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Date: 14th July 2017
Your Ref:
Our Ref: 003SCAAP

Via Email: bankssolutionsuk@gmail.com

Mrs Claire Jones-Hughes
Programme Officer
Banks Solutions (Brighton)
6 Brading Road
Brighton
BN2 3PD

Dear Mrs Jones-Hughes

SOUTHEND CENTRAL AREA ACTION PLAN (SCAAP) – REPRESENTATIONS ON BEHALF OF SOUTHEND UNITED FOOTBALL CLUB

I write on behalf of Southend United Football Club (SUFC) to make representations regarding the latest submissions and amendments circulated to interested parties on 6th July for comments by 14th July 2017. The focus of the representations relates to Seaway Car Park CS1.2 and town centre policy DS1.1. Both comments are submitted to seek accordance with the National Planning Policy Framework (NPPF) principles and guidance and are to be considered in addition to comments already made on 5th May 2017. We would be grateful for these to be passed on to Mr Mike Fox the Inspector for the SCAAP examination.

We attach suggested amendments to policy DS1.1 shown as tracked changes. It is considered that the Council's and Indigo's suggested wording goes beyond the emphasis and guidance of the NPPF and is therefore unsound.

We also wish to reiterate the principle of our representations of 5th May supporting representations made on behalf of Stockvale Adventure Island and its concerns about the proposed loss of car parking on the seafront and its impact on the tourism trade in Southend. Parking is a critical issue for the tourism trade. The statement prepared by Turnstone by Carter Jonas demonstrates that only between 47 - 262 parking spaces could be delivered to support the commercial operation of a cinema if the policy requirement of no net loss of public parking is complied with (478 spaces in this instance) on the Seaway site. Seaways has a 478 parking space capacity (this number is not agreed between the Council and Stockvale Group/RPS with the latter considering that the site has 810 marked parking spaces). Turnstone are saying it could provide between 525 and 740 spaces as part of the scheme proposals.

The Carter Jonas statement identifies the heart of the problem of sound delivery of Policy CS1.2 for Seaways Car Park and is therefore not a sound policy to be incorporated in the SCAAP contrary to the local plan making requirements of the NPPF. It demonstrates that the delivery of a cinema on the Seaway site is severely compromised and unsound by the proposed policy requirement to amount to no net loss of public car parking, as it would not be possible to satisfy the cinema operators parking needs with this necessity to maintain public parking requirement at 478 (only between 47 - 262 operational

spaces could be delivered) and if Stockvale's parking numbers are accepted there may be no increase of parking spaces and potentially a significant loss of between 285 and 70 spaces above the existing car park capacity available for public sea front visitor use. By default therefore the 478 or 810 public car park capacity at Seaways would always be compromised by the proposed cinema operators needs to attract customers to the use.

Given the application proposals by SUFC at Fossetts Farm (Reference 17/00733/FULM), supported by a cinema operator and its operational requirement of 1,000 parking spaces, it remains questionable whether Seaways car park could be viably delivered for a cinema use. It is highly unlikely that a further cinema use could be accommodated at Seaways with the prospect of a new cinema at Fossetts Farm. This could therefore lead to the site being undeliverable and therefore unjustified for development during the SCAAP plan period.

We trust that the SCAAP Inspector will consider and amend these policies accordingly.

Yours sincerely

A handwritten signature in blue ink, reading "Mary Power", enclosed in a thin black rectangular border.

Mary Power
Director
PowerHaus Consultancy Ltd