary to demonstrate that there a no other reasonably available sites with a lower probability of flooding that would be appropriate to the type of development proposed.

4.8 The Sequential Test has been applied to the site and other areas within Rochford and Southend to identify other sites that could reasonably be considered for the proposed development. This has revealed that, taking into account other planning and operational requirements, that there are no alternative sites at less risk of flooding that can reasonable be considered.

4.9 Within the JAAP area there are sites identified for open space (Sites ii (b) and ii (c)) partly located within Flood Zone 1. Consideration should be given to locating those areas allocated for business and MRO uses currently within Flood Zone 2 and 3 to these locations.

# Appendix A : JAAP Areas for Change



## Appendix B : Sequential Test Site Assessment

Table B.1 - Sites within Flood Zone 1 and 2: Employment Sites and JAAP sites

Ref	Site	Flood Zone	SFRA Hazard Zone	Compatibility of proposed used	Current Policy Use	Assessment	Is site reasonably available taking account of other planning and operational issues?
001	LPE01: Starlane Industrial Estate, Great Wakering	1	N/A	✓	Employment Land	Poor quality of existing stock and poor strategic location. Is not considered in suitable location to support airport related employment activities	No
002	LPC01: Hockley Trading Centre, Hockley	1	N/A	✓	Employment Land	In a good strategic location for employment development. The Employment Land Study recommends the site is redeveloped for offices as part of a mixed use Masterplan for the town centre. Not suitable for airport related activities.	No
003	LPC02: Ashington Road, Rochford	1	N/A	✓	Employment Land	The site is a fit for purpose industrial estate and should remain in current use. The location and size of the site to not meet the operational requirements of the airport employment development	No
004	LPW01: Rawreth Industrial Estate, Rayleigh	1	N/A	✓	Employment Land	The environmental quality of this industrial estate is poor. The site is not well related to the principal route network and is remote from the airport.	No
005	LPW02: Imperial Park Industrial Estate, Rayleigh	1	N/A	✓	Employment	This is a fit for purpose industrial estate, however there is little spare capacity available. Its location and size does not lend itself to	No

Ref	Site	Flood Zone	SFRA Hazard Zone	Compatibility of proposed used	Current Policy Use	Assessment	Is site reasonably available taking account of other planning and operational issues?
						supporting airport related development.	
006	LPW03: Brook Road Industrial Estate, Rayleigh	1	N/A	✓	Employment Land	This site is well located to the strategic road network and would be a suitable location for high quality office/industrial development. Comprehensive redevelopment is limited by lack of availability.	No
007	EMP001: Central Area/Seafront	1	N/A	✓	Mixed use/ B1 Office	Suitable for B1 office and other own centre mixed uses when development opportunities arise. Suitability is constrained by lack of immediate opportunities. Seafront area (within Flood Zone 3) is a major location for leisure and tourism related uses. Currently lack of available accommodation or vacant space	No
008	EMP002: Victoria Avenue	1	N/A	✓	B1 Office	Suitable for employment but in need of long term management and re-development (mixed-use). Good strategic access and capable of B1 uses although inappropriate for B2 and airport related uses.	No
009	EMP003: Grainger Road	1	N/A	✓	B2	Poor quality industrial area with high level of vacancies. Potential for conflict with residential area and poor access. Could be re-developed for mixed use with site at Sutton Road. Not immediately available	No
010	EMP004: Sutton Road	1	N/A	✓	B2	As EMP003 Grainger Road	No

Ref	Site	Flood Zone	SFRA Hazard Zone	Compatibility of proposed used	Current Policy Use	Assessment	Is site reasonably available taking account of other planning and operational issues?
011	EMP005: Short Street	1	N/A	✓	B2	Suitable for redevelopment for higher density employment. Not currently available	No
012	EMP006: Tickfield Avenue	1	N/A	✓	B2	Poor quality employment premises in secondary location and unlikely to sustain employment use in the long term. Suitable for redevelopment but unlikely to be available in the short term.	No
013	EMP007: South Church Street	1	N/A	✓	Employment	Poor quality premises with high vacancy rates. Poor accessibility and potential for conflict with neighbours. Not suitable or available	No
014	EMP008: Boscombe Mews	1	N/A	✓	Employment	As EMP007 South Church Street	No
015	EMP12: Airborne Close	1	N/A	✓	Employment	Well located, good quality employment area. Low vacancy levels and high market demand limits opportunities for redevelopment	No
016	EMP013: Airborne Industrial Estate	1	N/A	✓	Employment	Well located, good quality employment area. Low vacancy levels and high market demand limits opportunities for redevelopment	No
017	EMP015: Thanet Grange	1	N/A	✓	Employment B1	High quality purpose built B1 offices in good location. Currently occupied and limited opportunity for intensification	No
018	EMP016: Prince Close	1	N/A	✓	Employment B2	Low quality post war industrial units. Not considered suitable for employment use due to proximity to residential and poor access. Size if site unlikely to deliver scale of employment growth required in JAAP	No

Ref	Site	Flood Zone	SFRA Hazard Zone	Compatibility of proposed used	Current Policy Use	Assessment	Is site reasonably available taking account of other planning and operational issues?
019	EMP019: Stocks Farm	1	N/A	✓	Employment	Mixed of B1, B2, B8 and some retail. Some potential for piecemeal redevelopment of older premises but none available of appropriate size and scale required by the JAAP	No
020	EMP020: Priory Works	1	N/A	✓	Employment	A secondary employment location but well used. Potential amenity issues with surrounding residential development. Access and site size not likely to support scale of development required.	No
021	EMP021: Vanguard Way	1	N/A	✓	Employment B2/B8	Well established industrial estate used for heavier industry and distribution. Reasonable access to the local road network but poor access to strategic roads due to peripheral location. Some vacancies but continued market interest as a secondary employment locations prevents site becoming available. The location is not suitable to meet the JAAP employment requirements	No
022	EMP023: Terminal Close	1	N/A	✓	Employment B2	Well established industrial estate used for heavier industry and distribution. Reasonable access to the local road network but poor access to strategic roads due to peripheral location. High vacancy rates with low demand. Potential for redevelopment at higher employment density or mixed use. Secondary location remote from strategic road network limits suitability.	No



Ref	Site	Flood Zone	SFRA Hazard Zone	Compatibility of proposed used	Current Policy Use	Assessment	Is site reasonably available taking account of other planning and operational issues?
023	JAAP ii (a)	1	N/A	✓	Business	Well related to exploit existing business uses at Aviation Way. Suitable for proposed use. Suitable for development in Flood Zone 1	Yes
024	JAAP ii (d)	1	N/A	✓	Business	Currently used for outdoor recreation. Proposed business use with existing recreation use being re-located. Well located to route network and adjoining business uses. Suitable for development in Zone 1.	Yes
025	JAAP v	1	N/A	✓	Open Space	The site is currently in agricultural use. It is isolated from the existing airport operations and sandwiched between two residential areas. Consequently it is not considered suitable	No
026	JAAP vii	1	N/A	✓	Airport terminal/rail station	This site is in Zone 1 and is currently use for private flying club activities. It is allocated for new passenger terminal and railway station in the JAAP, for which planning permission has been granted. This site is not considered suitable for alternative uses.	No
027	JAAP viii	1	N/A	✓	Southern MRO	Site is currently used for Maintenance Repair Overhaul (MRO) activities.	No
028	JAAP ix	1	N/A	✓	Amenity Space	Allocated for green/amenity space and buffer between new airport and rail facilities and adjoining residential areas. Shape, access and physical separation from airport by railway line renders site unsuitable for other uses.	No
029	JAAP x	1	N/A	✓	Runway extension/link road	This site will be used for the runway extension and essential road infrastructure. No alternative sites available.	No



Ref	Site	Flood Zone	SFRA Hazard Zone	Compatibility of proposed used	Current Policy Use	Assessment	Is site reasonably available taking account of other planning and operational issues?
030	JAAP iv	2	N/A	✓	Intensification of Business	Part of the site is in Zone 2. The site is already developed as a business park. The proposal is to redevelop to provide higher value uses. Suitable in planning terms for proposed uses.	Yes
031	JAAP xi	2	N/A	✓	Park and Ride	Allocated for park and ride facilities and will be within the Public Safety Zone of the extended runway.	Yes

Table B.2 - Sites within Flood Zone 3: Employment Sites and JAAP sites

Ref	Site	Flood Zone	SFRA Hazard Zone	Compatibility of proposed use	Current Policy Use/ Proposed Use(JAAP site)	Assessment	Is site reasonably available taking account of other planning and operational issues?
032	DRE01A: Baltic Wharf	3	Medium	✓	Employment Land	This site is allocated for employment and serves port related activities. These should be safeguarded. However, redevelopment should have regard to environmental constraints, flooding and the potential impact of traffic on rural road network.  Is not considered in suitable location to support Airport related employment activities	No
033	LPC03: Riverside, Rochford	3	N/A	✓	Employment Land	Poor condition of existing stock supports case for redevelopment. Strategic location close to town centre supports case for office use.  Not suitable for airport related uses.	No

Ref	Site	Flood Zone	SFRA Hazard Zone	Compatibility of proposed use	Current Policy Use/ Proposed Use(JAAP site)	Assessment	Is site reasonably available taking account of other planning and operational issues?
034	LPC04: Stambridge Mill, Rochford	3	N/A	✓	Employment Land	Site is appropriate for light industrial use. However location and size do not meet requirements of the airport related development.	No
035	LPC06: Purdeys Industrial Estate, Rochford	3	N/A	✓	Employment Land	This is a fit for purpose industrial estate which the Employment Land Study recommends for retention and expansion.  There is land available within the site and is relatively well located in close proximity to the airport. However, the amount of land available is insufficient to meet the employment growth requirements of the JAAP.	No
036	EMP009: Comet Way	3	N/A	✓	Employment/ B1	High quality employment area with low vacancy levels. No scope for additional employment floorspace unless significant intensification through redevelopment.  Good access to strategic road network and the airport	No
037	EMP010: Progress Road	3	N/A	✓	Mixed use employment and retail	This is a strategic employment site with good accessibility to key routes.  Some vacant units capable of redevelopment but not of sufficient area to meet scale of employment required in JAAP.	No
038	EMP011: Aviation Way	3	N/A	✓	Employment	Good access to road network and proximity to airport. Some underused plots that could support employment growth through intensification of uses although unlikely to deliver scale of development envisaged for the	No

Ref	Site	Flood Zone	SFRA Hazard Zone	Compatibility of proposed use	Current Policy Use/ Proposed Use(JAAP site)	Assessment	Is site reasonably available taking account of other planning and operational issues?
						JAAP	
039	EMP014: Laurence Industrial Estate	3	N/A	✓	Employment	Good quality premises, well located to road network and airport. High levels of occupancy. High market demand for premises reduces scope for increasing employment floorspace.	No
040	EMP017: Priory Crescent	3	N/A	✓	Employment B8	Part of the site has been prepared for redevelopment. Most of the premises fully occupied and likely to remain with high market demand due to good accessibility.  Unlikely that sufficient land can be made available to support employment growth.	No
041	EMP018: Temple Farm	3	N/A	✓	Employment	Good quality employment site with high occupancy levels. Will continue to support existing employment rather than additional growth.	No
042	EMP022: Towerfield Drive	3	N/A	✓	Employment B2/B8	Well established industrial estate used for heavier industry and distribution. Reasonable access to the local road network but poor access to strategic roads due to peripheral location.  Some vacancies but continued market interest as a secondary employment locations prevents site becoming available.  The location is not suitable to meet the JAAP employment requirements	No
043	EMP024: Campfield Road	3	N/A	✓	Employment B8	Well established industrial estate used for heavier industry and distribution. Reasonable	No

Ref	Site	Flood Zone	SFRA Hazard Zone	Compatibility of proposed use	Current Policy Use/ Proposed Use(JAAP site)	Assessment	Is site reasonably available taking account of other planning and operational issues?
						<p>access to the local road network but poor access to strategic roads due to peripheral location.</p> <p>High occupancy levels driven by demand to low value B8 premises in secondary locations and therefore unlikely to be available.</p>	
044	EMP025: Garrison Phase 1	3	High	✘	Employment B1	<p>Purpose built high quality business premises recently completed. Reasonable access to the local road network but poor access to strategic roads due to peripheral location.</p> <p>Currently meets local employment needs but little scope for intensification to meet strategic employment needs</p>	No
045	EMP026: Garrison Phase 2	3	High	✘	Allocation	<p>Reasonable access to the local road network but poor access to strategic roads due to peripheral location.</p> <p>The site could be developed to provide high quality business premises although its secondary location restricts demand to local employment and lower rents.</p> <p>The site area is consistent with that being sought in the JAAP although is not sufficiently related to the airport to be considered.</p>	No
046	JAAP i	3	N/A	✓	Business	<p>The site is partly brownfield and therefore well suited for re-development. It is well located in relation to the strategic route network and existing employment areas and of a scale and character to accommodate the proposed development without causing significant harm to surrounding non business uses. The northern</p>	Yes

Ref	Site	Flood Zone	SFRA Hazard Zone	Compatibility of proposed use	Current Policy Use/ Proposed Use(JAAP site)	Assessment	Is site reasonably available taking account of other planning and operational issues?
						margin of the site is within Flood Zone 3 and detailed planning and layout will require appropriate mitigation.	
047	JAAP ii (b)	3	N/A	✓	Open Space/Sport	Northern part of site (approx 30%) is located in Flood Zone 3. The site will accommodate the re-location of rugby club and will have some built development. Suitable for proposed use providing appropriate layout to avoid built development in Zone 3. Water compatible use within Flood Zone 3. The area of the site located within Flood Zone 1 could be suitable for B1 development if alternative sites are required. It would be well located to other B1 sites but not sufficiently well related to the airport to support the extension of the MRO activities. The development of the site would compromise the delivery of a suitable site for the relocation of the rugby club.	Yes
048	JAAP ii (c)	3	N/A	✓	Open Space	Approximately 40% of site is within Zone 3 and had high ecological value. Current (and proposed use) are water compatible in Flood Zone 3	No
049	JAAP iii	3	N/A	✓	Extension of MRO	The site is almost entirely in Zone 3. The site is vacant greenfield land and relates well to site ii (c) (open space). If conventional business uses were proposed an alternative site could be identified. However as this site is required for MRO activities a location immediately adjacent to the airport is an operational requirement. Exception test required.	Yes

Flood Risk Sequential Test

Ref	Site	Flood Zone	SFRA Hazard Zone	Compatibility of proposed use	Current Policy Use/ Proposed Use(JAAP site)	Assessment	Is site reasonably available taking account of other planning and operational issues?
050	JAAP vi	3	N/A	✓	Northern MRO	This site is almost entirely within Zone 3. This site is already developed for airport related uses and the proposal relates to the enhancement of these existing uses. Exception test required.	Yes

## Appendix C : Assessment Sites



