

# southend central area action plan (scaap) consultation statement september 2011

southend on sea borough council  
local development framework



delivering regeneration and growth



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## **Section 1: Introduction**

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- 1.1 The Southend Central Area Action Plan (AAP) is one of the planning documents that make up the Southend-on-Sea Local Development Framework. The Core Strategy sets out the spatial vision, strategic objectives and policies for the Borough. The Core Strategy was declared 'sound' by a Planning Inspector and was adopted by the Council in December 2007. The policy direction set out in the Core Strategy forms the basis for the production of the Southend Central AAP Proposed Submission document.
- 1.2 The Southend Central AAP has been prepared to be in compliance with the Town and County Planning (Local Development) (England) Regulations 2008. Regulation 27 states that the Council should publish its proposed submission documents, including a statement setting out:
- Who was invited to be involved in the plan preparation;
  - How they were invited to be involved in the plan preparation; and
  - A summary of the main issues raised and how these issues have been addressed.

### **Sustainability Appraisal**

- 1.3 The Planning and Compulsory Purchase Act (2004) requires Sustainability Appraisals to be carried out on Local Development Plan Documents (DPDs). In order to assess the sustainability impacts of different plan and policy options, an appraisal framework was devised, with inputs from key stakeholders. The Sustainability Appraisal provides a qualitative appraisal of the Southend Central AAP. For the previous stages of the AAP, a sustainability appraisal was consulted on for the Seafront and Town Centre AAPs, in accordance with Government guidance.

### **Statement of Community Involvement**

- 1.4 The following sections address the requirements of Regulation 27 and also set out how the Southend Central AAP Issues and Options consultation was undertaken in accordance with the with Southend-on-Sea's adopted Statement of Community Involvement (SCI). The SCI stipulates the level of consultation to be undertaken, which includes a wide range of media and publicity to engage the general public, hard-to-reach-groups, community groups, councillors, businesses and governmental bodies.

### **Background to the Southend Central AAP**

- 1.5 The Core Strategy DPD (2007) spatial strategy made provision for a large share of the Borough's new growth and regeneration to be focussed in the central area.

### **Town Centre AAP Issues and Options and Seafront AAP Issues and Options report**

- 1.6 A Town Centre Area Action Plan Issues and Options version and Seafront Area Action Plan Issues and Options version were therefore established to provide the planning framework for these areas, where significant change or conservation is needed. These documents were consulted on in 2007.
- 1.7 The pre-submission consultation Issues and Options Reports for the Town Centre and the Seafront sought views on four alternative options for a boundary for the Plan. As a result of the responses received, subsequent development pressures and other changes, a new boundary was proposed.

### **Central Area Masterplan**

- 1.8 In November 2007 the Council endorsed the principles of the Central Area Masterplan (CAM). A year later, in November 2008, the Council agreed to adopt the CAM, prepared by Renaissance Southend Limited (RSL) as a design brief and interim guidance. As a result of this the SCAAP is derived from, and takes forward, the guiding principles from the CAM as well as comments made in the Seafront AAP related to the central seafront area.
- 1.9 The CAM seeks to encourage better integration and cohesion between the seafront area and the town centre. It is considered that the natural linkages and the association between these areas will create added value and strategic opportunities for regeneration. Therefore, as a result of the responses received in the Town Centre AAP and the Seafront AAP, subsequent development pressures and other changes a new boundary is proposed, which allows for these natural linkages and the interrelationship to be developed further to the benefit of both areas socially, economically and environmentally.

### **Southend Central AAP Issues and Options Version 2010**

- 1.10 The proposed submission version of the SCAAP builds on the Issues and Options version which was published in June 2010, setting out the Borough Council's policies for positively managing development within the SCAAP boundary which now includes the town centre and central seafront area.

## Section 2: Issues and Options – early preparation

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### LDF Consultations

- 2.1 The preparation of the Southend Central AAP Issues and Options was informed by the 'Southend Together' Sustainable Community Strategy 2007 – 2017 and was also informed by a number of LDF consultation events, which included the:
- Southend-on-Sea Core Strategy DPD;
  - Town Centre Area Action Plan Issues and Options;
  - Seafront Area Action Plan Issues and Options;
  - Planning Obligations and Vehicle Parking Standards DPD Preferred Options; and
  - Design and Townscape Guide SPD.
- 2.2 A number of common themes and issues were raised by the general public and stakeholders during the LDF consultations. These themes and issues include:
- The creation of a viable and vibrant town centre for a mix of shopping, cultural, leisure activities supported by commercial, education and technology sectors;
  - The requirement for a flexible approach to development within the town centre;
  - Accommodating additional employment and business development in the town centre;
  - Safeguarding existing industrial areas;
  - Ensuring that housing allocations in the town centre are treated on their merits taking into account design consideration;
  - Controlling the amount of flatted developments;
  - Ensuring that parking provision protects residential amenity and character;
  - Incorporate improvements to cycle and walking facilities;
  - Setting out a design criteria policy to assess all developments;
  - Retaining the principle of frontages of townscape merit;
  - Setting out a design criteria and guidance policy for tall buildings;
  - Promoting the development of additional educational, cultural and tourism facilities in the town centre;
  - Protecting the Seafront as an historical asset;
  - Protecting the extent of the Green Belt;
  - Ensuring that no development takes place on Two Tree Island;
  - Protecting the marine activities at Leigh-on-Sea;
  - Restricting the height levels along the Seafront to reflect the to Victorian levels;
  - Prevent high-rise development along the Seafront;
  - Protecting existing bungalows and small family houses;
  - Ensuring that national environmental designations are taken into account in planning decisions; and

- Applying the proposed Seafront Character Zones to manage the future planning of these areas.
- 2.3 The Council's detailed responses to written representations received on the Southend Town Centre and Seafront AAP issues and options consultations are contained within Appendix 4.

## **Background Studies**

- 2.4 The Southend Central AAP Issues and Options was also informed by a number of background studies that assisted in understanding the key issues affecting Southend-on-Sea. These background studies are set out on the Council's website.

## **Sustainability Baseline (Core Strategy DPD, Town Centre AAP and Seafront AAP)**

- 2.5 In 2004 the UK Government ratified European Union Directive 2001/42/EC (SEA Directive) on the assessment of the effects of certain plans and programmes on the environment. The SEA Directive requires that plans and programmes should be assessed to identify and mitigate against detrimental impacts upon the environment and implemented through Sustainability Appraisal (SA). This requires, where possible, some understanding of the 'baseline' situation so that the change that might arise from the influence of the plan can be considered.
- 2.6 Information regarding borough-wide sustainability issues was collected as part of the Sustainability Appraisal for the Core Strategy. At the scoping stage for the Sustainability Appraisal for the Town Centre AAP and Seafront AAP, a further layer of information was collected in order to inform the sustainability appraisal process of appraisal. The key sustainability issues identified for the Borough are summarised below.

## **Borough-Wide Issues**

- The area is under quite high risk of flood, although direct tidal inundation is largely mitigated for through sea flood defences. However, tidal effects on the rivers in the Borough may present a greater risk;
- Habitats of international significance are located within the Borough. These must be protected from development that would threaten their integrity;
- The constrained boundaries of the Borough and the need for new housing is putting pressure on open space within the built up area for development, as well as on the high quality agricultural land on the built up area boundary;
- Nature conservation and biodiversity resources within the built up area are limited. Every attempt should be made to conserve and enhance existing resources, and create new ones, as well as the protection and enhancement of wildlife corridors;



- Traffic levels are increasing in the Borough, with consequences for air quality. New development must help to limit any increase in traffic by endeavouring to suggest a change to travel patterns;
- South Essex will be experiencing a shortage of potable water supply, therefore this must be taken into account in new development and every attempt made to include water efficient design into new development;
- The quality of the built environment is important, not only with the effect of new building in 'mending the fabric', but also in affecting existing areas of identifiable character;
- There are high levels of out commuting to London, due to relatively low house prices in Southend compared to the other local authority areas around London. There is also a lack of appropriate employment opportunities in the Borough.
- Diversification of the economy is required. Lack of diversification could lead to economic downturn in the area as the traditional employment base of the Borough is in decline;
- There is an identified need for affordable housing;
- There are high levels of deprivation in some parts of the Borough particularly in Kursaal ward and parts of the Milton and Southchurch wards;
- Climate change could have the following impacts upon Southend-on-Sea: water resource deficiencies, which may lead to serious issues in the area particularly with the levels of development set for the Thames Gateway; increased flood risk, including for sea defence overtopping, and also from rivers; a risk of subsidence through changing soil moisture levels.

### Town Centre Issues

- New urban open space, including new green space, could be provided in the town centre;
- Development should help in the continued enhancement of the built environment in the town centre, with new buildings of high quality and developed to sound urban design principles;
- The town centre is a focus of employment for the Borough, and this role needs to be maintained, while also ensuring a range of employment opportunities are maintained in a variety of employment sectors;
- Air quality levels in the town centre should be maintained;
- Every attempt should be made to bring biodiversity enhancements to the Town Centre and also to ensure development in this area does not harm the nearby Natura 2000 sites; and
- Much of the Town Centre is used for car parking, the AAP should set out strategies for the rationalisation of town centre parking in order to allow land to be released for other uses and create a higher quality urban environment.

## Seafront Issues

- Much of the Seafront is at risk of flooding however, existing flood defences should protect against this. Maintenance of these defences is essential. All new development should be accompanied by an appropriate flood risk assessment before proceeding;
- To protect public safety and existing built assets unstable cliffs need to be engineered as appropriate to make stable;
- Air and bathing water quality of the Seafront should be maintained or enhanced as necessary through control of relevant development;
- Biodiversity and nature conservation is a key matter that needs to be considered and it will need to be ensured that new development does not cause harm to European sites. New development should also help enhance the biodiversity quality of the Seafront area where appropriate;
- Need for better bus services west of the pier and completion of the Sustrans cycle route;
- The built environment quality of the Seafront should be enhanced to provide a cohesive Seafront style. This will include regeneration of redundant sites but this must take into account impacts on biodiversity and take into account community views;
- Development along the Seafront must support the South Essex Greengrid Strategy;
- Provision for improving the overnight visitor accommodation on the Seafront should be included to encourage longer stays and higher visitor spend; and
- Continued support needs to be given to employment provision and new housing in the Seafront area in order to meet objectives of the Core Strategy.

## Regulation 25: SOUTHEND CENTRAL AAP Issues and Options Consultation (21<sup>st</sup> June 2010 to 9<sup>th</sup> August 2010)

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### Summary

- 3.1 The Southend Central Issues and Options consultation was held at the same time as the Development Management DPD, which also raised a number of development management issues for the central area.
- 3.2 Both consultations were open for an 8-week period between 21<sup>st</sup> June 2010 and 9<sup>th</sup> August 2010. Both documents were accompanied by a sustainability appraisal that formed part of the consultation documentation.
- 3.3 The Southend Central AAP Issues and Options consultation document set out the relevant issues with a suggested policy option and reasonable alternative policy options. A number of consultation questions sought to determine whether all the issues and policy options had been identified. A summary of each of the issues raised and policy options was presented within the Sustainability Appraisal.

### Consultees

- 3.4 Regulation 25 is a single preparatory phase for DPDs, which should not be regarded as an isolated stage of consultation. The minimum requirements of Regulation 25 are:
  - The Council must notify each of the 'specific consultation bodies' and 'general consultation bodies' that the Council considers may have an interest in the subject of the proposed DPD;
  - The Council must invite these bodies to make representations on what the DPD should contain;
  - The Council must also consider whether it is appropriate to invite representations from people resident or carrying out business in the Council's administrative area;
  - In preparing DPDs, Southend Borough Council must take into account any representations made in response to its invitation to make representations.
- 3.5 In accordance with the adopted Statement of Community Involvement, the Council exceeded these minimum consultation requirements for the Southend Central AAP Issues and Options consultation.
- 3.6 The Statutory Bodies listed in PPS12 and the planning regulations were formally invited to make representation on the content of the Southend Central AAP Issues and Options consultation document. In addition, individuals, organisations, and groups held on the LDF Mailing List were directly consulted. A list of all those who contacted is contained within Appendix 1.

## Consultation Methods

3.7 The following table sets out the consultation actions taken to consult on the Southend Central AAP Issues and Options consultation document.

**Table 1: Consultation Methods**

Method	Action Taken
Direct Consultation with Specific, General and Other Consultees including hardcopies/electronic copies of the consultation document where appropriate	Letter sent on 21 <sup>st</sup> June 2010 to all contacts on the LDF database to inform them that the Southend Central Area Action Plan Issues and Options consultation document was published for consultation. The database contains 700 consultees representing Specific, General and Other Consultees.
	100 hard copies of the document were printed and made available on request.
	Letters and hard copies of the Southend Central Area Action Plan Issues and Options consultation document were sent to all of the Southend-on-Sea Borough Councillors on 21 <sup>st</sup> June 2010.
	An email was sent to all of Southend-on-Sea Borough Council's Corporate Directors informing them of Consultation and requesting dedicated officer for a response. Hard Copies were supplied on request.
Inspection copies were made available at all of the public libraries in the Borough and at the Civic Centre	Copies of the Southend Central Area Action Plan Issues and Options consultation document with posters and leaflets were placed at all libraries and Council Offices on 21 <sup>st</sup> June 2010.
Publish on the Southend-on-Sea Borough Council website	The Development Management Issues and Options consultation document was published on the Southend-on-Sea Borough Council website with a JDi on line consultation facility and ability to download document on 21 <sup>st</sup> June 2010. Information was provided on how to obtain hard copies and/or view at deposit points.
	Leaflets produced providing advice on the on-line consultation system and left at deposit points/exhibitions.
	Information about consultation and Links to Borough Council's Web Page placed on SAVS and Renaissance Southend's Web sites on 14 <sup>th</sup> July 2010 – this is to actively target more hard to reach groups.
Publication of Newsletters and/or Leaflets as appropriate	1,000 consultation leaflets were printed.
	Poster and Leaflets deposited at all Doctors Surgeries on 19 <sup>th</sup> July 2010 in order to potentially target some of the harder to reach groups.
Press Release + newspaper	Press Release to local papers issued printed on Friday

Method	Action Taken
notice	2 <sup>nd</sup> July 2010 and Friday 16 <sup>th</sup> July 2010. Advert about public consultation and information about drop in exhibition event in Town Centre (see below) placed in local press on Wednesday 14 <sup>th</sup> July 2010, Thursday 15 <sup>th</sup> July and Friday 16 <sup>th</sup> July 2010. Also advert placed in free weekly paper 14 <sup>th</sup> July 2010 [Evening Echo Essex Enquirer and Southend Standard].
Area Forums/Workshops/exhibitions	Drop in exhibition Victoria Plaza and The Royals Shopping Centres on 17 <sup>th</sup> and 18 <sup>th</sup> July 2010 to target Residents and Visitors to the Town Centre. Permanent Exhibition and Leaflets in Central Library from 19 <sup>th</sup> July to 9 <sup>th</sup> August 2010 to target Residents and Visitors to the Town Centre. Informed the regular breakfast meeting of Planning and Developers Forum held on 24 <sup>th</sup> June 2010 about the Southend Central Area Action Plan consultation to target the development industry.
Community Groups	Letter sent on 21 <sup>st</sup> June 2010 to all on LDF database to inform that the Southend Central Area Action Plan Issues and Options consultation document is published for consultation – includes comprehensive coverage of resident / tenants / community associations and societies across the Borough. Information about consultation and links to Borough Council's Web Page placed on SAVS and Renaissance Southend's websites on 14 <sup>th</sup> July 2010.
Councillors	Local Development Framework Working Party briefed about consultation on the Southend Central Area Action Plan Issues and Options consultation document on the 24 <sup>th</sup> June 2010. Councillor Drop-in sessions 15 <sup>th</sup> July 2010.
Feedback form to assess effectiveness of engagement activity	The Council's online system for making representations also includes an equalities feedback form. Document placed on the Council's website ( <a href="http://www.southend.gov.uk">www.southend.gov.uk</a> ) for inspection and downloading. The Borough Council encourage comments online via our E-Consultation service in order to make commenting on documents easier and straightforward.

## Summary of Main Issues Raised and How These Were Addressed

3.8 In general, there was a high level of support for the Southend Central AAP Issues and Options consultation document. Approximately 32% of the comments received were in support of the content and suggested options in the consultation document, whilst only approximately 7% objected to the content within the

consultation document. Approximately 61% of the comments received were of a general nature. In some instances, these comments put forward ways in which the suggested options within the Southend Central AAP Issues and Options consultation document could be improved.

**Table 2: Consultation Summary**

	Total No. of Respondents	Objectors	Total No. of Representations	Support	Object	General Comments
Southend Central Area Action Plan	27	9 (33%)	484	153 (32%)	36 (7%)	295 (61%)

3.9 A summary of the Council’s responses to written representations received on the Southend Central AAP issues and options consultation, and where these involved changes to the draft AAP, is contained within Appendix 5. The main issues arising from the consultation and an outline of how these have been addressed are summarised below.

### **Main Issues Arising from the Southend Central AAP Issues and Options version consultation**

The following provides a summary of the main issues arising from the Issues and Options consultation:

#### **Development Management**

- While a Development Management DPD should be brought forward that contains detailed development management policies for all development in the Borough, including the central area, there should be flexibility however, taking into account the range of sites, each with their associated site constraints, in the town centre.

#### **Green Space and Biodiversity**

- The town centre is under provided for in terms of open space and the AAP should support the creation of new public areas where possible. This could link to the green space and green grid strategy.

#### **The Historic Environment**

- The need to preserve and enhance the quality of the Historic Environment within the central area, in particular the Conservation Areas and Listed and Locally Listed Buildings.
- The unique Victorian and Edwardian streetscapes and vistas within the central area need to be carefully preserved, both short and long views.

- The High Street contains, or connects, a number of historic landmarks and spaces and its vitality should not be threatened by proposals to form alternative quarters or circuits.

#### **Public Realm**

- The AAP should include a framework for Public Realm and Environmental Improvements / Enhancements within the Central Area.
- The rear of the Odeon building currently does little to support the attractiveness or vibrancy of the Victoria Gateway Area, and actions could be taken to improve this.

#### **Transport and Access**

- Rather than depending on LTP3, the AAP should include some markers to maximise travel choice and encourage sustainable travel to work patterns.
- Parking is a major problem, it has to be provided off road for all new build and future conversions. The paid for town centre car parks and on street parking should be for visitors and shoppers, workers car parking should be provided within a short walk and permits for residents to park on street should be phased out in central town centre areas.

#### **The Seafront**

- A planning framework should be produced for the seafront, including the need to integrate the Quarters to provide a comprehensive strategy for development in the area. The St Johns, Central Seafront and Eastern Esplanade Quarter do not form, nor are planned to be, a coherent Central Quarter and this issue must be addressed by the AAP.
- The regeneration of the Golden Mile should be achieved with minimal intervention. The continuity of the Golden Mile is a key component of its vitality, vibrancy and attraction and should be retained.
- The determination of the boundaries of each of the Quarters splits sites and will be difficult to interpret on the ground, and this issue needs to be addressed within the AAP.

#### **Town Centre and Retail**

- With Southend town centre remaining the first preference for all forms of retail development and for other town centre uses, Town centre and prime retail frontages should be clearly defined on a proposals map.
- The extension of the retail area of the central area to both the east and west is unlikely to resolve the issues affecting the central area, particularly when it is questionable whether any additional retail space is required.

#### **Land Uses**

- The AAP should be specific in terms of land uses that could be brought forward through the proposals sites.
- The Primary School Sites in the Central Area are all on tight sites with well below the minimum site area for the number of pupils. Additional land would relieve this pressure if available.

### **Tall Buildings**

- The location and siting of tall buildings within the central area, and the potential negative impact this could have on views of the estuary, the potential impacts this could have on the quality of the built form, with particular reference to impacts on the setting of conservation areas and listed/locally listed buildings.

### **Housing**

- Housing density is not necessarily the problem, it is the quality that needs to be improved.
- Given the SHLAA and CAM identify theoretical capacities that exceed the targets set in the Core Strategy, it would not appear necessary to be prescriptive about density, which should be a function of the dwelling types for which there is a market or need.

### **Gateway Neighbourhoods**

- The focus on protecting existing employment areas from loss in Gateway Neighbourhoods may only be necessary in part. Not all employment areas are in suitable location and cause inconvenience to residents and hold back residential improvement of streets/areas.
- The character of each of the main Gateway Neighbourhoods identified are very different and each face different local issues and challenges. Each should therefore be separately assessed and have a separate policy approach.

### **The Quarters**

- The AAP will need to address the issue of an oversupply of outdated and poor quality office space.
- Reference is made to the provision of a new library, it is not clear where this is to be or why the existing library needs replacing.
- Promoting town centre living for families could be difficult on a number of levels including the noise, lack of parking, potential absence of homes with adequate private amenity space.
- Given the constrained nature of the High Street the identification of the former B&Q site for a large foodstore is in accordance with an identified need, and will provide a second anchor at the northern end of the High Street. This approach should be taken forward.
- The Development Brief for Warrior Square will need to make provision for suitable replacement of existing car parking provision as part of the proposed development of Warrior Square, or elsewhere within the town centre.
- It is not clear how parking requirements for the Clifftown Quarter will be met and also how the network of lanes/mews will support deliveries to business premises.
- The removal of all units, except for quality buildings, in the St Johns, Central Seafront and Eastern Esplanade quarter is unlikely to be viable in the current market and a more selective approach may be more



deliverable. Some flexibility will be needed however to ensure deliverability and the AAP should avoid being too prescriptive on this issue.

- There is uncertainty over Sainsbury's finding an alternative site, there is no mention that if they do find an alternative site they will retain a town centre presence within the London Road area, nor is there any mention of the redevelopment proposals for Roots Hall football ground. Given that there is a resolution to grant planning consent for the redevelopment of Roots Hall, the AAP should address this.

#### **Flood Risk**

- Flood risk needs to be taken into account by the AAP, including its impact on the options for the range and location of uses on key development sites. The AAP should clearly identify flood risk zones and provide options either for development or for potential mitigation in the identified locations.

#### **SA/SEA**

- The introduction of detailed policies and site specific proposals at the submission stage of the plan is too late in the planning process and may have implications for the SEA.

#### **Implementation and Monitoring**

- There is a need for an implementation and monitoring strategy.
- The success of the 'City by the Sea' option will be dependent on the strength and effectiveness of, and continued commitment to, the implementation and delivery mechanisms which should be further elaborated on in the final document.

## **Key Changes to the Southend Central Area Action Plan**

The following changes were made to the AAP following the Issues and Options Consultation:

#### **Development Management**

- The AAP addresses specific themes and issues which provide more detail, over and above that provided within the Development Management DPD. These relate to: certain types of land use, public realm and environmental quality, the historic environment, transport and access, and infrastructure provision and flood risk. The AAP should be read in conjunction with the DM DPD.

#### **Green Space and Biodiversity**

- The need to provide interlinked, functional green space to relieve the pressure on the biodiversity interests of the foreshore, provide for a pleasant central area environment, help to mitigate the impacts of climate change, and improve walking and cycling within the central area have been promoted within the Public Realm and Environmental Quality Strategy of the AAP.

#### **The Historic Environment**

- A detailed strategy which sets the policy framework for development and regeneration of the historic environment within the central area has been included within the AAP.

#### **Public Realm**

- Improvements to the public realm form a key part of the AAP, with the Public Realm and Environmental Quality Strategy identifying assets and opportunities and addressing key issues, such as public realm enhancements, protection of visually important views, and the promotion of visually active frontages.

#### **Transport and Access**

- A Transport and Access Strategy is included within the AAP, which builds upon LTP3, and includes a policy framework within the Quarters to ensure delivery.
- The Transport and Access Strategy within the AAP addresses provision of visitor car parking through a car parking strategy, which will be promoted through Quarter specific development principles and site specific proposals. Vehicle Parking Standards for the Borough, including the central area, are being taken forward in the Development Management DPD.

#### **The Seafront**

- The seafront will be treated as a coherent planning entity within which specific areas will have a different role whilst at the same time reflecting the common relationship they have with the seafront. This will allow the framework for Tylers Quarter to be more fully integrated with the town centre retail circuits. The Quarters have been realigned in the AAP to reflect a more coherent entity that will enable a more effective planning framework.

#### **Town Centre and Retail Uses**

- The Proposals Map has been amended to include the boundary of the defined town centre, which is to remain the same as that in the adopted Borough Local Plan.
- Primary retail frontages, which will form part of the extended retail circuit to the east, will extend to planned development in Tylers Avenue only in the AAP. Primary and secondary retail frontages have been represented on the proposals map.
- The Retail Study (2011) concluded that there is merit in broadening the High Street offer both spatially and in terms of types of shopping. As demand for additional retail is based on targeting bigger units and the regeneration of the town centre and seafront as a visitor destination, this approach has therefore been taken forward within the AAP.

#### **Land Uses**

- The AAP provides a policy framework that clearly defines where and how different land uses should be accommodated within the town, taking forward the preferred approach as set out in the Issues and Options Report.

- Reference has been made to the current managed shortage of primary school sites and the need for additional primary school places for planned population growth, with policy provision made to support the development a new primary school serving the central part of the town within the Victoria Avenue Proposal Site.

### **Tall Buildings**

- The AAP contains a clear approach to the siting of tall buildings within the central area, providing the policy framework to ensure they will be sited in appropriate locations and where they will not impact negatively on the existing environment. The AAP also provides a policy approach to ensure that tall buildings do not compromise the special character of the historic environment and key views, as identified within the AAP. The policy approach adopted by the AAP should be read in conjunction with the Development Management DPD, which provide a criteria for appropriate circumstances and location of tall buildings.

### **Housing**

- The AAP provides a policy approach which specifies overall housing numbers for the central area, the delivery on specific sites will come forward through development briefs.
- The Development Management DPD will provide more detail on tenure mix.

### **Gateway Neighbourhoods**

- The AAP provides a framework to facilitate the regeneration of Gateway Neighbourhoods, with focus on protecting existing employment locations where appropriate. New development opportunities will be expected to address employment regeneration needs, such as providing small scale move-on space for entrepreneurs. The approach taken in the AAP recognises the changing nature and function of parts of these neighbourhoods. Development Briefs will be used where appropriate to determine the types and function of development.
- The AAP sets out a policy framework for each of the Gateway Neighbourhoods, to enable the enhancement of gateway environments to the town, to compliment its role as a business and visitor centre, providing for future opportunities to meet affordable and more specialised housing needs, new recreational and community uses.

### **The Quarters**

- The AAP contains a strategy for office development, which focuses Grade A office within the town centre and addresses the regeneration opportunities of the outmoded supply on Victoria Avenue by bringing forward site specific proposals and policies.
- Policies within the AAP promote the delivery of a new public and academic library in association with the expanded Further and High Education Hub at Elmer Square.
- The AAP has taken forward to the approach that supports a large format foodstore on the former B&Q site subject to an assessment of the

impact of the proposal on the town centre, a transport assessment, and agreement on the detailed design.

- The AAP sets out a mixed use approach to the Warrior Square site, including office and residential uses and car parking, to be complimented by an enhanced public realm.
- Development principles for the Clifftown Quarter, which seek to create an area with a strong cultural identify and compliment the historic grain of the area, have been brought forward within the AAP.
- The London Road site and Roots Hall have been included as proposals sites within the AAP.

#### **SA/SEA**

- The SA of the Issues and Options report has taken into account the development strategy and preferred approach to land use within the quarters as part of its appraisal. Policies have been included within the AAP which set out the development principles for the quarters and gateways and Site Specific policies which translate this approach into a more formal policy framework.

#### **Implementation and Monitoring**

- An Implementation and Monitoring Strategy has been included within the AAP to address issues of delivery.

## 4. Summary of Sustainability Appraisal issues and responses for the Southend Central AAP

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- 4.1 A summary of the Council's responses issues raised by the Sustainability Appraisal and where these have involved changes to the AAP is contained within Appendix 6. The main issues arising, and how they have been addressed, are outlined below.

### Habitats Regulations Assessment (HRA)

- 4.2 Further work would be required when developing the policies for the SCAAP to ensure there are no adverse impacts on protected sites. Those of international significance must be protected from development that would threaten their integrity.

*4.2.1 A Screening Report (SR) was undertaken that considered the need for an Appropriate Assessment (AA) known for the purpose of the SR as an HRA, in compliance with the EU Habitats Directive, and part of Southend's LDF. The HRA considered whether the approach to a plan or project is likely to have a significant effect on the conservation objectives of the European site. These issues have been addressed within the core objectives of the SCAAP, and within policies CS4, CS5, and PR1.*

### Flood Risk (and Climate Change)

- 4.3 The Issues and Options version of the SCAAP asked whether the Core Strategy DPD provided sufficient policy guidance with regard to flood risk. The SA identified that the SCAAP needed to address the impacts of climate change, including water resource deficiencies, increased flood risk, and risk of subsidence through changing soil moisture levels.

*4.3.1. It was determined that a more proactive approach would be taken to ensure that all development within the central area assessed the right of flood, and that only water compatible uses and essential infrastructure (PPS23 Table D3) will be permitted in Flood Zone 3b, unless site specific recommendations in the SFRA state otherwise. Policy IF3 of the SCAAP sets out the Council's requirements, through its role in determining planning applications, for requiring that Flood Risk Assessments accompany planning applications, for consideration by the Council as Lead Local Flood Authority, in areas of local flood risk. All development should also have regard to sustainable surface water drainage. Policy CS3 of the SCAAP provides a further policy framework for ensuring all major development in Flood Zone 1, 2 and 3 (a and b) provide flood risk assessments.*

## **Biodiversity, Green and Open Space, and Connections to the Green Grid.**

4.4 Given the constraints of the borough boundary, coupled with the new for new housing, there is increasing pressure being put upon open space. The SCAAP should address these issues.

*4.4.1 The Council is committed to implementing a rolling programme of high quality new and enhanced open spaces in the central areas. It was determined therefore that through Policy PR1 of the SCAAP the Council will require all open spaces within the central area to be integrated within a wider green grid network.*

## **Traffic and Transport**

4.5 With traffic levels increasing in the Borough, and consequences for air quality, any new development must help to limit any increase by putting forward a change to travel patterns through the spatial strategy. As the AAP supports new development in central Southend this could lead to an increased demand for car travel, therefore proposals will need to demonstrate how they will successfully secure a mode shift away from car travel.

*4.5.1 The Council recognises the need to provide a comprehensive transport and access strategy for the central area. The decision was taken therefore that the SCAAP would contain a suite of policies which form the Transport and Access Strategy for the Central Area, within the context of Local Transport Plan 3 (LTP3) and supporting documents. These policies seek to improve transport access and connectivity for all. Policy TA2 provides the policy context within which the Council will work in partnership with key stakeholders to encourage a shift to travel by bus or rail, as well as promoting improvement to the public transport infrastructure and services.*

## **Design**

4.6 Although the underlying quality of the natural and built environment is high in many areas, parts of central Southend are characterised by a low quality built environment, and this should be addressed by the SCAAP.

*4.6.1 The Council recognises the importance of promoting good quality design. The Council's commitment to good design is outlined within the Core Strategy DPD (2007) Policy CP4 and within Design and Townscape Guide SPD (2009). While an additional framework will be provided by the Development Management DPD, it is considered that the SCAAP has the opportunity to set the basis for ensuring high quality new and enhanced open spaces within the central area (Policy PR1) and provide a detailed framework for providing public realm enhancements in the central area (Policy PR2). Within a heritage and conservation context, the*

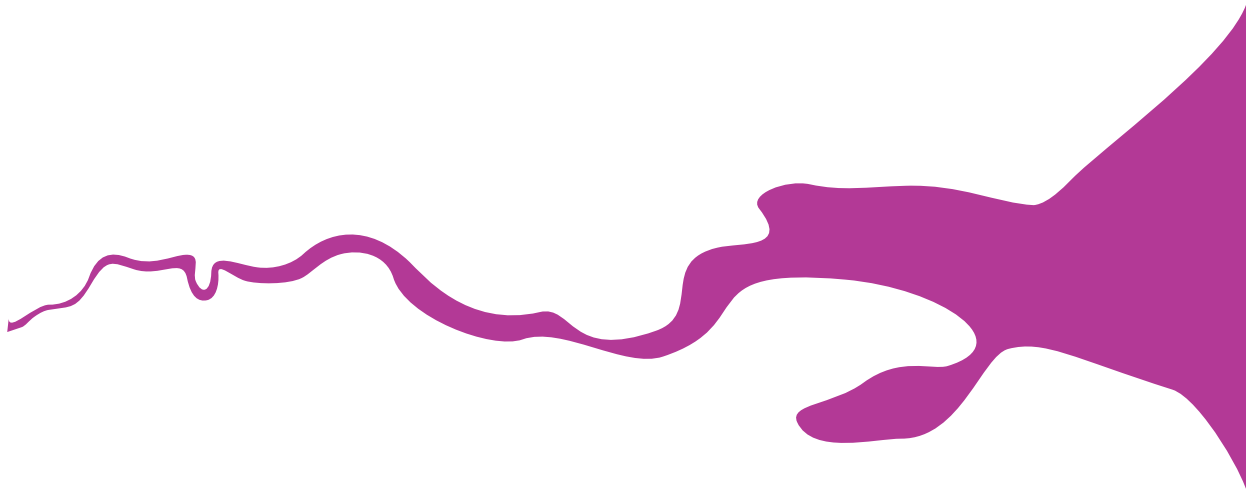
*importance of ensuring high quality design in the central area is addresses within Policies HE1-HE5 to ensure high quality design within the central area.*

## **Spatial Options**

4.7 Three Options for the spatial approach to the central area were put forward by the SCAAP Issues and Options report. An appraisal was undertaken of each Option, with concerns raised that Option 1 (strengthening the status quo) missed opportunities for mixed use regeneration and that the lack of enhancement to public transport and improve movement routes is unlikely to encourage use of more sustainable transport modes. For Option 2 (reinforcing the urban circuits), concerns were raised that there was no residential element included and therefore the objectives of delivering/supporting a more mixed use and vibrant town centre would not be met. The preferred option was Option 3 therefore, which would see the largest amount of redevelopment and therefore the greatest use of natural resources. New buildings must use energy and water efficiently. Respondents considered that the SCAAP should ensure the objective for growth in central Southend does not adversely impact upon the objectives of growth in other areas.

*4.7.1 The Council determined Option 3 to be the preferred choice for the central area and this has been progressed within the SCAAP, with specific policies setting out the transport and access strategy, and policies being developed alongside the Development Management DPD, which provides the policy context for ensuring that all development proposals in the Borough make the fullest contribution to minimising CO<sup>2</sup> emissions.*

## appendix 1 consultees







## LDF - Specific Consultees

Barling Magna Parish Council  
Basildon District Council  
Braintree District Council  
Brentwood Borough Council  
British Waterways(Southern Region)  
British Wind Energy Association  
BT Payphones  
BUPA Wellesley Hospital  
CAA Safety Regulation Group  
Canewdon Parish Council  
Castle Point Borough Council  
Chelmsford Borough Council  
Colchester Borough Council  
Dartford Borough Council  
Defence Estate East  
East of England Ambulance Service  
East Of England Development Agency  
English Heritage East of England  
Environment Agency  
Essex County Council  
Essex Fire & Rescue Service HQ  
Essex Police (Southend Division)  
Essex Police Community Safety Dept  
Essex Police, Headquarters  
Foulness Parish Council  
Government Office for the East of England  
Great Wakering Parish Council  
H M Customs & Excise  
Harlow District Council  
Hawkwell Parish Council  
Highways Agency (Network Strategy)  
Hockley Parish Council

Hullbridge Parish Council  
Land and Development Group, National  
Grid Transco  
Leigh Town Council  
Maldon District Council  
Mobile Operators Association  
Natural England  
Paglesham Parish Council  
Peter Harris Associates  
Qinetiq  
Renaissance Southend Ltd  
Rochford Parish Council  
Stambridge Parish Council  
Steel & Company  
Sutton Parish Council  
Tendring District Council  
Thames Gateway South Essex Partnership Ltd  
Thurrock Unitary Council  
Uttlesford District Council, Planning  
Department  
Wind Farm Enquires 02-49,  
Ofcom

## LDF - General Consultees

Age Concern

Ancient Monuments Society

Anglian Water Services

Argyll House Flats Management Co.

Arriva Southern Counties Ltd

Asda Superstores

Association of Jewish Refugees

Bairstow Eves

Barclays Bank Plc

Belfairs Gardens Residents Association

BHS

Boots The Chemist

British Hardware Federation

British Horse Society

Burges Estate Residents Association (BERA)

c2c Rail

c2c Rail & National Express East Anglia

Campaign to Protect Rural Essex (CPREssex)

Chalkwell Ward Residents Association

Circles Project

COBRA (Coalition of Borough Residents Associations)

Conservation Association Westcliff Seaboard

Crime Prevention Panel (Leigh)

Cycling Touring Club (CTC)

Darby & Joan Organisation

DIAL Southend

East of England Local Government Association

Eastern Electricity

English Sports Council (East)

Essex & Suffolk Water

Essex Badger Protection Group

Essex Biodiversity Project

Essex Bridleways Association

Essex Chambers of Commerce - South Essex Office

Essex Churchyards Conservation Group

Essex Horse & Pony Protection Society

Essex Racial Equality Council

Essex Water Company

Essex Wildlife Trust

Essex Wildlife Trust - Southend and Rochford Group

Ethnic Minority Forum

Evening Echo

Federation of Small Businesses

First Essex Buses Ltd

Forty Plus Cycling Club

Futures Community College

General Aviation Awareness Council

GreenKeeper

Growing Together Project

Hamlet Court Road Business Association

Herbert Grove Residents Association

Hindu Association (Southend & District)

Home Builders Federation (HBF)

Horse Owners and Riders (SE Essex)

HSBC Card Service

InterChurch Caring for the Elderly & Disabled

IPECO

John Grooms Association

John Stacey and Sons

Kent County Council

Lambert Smith Hampton  
Leigh Cliff Association  
Leigh Seafront Action Group  
Leigh Society  
Leigh Traders Association  
Leigh-on-Sea Crime Prevention Panel  
Lidl UK Ltd  
Lloyds TSB Card Services  
London Southend Airport  
Love Southend  
Marine Avenue Residents Action Group  
Marks & Spencer  
Member of Parliament for Southend West  
Mendip Community Group  
Milton Community Partnership  
Milton Conservation Society  
National Express East Anglia  
National Federation for the Blind  
National Grid Company Plc  
National Power  
National Rivers Authority Anglian Region  
Network Rail  
NIBS  
North Crescent & Feeches Rd Residents Association  
Older Peoples Federation  
Olympus KeyMed  
Parklife  
Pipe of Port Wine Bar  
Powergen Plc  
Priory Park Preservation Society  
Prittlewell Residents  
Prospects College  
QinetiQ  
Railtrack Property  
Residents Association of Westborough (RAW)  
RIBA South East Chapter  
Right to Ride Cyclist Touring Group  
Rikard Keen  
Rochford & Southend East Constituency Labour Party  
Royal Association For Deaf People (RAD)  
Royal Bank of Scotland (RBS)  
Royal Mail Group Property  
Royal National Lifeboat Institution - Southend Branch  
RSPB Southend Local Group  
SAEN  
Sainsburys Supermarkets  
SEEVIC  
Shoebury Forum  
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 Essex Area Health Authority  
South Westcliff Community Group  
Southend & District Aid Society  
Southend & District Pensioners Campaign  
Southend & Essex Hotel & Catering Assoc  
Southend & Leigh Fishermans Association  
Southend & Surrounds Cycling Campaign  
Southend Adult Community College

Southend and Westcliff Hebrew Congregation

Southend Animal Aid

Southend Area Bus Users Group

Southend Association of Voluntary Services

Southend Blind Welfare Organisation

Southend Hospital NHS Trust

Southend Islamic Trust

Southend Mencap

Southend Mind

Southend NHS Trust

Southend on Sea Access Group

Southend on Sea Sports Partnership (West)

Southend Ornithological Group

Southend PCT

Southend Play Council

Southend Seafront Illumination & Business Association

Southend Sports Council & Southend Wheelers Cycling Club

Southend Stroke Club

Southend Taxi Drivers Association

Southend Tenants and Residents Federation

Southend United Football Club c/o Savills

Southend University Hospital

Southend West School Sport Partnership

Southend Wheelers

Southend YMCA

Southend Youth Council

Southend-on-Sea Arts Council

Southend-on-Sea Guild of Help and Citizens Advice Bureau

Southend-on-Sea Sports Council

Sport England East

St Luke's Community Partnership

St Lukes Partnership & Residents Disability Forum

St Marys Prittlewell C of E School

St. John's Ambulance

Stephensons of Essex

Stocklale Group of Companies

Tattersall Gardens Residents Group

Tenpin Ltd

Tesco Stores Ltd

Thames Water Property Services

The Rescuers Wildlife Sanctuary

The Royals Shopping Centre

The Southend Pier Museum Trust Ltd

The Southend Society

The Theatres Trust

The Victoria Shopping Centre

Tolhurst House Residents Association

Transport for London

University of Essex Southend

Victory Residents Assoc (Victoria in Partnership)

W.H.Smiths

Waitrose Ltd

West Leigh Residents Association

West Milton & Queens Residents Association Action Panel

Westcliff & Leigh Neighbourhood Watch

Youth Service

## LDF - Other Consultees

A W Squier Ltd  
ACS Designs  
Adams Holmes Associates  
Andrew Martin Associates  
Anthony Bowhill Planning & Development Consultants  
ATP Group  
Barratt Eastern Counties  
Barton Willmore Planning  
Batias Independent Advocacy Service  
Bidwells  
BNP Paribas Real Estate  
Bovis Homes  
British Hardware Federation  
Burnett Planning and Development Ltd  
Bus & Rail User Group  
Business Link Essex Hub  
Business Link for Essex  
Butterfly Conservation  
C & S Associates  
CABE  
Carpenter Planning Consultants  
Carter Jonas Property Consultants  
CgMs Consulting  
Chalkwell Lifeguard Club  
Charles Planning Associates  
Chelmsford Diocesan Board of Finance  
Chestergate Estates Ltd  
China Corp  
Churchills Café Bar  
Civic Trust  
Cluttons LLP  
Colliers CRE  
Council for British Archaeology  
County Hotel  
Crown Estate Office  
Crowstone St George's United Reformed Church  
Cushman & Wakefield  
David Walker Chartered Surveyors  
Disability Essex (EDPA)  
DLP Planning Ltd  
DPDS Consulting Group  
Drivas Jonas  
East of England Tourist Board  
Essex Amphibian & Reptile Group  
Essex Birdwatching Society  
Essex Garden Trust  
Essex No 1 Circuit of Jehovah's Witness  
Essex Prosperity Forum  
Essex Reptiles & Amphibians Society  
Essex Training & Enterprise Council  
Europcar  
Fenn Wright  
First Cycle Courier  
Firstplan  
Friends of Hadleigh Castle Country Park  
Fuller Perser  
Garden History Society  
George Wimpey East London  
Gerald Eve  
Gladedale Homes  
Greenpeace  
Grosvenor Consulting

GVA Grimley  
H.A.R.P  
Healey & Baker  
Heron Educational Trust  
Higgins Homes  
Hillier Parker May & Rowden Chartered Surveyors  
Homeless Action Resource Project  
Iceni Projects Ltd  
Indigo Planning Ltd  
INTERACT  
J.C Gibb Chartered Surveyors  
Januarys  
Jones Lang Lasalle  
King Sturge  
Knight Frank LLP  
Labour European Office  
Landmark Information Group Ltd  
Landsbury Holding Plc  
Level  
Livemore Partnership  
London Bus Theatre Company  
Marguerite Livingstone Associates  
Martineau  
Marwalk Developments  
Medway Council  
Moments  
MVA Ltd  
Nacro Community Enterprises Ltd  
Nathaniel Lichfield & Partners  
National Farmers Union (east)  
National Fox Welfare Society  
National Market Traders Federation  
National Tremor Foundation  
Norman Garon Trust  
P.S.G Southend  
Parentline Plus  
Peacock and Smith  
Peacock and Smith Chartered Town Planning Consultants  
Persimmon Homes (Essex) Ltd  
Post Office Property Holdings  
Redrow Homes (Eastern) Ltd  
Regional Cycling Development Team  
Cycling Development Co-Ordinator  
East Relate South Essex  
Rethink  
Roger Tym and Partners  
Royal Town Planning Institute  
RSPB Eastern England Office  
S S R Town Planners & Development Consultants  
SAFE  
Safeway Stores PLC  
Savills Commercial Limited  
Shire Consulting  
Shoebury & Thorpe Bay Baptist Church  
Smart Planning Ltd  
Smith Stuart Reynolds Town Planners & Development Consultants  
Society for the Protection of Ancient Buildings  
South East Essex Advocacy for Older People  
South East Essex Archaeological Society  
South East Essex Archaeological and Historical Society  
South East Essex Organic Gardens  
South Essex Action for Mammals  
South Essex Natural History Society

Southend Youth Bowling Club

Southend-on-Sea Association for the  
Physically Handicapped

St. Matthew's Christian Spiritualist Church  
(1999) Ltd.

Steer Davis Gleave

Stewart Ross Associates

Strutt and Parker

SUSTRANS Essex

Tarmac Southern Ltd

Terence O'Rourke

Tetlow King Planning

Thames Estuary Partnership

The Guinness Trust

The Lace Place

The National Trust

The Planning & Development Partnership

The Planning Bureau Ltd

The Salvation Army Leigh on Sea

Thurrock Thames Gateway Development  
Corporation

Trust Links

Turnabout Trust

UK Rainwater Harvesting Association  
(UKRHA)

Vitalise

Wakering & District Natural History Society

Weatherall Green & Smith

Woodland Trust





**appendix 2**  
**statutory consultees letter**





**Andrew Meddle Head of Planning and Transport**

Our ref: TP/100/490/13/ds Telephone: 01702 215004 ext 5408  
Your ref: Fax: 01702 339607  
Date: 21 June 2010 E-mail: debeeskinner@southend.gov.uk  
Contact Name: Ms D Skinner DX 2812 Southend

To Addressee

Dear Consultee

**Planning and Compulsory Purchase Act 2004  
Southend-on-Sea Local Development Framework, Development Planning  
Document: Central Area Action Plan**

I write on behalf of the Council to seek your views and inputs on a public participation draft of the above document.

In accordance with Southend Borough Council's adopted Local Development Scheme and the Strategic Objectives and the policies within its Core Strategy Development Plan Document [DPD], the Borough Council is preparing an Area Action Plan [AAP] for the central area of the town (to be known as Southend Central AAP) and associated Proposals Map.

This Issues and Options Document is a statutory stage in the preparation of the Southend Central AAP and has been prepared for consultation with stakeholders. It is a spatial plan that will eventually form part of the statutory Local Development Framework for the Borough.

The UK economy entered a period of recession in 2008/2009 and experienced the biggest quarter-on-quarter economic decline since 1980. The economic recovery process has begun, but at a slow rate and the economy remains fragile. Coupled with a weak economy, the Government has to tackle a Government spending deficit that has exceeded an unprecedented £156 billion. The Treasury will also undertake a Spending Review, reporting in the autumn following consultation with all tiers of Government and the private sector. This current fragile economic situation is having a direct impact upon public and private investment decisions, which in turn is likely to affect the delivery of new houses, employment opportunities and infrastructure schemes, in the borough.

The Borough Council, however, is committed to providing a flexible and effective Planning Framework to guide development decisions in a way that best meets the needs and aspiration of local people and the business community. This means planning for the longer term now to provide certainty for the development industry ready for when the economy recovers.

The situation will be monitored closely and taken into account, along with comments made on this Issues and Options Report, during the next stage of Plan preparation.

All the public participation documents are available electronically and on the Council's website ([www.southend.gov.uk](http://www.southend.gov.uk)). Responses in electronic format, via the Council's website, e-mail address or directly to [debeeskinner@southend.gov.uk](mailto:debeeskinner@southend.gov.uk), are welcomed. All responses should be received by the Council by **5pm on Monday 9<sup>th</sup> August 2010**.

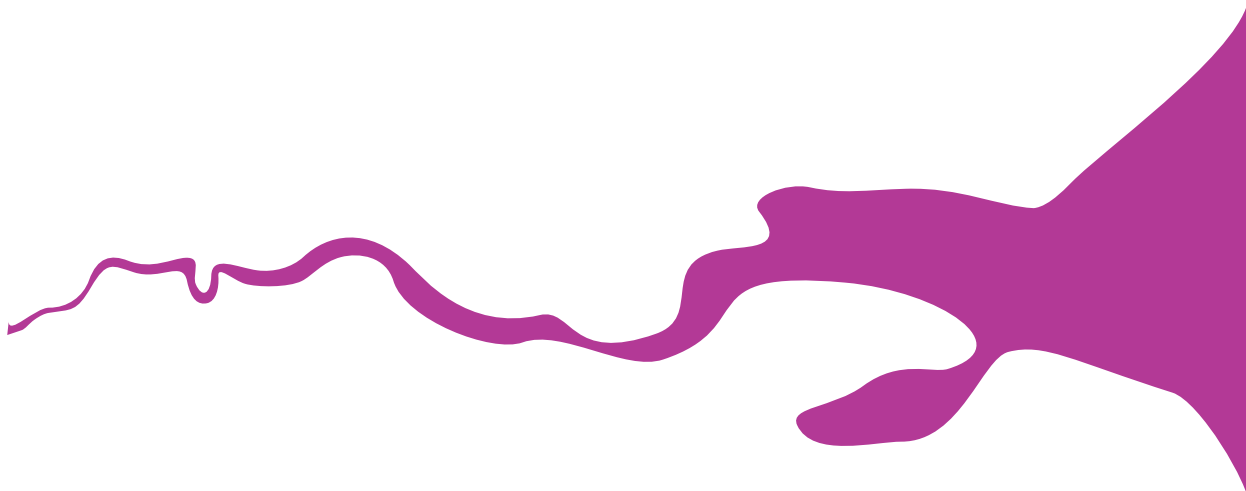
In the meantime, if you require further information, please contact the Council's Strategic Planning Group on 01702 215408. Thank you once again for your contributions.

Yours sincerely



Debee Skinner  
Technician (Design & Consultation)

appendix 3  
notice / advertisements / leaflets





# Have your say

**Consultation closes on 9th August 2010**

Southend-on-Sea Borough Council are consulting on two important planning policy documents, which along with the adopted Core Strategy will form part of the Local Development Framework.

## Southend Central Area Action Plan

This Issues and Options Document considers the planned growth and regeneration of the Town Centre and the wider central area.

## Southend Development Management Development Plan Document

This Issues and Options Consultation Document considers the different types of policies that could be used to determine planning applications across the Borough.

### To have your say and view the full reports:

- Head online and visit  
<http://southend.jdi-consult.net/ldf>
- Visit the Council's website  
[www.southend.gov.uk/planningpolicyconsultations](http://www.southend.gov.uk/planningpolicyconsultations)
- Call 01702 215004 and request a printed copy
- Visit your local library
- Visit the Southend Civic Centre

Drop in for more information at our exhibitions on

- 17th July at The Victoria Shopping Centre from 11am - 4pm
- 18th July at The Royals Shopping Centre from 11am - 4pm



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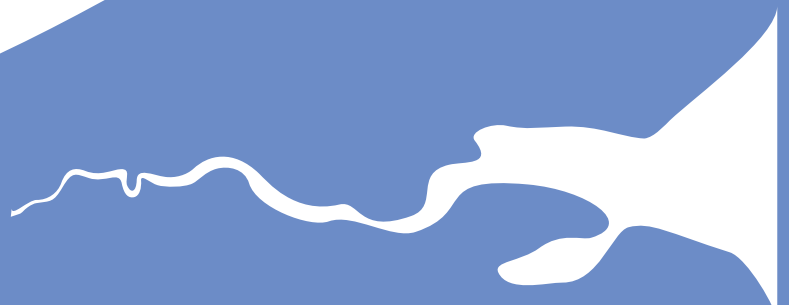
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[www.southend.gov.uk/planningpolicyconsultations](http://www.southend.gov.uk/planningpolicyconsultations)
- Call 01702 215004 and request a printed copy

The formal consultation will run until **9th August 2010**

Feedback on these consultation documents will play an important role in shaping the final versions which will be published for further consultation during the winter 2010/11.

## Development Management Development Plan Document

Southend on Sea Borough Council are consulting on two important planning policy documents. They are:

- Development Management Development Plan Document [DPD] and
- Southend Central Area Action Plan [AAP]

[This leaflet gives more information about the Development Management Development Document Issues and Options Document](#)

The Development Management DPD will support the Core Strategy DPD by setting out detailed policies for managing development in the borough. The Development Management Consultation Document sets out the issues relevant to Southend-on-Sea and the potential policy options.

We are seeking your views on the planning policies that will manage future development of the Borough. Development in Southend-on-Sea is presently guided by the adopted Southend Borough Local Plan 1994 Saved Policies.

The Borough Local Plan now needs to be updated to take account the Council's vision and objectives set out in the adopted Core Strategy and reflect changes made to national planning policy.

To help consideration of how planning policies may guide development in the Borough, the issues facing the Borough and possible policy options have been identified. The issues and options are set out in the Development Management Consultation Document under the following key topic areas:

- Design and Townscape;
- The Seafront;
- Residential Accommodation;
- Economic Development;
- Environmental Management; and
- Transport and Accessibility.



The Development Management consultation seeks your comments in relation to each identified topic area, issue and option. In addition we would like you to consider:

1. Whether you think the Council has identified all the key development management issues that are relevant to Southend-on-Sea.
2. Whether you agree with the suggested policy options.
3. Whether you think there are other policy options that the Council should consider.
4. Whether you consider the Council's evidence base to be sufficient to inform the Development Management DPD.

Please note that the Development Management DPD will **not** set development targets for the Borough. This Core Strategy has already set the development targets. The Development Management DPD will also **not** identify locations for development. Development sites will be identified in the Southend Central AAP, Shoeburyness AAP and Site Allocations DPD.



appendix 4  
public participation: issues and options  
regulation 25  
town centre AAP and seafront AAP





**Seafront Area Action Plan 2007 - Relevant comments from consultation**

Comments	Respondents	Response
<b>Is the boundary between the town centre and seafront AAP the right approach (Issue 2[2])</b>		
<p>The right approach is to keep the central seafront area within a separate Seafront Area Action plan</p>	<p><i>Housing Strategy SBC (25/030), West Leigh Residents Association (25/026), Essex Chamber of Commerce (25/022), Southend Conservation Forum (25/018), The Southend Society (25/016), Leigh Town Council (25/012), BERA (25/024)</i></p>	<p>The Council has proposed to merge the town centre and central area of the seafront (which includes almost all of the area known in Seafront Area Action Plan as 'Zone 5 - Central Seafront Area' apart from a small extremity to the west.</p> <p>The Seafront AAP will be discontinued and the policy requirements for the central area for the seafront will be dealt with as part of the Southend Central AAP (formally the Town Centre AAP).</p> <p>Southend adopted the Central Area Masterplan as corporate policy in November 2008. The Masterplan sought to encourage better integration and cohesion between the seafront area and the town centre as area which compliment each other. It went through public consultation before the final report was agreed. It is considered that the natural linkages and the association between these areas will create added value and strategic opportunities with their holistic development and regeneration.</p> <p>Planning policies to protect and enhance other areas of the seafront will be contained in the</p>

		<p>forthcoming Development Management DPD along with guidance in Townscape Guide. Seafront area within Shoeburyness will be addressed in the forthcoming Shoebury Area Action Plan.</p>
<p>Yes - The seafront is affected by flood risk and nature conservation constraints that do not affect the town centre therefore appropriate to keep town centre and seafront separate, also different transportation requirements</p>	<p><i>Environment Agency (25/015), Highways Agency (25/006)</i></p>	<p>Please see above.</p> <p>In addition, the issue of flood risk is dealt with in the Core Strategy DPD and in the Environment Agency's Flood Zone Maps or by other means, including the South Essex Strategic Flood Risk Assessment. This overarching theme of flood risk will be dealt with strategically as part of a shoreline management plan. Development Management policies within the Southend Central AAP may also address this issue specifically for the central seafront area.</p> <p>Nature conservation is dealt with in Policy KP2 in the Core Strategy and KP3, which requires an 'Appropriate Assessment' where necessary. There may also be scope for addressing Nature Conservation and Biodiversity within the Southend Central Action Plan within the Development Management section.</p> <p>Transportation issues will be addressed through the Local Transport Plan in conjunction with the Core Strategy and the Southend Central Area Action Plan. It is considered that there are many linkages and issues of accessibility between the Central Seafront areas and town centre which should</p>

		be considered holistically to ensure smooth integration between these key areas. The are key areas for the Southend economy for retail, tourism and leisure and a easy transition between these areas for the consumer will aid and bolster the Southend economy.
While overlapping issues between seafront and town centre a boundary between the two is necessary to consider different aspects	<i>SSIBA (25/014)</i>	Please see above (first response).
Important to maintain some control over the central seafront activities and they are not allowed to spread – the boundary appears reasonable	<i>BERA (25/024)</i>	Please see above (first response).
The Masterplan will seek to encourage far better integration and cohesion between the seafront area and the town centre. Pier Hill and Seaway car park have a key role in achieving this. In this respect there is concern about separating these sites in Policy terms. To deliver the Central Area Masterplan it would be better if central seafront area was included in Town Centre AAP.	<i>Renaissance Southend Ltd (25/001)</i>	Please see above (first response).  Representation noted and approach will be taken forward as part of the Southend Central Area Action Plan (SCAAP). The Central Area Masterplan is now adopted as corporate policy, which links the town centre and central seafront area will be used a basis for the proposed approach in the SCAAP.
Ask for the opportunity to extend the Southend Seafront AAP to incorporate the Woodgrange Drive Estate (aka the Kursaal Estate) and would provide a much wider scope for delivering affordable housing, therefore, please consider moving the existing boundary of current Seafront AAP.	<i>Estuary Housing Association (467/9)</i>	Representations have been noted.  The Woodgrange Drive Estate has been incorporated within the proposed boundary for the Southend Central Area Action Plan.  It is consider that any rejuvenation of the Estate should be closely linked with the strategic regeneration and growth of the town centre and seafront area to provide a comprehensive and holistic approach, especially when considering the population density and deprivation within this area; some intervention may be required and it should be considered within the context and function of the wider



		area.
The definition of town centre in Map 3 excludes the historically significant, and distinctive, areas adjoining the commercial centre. It is important that the qualities these bring to Southend are integrated with, and lend quality to, the areas where new development will be focussed.	<i>English Heritage (25/028)</i>	A number of key conservation areas, which include listed buildings, have been incorporated within the proposed SCAAP boundary, including Clifftown and Kursaal. These areas make a valuable contribution to the aesthetic quality of the central area, as well as creating a sense of place owing to quality of townscape and green spaces.  No specific references have been made in the representation for areas, buildings or structures to include. It is hoped that any areas that may have been missed will be highlighted in a response from English Heritage at the next round of public consultation.
It is difficult to determine exactly what the boundary is for the Seafront AAP since map 3 is unclear and does not appear to include the whole Seafront AAP boundary. We would expect this boundary to be clearly delineated as the document progresses.	<i>Go-East (25/020)</i>	Please see above (first response).  Representation noted. The town centre and central seafront area boundary will be clearly illustrated in the SCAAP to ensure clarity for the viewer.
As long as implications of interconnectivity (between the Town Centre and Seafront Area) is adequately addressed. For example, increased dwelling provision with the Town Centre has the capacity to influence the quality of other character zones.	<i>Natural England (25/011)</i>	Please see above (first response).
<b>Zone 5: Central Seafront Area (Palmeira Avenue to former Corporation Loading Jetty) (Question 4 [12] )</b>		
<b>(Question 4 [12] )</b>		
<b>Potential Strategic Development Areas:</b>		
<ol style="list-style-type: none"> <li>1. The Bastion and the Leas toilet block – redevelop and refurbish facilities to provide improved cafe and toilet facilities and create a landmark gateway at the entrance to the central seafront area</li> <li>2. Existing Rossi Cafe and the access to Cliffs Pavilion – support the refurbishment and extension of existing facilities and create quality</li> </ol>		

- linkage between the seafront road and Cliffs Pavilion
3. Cliff Gardens – introduce an element of residential, realign promenade the seaward frontage and stabilise Cliff area
  4. Promenade / revetment west of Pier including and between two decked areas over the foreshore – replace existing decking with a larger boardwalk decked area to facilitate trim trail or gym recreation uses
  5. Bandstand and Cliff Gardens (cliff slip area) – promote the development of a major cultural centre housing the Saxon King finds, museum services, relocation of the Beecroft Art Gallery, restaurant and parking and replacement bandstand and associated cliff stabilisation
  6. Palace Hotel and public space south of Debenhams – refurbishment of Palace Hotel underway, improve public realm and provide for cafe or restaurant facility
  7. Seaway Car Park – roll forward a modified Proposal P9k to meet the challenges and opportunities for regeneration of the seafront and town centre with associated improved pedestrian access to both the seafront and Town Centre
  8. Golden Mile including area known as Dizzy Land – improvements to the built environment, access to seaway car park and enhanced quality of tourism offer
  9. Jubilee Beach and Promenade – Introduce public realm improvements to take forward an Urban Beach Approach
  10. Sea Life Centre and surrounds – promote improved destination and water based visitor attraction
  11. Former Corporation Loading Jetty - retain flushing chamber with solid walls as platform for cafe or restaurant. The suspended deck on columns is structurally unsound and must be demolished at the earliest opportunity
  12. Esplanade House – redevelop mixed use landmark development to provide Gateway to Central Area from the west

**Is the development rationale set out above the right approach to regeneration in this important seafront location? Is there a reason why any of the Strategic Development Areas should not be promoted in the manner suggested. Are there alternative uses or attractions you would wish to see promoted in this Zone?**

<p>The development rationale set out in the Seafront AAP is the right approach to regeneration in Zone 5</p>	<p><i>Housing Strategy SBC (25/030), West Leigh Residents Association (25/026)</i></p>	<p>Representation noted. It is considered that regeneration of the seafront area will bring social, economic and environmental benefits to the town centre and central seafront area.</p>
<p>Redevelopment of the town centre and seafront must ensure that existing wastewater infrastructure is unaffected in its condition and operation. Brownfield development should not increase flows to the waste and surface water systems, attenuation should be incorporated into the design, where necessary.</p>	<p><i>Anglian Water Services Ltd (467/9)</i></p>	<p>Southend Borough Council will commission a Water Cycle Study as part of its Strategic Flood Risk Assessment which will assess the water infrastructure capacity and requirements based on the amount of development which will be taking place in the Borough according to the</p>

		Core Strategy. Any extra capacity required in the waste and surface water systems will be met through planning obligations, CIL and upgrade to the existing system through the obligation on water companies to develop and maintain an efficient and economic system of water supply within its area. These measures should ensure that flows are not increased despite the need to increase supply to meet demand. It is noted that Water Companies have a statutory obligation to promote water efficiency.
Seaway car park acts as a buffer between the entertainment and residential areas of Southend – if developed will need to replace with a similar area to absorb and disperse revellers. 500 dwellings so close to night club and casino will mix residents and revellers in unacceptable proximity.	<i>Herbert Grove Residents (25/029)</i>	500+ dwelling are planned for the Seafront area of Southend as part of the Core Strategy. These dwellings are expected to come forward along the entire length of the seafront and as such will not be concentrated just in the central seafront area. Nevertheless Central Southend will be expected to meet some growth up to 2021. Any housing growth which does occur within the central seafront area will be planned appropriately to ensure that any potential noise emanating from commercial use will not adversely affect the amenity of new and existing residential areas detrimentally.
Milton and Kursaal wards have a greater density of housing than any other areas of Southend and it does not have the infrastructure to accept another 500 homes.	<i>Herbert Grove Residents (25/029)</i>	Please see response above in respect to the distribution of housing growth along the seafront. In addition development will not be permitted which is contrary to planning policy and does not ensure that the infrastructure is sufficient to meet the increases in dwellings number. Overdevelopment and inappropriate development will be refused planning permission.

<p>Area already has a surplus of quality retail space – Royals has seven empty retail units at the time and there are three large shops in the High Street used as charity outlets.</p>	<p><i>Herbert Grove Residents (25/029)</i></p>	<p>Southend Borough Council will be commissioning an update to its existing Retail Study which was published in 2003. It is expected that the new Retail Study will inform the development of the retail policy for the Town Centre and Central Seafront area. The study should help to determine the quantity and types of retail space required up to the medium term. In addition it is envisaged that the regeneration of the town centre will help to attract more, as well as better quality retailers which should help to ensure that units do not remain empty, although this may be owing to present economic conditions.</p>
<p>Statements in DPD subscribing to an Urban Renaissance but we are concerned that there is nothing about the quality of the current town centre or the need to retain any cultural significance buildings. The archaeological interest of the seafront and coastal area is missing here and should be addressed in the baseline. The importance and vulnerability of archaeological deposits should be clearly identified.</p>	<p><i>English Heritage (25/028)</i></p>	<p>Southend Borough Council will be commissioning a Borough Wide Character Assessment which will provide an evidence base survey of the architectural merit and character of the Borough. An urban renaissance and regeneration of the town centre will look to enhance the quality of the environment, maintaining existing quality as well as complimenting this with additional development to provide new focal points and interests within the townscape public realm. The town centre has significant areas of townscape merit, and the Council wishes to see this setting retained and enhanced.</p>
<p>Agreed to the undeveloped parts of the cliffs to be stabilised and possibly developed as part of an engineering solution.</p>	<p><i>West Leigh Residents Association (25/026)</i></p>	<p>Comments noted. A solution may be explored which will stabilise the cliffs, enhance the setting as well as provide a new cultural, leisure and tourism focus.</p>
<p>Approach to additional or improved visitor accommodation should be part of a strategy that assesses the merits of each individual scheme.</p>	<p><i>West Leigh Residents Association (25/026)</i></p>	<p>Comments noted. Visitor accommodation will be addressed as part of the emerging</p>

		Development Management DPD and the Southend Central Area Action Plan. Criteria based policy relating to the location of visitor accommodation and as well as the identification of sites for such uses will be brought forward.
Generally supports the provision of more sustainable transportation. The provision of these facilities should not, however, compromise the interest features for which the European sites are designated sites or have a detrimental effect on the wildlife that attract people to the area. This can be avoided by taking care to ensure that walkways and cycleways are appropriately site and designated to protect the most sensitive parts of each site.	<i>RSPB (25/025)</i>	Representation noted. The Council will ensure that any development takes place does not detrimentally affect European Designated sites. The Sustainability Appraisal, which is issued alongside the SCAAP, will highlight circumstances where there may be a negative effect. The Council can then use this information adjust proposals to keep in line with the requirements of the European Sites.
Recognises the need for revitalisation of some of Southend's open spaces and would support the Council in improving these facilities and recommend that any improvements to the seafront promenade reflect the value of the natural habitat.	<i>RSPB (25/025)</i>	Representation noted. The Council is looking to improve open space provision and the Seafront Promenade.
Developments should incorporate energy efficient materials in the construction and explore opportunities for obtaining a proportion of energy from renewable sources.	<i>RSPB (25/025)</i>	The Council is keen to adopt policies for carbon reduction. The Core Strategy contains a policy for at least 10% renewables in all developments. The Development Management DPD will contain policies for low carbon development.
Objects to inclusion of a proposed hovercraft route and associated landing facilities. The proposals is likely to have a significant effect on Benfleet and Southend Marshes due to potential disturbances to feeding and roosting waterfowl and disturbance of water column and sediment beneath.	<i>RSPB (25/025)</i>	Objection noted. No development will take place which would have a detrimental effect on European Designated sites.
The Development Strategy appears sensible except a) I cannot see the rationale of introducing an element of residential into Cliff Gardens and b) surely Esplanade House would provide a gateway from the East not West.	<i>BERA (25/025)</i>	Representation noted. Development options are being explored which may allow for the works to be carried out to stabilise the cliff and also enhance the tourism and leisure offer and

		explore any sympathetic enabling residential development as part of a comprehensive approach to a site. Observation noted in relation to Esplanade House and the approach to this gateway.
General reserved support on the basis of wishing to be consulted on more detailed proposals as they become available, strong support for No. 5 Bandstand and Cliff Gardens.	<i>Essex Chamber of Commerce (25/022)</i>	Representation noted. This will be explored further as the document progresses.
Any redevelopment of Seaway Car Park should be tourism related that adds value to the commercial viability of the seafront. In particular, consideration should be given to a mixed development that includes siting the replacement Warrior Square Swimming Pool to this site with a high quality design that also incorporates leisure waters. If this also includes new access through to the seafront this would significantly add to the all year round offer of this important zone.	<i>Essex Chamber of Commerce (25/022)</i>	Seaway Car Park is a key potential development site and would provide a link between the seafront and the town centre. It is expected that any development coming forward in this area should be mixed. It is expected that this would include tourism and leisure facilities as well as an element of residential and car parking provision. The Council is exploring locations for a new swimming pool and no conclusion has been reached at this time. All sites will be assessed again their ability to meet all requirements.
Esplanade House and the Corporation Jetty (SSIBA) urgently needs redevelopment which appropriate mixed use that has a high quality leisure/tourism content that adds value to the seafront.	<i>Essex Chamber of Commerce (25/022), SSIBA (25/014)</i>	Representation noted. This will be explored as part of the SCAAP and Masterplan.
Do not think that the definition at 4.39.3 regarding cliff Gardens should include the term 'residential'. There is no reason why this Character Zone is a 'jewel along the seafront' (para. 4.36) in which residential forms no part of the historic character, should include such a term. Nor do we see why in a development rational the promenade should necessarily be 'realigned'. This particular development area should only describe the stabilisation of the cliffs, restoration and enhancement of the gardens through improved landscaping and public access.	<i>Southend Conservation Forum (25/018)</i>	Representation noted. The work to stabilise the cliffs is expensive and the Council need to explore all options for this. At present the area is inaccessible and every effort should be made to ensure that it can be made into a useable space as such all options need to be considered. The stabilisation will consider tourism and leisure uses and the potential for some residential development as part of a comprehensive development. Nevertheless these are only options and may not be taken

		forward in their entirety. Any development would need to be taken forward as part of a planning application with public consultation.
Further to the new policy framework described we believe that a new focus should be determined for the Pier. Design criteria based policy is all very well but this has not, and will not deliver a strategy for that commercially viable restoration and future sustainability of the pier. A full investigation into the future of the Pier needed.	<i>Southend Conservation Forum (25/018)</i>	Representation noted. It is understood that a full investigation of the Pier and potential redevelopment options will be conducted in the near future.
Where 'strategic development areas' are situated in flood zone 3, for the plan to be sound it must be demonstrated that the proposals have been subject to the PPS25 sequential test and exceptions test, where necessary. The evidence base must show that there are no reasonable alternatives sites for the proposed development, including justification of why other sites have been deemed unsuitable. The SRFA may provide evidence to aid in applying the sequential test. The flood risk vulnerability classification (PPS 25 table D2) of the development must also be taken into account.	<i>Environment Agency (25/015)</i>	Southend Core Strategy has included the Seafront as a regeneration area for the delivery of jobs and housing. As such it would not be subject to the sequential test in comparison to other areas of the Borough. It would need to deliver an agreed housing target if adopted. Nevertheless the Council are planning to commission a SRFA to help inform development plans and planning applications. All development which takes place along the seafront will be required through a planning application to demonstrate how measures have been introduced to risk vulnerability to flooding.
The main focus of forward planning for the Seafront Area should be on economic development and regeneration within the Tourism and Leisure sectors. Movement and Access which should include parking facilities is an extremely important second. The inclusion of housing development within the Central Seafront Area should be viewed as a negative aspect and inhibitor to the regeneration of the Tourism and Leisure sectors as residential developments utilise valuable commercial space and creates conflict with businesses and visitors and increases parking stress and aggravates access issues.	<i>SSIBA (25/014)</i>	Representation noted. The Seafront is a key leisure and tourism resource for the Borough. These facilities are very important for the growth and economic development of Southend. A key focus for the regeneration of the seafront will be the enhancement of these facilities. In addition, potential will be explored for commercial and residential in places to create a lively and buoyant mixed use quarter. A key element will be the accessibility between the town centre and the central seafront area. The need to provide appropriate parking has

		been taken into account.
The repair and stabilisation of the Cliffs slippage is imperative. Should a further significant slippage occur the impact could be disastrous for the existing economy of the Seafront Area as well as the Town Centre. The opportunity exists to incorporate a certain amount of development with repairs that could enhance facilities of the Tourism and Leisure Sector for the future and help offset some of the repairs costs.	<i>SSIBA (25/014)</i>	Representation noted. This approach is being considered by the Council as an option to ensure the future stability of the cliff. If enabling development is required as part of a mixed used scheme, which concentrates on leisure and tourism, then this should be explored further.
Car Parking facilities as part of the Cliffs stabilisation works would assist in the promoting of the economic viability of the Central Seafront Area. The redevelopment of Seaway Car Park should be primarily be related to the enhancement and support of the Seafront and Tourism and Leisure sector and should not be used for general retail or residential development.	<i>SSIBA (25/014)</i>	Representation noted. The Seafront is a key leisure and tourism resource for the Borough. These facilities are very important for the growth and economic development of Southend. A key focus for the regeneration of the seafront will be the enhancement of these facilities. In addition, potential will be explored for commercial and residential in places to create a lively and buoyant mixed use quarter. A key element will be the accessibility between the town centre and the central seafront area. The need to provide appropriate parking has been taken into account.
Leisure and recreation on the Cliffs but not amusements – parks and gardens appropriate. Café to replace the kiosks. Beach replenishment as part of flood defences and raise road to provide visuals. Move RNLI to corporation loading jetty area and free up space close to the Pier for public use.	<i>Councillor Wexham (25/013)</i>	Representation noted. Leisure and tourism will be considered as part of any enabling development required to stabilise the cliffs. The amusements are focus on the central seafront area referred to as 'the Golden Mile'. There is no consideration at present to extend this area.
Cliff Gardens should not include the introduction of 'an element of residential'. We see no good, objective planning reason why this Character Zone, in which residential forms not part of the existing and historic character should include such as term – should be protected as Gardens for the good of the town. Unsure of the development rationale the promenade should necessarily be 'realigned'. This particular development area should only describe the stabilisation of the cliffs,	<i>Milton Conservation Society (25/010)</i>	Representation noted. The work to stabilise the cliffs is expensive and the Council need to explore all options for this. At present the area is inaccessible and every effort should be made to ensure that it can be made into a useable space as such all options need to be considered. The stabilisation will consider



restoration and enhancement of the gardens through improved landscape design and public access.		tourism and leisure uses and the potential for some residential development as part of a comprehensive development. Nevertheless these are only options and may not be taken forward in their entirety. Any development would need to be taken forward as part of a planning application with public consultation.
In relation to the seafront there is a need to enhance and maintain the environmental quality of the area. EEDA supports the promotion of sites 6-8 in the AAP however they are concerned that the area on the landward side of the pier has not been included. This area is in need of enhancement in terms of the quality of development and facilities beyond the existing amusements and facilities.	<i>EEDA (25/008)</i>	Representation noted. All sites will be considered for inclusion within the next stage of the document. The support for sites 6-8 has been noted and welcomed. The Council are looking to regeneration and enhance the central seafront area and provide good accessibility between town centre and seafront will improvements to the public realm.
Development with strategic development areas should take full consideration of transport considerations with the movement issues detailed in paragraph 4.45 being treated as having equal importance. The HA would be supportive of the approach to rationalise parking along the seafront and promote travel by alternative modes by the car.	<i>Highway's Agency (25/006)</i>	Representation noted. The Council will through its development plan documents and the Local Transport Plan promote and encourage alternative modes of travel to the car including waking and cycling.
It is important to set the approach to the central seafront in context of the functionality of the three character sub-areas (Western seafront and Cliff Gardens, Central Seafront and Eastern Seafront). The Masterplan makes a stronger reference to the cultural and environmental landscaping opportunities in Cliff Gardens. Other opportunities exist in relation to enhancing the public realm at Pier Hill, enhancements to the Adventure Island area, and also potential for the area outside the Kursaal. There are also significant opportunities to enhance the public realm and highways arrangements on the Esplanade to the east and west of the Pier. It should be noted that the Seaway site presents a major opportunity and could play a key role in functional and urban design terms in lining the core town centre with seafront.	<i>Renaissance Southend Ltd (25/001)</i>	Representation noted. Southend Borough Council adopted the Southend Central Area Masterplan as corporate policy in November 2008. As such the approach taken in this document will be incorporated into the SCAAP to be tested through public consultation as part of the planning process.
<b>Questions 4(13) &amp; (14)</b>		
<b>Is there a reason why the policy framework for regeneration of the Pier should not be based on a clear criteria for the type of design</b>		

<p><b>approach that will be required and the provision of options and themes for development? Is this the right approach to movement and parking issues in Central Seafront Area? Do you consider these options to be of equal importance?</b></p>		
<p><b>Options related to movement and parking:</b></p> <p>I. rationalisation of road space to create pedestrian piazzas, leisure opportunities and environmental improvements in the central seafront area;</p> <p>II. rationalisation of seafront parking west of the Pier in association with increased capacity at Shorefields car park;</p> <p>III. consideration of car parking as part of Cliff Gardens stabilisation works;</p> <p>IV. re-provision of car parking in conjunction with the redevelopment of the Seaway Car Park (to include parking displaced from the seafront);</p> <p>V. relocation of parking lost at Dizzyland Car Park to a new facility to be provided as part of the redevelopment of the Dizzyland site;</p> <p>VI. Promote the continuation of the segregated Sustrans cycle track along the seafront</p>		
<p>Agree with the policy framework for regeneration of the Pier, the approach to parking issues and considers that the options are of equal importance.</p>	<p><i>Housing Strategy SBC (25/030)</i></p>	<p>Representation noted.</p>
<p>Four storeys (current) should not be exceeded – adequate parking is a must.</p>	<p><i>West Leigh Residents Association (25/026)</i></p>	<p>The storey height will be determined by the context and character of the area. Some areas will be able to take a greater height than others depending on the location and nature of existing buildings. Tall and landmark buildings may be appropriate in some cases and will be determined by policy within the SCAAP, the emerging Development Management DPD as well as the Design and Townscape Guide SPD. Tall buildings may create a focus for an area and provide a marker for a gateway to an area. Nevertheless the Council are minded to ensure that tall buildings are an exception rather than a rule along the seafront. There may be some scope for taller buildings within the central Seafront area. These would be subject to a planning application and public consultation. Parking will be dealt with in the emerging Development</p>

		Management DPD and the current Vehicle Parking Standards Guidance for Essex (2001) to ensure there is adequate parking with development.
Generally supports the provision of more sustainable transportation. The provision of these facilities should not, however, compromise the interest features for which the European sites are designated sites or have a detrimental effect on the wildlife that attract people to the area. This can be avoided by taking care to ensure that walkways and cycleways are appropriately site and designated to protect the most sensitive parts of each site.	<i>RSPB (25/025)</i>	The Council will ensure that any development, whether buildings, structures or additions to the transport network do not have a detrimental effect on European Designated sites. The provision of sustainable transport will be developed alongside the Local Transport Plan.
Recognises the need for revitalisation of some of Southend's open spaces and would support the Council in improving these facilities and recommend that any improvements to the seafront promenade reflect the value of the natural habitat.	<i>RSPB (25/025)</i>	Any regeneration which takes place will have full regard to the European Designated sites as well as Biodiversity. The Council is looking to develop and enhance green space linking the central seafront with the town centre.
Developments should incorporate energy efficient materials in the construction and explore opportunities for obtaining a proportion of energy from renewable sources.	<i>RSPB (25/025)</i>	Agreed. A low carbon approach to development will be explored in the SCAAP and the emerging Development Management DPD. The Core Strategy includes policy which requires at least 10% renewables in all development. In addition energy efficient measure will be directed by new Building Regulations (namely Part L).
Any redevelopment or regeneration of the Pier should adhere to national and international legislation that protects Benfleet and Southend Marshes SSSI, SPA and Ramsar Site and associated bird populations.	<i>RSPB (25/025)</i>	Agreed. Any redevelopment at the Pier will respect any European Designations and other designations to ensure that habitats for wildlife is protected and enhanced where possible.
Support the policy framework for regeneration of the Pier as set out in 4.42.	<i>Essex Chamber of Commerce (25/022)</i>	Representation noted.
Do not agree that this is the right approach as concerned that suggested options, in particular No's 1 and 2, would have a detrimental affect on the economic viability.	<i>Essex Chamber of Commerce (25/022)</i>	The Council considers that rationalisation is required of the road space to provide a better public realm and environment for those visiting the central seafront area and lower section of

		the town centre. An improved environment should encourage further patronage and increase the number of visitors, therefore, have a positive effect on the economy. This increased footfall and spending should encourage more commercial enterprise and would make the area more viable overall.
A new clear focus should be determined for the Pier – a dedicated investigation into the future of the Pier is required.	<i>Milton Conservation Society (25/010)</i>	Representation noted. The Council is looking into options for the Pier as part of an investigation into its long term future as a key landmark for Southend.
In relation to the Pier, there is a need for a clearly articulated design approach with a high degree of flexibility. Whilst private involvement could play a role in the operation of the pier, there is a need for overall public-led management and vision.	<i>Renaissance Southend Ltd (25/001)</i>	Representation noted and agreed.
<b>General Comments for SCAAP</b>		
Recommend that 'sea defences' is termed 'flood risk management' to enable more sustainable solutions than just 'holding the line' to evolve.	<i>RSPB (25/025)</i>	Representation noted. Sea defences will be discussed in the SCAAP in terms of addressing flood risk to ensure that measures wider than just sea defences are considered as a way of managing risk.
Would wish to see an additional policy in relation to Shoreline Management Plans if not addressed by the Core Strategy already.	<i>EERA (25/023)</i>	A Shoreline Management Strategy is discussed in the Core Strategy DPD. The Strategy present the Council's approach to flood risk across the Borough, and will be included in future Development Plan Documents.
The AAP should be a key delivery mechanism of known elements of the Shoreline Management Plan (SMP). Therefore as the document progresses, we would expect the authority to give further consideration to the AAP's explicit role in delivering elements of the SMP.	<i>Go-East (25/020)</i>	Representation noted. Key elements of the Shoreline Management Strategy will be included in the document as it is progressed.
Conserving and enhancing the natural and historic environment should be given the greatest emphasis in the Seafront area. No development must be allowed that would damage the integrity of these areas. This	<i>CPRE (Essex) (25/019)</i>	Southend Borough Council will be commissioning a Borough Wide Character Assessment which will provide an evidence

<p>includes improvements and/or alterations to flood/sea defences, which can result in damage to marine habitats through coastal squeeze.</p>		<p>base survey of the architectural merit and character of the Borough. The regeneration of the central seafront area will respect the historic environment and look to enhance the setting of significant and important buildings, streetscapes and localities. The Council will adhere to European Designated Sites and other designations to ensure that there is no detrimental effect on marine habitats.</p>
<p>A glossary or abbreviations and technical terms should be included in the Plan.</p>	<p><i>Southend Conservation Forum (25/018)</i></p>	<p>Representation noted. A glossary will be a useful addition to the SCAAP as it progressed towards examination.</p>
<p>With regard to transportation, improvements are needed in terms of access to and connections between areas.</p>	<p><i>EEDA (25/008)</i></p>	<p>Agreed. The SCAAP will look to create appropriate linkages and accessibility between the lower part of the town centre and seafront. A potential approach to this has been highlighted in the Southend Central Masterplan which was adopted by the Council as corporate policy in November 2008.</p>

***Representations received on Issues and Options Report 2007***

**Town Centre Area Action Plan 2007 - Relevant comments from consultation**

Comments	Respondents	Response
<b>Issue No. 1      Town Centre AAP Boundary</b>		
Boundary should be as per CAM	<i>Essex Chamber of Commerce; Tesco, RSLtd, John Davey</i>	Point noted. A preferred Boundary for the AAP will be tested through further consultation having regard to potential development pressures, comments made and the findings of the SHLAA and ELR (including 'Call for Sites') and Retail and Town Centre study.
Support a wider area to be included within the AAP along the lines of the proposed boundary in Map 3 in TCAAP Issues and Options Report. In particularly AAP area should include	<i>English Heritage, Housing Strategy Group, The Southend Society, BERA</i>	Comments noted. A preferred Boundary for the AAP will be tested through further consultation having regard to comments made and the findings of the SHLAA and ELR (including 'Call for Sites'), Retail study, and potential development pressures, including an evaluation of these areas in relation to their functional relationship, their contribution to meeting the overall vision and objectives for the area, and the identified opportunities for delivering specific key land use requirements in the central area.
<ul style="list-style-type: none"> <li>• Central seafront due to functional relationship</li> </ul>	<i>RSLtd</i>	
<ul style="list-style-type: none"> <li>• Seaway car park</li> </ul>	<i>Economic Regeneration Team</i>	
<ul style="list-style-type: none"> <li>• Roots Hall</li> </ul>	<i>Sainsbury's, SUFC</i>	
<ul style="list-style-type: none"> <li>• Historically significant and distinctive areas adjoining commercial area;</li> </ul>	<i>Milton Conservation Society</i>	
<ul style="list-style-type: none"> <li>• Area around Prittlewell station</li> </ul>	<i>Network Rail [1]</i>	
Boundary should be drawn tightly as per adopted BLP Town Centre inset for PPS6 reasons	<i>Land Securities Trillium</i>	Point noted. A preferred Boundary for the Southend Central AAP will be tested through further consultation including an assessment of the need for the proposals map to include a 'town centre' boundary for the purposes of PPS6. This will be informed by the Borough Council's Retail and Town Centre Study findings.
Residential areas to west of Clifftown	<i>RSL</i>	Comment noted. A preferred boundary will be

		explored through the preparation of the preferred options report and will consider the functional relationships and requirements of all areas within the central area.
Should <u>not</u> include seafront as should be treated separately to best address		Comments noted. Nature conservation, and flood risk within the central seafront area will be addresses in line with Government guidance and taken forward as part of the preparation of either the SCAAP or Borough Wide Development Management DPD. The AAP itself will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment if required] to ensure protection of environmental designations in particular. Highway issues will be taken forward having regard to LTP3 particularly where there are interrelationships between the Town Centre, Seafront and wider borough.
<ul style="list-style-type: none"> <li>The need to conserve and enhance nature conservation assets</li> </ul>	<i>Natural England</i>	
<ul style="list-style-type: none"> <li>Seafront specific physical constraints related to flood risk and conservation issues which do not impact on Town Centre</li> </ul>	<i>Environment Agency</i>	
<ul style="list-style-type: none"> <li>The two areas have different highway requirements</li> </ul>	<i>Highways Agency</i>	
<b>Issue No. 2</b>	<b>Central Business District</b>	
TCAAP boundary and CBD should be the same to allow more flexible and holistic approach	<i>Economic Regeneration Team</i>	Comments noted. The need for a 'Town Centre' boundary in respect of the functional requirements of PPS6 and its relationship with the AAP boundary will be tested through further consultation on Southend Central AAP.
CBD should be as existing for reasons of PPS6 and renamed Core Activity Area	<i>Housing Department; Essex Chamber of Commerce Land Securities Trillium, BERA</i>	Point noted. The need for a 'Town Centre' Boundary for the purposes of the sequential test will be explored as part of the preparation of the next stage of the AAP.
Rely on designated allocations and PPS6 sequential test to	<i>The Southend Society,</i>	Comment noted. May be necessary to determine a

determine appropriate locations	<i>John Davey</i>	Town Centre Boundary for the purposes of the sequential test purposes.
To be determined on the basis of evidence and need	<i>RSLtd</i>	Comments noted. The need for a 'town centre' boundary in respect of the functional requirements of PPS6 and/or its relationship with the AAP boundary will be tested through further consultation on the AAP. A 'Town Centre' boundary will be examined as part of the Retail and Town Centre Study.
Boundary should recognise the centrality of the business area and recognises historic settlements at Clifftown and Milton	<i>Milton Conservation Society</i>	Comment noted. The need for a 'town centre' boundary and its extent will be explored by examining the opportunity areas and their character, their functional relationship, and their contribution to meeting the requirements of PPS6.
<b>Issue No. 3      A Vision for Southend Town Centre</b>		
Support Vision that is more generalised in seeking a mix of development as per 'Gateway Town Centre Strategy'. In addition should include:	<i>Economic Regeneration Team, Land Securities Trillium, The Southend Society, Essex Chamber of Commerce, Network Rail, John Davey</i>	Comment noted. The preferred vision will be developed further and explored as part of the preparation of the next stage of the AAP, including the development of an associated spatial development option.
<ul style="list-style-type: none"> <li>reference to retention of, or growth from, existing forms where these provide positive framework</li> </ul>	<i>English Heritage</i>	Comment noted. The preferred vision will be developed further and explored as part of the preparation of the next stage of the AAP, including the development of an associated spatial development option.
<ul style="list-style-type: none"> <li>Have regard to ETG 4 – achieve urban renaissance and promote a full range of town centre uses / full range of sub-regional services</li> </ul>	<i>EERA</i>	Comment noted. The AAP will need to be in conformity with the adopted Core Strategy DPD. As such the urban renaissance and regeneration of the town centre policy context is set, which is in general



		conformity with the East of England Plan whilst responding to local circumstances.
<ul style="list-style-type: none"> <li>• Include design and built to Secured by Design standards – and Park Mark</li> </ul>	<i>Essex Police</i>	Comment noted. The preferred vision will be developed further and explored as part of the preparation of the next stage of the AAP, including the development of an associated spatial option.
Vision should focus on promoting specific activities such as retail [particularly open air market]	<i>Housing Department West Leigh Residents Association, BERA, Leigh on Sea Town Council [</i>	Comment noted. The preferred vision will be developed further and explored as part of the preparation of the next stage of the AAP, including the development of an associated spatial development option.
<p>Vision should be set within a sustainability context that respects environmental limits for regeneration to be successful and sustainable, we believe that the environment should not only be attractive but also multifunctional in the following ways:</p> <ul style="list-style-type: none"> <li>• conserves significant biodiversity assets</li> <li>• provides adequate accessible natural green space to relieve recreational pressure on ecological sensitive sites</li> <li>• contributes to aesthetic qualities and character of local environment</li> <li>• contributes to environmental quality of local area – air quality, water quality, local climate etc.</li> </ul>	<i>Natural England</i>	Points noted. The AAP will need to be in conformity with the adopted Core Strategy DPD and as such the Sustainability policy context is set. The preferred vision will be developed further and explored as part of the preparation of an associated spatial development option. Green technologies, prudent use of natural resources and other sustainability objectives are likely to be applied across the Borough and not just the central area. The need for a specific Central Area approach [where different to the borough wide approach] will be explored in the preparation of the next stage of the AAP. The need to provide adequate accessible natural green space to relieve recreational pressure on ecological sensitive sites will be explored as part of a green grid strategy within the AAP. This will entail both identifying additional functional green space within the AAP area and a series of well defined easily accessible linkages for cycling and walking to connect the town centre seafront visitors and local

		community to other green space opportunities and the wider countryside.
Vision should encapsulate the purpose of the strategy and reflect Regeneration Framework and CAM which are based on evidence	<i>RSLtd</i>	Comment noted. The preferred vision will be developed further and explored as part of the preparation of an associated spatial development option. The Regeneration Framework and CAM will be considered further as the AAP is progressed, including the development of an associated spatial development option.
<b>Issue No. 4 Objectives for the Town Centre AAP</b>		
Support objectives based on suggested strategic themes. In addition objectives should:	<i>Economic Regeneration Team; Housing Department; West Leigh Residents Association; Land Securities Trillium; The Southend Society; Essex Chamber of Commerce; Arriva; BERA; Network Rail; Leigh Town Council; John Davey;</i>	Comment noted. The preferred objectives will be developed further and explored as part of further consultation.
<ul style="list-style-type: none"> <li>include making the most of the cultural heritage and creating high quality development</li> </ul>	<i>English Heritage</i>	Comment noted. The preferred objectives will be developed further and explored as part of further consultation.
<ul style="list-style-type: none"> <li>reflect SO's in Core Strategy and address impact across boundary of AAP particularly: environment [biodiversity; aesthetic qualities and character of local environment; air quality, water quality and local climate]; accessible green space [to relieve</li> </ul>	<i>Natural England</i>	Comment noted. The AAP will need to be in conformity with the adopted Core Strategy DPD and as such the Sustainability policy context is set. The preferred objectives will be developed further and explored as part of further consultation. The AAP itself

<p>recreational pressure on ecological sensitive areas] implementation assessed in terms of sustainability criteria and key test environmental limits [sustainable construction techniques, creative partnerships and S106]</p>		<p>will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment if required] to ensure protection of environmental designations in particular. These issues are high on the Government's agenda as laid out in the guidance document PPS1. Green technologies, prudent use of natural resources and other sustainability objectives are likely to be applied across the Borough and not just the central area. The need for a specific Central Area approach [where different to the borough wide approach] will be explored as the AAP is progressed. The need to provide adequate accessible natural green space to relieve recreational pressure on ecological sensitive sites will also be addressed as the AAP moves forward.</p>
<ul style="list-style-type: none"> <li>include reference to natural resources – limiting and adapting to climate change [energy and water efficiency; waste water infrastructure and surface water systems and sustainable construction]</li> </ul>	<p><i>Environment Agency; Anglian Water Services Ltd</i></p>	<p>Comments noted. The Core Strategy DPD clearly sets out the strategic requirements / key principles for development management. The Borough Council is preparing a Development Management DPD which will contain more detailed policies for managing development schemes. Green technologies, prudent use of natural resources, design issues and other sustainability objectives are likely to be applied across the Borough and not just the central area. The need for a specific Central Area approach [where different to the borough wide approach] will be explored in the preparation of the preferred option. Regard will be had to the Water Cycle Study and Waste Water Treatment paper and the development of a Waste</p>

		DPD.
<ul style="list-style-type: none"> <li>reflect Policy ETG4 in RSS</li> </ul>	<i>EERA</i>	Comment noted. The AAP will need to be in conformity with the adopted Core Strategy DPD. As such the urban renaissance and regeneration of the town centre policy context is set, which is in general conformity with the East of England Plan whilst responding to local circumstances. The preferred objectives will be developed further and explored as part of further consultation
Essential the objectives are appropriate and workable in planning policy terms and relate directly to the vision and reflect Regeneration Framework and CAM which are based on evidence	<i>RSLtd</i>	Comments noted. The preferred objectives will be developed further and explored as part of further consultation. The Regeneration Framework and CAM will be considered further as the AAP is progressed.
<b>Issue No. 5</b>		
<b>Vitality and Viability</b>		
Support a bold approach to promote new urban forms in the town centre including new open spaces Specific approaches should include		Comments noted. Spatial Development Strategy options will be prepared and tested in preparing the AAP for further consultation
<ul style="list-style-type: none"> <li>Widening of spatial offer, greater integration with central seafront, enhanced public realm projects</li> </ul>	<i>Economic Regeneration Team</i>	Comments noted. Spatial Development Strategy options will be prepared and tested, including the possible incorporation of the central seafront area, in preparing the AAP for further consultation.
<ul style="list-style-type: none"> <li>There is a need to expand the functional and physical area in the town centre and improve access and connections</li> </ul>	<i>EEDA</i>	Comments noted. Spatial Development Strategy options will be prepared and tested in preparing the AAP for further consultation
<ul style="list-style-type: none"> <li>Should be based on outcomes of CAM and its evidence-driven objectives</li> </ul>	<i>RSLtd</i>	Points noted. Further consideration of the spatial development strategy will also be informed by comments received and the findings of the SHLAA and ELR (including 'Call for Sites') and the Retail and Town Centre study, including an evaluation of these areas in relation to their functional relationship, their

		contribution to meeting the overall vision and objectives for the area and the identified opportunities for delivering specific key land use requirements in the central area.
<ul style="list-style-type: none"> <li>• Strategy to resolve access [parking] and based on realistic economic criteria</li> </ul>	<i>The Southend Society</i>	Comment noted. Access issues will be explored further as part of the LTP3 preparation process, utilising the borough wide transport model and the more detailed visualisation model for the town centre. Sustainable transport management, including parking, will be explored as part of the Borough-wide Development Management DPD, which may include standards specific to the Southend Central Area, and also considered as the AAP is progressed.
<ul style="list-style-type: none"> <li>• new modern green linkage from High Street to Warrior Square; rationalise land / concourse at university SEEC site new urban space at railway station; enhance, light alleyways on Alexandra Street</li> </ul>	<i>Essex Chamber of Commerce</i>	Comments noted. Spatial Development Strategy options will be prepared and tested in preparing the AAP for further consultation. The provision of linked functional green spaces will also be explored as an integral part of the spatial development strategy.
<ul style="list-style-type: none"> <li>• bold approach needed to provide adequate open space [green] to relive pressure of growth and regeneration on Natura 2000 site</li> </ul>	<i>Natural England; Environment Agency</i>	Comments noted. Spatial Development Strategy options will be prepared and tested in preparing the AAP for further consultation. The provision of linked functional green spaces will also be explored as an integral part of the spatial development strategy.
<ul style="list-style-type: none"> <li>• Turn B&amp;Q site into parkland as quid pro quo for loss of open space for new building</li> </ul>	<i>David McCullie</i>	Comments noted. Approach to opportunity sites will be explored with regard to the objectives, land use requirements and spatial development strategy being prepared and tested in preparing the AAP for further consultation The provision of linked functional green spaces will also be explored as an integral part of the spatial development strategy.
<ul style="list-style-type: none"> <li>• Historic attributes of seaside town important asset</li> </ul>	<i>English Heritage</i>	Point noted. The cultural and built heritage of the

which can promote a unique sense of place therefore need to respect historic building lines and spaces		town will be explored within the Spatial Development Strategy and when considering the role, function and sensitivities of specific Character Areas and will be informed by the Southend Character Study.
Treat schemes on their merit having regard to design and other related criteria	<i>Housing Department; West Leigh Residents Association; Leigh on Sea Town Council; John Davey; The development Planning Partnership [B&amp;Q]</i>	Comment noted. Consideration of a spatial development strategy will provide a planned framework for delivery of the overall vision and objectives for the area and identify opportunities for delivering specific key land use requirements in the central area. It will need to be informed by comments received and the findings of the SHLAA and ELR (including 'Call for Sites') and Retail and Town Centre study etc and include an evaluation of these areas in relation to their functional relationship.
Borough Council should not create new spaces since has experience of poor construction and maintenance in High Street and Warrior Square.	<i>BERA, Roger Glover</i>	Point noted
Matter for local consideration	<i>EERA</i>	Point noted
<b>Issue No. 6 Existing Character Zones</b>		
Support the development of existing character zones	<i>BERA; RSLtd</i>	Comments noted. The Character Areas and surrounding neighbourhoods provide a robust basis for taking forward a spatial development strategy in the SCAAP. Strategic sites opportunities will be identified and their role and interrelationships will be explored further having regard to strategic land use needs. This will be informed by the findings of the SHLAA, ELR, Retail Study, Borough Wide Character Assessment and viability studies within the context of a preferred spatial development strategy for the AAP
<ul style="list-style-type: none"> <li>• However should act as a guide and not limit economic development – flexible approach to achieve more mixed use development and reduces risk particularly in Gateway Neighbourhoods, Victoria Avenue</li> </ul>	<i>Economic Regeneration Team, Housing Department, Land Securities Trillium</i>	
<ul style="list-style-type: none"> <li>• Excludes the historically significant, and distinctive, areas adjoining the commercial centre. It is important that the qualities these bring to Southend are integrated with, and lend quality to, the areas where new development will be focussed. In addition to the conservation areas, listed buildings (including the</li> </ul>	<i>English Heritage</i>	

<p>pier), and registered historic park (Cliff Gardens) the archaeological interest of the area should be considered. In para 3.7 the historic importance of the routes might be acknowledged, especially in connection with medieval and other archaeological sites. The importance of the railway to the development and current character of Southend should be mentioned.</p> <ul style="list-style-type: none"> <li>• Further consideration should be given to developing the evidence base for the historic environment and how this might inform the definition and development of the Town Centre. However should also promote understanding of inter-relationships and the historically significant areas and routes including railway line.</li> <li>• While the railway lines and highways do ‘...divide the central area into distinctive zones...’ there could be some recognition of the quality these routes confer, and a commitment to celebrate and retain that quality. Promoting understanding of different character zones is useful, but it is important that the inter-relationships between zones is acknowledged.</li> </ul>		
<ul style="list-style-type: none"> <li>• However Map 4 identification of Roots Hall area as ‘residential’ oversimplified should be amended to reflect mixed retail, commercial and residential</li> </ul>	<p><i>SUFC</i></p>	
<ul style="list-style-type: none"> <li>• However must protect key assets such as Clifftown and Milton Conservation Areas with special policy</li> </ul>	<p><i>Milton Conservation Area</i></p>	
<ul style="list-style-type: none"> <li>• However should develop policy to allow a more flexible approach across the town</li> </ul>	<p><i>The Southend Society; Essex Chamber of Commerce; Network Rail; John Davey;</i></p>	

Issue No. 7	Retail Provision	
Provision should rely on existing sites allocated in adopted BLP	<i>West Leigh Residents Association; Leigh on Sea Town Council</i>	Comment noted
Provision should be provided through a bold approach to sites/quarters in the town centre building on existing allocated sites. In particular	<i>The Southend Society</i>	Points noted. Retail provision will be based on the findings of the Retail Study and development of spatial development strategy as the AAP is progressed and further consulted upon. Consideration of a boundary of the 'town centre' for PPS6 purposes will be taken forward as part of these considerations.
<ul style="list-style-type: none"> <li>• B&amp;Q site should be allocated for retail</li> </ul>	<i>The Development Planning Partnership</i>	
<ul style="list-style-type: none"> <li>• Should be based on robust evidence of demand and site allocations and new prime retail circuit</li> </ul>	<i>RSLtd</i>	
Retail provision should be treated on merit subject to sequential approach.	<i>Housing Department, BERA, John Davey</i>	
<ul style="list-style-type: none"> <li>• However need to broaden retail circuit and offer</li> </ul>	<i>Economic Regeneration Team</i>	
<ul style="list-style-type: none"> <li>• However need to address issue of town centre boundary for test purposes</li> </ul>	<i>Economic Regeneration Team; Essex Chamber of Commerce</i>	
<ul style="list-style-type: none"> <li>• However increased visitor numbers need to be managed and new parks provided to prevent undue pressure on Natura 2000</li> </ul>	<i>Natural England</i>	
<ul style="list-style-type: none"> <li>• However, consider opportunities to reduce need for travel, reduce distance travelled and encourage travel by sustainable modes</li> </ul>	<i>Highways Agency</i>	
Ability for town centre to significantly expand its retail floorspace in short to medium term is severely limited on existing sites, therefore should allow well planned retail provision at Fossetts Farm	<i>SUFC</i>	Comment noted. The development at Fossetts Farm is outside the remit of this AAP. Retail provision will be based on the findings of the Retail Study; be in conformity with the Core Strategy; and consistent with National Policy.
Ability for town centre to significantly expand its retail	<i>Roger Glover</i>	Point noted. Retail provision will be based on the



<p>floorspace in short to medium term is severely limited. There is no demand, already empty units etc</p>		<p>findings of the Retail Study including the identification of future capacity for additional convenience and comparison floorspace.</p>
<p>Approach is a matter for local concern but treating retail development on merit would make it difficult to locate all major new retail and complementary town centre uses in the town centre in line with Policy ETG 5</p>	<p><i>EERA</i></p>	<p>Points noted.</p>
<p><b>Issue No. 8 Primary and secondary shopping frontage</b></p>		
<p>Should Relax policy to encourage the provision of cafes and restaurants in primary frontage in the High Street.</p>	<p><i>Economic Regeneration Team, The Southend Society; Essex Chamber of Commerce; John Davey</i></p>	<p>Points noted. The need to create and maintain a functioning retail circuit within the town centre will be explored further as part of the overall consideration of a spatial development strategy and the opportunities of the identified Character Areas. Their role and interrelationships will be explored further having regard to strategic land use needs and the findings of the SHLAA, ELR, Retail Study. The need for a development management approach will be explored within the Development Management DPD and refined further as the AAP is progressed with regard to the Points noted. Retail provision will be based on the findings of the Retail Study and development of the spatial development strategy, subject to further consultation as the AAP is moved forward.</p> <p>Consideration of the boundary of the 'town centre' for PPS6 purposes will be taken forward as part of these considerations</p>
<p>Policy should also</p> <ul style="list-style-type: none"> <li>• Ensure loss of retail frontage in mainstream retail area is only to the greater provision of cafes and restaurants;</li> <li>• Should aspire to achieve a balance between retail/café (day) economy, and restaurant /nightclub (night) which contributes to building inclusive communities in its ability to attract a much wider range of people to the area during the evening; and</li> <li>• Be explicitly linked with the wider CP1 regeneration objectives</li> </ul>	<p><i>Housing Department</i></p>	
<p>A key issue will be creating a properly functioning primary retail circuit (to concentrate and direct the primary pedestrian flows) that will enable the secondary streets that lead off it to thrive. This circuit should be evidence driven taking into a wide range of considerations,</p>	<p><i>RSLtd</i></p>	

including the deliverability of the additional retail floorspace needed to create the circuit and meeting retail capacity need in ways that will drive up the competitiveness of the town centre as a whole and in all its functions		
Continue to restrict non-retail use in Primary Frontage	<i>West Leigh Residents Association; BERA; Leigh on Sea Town Council; Roger Glover</i>	
<b>Issue No. 9 Potential for a more vibrant evening economy</b>		
Relaxation of policy on retail use (see issue 8) would benefit further the evening economy offer and encourage a family friendly town centre	<i>Economic Regeneration Team</i>	Points noted. Government Guidance advocates an approach to a wide range of uses appropriate to a town centre location within PPS 6. Leading and supporting land uses appropriate to the opportunities within the character areas will be taken forward as the AAP is progressed and will have regard to the functional relationship between each quarter and objectives for the central area. The potential for a more vibrant evening economy within the town centre will be explored further as part of the overall consideration of a spatial development strategy. Further consultation will be carried out as the AAP is progressed.
Concentrate evening economy uses in particular zones (uses discussed in character zones in issue 6 is a good way of structuring this)	<i>Housing Dept; RSLtd; Arriva</i>	
Concentrate evening economy uses as part of mixed use development in specified locations	<i>West Leigh Residents Association; The Southend Society; Essex Chamber of Commerce; BERA; Leigh on Sea Town Council; John Davey</i>	
<b>Issue No. 10 Employment and Business Provision</b>		
LDDs must allocate sufficient land to meet the indicative job targets in RSS policy E2 therefore may need to allocate further land above that in existing BLP	<i>EERA</i>	Point noted. The Central area has a key role to play in the economic regeneration of the borough. This will require major change in some areas to encourage new investment and provide for modern premises. The identification of land for employment purposes will be explored further having regard to the emerging

		spatial development strategy which meets strategic land use requirements in the central area and takes account of the SHLAA/ELR and Retail study and comments received
<p>Allocate new sites for employment and business development to accommodate all of the jobs targets as set out in Core Strategy CP1</p> <p>Sites should include</p> <ul style="list-style-type: none"> <li>- Market Place,</li> <li>- Tylers Avenue</li> <li>- Warrior Square</li> <li>- Farringdon (aka Elmer Square)</li> <li>- Victoria Railway Station</li> <li>- Victoria Avenue Office District – allocated as employment and business uses as part of a mixed use development scheme including student accommodation – <i>Land Securities Trillium</i></li> <li>- Victoria Avenue Civic Area</li> <li>- Sutton Road Commercial and Industrial Area</li> <li>- Roots Hall</li> <li>- B&amp;Q site should be a park - <i>David McCullie</i></li> </ul>	<p><i>The Southend Society Housing Department Highways Agency,</i></p>	<p>Comments noted. The Central area has a key role to play in the economic regeneration of the borough. This will require major change in some areas to encourage new investment and provide for modern premises. The identification of land for employment purposes will be explored further having regard to the need for a spatial development strategy which meets the strategic land use requirements in the central area, the findings of the SHLAA/ELR and Retail study and sites promoted as part of this consultation</p>
<p>Need to move away from traditional zoning for office and focus in the town centre on the basis of primary and secondary locations – sites need to be allocated that are attractive (both in location and size), close to complimentary and supporting uses and provide good operating conditions (access and parking)</p>	<p><i>RSLtd</i></p>	<p>Comments noted. The Central area has a key role to play in the economic regeneration of the borough. This will require major change in some areas to encourage new investment and provide for modern premises. The identification of land for employment purposes will be explored further having regard to the need for a spatial development strategy which meets the strategic land use requirements in the central area, the findings of the SHLAA/ELR and comments received. Regard will be had to the ELR and Retail and</p>

		Town Centre study in respect to the office sector.
Assessment should have regard to:		
<ul style="list-style-type: none"> <li>The need to ensure that existing waste water infrastructure is unaffected and brownfield development should not increase flows to the waste and surface water systems</li> </ul>	<i>Anglian Water Services Ltd</i>	Comments noted. The Core Strategy DPD clearly sets out the strategic requirements / key principles for development management. The Borough Council is preparing a Development Management DPD which will contain more detailed policies for managing development schemes. Green technologies, prudent use of natural resources, design issues and other sustainability objectives are likely to be applied across the Borough and not just the central area. The need for a specific Central Area approach [where different to the borough wide approach] will be explored in the preparation of the preferred option. Regard will be had to the Water Cycle Study and Waste Water Treatment paper.
<ul style="list-style-type: none"> <li>Secured by Design standards and Park Mark</li> </ul>	<i>Essex Police</i>	
<ul style="list-style-type: none"> <li>The need to address revised vision (i.e. includes reference to need to protect Natura 2000 site) insofar as all additional growth raises the need to effectively manage people so that there is no adverse effect of biodiversity interest and also provide for new/adequate green space</li> </ul>	<i>Natural England; Environment Agency</i>	Comments noted. The AAP will conform to the adopted Core Strategy DPD and consequently the sustainability policy context established. The preferred objectives will be developed further and explored as part of further consultation. The AAP itself will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment if required] to ensure the protection of environmental designations in particular. The provision of linked functional green spaces will also be explored as an integral part of the spatial development strategy.
Treat all applications for new employment and business	<i>West Leigh Residents</i>	Comments noted. The Central area needs to provide

development on their merits having regard to the boundary of the CBD	<i>Association; Essex Chamber of Commerce; Leigh on Sea Town Council; John Davey</i>	for 6,500 net additional jobs. This will require major change in some areas to encourage new investment and provide for modern premises. The identification of land for employment purposes will be explored further having regard to the need for a spatial development strategy which meets the strategic land use requirements in the central area, the findings of the SHLAA/ELR and Retail study and comments received
Southend's marginal location means that the town is not a desirable location for larger business	<i>BERA</i>	Point noted
<b>Issue No. 11      Safeguarding Employment Land</b>		
Allocation of employment sites consistent with RSS Policy E1	<i>EERA</i>	Point noted
Existing employment land and premises should be safeguarded and sites should be identified that should be excepted in the interest of promoting wider regeneration and and/or set out criteria where such exceptions would be made;	<i>John Davey; Highways Agency</i>	Comments noted. The Core Strategy DPD Policy KP1 and CP1 set out the spatial distribution, type and scale of regeneration and employment growth in the Borough. These policies depend on maximising the contribution of existing employment sites whilst recognising the opportunities for change that can be delivered through AAPs for the key growth and regeneration areas. The functional value of existing employment land and premises and opportunities for new employment development within the Central area will be explored in the next stage of the AAP preparation having regard to the need for a spatial development strategy which meets the strategic land use requirements in the central area, the findings of the SHLAA/ELR and Retail and Town Centre study and comments received. The need to provide adequate accessible green space will be explored as the AAP moves forward.
<ul style="list-style-type: none"> <li>Roots Hall should be comprehensively redeveloped for residential, retail and employment opportunities - this would be enhanced if Prospects College site was included</li> </ul>	<i>EEDA; SUFC</i>	
<ul style="list-style-type: none"> <li>B&amp;Q site should be used for a park</li> </ul>	<i>David McCullie</i>	
<ul style="list-style-type: none"> <li>Victoria Avenue offices area is outmoded and should be re-designated for comprehensive mixed use development</li> </ul>	<i>Land Securities Trillium; RSLtd</i>	
<ul style="list-style-type: none"> <li>Kenway and Grainger Road fall into exception category</li> </ul>	<i>Essex Chamber of Commerce</i>	
Existing office development and industrial site allocations as defined in BLP should be safeguarded	<i>Housing Department; West Leigh Residents Association; Leigh on</i>	

	<i>Sea Town Council</i>	
No point in safeguarding employment land if it has proved unattractive to the market (i.e. Victoria Avenue Office Area) and should build inter-trading activities in the town centre	RSL	
Development sites should		
<ul style="list-style-type: none"> <li>provide accessible natural green space provision within the criteria</li> </ul>	<i>Natural England; Environment Agency; RSPB</i>	Comment noted. Approach to all opportunity sites will be explored with regard to the objectives, land use requirements and spatial development strategy being prepared and tested in preparing the AAP for further consultation. The provision of linked functional green spaces will also be explored as an integral part of the spatial development strategy.
<ul style="list-style-type: none"> <li>Sequential approach which is part of a comprehensive redevelopment strategy, resolution of access and parking and realistic economic criteria</li> </ul>	<i>The Southend Society</i>	Comment noted. Approach to all opportunity sites will be explored with regard to the objectives, land use requirements and spatial development strategy being prepared and tested in preparing the AAP for further consultation. The ELR findings will provide information as to economic viability as part of the consideration of all sites. Access and parking issues will be explored further utilising the borough wide transport model and the more detailed visualisation model for the town centre. Sustainable transport management, including parking, will be explored as part of the borough wide Development Management DPD, which may include standards specific to the Southend Central Area.
It is not clear that there are other potential sites which offer significant benefits over existing ones	<i>BERA</i>	Point noted
<b>Issue No. 12      Secondary Offices</b>		
Treat all applications for secondary office development on its merit having regard to design and other retail policy	<i>Housing Department; Essex Chamber of</i>	Comments noted. Government Guidance advocates an approach to a wide range of uses appropriate to a

criteria to protect retail core. Including:	<i>Commerce; BERA; John Davey</i>	town centre location within PPS 6. Leading and supporting land uses appropriate to the opportunities within the character areas and with regard to their strategic functional relationship and objectives for the central area will be taken forward as part of the Spatial Development Strategy. Regard will be had to the ELR and Retail and Town Centre study in respect to the office sector and further consultation will be carried out as the AAP is progressed. The need for a development management approach will be explored further with regard to whether or not there is a need to have specific policies to restrict uses within the Town Centre and if so whether or not these should be contained within the Development Management DPD.
<ul style="list-style-type: none"> <li>Sequential approach which is part of comprehensive redevelopment strategy, resolution of access and parking and realistic economic criteria</li> </ul>	<i>The Southend Society</i>	
<ul style="list-style-type: none"> <li>Secondary office should be promoted in specific locations but also appropriate to assess such cases on its merit as they have the potential to enhance broader mix. Essential to go with grain of the market and take account of best available evidence</li> </ul>	<i>RSLtd</i>	
<ul style="list-style-type: none"> <li>new green space is promoted as part of design</li> </ul>	<i>Natural England</i>	
<ul style="list-style-type: none"> <li>Assessment should have regard Secured by Design standards and Park Mark</li> </ul>	<i>Essex Police</i>	Comment noted. The provision of linked functional green spaces will also be explored as an integral part of the spatial development strategy. Security and Crime prevention issues are likely to be applied across the Borough and not just the central area. The need for a specific Central Area approach [where different to the borough wide approach] will be explored as the AAP is progressed.
<b>Issue No. 13</b>	<b>Housing Provision</b>	
RSS Policy H1 requires council's to allocate sufficient land for housing to meet the minimum target for their area, there is an expectation that this target should be exceeded unless it can be demonstrated that it would breach environmental limits and infrastructure constraints	<i>EERA; HBF</i>	Point noted. The Core Strategy DPD Policy KP1, CP1 and CP8 set out the spatial distribution, type and scale of economic regeneration and housing growth in the Borough. This articulates a job led approach to meet the regeneration needs of the Borough as a whole and the Central Area in particular. CP8 provides for the provision of 2,000 net additional dwellings during the plan period 2001-2021. These policies depend on

		maximising the contribution of existing sites whilst recognising the opportunities for change that can be delivered through AAPs for the key growth and regeneration areas. Potential sites will be informed by an underpinning evidence base including the SHLAA, ELR and Retail and Town Centre Study.
Allocate new sites within AAP for housing to meet targets and have regard to Strategic Development Areas identified:	<i>Land Securities Trillium; Natural England; Housing Dept; The Southend Society; Essex Chamber of Commerce; BERA</i>	Comments noted. The Core Strategy DPD Policy KP1 and CP8 set out the spatial distribution, type and scale of regeneration and housing growth in the Borough. The functional value of existing land and premises and opportunities for new development within the Central area will be explored in the next stage of the AAP preparation having regard to the need for a spatial development strategy which meets the strategic land use requirements [including housing and Employment floorspace] in the central area. The findings of key evidence base documents including the SHLAA/ ELR and Retail study will inform the AAP as it is progressed and regard will be had to comments received.
Specific sites		
<ul style="list-style-type: none"> <li>Roots Hall - Current redevelopment proposals should include a maximum of 350 residential units which will contribute to AAP housing targets</li> </ul>	<i>SUFC</i>	
<ul style="list-style-type: none"> <li>Victoria Avenue Office - area should accommodate residential as part of mixed redevelopment scheme</li> </ul>	<i>Essex Chamber of Commerce</i>	
<ul style="list-style-type: none"> <li>Victoria House conversion to student accommodation</li> </ul>	<i>Land Securities Trillium</i>	
<ul style="list-style-type: none"> <li>Carnarvon Road – former SE Essex College</li> </ul>	<i>Essex Chamber of Commerce</i>	
<ul style="list-style-type: none"> <li>Contribution to vitality and viability of the Town Centre – provide labour and spending base and add to viability of mixed use schemes</li> </ul>	<i>RSLtd</i>	
<ul style="list-style-type: none"> <li>Need up-to-date SHLAA and suitable Housing Trajectory</li> </ul>	<i>HBF</i>	
<ul style="list-style-type: none"> <li>Other housing treated on merit with regard to other criteria</li> </ul>	<i>Housing Dept; The Southend Society</i>	Point noted.
		Point noted. SHLAA has been completed and will be monitored and updated.
		Comments noted. The development management approach to housing development is likely to be applied across the Borough and not just the central



		area. The need for a specific Central Area approach [where different to the borough wide approach] will be explored as the AAP is progressed further.
Treat all applications for new housing on their merits having regard to design and other related criteria including	<i>West Leigh Residents Association; Network Rail; Leigh on Sea Town Council; John Davey</i>	Comments noted RSS Policy H1 requires council's to allocate sufficient land for housing to meet the minimum target for their area, The development management of other housing development is likely to be applied across the Borough and not just the central area. The need for a specific Central Area approach [where different to the borough wide approach] will be explored as the AAP is progressed further.
<ul style="list-style-type: none"> <li>encourage vacant space/room above office/retail to be converted to living accommodation</li> </ul>	<i>Essex Police</i>	
<ul style="list-style-type: none"> <li>having regard to the need to meet targets and the contribution to vitality and viability of the Town Centre</li> </ul>	<i>Crest Nicholson (eastern) Ltd [Barton Willmore planning partnership]</i>	
Accounting for the pressures on the seafront, it would make sense to explore whether options exist to: -	<i>Natural England</i>	
(i) Locating high density dwellings in areas appropriate distances from the seafront/ecologically sensitive sites		Comments noted. The AAP will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment if required] to ensure protection of biodiversity assets and environmental designations in particular.
(ii) Ensure developments have adequate accessible natural (non designated site) greenspace within suitable distances		The provision of linked functional green spaces will also be explored as an integral part of the spatial development strategy.
(iii) Ensure adequate land within allocated areas to incorporate accessible natural (non designated site) greenspace within the development area or created/enhanced as part of planning gain		A development management approach to 'Greening of the borough', design issues and other sustainability objectives are likely to be applied across the Borough and not just the central area. The need for a specific Central Area approach [where different to the

		borough wide approach] will be explored as the AAP is progressed further.
Sustainability issues include:		
(i) Refer to the phasing of housing in the context of provision of adequate water supply, infrastructure and foul water treatment capacity. Such infrastructure and green infrastructure should be in place in advance of, or along side housing development	<i>RSPB; Anglian Water Services Ltd</i>	Comments noted. Government Policy and the Core Strategy DPD are committed to creating sustainable communities. This includes the need for prudent use of natural resources, and the need to address flood risk when considering new development. These issues have been addressed in the Core Strategy DPD and more detailed policy requirements where appropriate will be applied across the Borough and not just in the central area. The Water Cycle Study and Waste Water Treatment paper will be used to inform the preparation of a sustainable delivery strategy for the AAP.  A development management approach to green technologies, prudent use of natural resources, design issues and other sustainability objectives are likely to be applied across the Borough and not just the central area. The need for a specific Central Area approach [where different to the borough wide approach] will be explored as the LDF, including the AAP, is progressed further.
(ii) After PPS25 sequential and exceptions test all appropriate measures must be taken to ensure risk of flooding is minimised;	<i>Environment Agency</i>	
(iii) Brownfield land will require site investigations to establish any risk of contamination, full site investigations and remediation will be required where there is a potential risk of pollution to the water environment.		
(iv) Need to protect the quality of water resources from pollution associated with construction and lifetime of the development.		
(v) Water efficiency measures so as not to increase pressure on water supply		
<b>Issue No. 14</b>	<b>Safeguarding Residential Uses</b>	
There is a need to safeguard residential uses but provide for a more flexible approach with CBD in the interests of promoting regeneration -	<i>Housing Dept; West Leigh Residents Association; The Southend Society; Essex Chamber of Commerce; Leigh on</i>	A development management approach in safeguarding residential amenity and the character of areas is now likely to be applied across the Borough and not just the central area. The need for a specific Central Area approach to safeguarding housing stock [where different to the borough wide approach] will be

	<i>Sea Town Council; John Davey; RSLtd</i>	explored as the LDF, including the APP, is progressed.
Approach needs to be consistent with amended vision which should include a detailed sustainability requirements	<i>Natural England</i>	
The need for housing stock means that there should be minimal loss of existing units	<i>BERA;</i>	
Should be linked to a specific aim – i.e. resist loss of a specific type, size or tenure	<i>Crest Nicholson Easter Ltd [Barton Willmore]</i>	
Should protect key assets (Conservation Areas) and deliberately be used to assist historically sensitive repair and restoration	<i>Milton Conservation Society</i>	Government policy sets out that the character of conservation areas should be preserved or enhanced.
<b>Issue No. 15</b>	<b>Flat Developments</b>	
Control flat development in residential streets adjoining the town centre but provide a more flexible approach within the CBD in the interests of promoting regeneration. In addition policy should be:	<i>Land Securities Trillium; Essex Chamber of Commerce; John Davy</i>	Comments noted. To make the most of the Boroughs limited amount of land and to meet the spatial distribution of housing growth set within the Core Strategy DPD it is likely that flatted development will be required particularly in the Town Centre. However, in conjunction with the evidence from housing, SHLAA/ELR and viability studies on strategic sites, future policies regarding the distribution of flats and family homes will be explored as the AAP, is progressed and will be set within the context of a spatial development strategy and transport and accessibility strategy for the area. Design issues, dwelling mix options, residential standards, and other sustainability objectives are likely to be applied across the Borough. The need for a specific Central Area approach to safeguarding housing stock [where different to the borough wide approach] will be
<ul style="list-style-type: none"> <li>• set within overall strategy, resolve access (parking) and assess realistic economic criteria</li> </ul>	<i>The Southend Society; RSL</i>	
<ul style="list-style-type: none"> <li>• Compliment objectives of BLP Policy H3</li> </ul>	<i>Housing Dept</i>	
<ul style="list-style-type: none"> <li>• include Secured by Design, park mark</li> </ul>	<i>Essex Police</i>	
<ul style="list-style-type: none"> <li>• Not be at the detriment of providing decent space standards to allow for family expansion etc</li> </ul>	<i>Housing Dept</i>	

<p>Control the amount of flat development in accordance with the principles established in BLP Policy H3</p>	<p><i>West Leigh Residents Association; BERA; Leigh on Sea Town Council</i></p>	<p>explored as the LDF, including the AAP, is progressed.</p>
<p>Accounting for the pressures on the seafront, it would make sense to explore whether options exist to: -</p> <ul style="list-style-type: none"> <li>(i) Locating high density dwellings in areas appropriate distances from the seafront/ecologically sensitive sites</li> <li>(ii) Ensure developments have adequate accessible natural (non designated site) greenspace within suitable distances</li> <li>(iii) Ensure adequate land within allocated areas to incorporate accessible natural (non designated site) greenspace within the development area or created/enhanced as part of planning gain</li> </ul>	<p><i>Natural England</i></p>	<p>Comments noted. Government Policy and the Core Strategy DPD are committed to creating sustainable communities. This approach recognises both the need for quality amenity space within developments and for the communities to have access to easily accessible functional open space. National, Regional and local policy also acknowledges the need to ensure that growth and regeneration mitigate any likely impact on ecologically sensitive areas. Future policies regarding the distribution of flats and family homes will be explored as the AAP is progressed and will be set within the context of a spatial development strategy and transport and accessibility strategy for the area. The AAP will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment if required] to ensure protection of environmental designations in particular. The provision of linked functional green spaces will also be explored as an integral part of the spatial development strategy. A development management approach to design issues, including greenspace, and other sustainability objectives are likely to be applied across the Borough and not just the central area. The need for a specific Central Area approach [where different to the borough wide approach] will be explored as the AAP</p>

		is progressed further.
<p>Criteria for providing for housing should:</p> <p>(i) Refer to the phasing of housing in the context of provision of adequate water supply, infrastructure and foul water treatment capacity. Such infrastructure and green infrastructure should be in place in advance of, or along side housing development -</p> <p>(ii) After PPS25 sequential and exceptions test all appropriate measures must be taken to ensure risk of flooding is minimised;</p> <p>(iii) Brownfield land will require site investigations to establish any risk of contamination, full site investigations and remediation will be required where there is a potential risk of pollution to the water environment.</p> <p>(iv) Need to protect the quality of water resources from pollution associated with construction and lifetime of the development.</p> <p>(v) Water efficiency measures so as not to increase pressure on water supply</p>	<p><i>RSPB; Anglian Water Services Ltd Environment Agency</i></p>	<p>Comments noted. Government Policy and the Core Strategy DPD are committed to creating sustainable communities. This includes the need for prudent use of natural resources, and the need to address flood risk when considering new development. These issues have been addressed in the Core Strategy DPD and more detailed policy requirements where appropriate will be applied across the Borough and not just in the central area. The need for a specific Central Area approach [where different to the borough wide approach] will be explored as the AAP is progressed and will be informed by a robust evidence base regarding water related infrastructure.</p>
<p>Treat all flat development schemes on their merits having regard to housing needs, design and other related criteria [PPS1 / PPS3]</p>	<p><i>SUFC; Crest Nicholson Eastern Ltd; Network Rail; HBF</i></p>	<p>Comments noted. It is set out in government policy that we need to plan for the future and control land use to result in efficient and effective places. Whilst a degree of flexibility should be applied with regard to development schemes, this will be achieved through the borough wide development management polices, However, in conjunction with the evidence from housing, SHLAA/ ELR etc and viability studies on strategic sites, future policies regarding the distribution of flats and family homes will be explored will be explored as the LDF, including the AAP, is progressed</p>

		and will be set within the context of a spatial development strategy and transport and accessibility strategy for the area.
<b>Issue No. 16</b>	<b>Public Transport</b>	
Matter for local consideration but improvements to public transport is consistent with Regional Transport Strategy	<i>EERA</i>	Point noted
Safeguard a route linking London Road, Queensway, Chichester Road, Queensway and the seafront to include priority routes/access for buses	<i>Economic Regeneration Team, Housing Dept; The Southend Society; Essex Chamber of Commerce; Arriva; BERA; John Davey</i>	Comments noted. The Core Strategy DPD Policy CP3 requires improvements to the transport infrastructure and services to achieve a modern integrated transport system. This includes widening travel choice – including the development of showcase bus priority corridors, making provision and safeguarding appropriate corridors / land for new modes of passenger transport such as SERT and linked to Park and Ride schemes and providing for the development of high quality transport interchanges at Southend (Regional Transport Node). Public transport along with other access and parking issues will be explored further in conjunction with the preparation of the Council’s LTP3 and utilising the borough wide transport model and the more detailed visualisation model for the town centre. These will be considered further as the AAP is progressed.
Proposals for public transport need to be considered in the context of the strategy for the town centre as a whole and the optimal layout of existing and new land uses so that PT serves each appropriately	<i>RSLtd</i>	
Supportive of initiatives that would improve public transport provision to reduce impact on transport network	<i>Highways Agency</i>	
Support improvement to public Transport provided no adverse impact on SPA – particularly ‘hoppa’ bus circuit linking railway stations and park and ride	<i>RSPB</i>	
<b>Issue No. 17</b>	<b>Park and Ride</b>	
Support policy provision to provide for Park and Ride facilities to serve Town Centre , suggested locations include	<i>The Southend Society; Milton Conservation Society; RSPB</i>	Comments noted. The Core Strategy DPD Policy CP3 requires improvements to the transport infrastructure and services to achieve a modern integrated transport system. This includes widening travel choice – including the development of showcase bus priority corridors, making provision and safeguarding appropriate corridors / land for new modes of
<ul style="list-style-type: none"> <li>Airport and Leigh Station</li> </ul>	<i>Economic Regeneration Team</i>	
<ul style="list-style-type: none"> <li>Nestuda Way</li> </ul>	<i>RSLtd</i>	
The provision of off street parking might reduce	<i>Campaign to Protect</i>	

effectiveness of Park and Ride	<i>Rural Essex</i>	passenger transport such as SERT and linked to Park and Ride schemes and providing for the development of high quality transport interchanges at Southend (Regional Transport Node). Public transport along with other access and parking issues will be explored further in conjunction with planned growth and the preparation of the Council's LTP3 and utilising the borough wide transport model and the more detailed visualisation model for the town centre. These will be considered further as the AAP is progressed.
<ul style="list-style-type: none"> <li>Success of the scheme would also depend upon the level of town centre/seafront car park charges</li> </ul>	<i>Arriva</i>	
Quality of shopping offer needs to improve to generate demand	<i>BERA</i>	
Treat all schemes on their merit having regard to other policies	<i>West Leigh Residents Association; Essex Chamber of Commerce; Leigh Town Council</i>	
Significant planning issues involved including environmental effects need to be fully assessed	<i>Natural England</i>	The AAP will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment if required] to ensure protection of environmental designations in particular.
Matter for local consideration but improvements to public transport is consistent with Regional Transport Strategy -	<i>EERA</i>	Point noted
Added criteria that facilities should attain Safer Parking award PARK MARK	<i>Essex Police</i>	Point noted
<b>Issue No. 18 Interchanges</b>		
Develop specific principles to promote improved facilities and linkages	<i>The Southend Society; Essex Chamber of Commerce; Arriva; John Davey</i>	Comments noted. The central area of Southend is a major transport interchange and the quality and sustainability of connections to and between the bus interchange and rail stations will need to be a cornerstone of AAP. Easy and efficient movement between interchanges of different modes, including siting of improved interchanges based on a spatial strategy for the town will be explored further in association with the development of LTP3.
<ul style="list-style-type: none"> <li>Easy and efficient movement between interchanges of different modes, including siting of improved interchanges based on spatial strategy for the town. CAM suggests – Victoria Circus, Pier Hill, Central Station, Tylers Avenue/Royals Based on traffic impact assessment and modelling</li> </ul>	<i>RSLtd</i>	

<ul style="list-style-type: none"> <li>Important to enhance linkages between transport interchanges and provide connectivity between town centre and seafront</li> </ul>	<i>Highways Agency</i>	
<ul style="list-style-type: none"> <li>Consideration should be given to improved connectivity – good signage and route planning at arrival and destination points</li> </ul>	<i>Economic Regeneration Team; EEDA</i>	
<ul style="list-style-type: none"> <li>Should be set within sustainability objectives</li> </ul>	<i>Natural England</i>	
Matter for local consideration but improvements to public transport is consistent with Regional Transport Strategy	<i>EERA</i>	Point noted.
Retain BLP provision	<i>BERA</i>	Comments noted
Object to the promotion of Hovercraft facility, will need Appropriate Assessment	<i>Natural England, RSPB</i>	Point noted
<b>Issue No. 19</b>		
<b>Car-Parking Off-Street</b>		
Rationalising facilities to maximise development value and provide improved replacement car parking facilities at entry points to the town centre in appropriate locations would be the preferred option	<i>Housing Dept; The Southend Society</i>	Comments noted. The Borough Council's parking policy involves maintaining public parking to 2021 at current levels (2,518 spaces) and to provide replacement public car parking as a condition precedent of redevelopment of existing surface car parks and to replace the current stock of surface car parks with high quality and secure multi-storey and/or basement car parks on the edge of the town centre. Leading and supporting land uses appropriate to the opportunities within existing off-street parking areas and with regard to their strategic functional relationship and objectives for the central area will be taken forward as part of the Spatial Development Strategy. Regard will be had to the evidence base, including SHLAA, ELR and Retail and Town Centre study and further consultation as the AAP is progressed.
<ul style="list-style-type: none"> <li>Preferred locations would be at each corner of the town centre, guiding pedestrians through the town centre and increasing footfall. However, sustainable modes of travel must be an alternative to encourage motorists to leave their cars at home and reduce congestion</li> </ul>	<i>Economic Regeneration Team</i>	
<ul style="list-style-type: none"> <li>Land near Victoria Railway Station</li> </ul>	<i>John Davey</i>	
<ul style="list-style-type: none"> <li>Preferred locations: SE Essex College Site; 2/4 st. car park at Sainsburys Queens Road; replace and release Farringdon for Campus expansion, replacement for Alexandra/Clarence car parks before development</li> </ul>	<i>Essex Chamber of Commerce, BERA</i>	
<ul style="list-style-type: none"> <li>Rationalise car parking along seafront – kept to a minimum to promote travel by alternative modes</li> </ul>	<i>Highways Agency</i>	
New provision should be at a lower ratio to existing	<i>RSLtd</i>	Comments noted. The Borough Council's parking



provision (80% of current standard) and comprehensive relocation and re-provision to release development sites		policy is involves maintaining public parking to 2021 at current levels (2,518 spaces).
Linkages with Public Transport policy, park and ride and sustainable parking charges	<i>Arriva; BERA</i>	Comments noted. The preparation of LTP3 will inform this AAPs approach to all aspects of transportation with a view to incorporating an integrated transportation Strategy for the town centre within this AAP.
Use rationalised car parking facilities to create accessible natural (non designated site) greenspace	<i>Natural England</i>	Comments noted. The Borough Council's parking policy involves maintaining public parking to 2021 at current levels (2,518 spaces).
Regard should be had to RSS Policy T14	<i>EERA</i>	Point noted
Retain current provision	<i>West Leigh Residents Association; Leigh on Sea Town Council</i>	Comments noted. The Borough Council's parking policy involves maintaining public parking to 2021 at current levels (2,518 spaces).
<b>Issue No. 20</b>	<b>Car Parking – On Street</b>	
Residents Parking Provision needs to be included in future policy in the interest of protecting residential amenity and character	<i>Economic Regeneration Team; Housing Dept; West Leigh Residents Association; The Southend Society; Essex Chamber of Commerce; Leigh on Sea Town Council; John Davey; Milton Conservation Society</i>	Comments noted: The preparation of LTP3 will inform this AAPs approach to on street parking as part of an integrated approach to all aspects of access and travel in the central area. Amenities of residential areas will be a key consideration, and exploration of visitor parking needs, residents parking permits, traffic management measures (such as home zones etc) will be explored further as the AAP is progressed. Vehicle parking standards for development schemes will be explored as part of the borough wide Development Management DPD, which may include standards specific to the Southend Central Area.
<ul style="list-style-type: none"> <li>Carefully considered according to local environmental circumstances</li> </ul>	<i>Natural England</i>	
<ul style="list-style-type: none"> <li>However the benefits of living within the town centre necessitate having to forgo convenient parking</li> </ul>	<i>BERA</i>	
<ul style="list-style-type: none"> <li>Transport policy at development management level</li> </ul>	<i>Highways Agency</i>	

need to be proactive input to the sustainable planning process – reduce need to travel, reduce distance travelled and encourage sustainable modes		
Maintain the status quo outside Core Town Centre where is does not constrain access to the town centre, redevelopment areas with the Core area will require careful consideration as part of a comprehensive master planning approach	<i>RSLtd</i>	
<b>Issue No. 21      Traffic Management</b>		
Base future Planning Policy on current route hierarchy set out in the Local Transport Plan	<i>Housing Dept</i>	<p>All comments noted. The Council is currently preparing LTP3. It is envisaged that this will include an integrated access and movement strategy for the central/town centre area, including easy and equitable access to and within the area, encouraging sustainable modes and their integration, investigation of traffic movement and modelling, and route hierarchy and traffic management. The LTP3 will also need to respond to the spatial development strategy prepared for this AAP which in turn will take on board the subsequent requirements for transportation.</p> <p>Particular issues to be addressed include:</p> <ul style="list-style-type: none"> <li>• High Street – extent of pedestrianisation and the need for activities to maintain viability</li> <li>• Future role and alignment of Chichester Road</li> <li>• Potential to link the south eastern part of the High Street/Chichester Road through to the seafront via St John’s and Seaway, and improvements to linkages at Pier Hill</li> <li>• The role and management of traffic along the</li> </ul>
<ul style="list-style-type: none"> <li>• Create a formal borough-wide Bus Punctuality Improvements Partnership with Traffic Manager</li> </ul>	<i>Arriva; BERA; John Davey</i>	
<ul style="list-style-type: none"> <li>• Additional interventions where necessary with respect of strategic development sites</li> </ul>	<i>RSLtd,</i>	
Adopt route hierarchy to include additional traffic management measures		
<ul style="list-style-type: none"> <li>• Segregate usage</li> </ul>	<i>The Southend Society</i>	
<ul style="list-style-type: none"> <li>• Need to consider environmental considerations i.e. local air quality policy</li> </ul>	<i>Natural England</i>	
<ul style="list-style-type: none"> <li>• Additional interventions where necessary with respect of strategic development sites</li> </ul>	<i>RSLtd, Highways Agency</i>	
<ul style="list-style-type: none"> <li>• Transport policy needs to be proactive input to the sustainable planning process – reduce need to travel, reduce distance travelled and encourage sustainable modes</li> </ul>	<i>Highways Agency</i>	
New major east west route that does not dissect high street – full pedestrianisation and removal of existing roads that encroach on the High Street	<i>Essex Chamber of Commerce</i>	

Maintain overall High Street traffic-free character - maintain east west route - Principle of maintaining bus penetration	<i>RSLtd</i>	<p>Esplanade / wider seafront route</p> <ul style="list-style-type: none"> <li>• The requirements of public transport and associated provision of interchanges, cycling and walking</li> <li>• Traffic management to and around the central area having regard to residential areas, areas of heritage importance, and associated provision of car parks</li> </ul>
Matter for local consideration but improvements to public transport is consistent with Regional Transport Strategy	<i>EERA</i>	
<b>Issue No. 22      Cycling and Walking</b>		
<b>General</b>		
Seek improvements on an ad hoc basis as resources permit having regard to the LTP strategy and cycle network	<i>BERA</i>	<p>Comments noted. Support for walking and cycling as an alternative, healthier and more environmentally friendly mode of travel has increased over the years. Southend's topography and climate are well suited for both modes. Cycling Southend's vision is for the bike to become part of the daily routine, with more and more people choosing to cycle both recreationally and as a preferable mode of travel. As such the £6.4 million project has already achieved a great deal both in terms of improved infrastructure and facilities, education and promotion. Walking routes have an equally important role in enhancing recreational opportunities and access between the town centre and seafront and increasing footfall within the town centre retail circuits etc. The cycle network needs to provide a framework for attractive, integrated, and 'greener' routes to and within the central area, seafront and to the wider borough / surrounding countryside for both cyclists and walkers. LTP3 will address cycling and walking as part of its broader integrated transportation strategy</p>
Proposals and priorities should be set within overall strategy that delivers objectives which have regard to environmental consideration	<i>Natural England</i>	
<ul style="list-style-type: none"> <li>• In addition should reflect priorities set within the CAM</li> </ul>	<i>RSLtd</i>	
Specific policy aimed at structured and progressive improvement should be developed	<i>Milton Conservation Society</i>	
<p>Support in principle improvements to walking and cycling provided</p> <ul style="list-style-type: none"> <li>• Accompanied by appropriate furniture</li> <li>• Supported and linked to public transport network</li> <li>• Appropriately sited and designed to protect environment</li> <li>• On seafront may not be appropriate to provide lighting and may need to be screened</li> </ul>	<i>RSPB</i>	
Facilities for cycling and walking should be segregated	<i>The Southend Society</i>	
Matter for local consideration but improvements to cycling and walking is consistent with Regional Transport Strategy	<i>EERA</i>	

<b>Cycling</b>		
Enhancement of existing cycle routes should be improved further and more widely promoted including sign posting and cycle parking	<i>Economic Regeneration Team; Essex Chamber of Commerce</i>	Comments noted. Cycling Southend's vision is for the bike to become part of the daily routine, with more and more people choosing to cycle both recreationally and as a preferable mode of travel. As such the £6.4 million project has already achieved a great deal both in terms of improved infrastructure and facilities, education and promotion. The cycle network needs to provide a framework for attractive integrated, and 'greener' routes to and within the central area for cyclists and walkers
Cycle route in central seafront area needed to link up with the route along seafront	<i>John Davey</i>	
<b>Walking</b>		
Complete pedestrianisation of High Street with additional pedestrianisation of Elmer Approach, York Road and Queens Road	<i>Essex Chamber of Commerce</i>	Comments noted. High Street will need to maintain its traffic free character. Further pedestrianisation as well as the scope for other traffic free routes will be addressed through LTP3 having regard to a preferred spatial development strategy, and the requirements of public transport and servicing.
Approaches to High Street should be prioritised to provide more welcoming and attractive environment	<i>Economic Regeneration Team</i>	
Maintain overall High Street traffic-free character - maintain east west route and principle of maintaining bus penetration	<i>RSLtd</i>	
Support development of a pedestrian area for the Central Seafront	<i>Highways Agency</i>	
<b>Issue No. 23 Design Policy</b>		
Develop policy approach setting out design principles to which development should adhere in accordance with adopted Design and townscape Guide. In addition:	<i>Essex Chamber of Commerce; John Davey; Milton Conservation Society</i>	Comments noted: The Core Strategy DPD clearly sets out the strategic requirements / key principles for development management. The Borough Council is preparing a Development Management DPD which will contain more detailed policies for managing development schemes. These policies will include detailed design requirements enshrining the good practice guidance set out in its adopted Design and
<ul style="list-style-type: none"> <li>Should encourage iconic / contemporary buildings to provide legacy of our times</li> </ul>	<i>Economic Regeneration Team</i>	
<ul style="list-style-type: none"> <li>Should be informed by an understanding of historic interest of the area, including the scale, form and</li> </ul>	<i>English Heritage</i>	

distinctive qualities of the townscape and buried archaeology [should have a coastal heritage strategy]		Townscape Guide SPD. As the LDF, including AAP, is progressed it will address whether or not there is a need to have a suite of development management policies specific to the Town Centre / central area and/or to provide strategic site specific guidance within development briefs.
<ul style="list-style-type: none"> <li>Should provide accessible greenspace and conserve biodiversity interests</li> </ul>	<i>Natural England</i>	
<ul style="list-style-type: none"> <li>Where specific development brief developed for strategic Development areas then this could include appropriate design guidance specific for the area or SPD for town Centre</li> </ul>	<i>Land Securities Trillium, RSLtd BERA</i>	
<ul style="list-style-type: none"> <li>Design and built to Secured by Design Standards – connectivity should not lead to unnecessary ‘permeability’ that could lead to crime, anti-social behaviour etc</li> </ul>	<i>Essex Police</i>	
<b>Energy / Resource Efficiency</b>		
Supports the Design Guide SPD, however, believe that the AAPs could go further and discuss possible strategies to reduce energy consumption.	<i>RSPB</i>	Comments noted: The Core Strategy DPD clearly sets out the strategic requirements / key principles for development management in respect of sustainable development. The Borough Council is now preparing a Development Management DPD which will contain more detailed policies for managing development schemes. These policies will include detailed requirements for sustainable development. The need for a specific Central Area approach [where different to the borough wide approach] will be explored as the LDF, including AAP, is progressed further.
Developments should incorporate energy efficient materials in the construction and explore opportunities for obtaining a proportion of energy from renewable sources. Recommend that the AAPs include specific targets for achieving the following (or similar) principles for sustainable design		
<ul style="list-style-type: none"> <li>A commitment to reducing carbon emissions by ensuring all new developments are expected to incorporate renewable energy technologies.</li> </ul>		
<ul style="list-style-type: none"> <li>A commitment to ensuring that all new development must achieve at least BREEAM EcoHomes ‘Very Good’ or ‘Excellent’ standard and the equivalent for commercial properties.</li> </ul>		
<ul style="list-style-type: none"> <li>A commitment to reducing water consumption and wastage by ensuring all large developments must</li> </ul>		

<p>submit a Water Conservation Strategy, detailing how water will be conserved, and the water environment protected from adverse impacts.</p>		
<ul style="list-style-type: none"> <li>• Encouraging all new development to manage excess rainwater via retention in SUDS. The RSPB encourages SUDS to be managed as functioning ecosystems, for example as wetland, ditch and pond features. These can support biodiversity as well as providing water storage and reducing flood risk.</li> </ul>		
<ul style="list-style-type: none"> <li>• Encouraging the use of sustainable building materials and re-use of materials, such as recycled aggregates and wood, wherever possible.</li> </ul>		
<ul style="list-style-type: none"> <li>• Encouraging incorporation of vegetation into built structures and provision of high-quality public space, by creating or restoring wildlife habitats, in new developments.</li> </ul>		
<p><b>Protection of Designated sites</b></p>		
<p>Protection of undeveloped parts of the coastline will be essential to ensure that the diversity and abundance of species are both protected and enhanced. Appropriate assessment will need to be carried out where development is likely to have impacts on the protected Nature conservation areas adjacent to the coastline.</p>	<p><i>Environment Agency</i></p>	<p>Comment noted. The AAP itself will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment] to ensure protection of environmental designations in particular.</p>
<p><b>Flood Risk</b></p>		
<p>After undertaking the PPS25 Sequential and Exception tests, where any development takes place in areas at risk of flooding, all appropriate measures must be taken to ensure that the risk of flooding to both the development and its occupants are minimised. The Thames Gateway South Essex Strategic Flood Risk Assessment (TGSE SFRA) a site specific Flood Risk Assessments (FRA) will inform the</p>	<p><i>Environment Agency</i></p>	<p>Comment noted. Government Policy and the Core Strategy DPD are committed to creating sustainable communities. This includes the need to address flood risk when considering new development. The issue of flood risk has been dealt with in the Core Strategy DPD and in the Environment Agency's Flood Zone Maps or by other means, including the South</p>

<p>required flood risk mitigation to allow development to proceed in a safe and appropriate manner.</p>		<p>Essex Strategic Flood Risk Assessment. This overarching theme of flood risk will be dealt with strategically as part of a shoreline management plan. Development Management policies within the Southend Central AAP will address this issue specifically for the central seafront area.</p>
<p><b>Contamination / Pollution</b></p>		
<p>We encourage development on previously used brownfield land, as this provides the opportunity to clean up contaminated land, bringing it back into use, as encouraged by PPS23. The AAPs should state that all redevelopment of brownfield land will require site investigations to establish any risk of contamination. Full site investigation and remediation will be required where there is any potential risk of pollution to the water environment.</p>	<p><i>Environment Agency</i></p>	<p>Comment noted. The Development Management DPD will explore a borough wide approach to environmental protection and the issues surrounding contaminated land.</p>
<p><b>Water Resources</b> Reference is made to the need to protect the quality of water resources through acknowledging and managing the risks of pollution associated with the construction and arising during the lifetime of the development. Reference should also be made to ensuring future water demand does not increase the already heavy burden on water supply in the South Essex area. All developments, regardless of nature or scale, should seek to include water efficiency measure, to encourage re-use and recycling of grey/rain water and efficient use of clean water sources.</p>	<p><i>Environment Agency</i></p>	<p>Comments noted. The Core Strategy DPD clearly sets out the strategic requirements / key principles for development management. The Borough Council is preparing a Development Management DPD which will contain more detailed policies for managing development schemes. Green technologies, prudent use of natural resources, design issues and other sustainability objectives are likely to be applied across the Borough and not just the central area. The need for a specific Central Area approach [where different to the borough wide approach] will be explored as the AAP is progressed. Regard will be had to the Water</p>

		Cycle Study and Waste Water Treatment paper.
<b><i>Crime prevention</i></b>		
All new build should be built to Secured by Design standards - public parking provision should be designed and built to the Safer Parking Award standards – ‘PARK MARK’	<i>Essex Police</i>	Point noted. The Core Strategy DPD clearly sets out the strategic requirements / key principles for development management. The Borough Council is preparing a Development Management DPD which will contain more detailed policies for managing development schemes including crime prevention measures. The need for a specific Central Area approach [where different to the borough wide approach] will be explored as the AAP is progressed.
<b>Issue No. 24</b>	<b>Frontages for Townscape Merit</b>	
Retain the principle of Frontages of Townscape merit	<i>Economic Regeneration Team, Housing Dept, Essex Chamber of Commerce, BERA, John Davey, RSLtd, Milton Conservation Society,</i>	Comments noted. The adopted Design and Townscape Guide provides guidance concerning frontages for townscape merit. The Borough Council is preparing a Development Management DPD which explore this issue. The need for a specific Central Area approach [where different to the borough wide approach] will be considered as the LDF, including the AAP, is progressed.
Do not agree with any options	<i>The Southend Society</i>	
<b>Issue No. 25</b>	<b>Tall Buildings</b>	
Develop a specific tall building policy for the town centre	<i>John Davey</i>	Comments noted. The adopted Design and Townscape Guide provides guidance concerning Tall Buildings. It is proposed that the Development Management DPD will set out an approach for tall and large buildings across the borough with specific
Tall buildings would have an increased impact on the historic environment as well as natural environment – therefore should be based on CABI/English Heritage joint guidance	<i>English Heritage</i>	



Permitted on exceptional merit only in the centre of town and include examination of skyline merit, landmark, silhouette and shadow issues	<i>Milton Conservation Society</i>	reference to the town centre and central area, evidenced by the Borough Wide Character Study. This will be explored as the LDF is progressed.
Determine such proposals on their merits having regard to design and other related guidance and criteria	<i>Economic Regeneration Team; SUFC; Housing Dept, Securities Land Trillium, The Southend Society, Essex Chamber of Commerce,</i>	
If it enabled increased provision of accessibility natural greenspace/habitats provision	<i>Natural England</i>	
Indicative height and massing should be defined for some key sites, case by case approach and all applicants should be encouraged to undertake a thorough context study demonstrating the logic of a tall building	<i>RSLtd</i>	
No demand at the moment for specific policy	<i>BERA</i>	
<b>Issue No. 26      Open Space</b>		
Need to enhance the environmental quality of the area	<i>EEDA</i>	Points noted. The AAP will need to be in conformity with the adopted Core Strategy DPD and as such the environmental and urban renaissance policy context is set. The need to provide adequate accessible open space will be explored as part of a green grid strategy within the AAP. This will entail both identifying additional functional open space within the AAP area and a series of well defined easily accessible linkages for cycling and walking to connect the town centre seafront visitors and local community to other green space opportunities and the wider countryside. This
Develop specific policy for the town to promote the concept of the Green Grid	<i>Leigh Town Council; John Davey</i>	
Develop policy to promote the development of additional public open spaces <u>and</u> develop new areas as part of a green grid concept in the town; in addition	<i>The Southend Society; West Leigh Residents Association</i>	
<ul style="list-style-type: none"> <li>Also need event areas and focal points</li> </ul>	<i>- Economic Regeneration Team;</i>	
<ul style="list-style-type: none"> <li>Consideration should be given to identifying locations for green space as part of the development on strategic sites and in particular where new housing</li> </ul>	<i>Housing Dept</i>	

growth is to be accommodated and this should be part of the mapping and planning process for a wider green grid		will be informed by the findings of key evidence base documents including SHLAA, ELR, Retail Study, Borough Wide Character Assessment.
<ul style="list-style-type: none"> <li>Enhancement of natural and historic environment should be given more emphasis, if lost cannot be replaced</li> </ul>	<i>CPRE</i>	
<ul style="list-style-type: none"> <li>Replace lost open space on edge of town by creating a big green field site on the B&amp;Q site</li> </ul>	<i>David McCullie</i>	
<ul style="list-style-type: none"> <li>RSS Policy ENV1 requires LDDs to provide substantial networks of green space to serve new development and should be linked to Green Grid concept</li> </ul>	<i>EERA</i>	
<ul style="list-style-type: none"> <li>Also should include enhancement of Warrior Square</li> </ul>	<i>Essex Chamber of Commerce</i>	
<ul style="list-style-type: none"> <li>Should also consider safety issues and consideration of the potential for roof gardens</li> </ul>	<i>The Milton Conservation Society</i>	Comment noted. The need to provide adequate accessible open space to relieve recreational pressure on ecological sensitive sites will be explored as part of a green grid strategy within the AAP. The AAP itself will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment if required] to ensure the protection of environmental designations in particular.
<ul style="list-style-type: none"> <li>Should provide alternative space to reduce impact on seafront – and provide additional habitats for wildlife, all recreational new space should not impact on SPA and associated landscapes - should encourage passive enjoyment of wildlife assets [connectivity through public art, street furniture and information] - understand that a memorandum of understanding has been agreed with the council on how to treat the seafront public space</li> </ul>	<i>RSPB</i>	
AAP should deal with matters of delivering the CAM strategic public realm framework	<i>RSL</i>	Comment noted. The CAM will be considered further as the AAP is progressed.
Should contribute to 'sense of place' and 'quality of life' in the following ways -	<i>Natural England</i>	Comments noted: The Core Strategy DPD clearly sets out the strategic requirements / key principles for

<p>i) conserves significant biodiversity assets (<i>CPRE</i>)  ii) provides adequate accessible natural greenspace to relieve recreational pressure on ecological sensitive sites  iii) contributes to aesthetic qualities and character of local environment  iv) contributes to environmental quality of local area – air quality, water quality, local climate etc.</p>		<p>development management in respect of sustainable development and environment. The Borough Council is now preparing a Development Management DPD which will contain more detailed policies for managing development schemes. These policies will include detailed requirements for sustainable development and design. The need for a specific Central Area approach [where different to the borough wide approach] will be considered as the AAP is progressed.</p>
<p>Enhance biodiversity in the town centre by, using native species and drought resistant species to reduce demand on water supply, provide appropriate spaces and habitat links and corridors where possible</p>	<p><i>Environment Agency</i></p>	
<p>Unsure of standard of provision and maintenance provided by the Council, so if no funds should not provide further space</p>	<p><i>BERA</i></p>	<p>Comment noted.</p>
<p><b>Issue No. 27      Education, Culture and Tourism</b></p>		
<p>RSS Policy ETG4 requires LDDs to plan for high quality sub-regional mixed use development</p>	<p><i>EERA</i></p>	<p>Comments Noted. The Core Strategy provides policy for community infrastructure provision within the Borough. National Policy in the form of PPS6 also provides guidance on town centre uses. It is envisaged that the Development Management DPD will provide more detail on employment sectors, including cultural, educational and leisure services. The need for a specific Central Area approach will be considered as the AAP is progressed and the spatial strategy is developed. This will be informed by underpinning evidence including, SHLAA, ELR and Retail and Town Centre Study. The CAM will be considered further as the AAP is progressed.</p>
<p>Develop specific policy criteria to promote the development of additional education, culture and tourism facilities in the town and identify specific <u>sites</u> also treat application on merits</p>	<p><i>The Southend Society</i></p>	
<ul style="list-style-type: none"> <li>Farringdon Car park for further expansion of the Higher education campus and new museum for Saxon king in the old museum n Victoria Avenue</li> </ul>	<p><i>Essex Chamber of Commerce</i></p>	
<ul style="list-style-type: none"> <li>degree of flexibility should be built in, CAM will define areas for expansion, deliverability will be need to be addressed</li> </ul>	<p><i>RSL</i></p>	
<p>Treat all schemes on their merit</p>	<p><i>West Leigh Residents Association, BERA; Leigh on Sea Town</i></p>	

	<i>Council; John Davey</i>	
Develop policy to promote the development of additional education, culture and tourism facilities in the town	<i>Housing Strategy Team</i>	
<ul style="list-style-type: none"> <li>Also need support facilities like student accommodation and tourist accommodation [lack of quality hotel space]</li> </ul>	<i>Economic Regeneration Team; Land Securities Trillium</i>	
<ul style="list-style-type: none"> <li>Respect environmental limits and not adverse impact on Natura 2000 site</li> </ul>	<i>Natural England</i>	Comment noted. The AAP itself will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment if required] to ensure protection of environmental designations in particular.
Ecotourism breaks away from traditional tourist seasonal pattern of visitors, the presence of over wintering birds could extend the season by promoting quiet recreational and educational facilities	<i>RSPB</i>	
<b>Issue No. 28</b>	<b>Environment of residential areas</b>	
Develop new policy having regard to the Environmental Room provisions i.e. quality of local environment will have priority	<i>Housing Strategy Team</i>	Comments noted. The Borough Council is preparing a Development Management DPD which will contain more detailed policies on design and residential amenity. The Design and Townscape SPD also provides valuable guidance on design matters. The Core Strategy CP4 seeks to safeguard and enhance conservation areas. The need for a specific Central Area approach to safeguard and enhance specific residential areas within the central area [where different to the borough wide approach] will be explored as the AAP is progressed.
<ul style="list-style-type: none"> <li>also particularly protect conservation areas and promotes enhancement and definition of other residential areas</li> </ul>	<i>Milton Conservation Society</i>	
<ul style="list-style-type: none"> <li>Treat applications on merit</li> </ul>	<i>The Southend Society</i>	
Treat all applications on merit having regard to design and other criteria	<i>Essex Chamber of Commerce; BERA; John Davey</i>	
Options need to respect environmental limits, conserve and enhance natural environment, provide adequate green infrastructure with all new development	<i>Natural England; RSPB</i>	The AAP itself will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate

		Assessment if required] to ensure the protection of environmental designations in particular. The need to provide adequate green infrastructure will be explored as part of a green grid strategy within the AAP.
The direction of town centre uses to core area and the promotion of sustainable transport modes will relieve pressure on residential areas and enhance environment	<i>RSLtd</i>	Noted. The Core Strategy and National Policy guidance PPS6 provide policy and establishes the sequential preferences for town centre uses. The Development Management DPD will also provide guidance on town centre uses. The need for further policy development regarding where town centre uses should be directed within the Central Area will be explored as the AAP is progressed.
<b>STRATEGIC DEVELOPMENT SITES</b>		
<b>Issue No.</b>	<b>Market Place</b>	
Regenerate the area based on small scale mews format and leisure uses and possible new market as outlined in English Partnerships proposal	<i>Economic Regeneration Team; Housing Strategy Team; BERA; John Davey</i>	Comments noted. Approach to sites will conform to the Core Strategy and National Policy whilst considering local circumstances and be explored with regard to the emerging vision, objectives, land use requirements and spatial development strategy as the AAP is progressed for further consultation. It will be informed by comments received and the findings of evidence documents and relevant strategies, including SHLAA and ELR (including 'Call for Sites') and Retail and Town Centre study. Transport issues will be explored further as part of the LTP3 preparation process. The AAP will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment] to ensure protection of environmental
<ul style="list-style-type: none"> <li>Should also include sensitive and appropriate solutions for car parking</li> </ul>	<i>Essex Chamber of Commerce</i>	
<ul style="list-style-type: none"> <li>CAM suggests specialist retail, independent food and drink with residential at upper floors</li> </ul>	<i>RSLtd</i>	
<ul style="list-style-type: none"> <li>Should also underpin and support this area that already has local identity</li> </ul>	<i>The Milton Conservation Society</i>	
Redevelop for retail and parking	<i>The Southend Society</i>	
All options need to be appropriate to the vision as amended to meet appropriate sustainability context – and the environmental safeguarding conserve and enhance approach set out in the Core Strategy	<i>Natural England</i>	

Should be any option than leaving in current form	<i>EEDA</i>	designations in particular.
<b>Issue No. 30 Tylers Avenue</b>		
Improve alignment of Chichester Road and redevelop for retail with replacement public car parking and public transport facilities and potentially office floorspace and covered market	<i>John Davey</i>	Comments noted. Approach to sites will conform to the Core Strategy and National Policy whilst considering local circumstances and be explored with regard to the emerging vision, objectives, land use requirements and spatial development strategy as the AAP is progressed for further consultation. It will be informed by comments received and the findings of evidence documents and relevant strategies, including SHLAA and ELR (including 'Call for Sites') and Retail and Town Centre study. Transport issues will be explored further as part of the LTP3 preparation process. The AAP will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment] to ensure protection of environmental designations in particular.
<ul style="list-style-type: none"> <li>• However not sure why Chichester Road needs realigning</li> </ul>	<i>BERA</i>	
Redevelop mixed use scheme comprising retail, housing and car parking and possible phase 2 of Travel Centre and possibly community facilities	<i>Economic Regeneration Team, Housing Strategy Team; Essex Chamber of Commerce; Arriva</i>	
<ul style="list-style-type: none"> <li>• In addition relocate market</li> </ul>	<i>The Southend Society</i>	
<ul style="list-style-type: none"> <li>• This option is a response to the specific retail development / retail circuit objectives</li> </ul>	<i>RSLtd</i>	
Any development which does not require the relocation of the County Court should take full account of the court's on-going and very specific operational requirements. Any scheme that requires relocation of the county Court or would be assisted by relocation may be acceptable subject to being funded by external investment and an alternative location and facility being provided	<i>HM County Court Services</i>	
All options need to be appropriate to the vision as amended to meet appropriate sustainability context – and the environmental safeguarding conserve and enhance approach set out in the Core Strategy	<i>Natural England</i>	
Should be any option than leaving in current form	<i>EEDA</i>	
<b>Issue No. 31 Warrior Square</b>		
Redevelop mixed use scheme comprising retail, housing,	<i>Economic</i>	Comments noted. Approach to sites will conform to

leisure and car parking and possible additional university facilities, in addition:	<i>Regeneration Team;</i>	the Core Strategy and National Policy whilst considering local circumstances and be explored with regard to the emerging vision, objectives, land use requirements and spatial development strategy as the AAP is progressed for further consultation. It will be informed by comments received and the findings of evidence documents and relevant strategies, including SHLAA and ELR (including 'Call for Sites') and Retail and Town Centre study. Transport issues will be explored further as part of the LTP3 preparation process. The AAP will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment] to ensure protection of environmental designations in particular.
<ul style="list-style-type: none"> <li>Relocate Council offices and/or police here</li> </ul>	<i>Housing Strategy Team</i>	
<ul style="list-style-type: none"> <li>Redevelop for mixed use comprising office, hotel with multi-level car parking (respect conservation area – max 4 floors)</li> </ul>	<i>BERA</i>	
<ul style="list-style-type: none"> <li>Extend public open space and consider parking underground</li> </ul>	<i>The Southend Society</i>	
<ul style="list-style-type: none"> <li>Ensure green space provision to maximise biodiversity value and allow for adaptation to climate change within urban area –</li> </ul>	<i>Environment Agency</i>	
<ul style="list-style-type: none"> <li>Serious consideration should be given to relocate the swimming pool to seaway car park to provide traditional swimming and leisure waters</li> </ul>	<i>Essex Chamber of Commerce</i>	
Should respond to the specific objective for meeting the needs of offices (small offices, grow on space, professional offices) and other options resulting from consultation	<i>RSLtd</i>	
Another option but not specified	<i>John Dave</i>	
Retain and enhance character of the public open space and surrounding residential properties by redeveloping southern end with similar scale housing	<i>The Milton Society</i>	
All options need to be appropriate to the vision as amended to meet appropriate sustainability context – and the environmental safeguarding conserve and enhance approach set out in the Core Strategy	<i>Natural England</i>	
Should be any option than leaving in current form	<i>EEDA</i>	
<b>Issue No. 32      Farringdon [aka Elmer Square]</b>		
Relocate car parking and redevelop as an extension to the Higher education campus	<i>Economic Regeneration Team;</i>	Comments noted. Approach to sites will conform to the Core Strategy and National Policy whilst

	<i>Essex Chamber of Commerce; John Davey; RSLtd; Milton Conservation Society</i>	considering local circumstances and be explored with regard to the emerging vision, objectives, land use requirements and spatial development strategy as the AAP is progressed for further consultation. It will be informed by comments received and the findings of evidence documents and relevant strategies, including SHLAA and ELR (including 'Call for Sites') and Retail and Town Centre study. Transport issues will be explored further as part of the LTP3 preparation process. The AAP will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment] to ensure protection of environmental designations in particular.
• Relocate Council Offices or Courts	<i>Housing Strategy Team</i>	
Car Parking with Student accommodation over – Extra air rights for University over central station	<i>The Southend Society</i>	
Retain and enhance car parking facilities on this site	<i>BERA</i>	
If park and ride is a serious option – redevelop this site with no replacement car parking	<i>Arriva</i>	
Should be any option than leaving in current form	<i>EEDA</i>	
<b>Issue No. 33</b>	<b>London Road / Queensway / High Street</b>	
Pedestrianise London Road to create piazza to promote leisure uses and enhance the environment	<i>Economic Regeneration Team; Housing Strategy Team; Essex Chamber of Commerce; John Davey</i>	Comments noted. Approach to sites will conform to the Core Strategy and National Policy whilst considering local circumstances and be explored with regard to the emerging vision, objectives, land use requirements and spatial development strategy as the AAP is progressed for further consultation. It will be informed by comments received and the findings of evidence documents and relevant strategies, including SHLAA and ELR (including 'Call for Sites') and Retail and Town Centre study. Transport issues will be explored further as part of the LTP3 preparation process. The AAP will be subject to a Sustainability Appraisal that assesses each option against a variety
Narrow London Road rather than pedestrianise it	<i>BERA</i>	
CAM promotes the area as a focus for prime office led mixed use	<i>RSLtd</i>	
Redevelop for retail – but query leisure and parking uses	<i>The Southend Society</i>	
Develop policy to retain the area principally in current format	<i>Arriva</i>	
Should be any option than leaving in current form	<i>EEDA</i>	



		of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment] to ensure protection of environmental designations in particular.
<b>Issue No. 34</b>	<b>Southend Victoria Station</b>	
Comprehensively redevelop to improve transport interchange and public realm facilities and provide for mixed use development of retail, offices, hotel and residential	<i>Economic Regeneration Team; Housing Strategy Team; The Southend Society; Essex Chamber of Commerce; Arriva; BERA; John Davey; Network Rail</i>	Comments noted. Approach to sites will conform to the Core Strategy and National Policy whilst considering local circumstances and be explored with regard to the emerging vision, objectives, land use requirements and spatial development strategy as the AAP is progressed for further consultation. It will be informed by comments received and the findings of evidence documents and relevant strategies, including SHLAA and ELR (including 'Call for Sites') and Retail and Town Centre study. Transport issues will be explored further as part of the LTP3 preparation process. The AAP will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment] to ensure protection of environmental designations in particular.
<ul style="list-style-type: none"> <li>• And improve linkages to town centre and Victoria Plaza</li> </ul>	<i>Tesco</i>	
<ul style="list-style-type: none"> <li>• And incorporate re-alignment of Victoria Circus</li> </ul>	<i>RSLtd</i>	
Turn into parkland for residents and workers to enjoy	<i>David McCullie</i>	
Should be any option than leaving in current form	<i>EEDA</i>	
<b>Issue No. 35</b>	<b>Victoria Avenue Office District</b>	
Redevelop part of site for affordable housing purposes;	<i>The Southend Society</i>	Comments noted. Approach to sites will conform to the Core Strategy and National Policy whilst considering local circumstances and be explored with regard to the emerging vision, objectives, land use requirements and spatial development strategy as the AAP is progressed for further consultation. It will be
<ul style="list-style-type: none"> <li>• And possibly University facilities/student accommodation</li> </ul>	<i>Economic Regeneration Team; Essex Chamber of Commerce</i>	

<ul style="list-style-type: none"> <li>Area is a good opportunity to secure sustainable jobs and housing with provision for attractive green grid space and cafes</li> </ul>	<i>Housing Strategy Team</i>	<p>informed by comments received and the findings of evidence documents and relevant strategies, including SHLAA and ELR (including 'Call for Sites') and Retail and Town Centre study. Transport issues will be explored further as part of the LTP3 preparation process. The AAP will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment] to ensure protection of environmental designations in particular.</p>
Allocate as mixed use area promoted through high quality design [retain grand proportions], proximity to services and high accessibility	<i>Land Securities Trillium- currently have interest in Victoria House</i>	
Must retain employment opportunities although redevelopment of some existing offices is inevitable but the area should retain as a commercial centre	<i>BERA</i>	
Policy to retain in current form	<i>John Davey</i>	
Should be any option than leaving in current form	<i>EEDA</i>	
<b>Issue No. 36 Victoria Avenue Civic Area</b>		
Relocate some civic/community uses to more central location and redevelop site for housing and office/commercial use	<i>Economic Regeneration Team; The Southend Society; Essex Chamber of Commerce; John Davey</i>	<p>Comments noted. Approach to sites will conform to the Core Strategy and National Policy whilst considering local circumstances and be explored with regard to the emerging vision, objectives, land use requirements and spatial development strategy as the AAP is progressed for further consultation. It will be informed by comments received and the findings of evidence documents and relevant strategies, including SHLAA and ELR (including 'Call for Sites') and Retail and Town Centre study. Transport issues will be explored further as part of the LTP3 preparation process. The AAP will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment] to ensure protection of environmental designations in particular.</p>
Job led growth in the wider Victoria Avenue area	<i>Housing Strategy Team;</i>	
Any development which does not require the relocation of the Magistrate's Court should take full account of the court's on-going and very specific operational requirements. Any scheme that requires relocation of the county Court or would be assisted by relocation may be acceptable subject to being funded by external investment and an alternative location and facility being provided	<i>HM County Court Services</i>	
need to be clear as to whether it would be feasible in the plan period to change use in this area – and if the civic functions are to be located elsewhere, then alternate	<i>RSLtd</i>	

options for doing so ought to be considered as part of the AAP process		
Retain the area principally in its current format	<i>BERA</i>	
Should be any option than leaving in current form	<i>EEDA</i>	
<b>Issue No. 37 Southchurch Road (High Street/Queensway)</b>		
Develop a programme of environmental enhancements and improvements	<i>Economic Regeneration Team; Housing Strategy Team; Essex Chamber of Commerce;</i>	Comments noted. Approach to sites will conform to the Core Strategy and National Policy whilst considering local circumstances and be explored with regard to the emerging vision, objectives, land use requirements and spatial development strategy as the AAP is progressed for further consultation. It will be informed by comments received and the findings of evidence documents and relevant strategies, including SHLAA and ELR (including 'Call for Sites') and Retail and Town Centre study. Transport issues will be explored further as part of the LTP3 preparation process. The AAP will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment] to ensure protection of environmental designations in particular.
<ul style="list-style-type: none"> <li>• Could be a positive step provided is consistent with sustainability objectives</li> </ul>	<i>Natural England</i>	
<ul style="list-style-type: none"> <li>• Introduce specialist retail and residential uses</li> </ul>	<i>The Southend Society</i>	
Pedestrianise area and divert buses to and from Travel Centre via the Seaway Car Park roundabout –	<i>John Davey</i>	
area would benefit from enhanced streetscape and shop fronts on Southchurch Road and the redevelopment of Queensway House focussing on replacement parking facilities and uses including residential and offices -	<i>RSLtd</i>	
Retain the area principally in current form	<i>BERA</i>	
Should be any option than leaving in current form	<i>EEDA</i>	
<b>Issue No. 38 Sutton Road Commercial/Industrial Area</b>		
Regenerate and improve the environment of the area to retain existing uses but redevelop part of site for housing	<i>Housing Regeneration Team Essex Chamber of Commerce; John Davey</i>	Comments noted. Approach to sites will conform to the Core Strategy and National Policy whilst considering local circumstances and be explored with regard to the emerging vision, objectives, land use requirements and spatial development strategy as the AAP is progressed for further consultation. It will be
Option would provide opportunity to redevelop and improve pollution control mechanisms/formal drainage	<i>Environment Agency</i>	

systems to provide the best quality development, reducing the risk of harm to the environment resulting from industrial processes		informed by comments received and the findings of evidence documents and relevant strategies, including SHLAA and ELR (including 'Call for Sites') and Retail and Town Centre study. Transport issues will be explored further as part of the LTP3 preparation process. The AAP will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment] to ensure protection of environmental designations in particular.
Opportunities exist within redevelopment to design – in measures for conserving biodiversity and accessible greenspace provision (ANGS) , but allocations should account for distribution of dwellings, ANGS provision and wildlife resources	<i>Natural England</i>	
This area is not and should not be part of the town centre AAP and site designation should be within another DPD	<i>RSLtd</i>	
Should be any option than leaving in current form	<i>EEDA</i>	
<b>Issue No. 39      Roots Hall Football Ground, Victoria Avenue</b>		
Develop for mixed use development		Comments noted. Approach to sites will conform to the Core Strategy and National Policy whilst considering local circumstances and be explored with regard to the emerging vision, objectives, land use requirements and spatial development strategy as the AAP is progressed for further consultation. It will be informed by comments received and the findings of evidence documents and relevant strategies, including SHLAA and ELR (including 'Call for Sites') and Retail and Town Centre study. Transport issues will be explored further as part of the LTP3 preparation process. The AAP will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment] to ensure protection of environmental designations in particular.
<ul style="list-style-type: none"> <li>Taking into consideration the constraints and impact on the environment. The further development of better school facilities, doctors surgeries etc to be taken into consideration with future development</li> </ul>	<i>Economic Regeneration Team</i>	
<ul style="list-style-type: none"> <li>Including convenience retail floorspace</li> </ul>	<i>SUFC; Sainsbury's Supermarkets Ltd</i>	
<ul style="list-style-type: none"> <li>Uses need to address vision and choice should seek to best utilise space available to most effectively deliver towards regeneration targets, whilst respecting environmental limits e.g. opportunities may exist to locate significant numbers of dwelling in this area (which is a reasonable distance from the ecologically sensitive seafront) in exemplar high density development with adequate provision of ANGS</li> </ul>	<i>Natural England</i>	
<ul style="list-style-type: none"> <li>Also include / retain leisure / recreation uses</li> </ul>	<i>The Southend Society</i>	
<ul style="list-style-type: none"> <li>But limited in terms of scale commercial uses (i.e.</li> </ul>	<i>Essex Chamber of</i>	

housing with retail frontages	<i>Commerce</i>	
<ul style="list-style-type: none"> <li>The town centre needs to be the focus for retail development, but some <u>local</u> facilities and services maybe appropriate to support sustainable development of the site</li> </ul>	<i>EEDA</i>	
Redevelop for housing purposes - ideal location to develop affordable housing	<i>BERA</i>	
Retain the site in leisure / recreation uses	<i>John Davey</i>	
This area is not and should not be part of the town centre AAP and site designation should be within another DPD	<i>RSLtd</i>	
Should be any option than leaving in current form	<i>EEDA</i>	
<b>Issue No. 40      Implementation and Monitoring</b>		
<i>Indicators/Monitoring</i>		
Rely on performance indicators within Core Strategy DPD	<i>Economic Regeneration Team; Essex Chamber of Commerce; BERA</i>	Comment noted.
Develop more specific indicators to gauge the impact of policy provisions in the Town Centre. Should include issues such as ANGS provision and criteria related to significant environmental assets	<i>Natural England</i>	Comment noted. The Southend Annual Monitoring Report already monitors a number of environmental criteria across the Borough. The AAP will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment] to ensure protection of environmental designations in particular. The need for additional environmental monitoring indicators specific to the central area will be considered as the AAP is progressed.
<b>Implementation</b>		
Concern around test of soundness viii) which requires	<i>EEDA</i>	Comment noted. The plan will need to be deliverable

<p>clear mechanisms for implementation and monitoring. Implementation should be addressed in relation to any strategic development or opportunity sites. Would expect subsequent versions of this document to indicate timescale for the implementation of these sites in order to provide a clear indication that the plan can be delivered successfully</p>		<p>and able to be monitored. As the AAP is progressed these issues will be considered further and potential options regarding a detailed implementation plan for the AAP will be explored.</p>
<p>RSLtd needs to work closely on this with the Council. The Central Area Masterplan includes a delivery plan – and will anticipate the Council making full use of its powers resources, and support as appropriate the use of those of its partners, for example:</p> <ul style="list-style-type: none"> <li>• S106 specifically for the town centre;</li> <li>• compulsory purchase to assemble sites where sites cannot be assembled by negotiation and where there is a compelling case in the public interest for the development for which the land is required;</li> <li>• The use of its own land to enable the delivery of schemes;</li> <li>• The preparation of SPDs;</li> <li>• partnering RSL in development competitions or other means of procuring the risk investment needed from the market; and</li> <li>• Partnering RSL in the marketing of the opportunities to deliver the strategy for the Town Centre as set out in the AAP</li> </ul>	<p><i>RSLtd</i></p>	<p>Comment noted. The plan will need to be deliverable and able to be monitored. As the AAP is progressed these issues will be considered further and potential options regarding a detailed implementation plan for the AAP will be explored. This will be considered together with the Regeneration Framework and CAM. The approach to Planning obligations and developer contributions is likely to be applied across the Borough and not just the central area. The need for a specific Central Area approach [where different to the borough wide approach] will be explored as the AAP and the Local Development Framework is progressed further.</p>
<p>Whilst acknowledging that the Borough, as a whole should seek to address must be set within a sustainability context that respects environmental limits. These requirements the demands and challenges are most acute within the Town Centre and innovative approaches are</p>	<p><i>Natural England</i></p>	<p>Comment noted. The plan will need to be deliverable and able to be monitored. The management of sustainable development within the Borough will be considered within a Development Management DPD. The need for a specific Central Area approach [where</p>

<p>likely to be necessary. With this in mind, whilst welcoming the Council's role within the regional forum we also advise discussion with the London Development Agency, where strategic approaches and case studies are emerging to address similar issues. It is likely that the combination of appropriate land-use allocation, landscape design and urban area treatment needs to deliver innovative approaches to meet the challenges. This includes considered application of sustainable construction techniques and creative partnerships including private sector investment via mechanisms such as planning gain</p>		<p>different to the borough wide approach] will be explored as the LDF, including AAP, is progressed further. The AAP will be subject to a Sustainability Appraisal that will assess the development strategy and options against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment] to ensure protection of environmental designations in particular. The Regeneration Framework and CAM will be considered further as the AAP is progressed.</p>
<p>Implementation &amp; Monitoring – regeneration success to be assessed in terms of sustainability criteria, acknowledging biodiversity is a key test of sustainable development and environmental limits need to be respected. The effects of the Town Centre spans beyond its AAP boundary and therefore strategic approach across the wider area is necessary to adequately address the key challenges and meet regeneration targets.</p>		<p>Comment noted. The AAP will need to be in conformity with the adopted Core Strategy DPD, which is in general conformity with the East of England Plan whilst responding to local circumstances and as such the Sustainability policy context is set and implications on the wider area has been considered. The AAP will be subject to a Sustainability Appraisal that will assess the development strategy and options against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment] to ensure protection of environmental designations in particular.</p>
<p>Is the URC qualified to deliver the policies? To transform all these policies to projects to time and budget requires enormous finance; clear agreed prioritisation between vital and least important elements; plus rigorous and effective monitoring and reporting throughout. A large independent planning specialist experienced in the Local</p>	<p><i>John Davey</i></p>	<p>Comment noted. The plan will need to be deliverable and able to be monitored. A detailed implementation plan will be explored as the AAP is progressed.</p>

Authority field may be the best option		
Commission visionary master planner with proven capabilities	<i>The Southend Society</i>	Comment noted.
<b>Issue No.41 Additional Issues</b>		
<b>General</b>		
Character Map oversimplifies Roots Hall area as 'residential' should reflect mixed use character to include – retail, commercial, residential	<i>SUFC</i>	Comment noted. Map 4: Existing Character Zones; should depict the existing Football Ground at Roots Hall.
There is a need to develop Development Management Policies before AAP so that policies will expand on the Core Strategy DPD and relate to the Borough as a whole. Only after that should it be considered whether additional or additional or different policy provisions are required for the specific area covered by AAP.	<i>Crest Nicholson (Eastern) LTD</i>	Comment noted. A Development Management DPD is being produced for the Borough. The need for a specific Central Area approach [where different to the borough wide approach] will be explored as the LDF, including AAP, is progressed.
<b>Historical / Conservation Issues</b>		
Maps and evidence base should include historically significant areas of the area including Conservation Areas, Listed Buildings (including the pier), registered historic park (Cliff gardens), archaeological interests, historically important routes especially in connection with medieval and other archaeology sites. Importance of the railway to the development and current character of Southend	<i>English Heritage</i>	Comment noted. The Borough-wide Character Study provides an overview of the form, character and special attributes of the Borough and conservation areas. A more detailed assessment of conservation areas within the Central Area will be carried out as the AAP is progressed. The Core Strategy CP4 seeks to safeguard and enhance conservation areas. The need for a specific Central Area approach to safeguard and enhance specific residential areas within the central area [where different to the borough wide approach] will be explored as the AAP is progressed.
Policy development should protect and enhance Milton and Clifftown conservation areas – elevate historic profile to the oldest parts of the town to give a context and reference point to the latest modern development	<i>Milton Conservation Society</i>	
<b>Parking</b>		
The issue of insufficient parking in residential areas in and around the CBD, and the need to ensure growth through jobs and housing do not worsen the situation. The	<i>Economic Regeneration Team</i>	Comment noted. Access issues will be explored further as part of the LTP3 preparation process, utilising the borough wide transport model and the



<p>development of policy which promotes the provision of sufficient off-street residential parking in and around CBD</p>		<p>more detailed visualisation model for the town centre. Sustainable transport management, including parking, will be explored as part of the Borough-wide Development Management DPD, which may include standards specific to the Southend Central Area, and also considered as the AAP is progressed.</p>
<p><b>Sustainability issues - Vision</b></p>		
<p>The vision needs to take into account the additional guiding principles: The growth and regeneration aspirations must be set within a sustainability context that respects environmental limits. For regeneration to be successful and sustainable, we believe that the environment should not only be attractive but also multifunctional in the following ways:</p> <ul style="list-style-type: none"> <li>• conserves significant biodiversity assets</li> <li>• provides adequate accessible natural greenspace to relieve recreational pressure on ecological sensitive sites</li> <li>• contributes to aesthetic qualities and character of local environment</li> <li>• Contributes to environmental quality of local area – air quality, water quality, local climate etc.</li> </ul>		<p>Points noted. Similar response set out within the vision section above. The AAP will need to be in conformity with the adopted Core Strategy DPD and as such the Sustainability policy context is set. The preferred vision will be developed further and explored as part of the preparation of an associated spatial development option. Green technologies, prudent use of natural resources and other sustainability objectives are likely to be applied across the Borough and not just the central area. The need for a specific Central Area approach [where different to the borough wide approach] will be explored as the AAP is progressed. The need to provide adequate accessible natural green space to relieve recreational pressure on ecological sensitive sites will be explored as part of a green grid strategy within the AAP.- This will entail both identifying additional functional green space within the AAP area and a series of well defined easily accessible linkages for cycling and walking to connect the town centre seafront visitors and local community to other green space opportunities and the wider countryside. The AAP itself will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also</p>

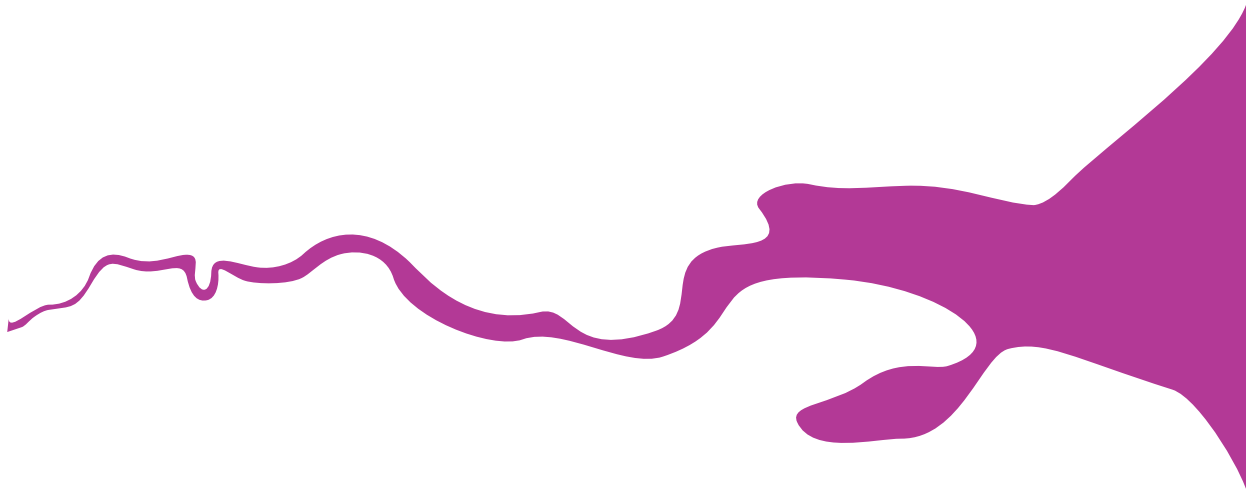
		be assessed under the Habitats Regulations [including Appropriate Assessment if required] to ensure protection of environmental designations
<b>Sustainability issues – Strategic Objectives</b>		
<p>The strategic objectives need to be set within the emerging Core Strategy framework. The objectives need also to take account of additional criteria, such as:</p> <ul style="list-style-type: none"> <li>• Environmental – see (i-iv) above</li> <li>• Movement &amp; Accessibility – See (ii) above</li> <li>• Implementation &amp; Monitoring – regeneration success to be assessed in terms of sustainability criteria, acknowledging biodiversity is a key test of sustainable development and environmental limits need to be respected. The effects of the Town Centre spans beyond its AAP boundary and therefore strategic approach across the wider area is necessary to adequately address the key challenges and meet regeneration targets.</li> </ul>	<i>Natural England</i>	<p>Comment noted. The AAP will need to be in conformity with the adopted Core Strategy DPD and as such the Sustainability policy context is set. The preferred objectives will be developed further and explored as part of further consultation. Sustainability is high on the Government’s agenda as laid out in the policy document PPS1. Green technologies, prudent use of natural resources and other sustainability objectives are likely to be applied across the Borough and not just the central area. The need for a specific Central Area approach [where different to the borough wide approach] will be explored as the AAP is progressed. The plan will need to be deliverable and able to be monitored. As the AAP is progressed these issues will be considered further and potential options regarding a detailed implementation plan for the AAP will be explored. The AAP itself will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment if required] to ensure protection of environmental designations in particular.</p>
<b>Tourism</b>		
Southend-on-Sea is in a strong position to support tourism		Comment noted. The AAP must be justifiable, founded

<p>that provides opportunities for quiet recreation, including walking and wildlife watching. To ensure the town fulfils its potential for tourism, the unique natural environment should not be compromised through inappropriate or damaging development. Ecotourism breaks away from a traditional seasonal pattern of visits and the presence of large numbers of wintering birds, along with other fascinating wildlife, can ensure there are visitors throughout the year. By promoting quiet recreational opportunities as part of the tourism industry, local communities also benefit through improved recreational and educational facilities, increased economic security and a higher quality of life</p>		<p>on a robust and credible evidence base. A number of evidence base documents have been considered in the preparation of this AAP Issues and Options Report. Relevant additional evidence will be developed and used to inform the AAP as it is progressed, including evidence in relation to economic development and tourism. The AAP itself will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment if required] to ensure protection of environmental designations in particular.</p>
<p><b>Water infrastructure</b></p>		
<p>Redevelopment of the town centre and seafront must ensure that existing wastewater infrastructure is unaffected in its condition and operation. Also brownfield development should not increase flows to the waste and surface water systems, attenuation should be incorporated into the design where necessary.</p>		<p>Comments noted. The Core Strategy DPD clearly sets out the strategic requirements / key principles for development management. The Borough Council is preparing a Development Management DPD which will contain more detailed policies for managing development schemes. Green technologies, prudent use of natural resources, design issues and other sustainability objectives are likely to be applied across the Borough and not just the central area. The need for a specific Central Area approach [where different to the borough wide approach] will be explored in the preparation of the preferred option. Regard will be had to the Water Cycle Study and Waste Water Treatment paper and the development of a Waste DPD.</p>

<b>Terminology etc</b>		
Should refer to RSS as East of England Plan	EERA	Comment Noted.



appendix 5  
Public Participation: Issues and Options  
Regulation 25: Southend Central AAP





	Respondent	Summary of Rep	Council Response
<b>General Comments</b>			
<b>Process</b>			
	Montagu Evans	<p>The Council is currently in the process of preparing a Retail Study, which we understand is expected to be published shortly. The AAP states that the contents of the Retail Study will inform the submission version of the document. The findings of the Retail Study will be an important consideration when deciding how much additional floorspace can be supported in order to ensure that adequate sites are identified.</p> <p>In these circumstances we consider that the current consultation is premature prior to the publication of the Retail Study. The soundness tests of PPS12 require that in order for an LDF document to be justified it should be founded on a robust and credible evidence base. As the Central Area Action Plan currently stands it is not founded on such an evidence base because the Retail Study is the only independent assessment which can determine the appropriate retail strategy. This is particularly important in Southend where there are competing out of centre schemes to consider.</p> <p>The Council should re-consult on the Issues and Options Central Area Action Plan once the Retail Study has been published in order to enable representations to be submitted in full knowledge of the contents of this document.</p>	<p>NOTED. The Retail Study of 2003 underpinned the spatial development and Town Centre Strategies in the adopted Core Strategy. The SCAAP Issues and Options Report presented a preferred approach to the fundamental regeneration of the Town Centre based on the Core Strategy which seeks to focus retail development in the town centre, broadened retail offer, in association with significant increase in employment and residential population and other unique Southend attributes such as the further and higher education hub, cultural capital and the seafront.</p> <p>The reliability of the expenditure and population data sets, which forecast growth in retail is based upon robust evidence, though reduces over time and it is necessary to provide a policy framework that is flexible enough to meet demands over the long term whilst at the same time set out a spatial framework to accommodate this and mesh it with the other strands of development opportunities and needs associated with town centre development.</p> <p>The Issues and Options Report therefore articulated the preferred approach to a spatial framework for this regeneration based on the Southend Regeneration Framework and Central Area Master Plan (produced by the former Renaissance Southend LTD). The latter was adopted by the Council in 2008. The Central Area Masterplan was commissioned by RSL in June 2006, and its development progressed through the following stages:</p> <p>Stage 1: Baseline Report: Project appreciation, baseline research and analysis and identification of strengths, weaknesses and opportunities.</p> <p>Stage 2: Options Identification Report: Identification and evaluation of physical development options.</p> <p>Stage 3: Draft Final Report: Identification of preferred options</p> <p>Stage 4: Final Report: Publication of Central Area Masterplan</p>
<b>Section 1 Introduction</b>			
<b>General Comments</b>			
	Savills	<p>Para 1.7</p> <p>The scale at which the plan is available is inadequate to determine into which Character Areas particular sites fall.</p> <p>We object in general to the approach to demarcation of the boundaries between each of the Central Quarters, which splits sites and will difficult to interpret on the ground.</p> <p>The boundaries should more closely follow site / ownership boundaries and / or other physical features such as roads. In particular we object to the boundary between Central Quarter 8 (St John's, Central Seafront and Eastern Esplanade) and Central Quarter 10</p>	<p>Agree. The quarters should be realigned to reflect a more coherent entity and enable a more effective planning framework</p> <p>Agree. The seafront will be treated as a coherent planning entity within which specific areas will have a different role whilst at the same time reflecting the common relationship they have with the seafront. This will allow the framework for</p>



		Respondent	Summary of Rep	Council Response
			(Gateway Neighbourhoods). The St Johns, Central Seafront and Eastern Esplanade do not form nor are planned to be a coherent Central Quarter. We propose an amendment to the boundary between CQ8 and CQ10 so that the site to the eastern end of the Esplanade falls wholly within CQ8. St Johns, Central Seafront and Eastern Esplanade should be considered as separate quarters and delineated separately on the AAP map. Consideration should be given to having separate policy approaches for each of the three Gateway Neighbourhoods.	Tylers Quarter to be more fully integrated with its relationship with the Town Centre retail circuits. Both quarters will need to acknowledge the interrelation ship ie between the town centre and Seafront
		Savills	Para 1.14 We support the identification of the central area as the focus for new growth and regeneration. None	Noted
		Savills	Para 1.14 The introduction of detailed policies and site-specific proposal only at the submission stage of the plan is too late in the planning process and may have implications for the SEA Options for site specific policies on the main central area sites should be considered in advance of the submission stage	Noted. – The SA of the Issues and Options report has taken into account the development strategy and preferred approach to land use within the quarters as part of its appraisal. Policies setting out the development principles for the quarters and gateways and Site Specific policies will translate this approach into a more formal policy framework. More detailed articulation of the specifics for each development site will be brought forward through development and planning briefs. These will be consulted on and provide the opportunity for further comment. This approach will allow some flexibility to adapt to the economic conditions and focus. It is noted that Savills supports a flexible and effective planning framework which is the intention of this approach.
		Savills	Para 1.15 We support the Council's commitment to a flexible and effective planning framework that has regard to changing economic conditions and their effect on public and private investment decisions	Noted
<b>Section 2 Context</b>				
<b>General Comments</b>				
		Savills	2.8.2.14 We support the main Core Strategy Policies (KP1, CP2, CP3 and CP4) and their application to the CAAP.	Noted
		Savills	The plan makes reference to the CS policies which relate to Southend Town Centre (TC) and states that "Southend Town Centre will remain the first preference for all forms of retail development and for other town centre uses attracting large numbers of people...". The SCAAP does not clearly define the TC or the location of the prime retail frontages. Both the Town Centre and prime retail frontages (see below) should be shown / clearly defined on a map base.	Agree the Proposals Map will define the town centre which will remain the same as that in the adopted Borough Local Plan. The Retail and Town Centre Study gave no indications that the boundary should change  Agree. Primary and secondary retail frontages will need to be represented on the proposals map
<b>Section 3 Key Challenges to be addressed</b>				
<b>General Comments</b>				
		Savills	Para 3.7 We support that the focus of retail activity should continue to be the established town centre in accordance with the adopted Core Strategy and PPS4 Planning for Sustainable	Noted. The primary retail frontages which will be part of the extended retail circuit to the east will extend to planned development in Tylers Avenue only. The extension of primary

	Respondent	Summary of Rep	Council Response
		<p>Economic Growth and the accompanying Practice Guidance on Planning for Town Centres.</p> <p>We also support the delivery of a strong retail circuit and a fresh major component to the retail offer by proposing and new units to the east of the High Street focussing on the Tyler's Avenue site. We consider that this retail circuit and extension to the High Street should include Marine Parade and Eastern Esplanade.</p> <p>The Town Centre definition should include areas to the east of the High Street, including Tyler's Avenue, Marine Parade and Eastern Esplanade.</p>	<p>retail to the seafront is not sustainable or supported by the Retail and Town Centre Study. Nevertheless the SCAAP policy framework will need to address the sorts of land use required to maintain interest along ground floor walking routes (new and/or existing) to the seafront that may be afforded by development at seaway car park and along Marine parade. Clearly this should comprise leisure, small secondary shopping, cafes etc. major land uses on Seaway car park and Marine Parade, could and should include major leisure, entertainment and cultural uses as well as housing</p>
	Savills	<p>Para 3.19 The plan states "It is recognised that larger scale leisure is likely to be market-led and would be a longer term aspiration for this Plan rather than a pre-requisite for realising this vision".</p> <p>The Plan should identify alternative potential sites for large scale leisure and a range of other large footprint uses which are proposed in the Plan, and / or set out clearly the locational criteria for such uses.</p>	<p>Noted. The Plan will provide a policy framework that will clearly define where and how different land uses should be accommodated within the town. This will take forward the preferred approach as set out in the Issues and options report which indicated the leading and supporting land use proposed for each quarter</p>
<b>Section 3 Key Challenges to be addressed</b>			
<b>Option Box 1 – Have we correctly identified the key challenges to be addressed by the Area Action Plan? If not what have we missed?</b>			
	A Thomas	yes in the main	Noted
	SBC – Children & Learning	The primary school sites in the central area e.g. Porters Grange, Barons court, Bournemouth park, Milton Hall and Westborough are all on tight sites with well below the minimum site area for the number of pupils. Additional land would relieve this pressure if available.	Agreed. Reference should be made to the current managed shortage and need for additional primary school places for planned population growth. This issue should also be addressed in Policy
	Society for the Protection of Undercliff Gardens	In general terms we see the Central Area as an historic core or anchor, to the Borough. In the last 15 years it has deteriorated for reasons that the Council has not addressed. we suggest that these may include:	Noted. the AAP should continue to seek to preserve and celebrate cultural and built heritage
	Society for the Protection of Undercliff Gardens	1. It is a sterile space, devoid of local character. The recent replacement paving and seating did not tackle the problem; it merely demonstrated that the Council had expensively lost the plot. It does not attract shoppers and visitors who are free to travel to more attractive areas.	1. Noted. The purpose of the AAP is to deliver regeneration in the Central Area and address issues within the town centre. Streetscape design and attractive linked and functional open spaces are an essential element. Improvements to the public realm will be a major element of the SCAAP approach. Policy related to heritage will be included to enhance and protect assets.

	Respondent	Summary of Rep	Council Response
	Society for the Protection of Undercliff Gardens	<p>2. Many shops are empty, which may be due to allegedly high business rates.</p> <p>3. The University does not provide the positive contribution expected.</p> <p>4. The old Victoria Circus area lacks intimacy. For example residents and visitors must wonder why trees were planted then ripped up and nobody has bother to repair or replace the millennium clock.</p> <p>5. The suggestion that the retail area of the centre should be extended east and west is unlikely to resolve the central problem - it may even compound it. We doubt whether there is any demand for more retail space.</p>	<p>2. Noted. Promoting and maintaining a viable and accessible retail sector.</p> <p>3. Noted. Southend on Sea Local Economic Assessment concludes that the University of Essex's Southend Campus and South Essex College have a strong presence in the area allowing Southend to assume the role of an education centre in the sub-region. With the assistance of the university campus, Southend has significant potential to become a knowledge-based employment centre. The expansion of the University offers increased potential to develop and support spin-off. Retention of University students to boost business start-up and survival rates</p> <p>4. Noted. Clearly well designed public space linked by attractive streets will enhance the visitor/shopping experience. Victoria Circus should be regenerated to provide for a valuable event space as well as other potential temporary uses to make it vibrant throughout the year.</p> <p>5. Noted. Retail Study concludes that there is merit in broadening the High Street offer both spatially and in terms of types of shopping. Demand for additional retail is based on targeting bigger units and regeneration of the Town Centre and Seafront as a visitor destination</p>
	Essex County Council	Essex County Council fully supports the preparation of the Central Area Action Plan. It will provide more detailed guidance which should greatly assist the process of securing high quality sustainable development of the Central Area to meet the needs of the community.	Noted
	Cllr Burdett	Good outline	Noted
	Cllr Burdett	2.6 Impressive	Noted
	Cllr Burdett	2.7 Makes no specific mention of access for people with disabilities (and yet could do so).	Noted. This reference is to the Community Strategy where access for all residents and visitors is paramount.
	Cllr Burdett	2.10 I or We back the notion of job creation efforts - much more could be made of the river Thames in terms our proximity to London - hover service to Kent	Noted. Core Strategy acknowledges the opportunities afforded by the River Thames both as an amenity asset and for transport in Policy CP3. This will need to be tempered against the need to manage the European Designations on the foreshore.
	Cllr Burdett	2.12 Does not happen in reality. Its intentions are merely a paper exercise	Noted. The sequential approach to retail and its focus on the town centre is set out in the Core Strategy (Policies KP1 and CP2) and will be reinforced within the AAP within the limitations of National Policy
	Cllr Burdett	2.15 and 2.16	Noted. With the adoption of the Core Strategy there has

	Respondent	Summary of Rep	Council Response
		What have we achieved to date?	been greater attention to sustainability development techniques in new buildings. The emerging Development Management DPD will have more detailed policies to ensure all development is sustainably constructed including development within the Central Area
	Cllr Burdett	3.7 to 3.9 Is accurate	Noted
	Cllr Burdett	3.10 We do not know what Bulky Food outlets mean. If you mean Cash and Carry then we have good outlets already in the town.	Noted. Planning policy no longer distinguishes between type of retail premises and their relative location.
	Cllr Burdett	3.12 We agree with	Noted
	Cllr Burdett	3.30 Is just words – especially the last sentence	Noted. The AAP should provide a positive policy framework for making the regeneration of Victoria Office area deliverable. There will also be an SPD to deliver and guide the intended approach.
	Cllr Burdett	3.35 Well written- there is serious intent here.	Noted. The AAP should deliver the objectives for an accessible Central Area through a positive policy framework
	Cllr Burdett	Substantial proposals. Well written and much needed. Section 8 There also needs to be better lighting along the high street as people do not feel safe, especially by Farringdon's car park. There are lots of spaces with no lighting. The offices opposite the university are completely empty this is making the rejuvenated area by the university look run down. High street is so much cleaner and neater than it used to be and there is a strong presence of police in the high street	Noted. Agreed, the AAP should promote a positive approach to lighting and provide the framework for a co-ordinated lighting strategy Agreed, the potential of sites and buildings should be maximised through a positive policy framework. This office block has a contribution to make for the objectives for the Quarter and the wider town centre
	Renaissance Southend Ltd	Six Key Challenges: 1. Addressing deprivation 2. How does the Plan secure much needed private investment to create a thriving regional centre 3. Reducing the oversupply of outdated and poor quality office space 4. Off street parking as a barrier to creating development opportunities 5. The future for commercial leisure on the seafront 6. The needs of South Essex College and University of Essex over the next ten years 7. delivering affordable housing on town centre sites with marginal viability	Agreed. 1. Economic regeneration and housing and equal access to opportunities should underpin the AAP 2. The AAP should address delivery through a well articulated Implementation and Monitoring Strategy 3. The AAP should have an office development strategy that focuses Grade A office within the town centre and addresses the regeneration opportunities of the outmoded supply on Victoria Avenue 4. the AAP should contain a Car Parking Strategy that releases the development opportunities within the Central Area 5. the AAP should clearly promote commercial leisure opportunities on the Seafront 6. The needs of an expanded Higher and further education hub in the town centre will continue to be promoted in the policy framework in the APP 7. The Affordable Housing Policy for all residential development (including that within the Central Area) is set out in Core Strategy Policy CP8
	Herbert Grove	The main point missed was the need to plan for the different types of people who use	Noted. The AAP should address the accessibility and

	Respondent	Summary of Rep	Council Response
	Residents	Southend, Residents, Visitors and Workers. The currently adopted Council plans mix late night revellers from the night clubs and pubs through newly created residential arrears such as the St. John's Quarter and the proposed road layout mixes the movement of Workers in and out of Southend with Residents the moving in the opposite direction at the same time. Many new crossing points have been created where traffic will compete for road space and parking.	movement requirements resulting from planned residential and commercial developments to create a coherent and pleasant environment for walking and cycling within and to the central area whilst having regard to the relative needs of different transport modes within a hierarchy of routes
	Herbert Grove Residents	Herbert Grove Residents believe that only the very minimum has been done necessary to 'tick the box'. The studies seem to have been carried out by consultants who have been no further than Brighton and do bring any of the new design ideas from successful holiday and commercial centres such as Alicante, Nice, Cannes and nearer at Le Touquet.	Noted. The approach to building design and streetscape will be central to the creation of an attractive central area within the AAP. City Beach and Victoria Gateway schemes have already set the benchmark for quality and imagination
	SBC Adult & Community Services	No mention of Hotel / Conference facilities and supplementary cultural and retail opportunities to entice the business visitor and also to encourage them to stay on and return for a leisure visit	Noted. The Core Strategy proposes hotels and conferencing facilities in the town. The AAP should provide a flexible development policy framework to accommodate opportunities where they arise.
	The Theatres Trust	Southend as a 'cultural hub' We support this aspiration and the bulleted list of examples which include theatres and music venues. However we do not think the document addresses the issue of how this state will be attained. Only the first bullet point at para.3.24 on page 17 relates to specific cultural development.	Agreed, The AAP should identify and promote specific opportunities through a strong policy framework
	English Heritage	Paras 3.26 to 3.29 refer to the town being a hub for natural and built heritage. English Heritage feels strongly that in order to fully understand and address change in this area more investigative work needs to be carried out. Our Conservation Principles, Policy and Guidance emphasises (para 62 onwards) the need to understand the fabric and evolution of a place and to identify who values the place and why they do so. Paragraph 89 underlines the value of specific investigation into understanding the impacts, or consequences, of proposed change.  Historically Southend has prospered by attracting visitors. We feel this role has had a profound influence on its character and that this should be taken into account when making future decisions. Policy HE2 of PPS5 advises local planning authorities to ensure that they have evidence about the historic environment and heritage assets in their area to adequately inform the plan-making process	Agreed. The AAP will be supported by a Heritage Assets Assessment and Borough-wide Character Study and include a strong policy framework that encourages the promotion of heritage assets within regeneration and protects such assets from impacts and the consequences of change.  A chapter in the SCAAP will be developed which will deal specifically with the historic environment and will build on the conservation area appraisals and Character Study amongst other evidence.
	English Heritage	Reference is made in the Plan's paragraph 3.28 to the existing conservation areas and historic buildings and we are aware that appraisals of some of the areas have been carried out recently. However, we feel that this would be the right time to consider further the extent of these areas, especially those which may be affected by the Area Action Plan, notably the Clifftown and Eastern Esplanade areas. It is also apparent that a number of the heritage assets in Southend are undesignated; in the context of PPS5 advice we suggest these should be evaluated. The statement in paragraph 3.28 that tall buildings may "create new iconic buildings and spaces" has not been justified. An urban characterisation process could identify existing iconic buildings and spaces (e.g. the Pier, Royal Terrace, Palace Hotel and The Cliffs) and assess their existing contributions, and whether there is capacity for additional large structures or interventions.	Agreed. The AAP will be supported by a Heritage Assets Assessment and Borough-wide Character Study and include a strong policy framework that encourages the promotion of heritage assets within regeneration and protects such assets from impacts and the consequences of change. In combination with the Development Management DPD, Core Strategy and Design and Townscape Guide SPD there will be a policy framework and guidance to address smaller details such as roof forms, materials, fenestration and signage. The AAP policy framework should address existing scale, form and alignment of existing and proposed linked open space and protected views and their setting, including the identification of new spaces and landmark buildings.

		Respondent	Summary of Rep	Council Response
				The submission version of the Development Management DPD will contain policy to address the siting and location of tall buildings to ensure that they are not harmful to the historic environment. Design principles including height, massing and bulk are addressed in the Design and Townscape Guide and will be addressed for specific proposals in the SCAAP through Development and Planning Briefs.
		English Heritage	The seafront is an area where layers of growth, often laid one on another, sometimes masks historic fabric. These none the less, in combination, present a townscape that gives Southend much of its distinctiveness. We agree that the linking of spaces may be important, but apart from on the waterfront itself these spaces are contained mainly by buildings. Their existing scale, form and alignment should be considered along with smaller details such as roof forms, materials, fenestration and signage.	<p>Agreed. The AAP will be supported by a Heritage Assets Assessment and Borough-wide Character Study and include strong policy framework that encourages the promotion of heritage assets within regeneration and protects such assets from impacts and the consequences of change. The AAP policy framework should address existing scale, form and alignment of existing and proposed linked open space and protected views and their setting, including the identification of new spaces and landmark buildings.</p> <p>The submission version of the Development Management DPD will contain policy to address the siting and location of tall buildings to ensure that they are not harmful to the historic environment. Design principles including height, massing and bulk are addressed in the Design and Townscape Guide and will be addressed for specific proposals in the SCAAP through Development and Planning Briefs.</p>
		Natural England	We note that, whilst there are a number of references to the importance of biodiversity interests, there are few if any references to geodiversity. However, apart from this minor omission, Natural England considers that the AAP addresses all of those issues which are within our remit; to a level of detail which is appropriate for the Issues and Options stage of the process. We do not, therefore, wish to comment further at this stage.	Noted – A HRA will accompany the pre-submission version of the SCAAP as well as SA to ensure that these issues are addressed.
		EEDA	The primary focus of regeneration and growth within Southend as stated in the core strategy will be to regenerate the existing town centre, as a fully competitive regional centre, led by the development of the University Campus, and securing a full range of quality sub-regional services to provide for 6,500 new jobs and providing for at least 2,000 additional homes in conjunction with the upgrading of strategic and local passenger transport accessibility, including development of Southend Central and Southend Victoria Stations as strategic transport interchanges and related travel centres.	Noted
		EEDA	The continued regeneration of Southend town centre is a regional and sub regional priority, the achievement of which requires support and intervention across a variety of projects and programmes. In broad terms, the Area Action Plan promotes and clarifies the spatial elements of these objectives and includes relevant references to the Regional Economic Strategy.	Noted
		EEDA	The key challenges are broadly addressed in the consultation document together with a summary of opportunities and constraints. EEDA would suggest that the objectives in the Action Plan could restate the key targets and outcomes identified in the core strategy.	Agreed. The Development Strategy within the AAP should reiterate the key targets within the Core Strategy relating to jobs and housing etc and make provision for their delivery

	Respondent	Summary of Rep	Council Response
			through a flexible policy framework
	EEDA	The Employment Land Review (May 2010) comments that the primary location for existing employment is the town centre, which contains 40% of all employment within the Southend-on-Sea Borough. The area is and will continue to be a significant location for future employment provision. Whilst some office buildings within the centre are of poor quality there is evidence of refurbishment. The report notes that it maybe the case that reasonable office buildings will need to be redeveloped as part of wider proposals for the regeneration of the town.	Noted. The AAP should have an office development strategy that focuses Grade A office within the town centre and addresses the regeneration opportunities of the outmoded supply on Victoria Avenue. The Victoria Avenue Development Brief will help to address this approach.
	EEDA	EEDA, with partners, has made significant investments into the town centre to secure economic growth and regeneration objectives. As identified in the plan EEDA welcomes the commitment to identify the key interventions required to deliver the action plan and to secure the long term economic success of the town in the light of the changing regional and sub national architecture.  By addressing these key elements the Central Area Action Plan will provide the context needed to maintain the prosperity of the East of England, enhancing its regional competitiveness and giving support to business growth.	Noted
	Burges Estates Residents Association	Page 17. Para 3.24 makes passing reference to a new library. Where is this to be? What is wrong with the existing one? Is this a serious proposition?	The AAP will promote the delivery of a new Library and academic library in association with the expanded FE/HE hub in the Elmer Quarter.
	Iceni Projects Ltd	Paragraph 1.14 reaffirms the spatial strategy of making provision for a large share of the Borough's new growth and regeneration to be focussed in the central area of the borough. Whilst the general principle of regeneration of the central area is accepted by Colonnade, it considers the strategy requires reconsideration in light of the implications the strategy could have on the delivery of growth.	Noted: The Regeneration of the Central Area is a strategic objective set out in the Core Strategy and will be delivered through a flexible policy approach to development opportunities. The main focus is the regeneration of the town centre over the plan period. It will be possible to deliver different types of housing within the existing urban area to provide a range of housing types. This approach will be promoted through policy in the Development Management DPD as well as through Development Briefs in the SCAAP which will set out the types of development which will be encouraged.
	Iceni Projects Ltd	Put simply, the reliance on the development of central brownfield sites for high density development will not deliver what the market, or residents (both current and future) of Southend require in many instances is not economically viable and in particular will put the delivery of affordable housing at risk.	
	Conservation Association Westcliff Seaboard	Unique Victorian and Edwardian streetscape and vistas - Need to be very carefully preserved - Both short views and long views - In the High Street, there are still some key well designed upper stories with features we will not see again	Noted. Visually important views and vistas should be protected and enhanced and new ones promoted to enhance the streetscape experience and legibility of the central area. The AAP will continue to address the protection and enhancement of frontages of townscape merit and promote good design in new development
	Conservation Association Westcliff Seaboard	Yes', although there is a great danger of buildings for buildings sake - Bulk outlets', Tall buildings, are a big red danger area.	Noted – Policies with the SCAAP and the emerging Development Management DPD will ensure that tall building are located where they are appropriate and where they will not cause harm to heritage assets.
	BNP Paribas Real Estates	In our view, the Council have correctly identified the key challenges to re-addressing the Area Action Plan in particular 'a residential place that people want to live-in, work and visit' in accordance with PPS3 and PPS1.	
	Savills	Option 1	Noted. The adopted Core Strategy sets out the strategic

	Respondent	Summary of Rep	Council Response
		<p>This plan stage may be potentially unsound as Flood Risk has not been fully taken into account in developing the action plan and its impact on the options for the range and location of uses on key development sites and locations.</p> <p>The Plan has not made provision for accommodating large new buildings, e.g into the urban fabric, if the Central Area is the preferred location for these uses, rather than at other locations.</p> <p>The CAAP plan should identify clearly flood risk zones and provide options either for development or for potential mitigation in the identified locations.</p> <p>The Plan should have assessed the potential for the significant public-owned sites to accommodate large new buildings, if the delivery of these in the Central Area is an objective.</p>	<p>planning framework for the Borough and identifies flood risk and strategic policy approach to land use and/or mitigation measures. In adopting the Core Strategy there is an assumption that the spatial strategy has been adopted (particularly in reference to the seafront) i.e. major growth and regeneration in the town centre and seafront. This sets the strategic framework for the SCAAP to deliver the development opportunities already agreed. In addition, it is considered that vulnerable developments are not proposed for areas of significant flood risk. In addition, TE20100 and the EA CFMP plans all acknowledge that flood defences in Southend will need to be maintained at current levels. The Issues and Options Report explored the issue of a more detailed policy framework for the challenge of Flood Risk. As a consequence the policy framework within the SCAAP will address this issue by building on the strategic direction laid down in the adopted Core Strategy. As a result there will be no significant impact on the preferred development strategy set out in the Issues and Options Report.</p> <p>The Council has assessed the development potential of publically owned sites through the first issues and options report, Central Area Master Plan and its own investigations – and published in its Local Investment Plan.</p>
	Environment Agency	<p>You have failed to recognise flood risk and climate change as a key challenge that could be addressed through this AAP. You need to consider all risks of flooding which are identified in your updated SFRA, Water Cycle Study and in the future by your Surface Water Management Plan. These background studies form a key part of your evidence base and must support the formulation of policies within this document and in your Core Strategy review.</p>	<p>Noted. The plan should recognise that flood risk and climate change are a challenge and should address these issues throughout its policy approach based on robust evidence base. It should also be noted that policies in the Development Management DPD and Core Strategy should be read in conjunction with the AAP and it is intended that in combination they will address these key challenges.</p>
	Montague Evans	<p>The Council is currently in the process of preparing a Retail Study, which we understand is expected to be published shortly. The AAP states that the contents of the Retail Study will inform the submission version of the document The findings of the Retail Study will be an important consideration when deciding how much additional floorspace can be supported in order to ensure that adequate sites are identified.</p> <p>In these circumstances we consider that the current consultation is premature prior to the publication of the Retail Study. The soundness tests of PPS12 require that in order for an LDF document to be justified it should be founded on a robust and credible evidence base. As the Central Area Action Plan currently stands it is not founded on such an evidence base because the Retail Study is the only independent assessment which can determine the appropriate retail strategy. This is particularly important in Southend where there are competing out of centre schemes to consider.</p> <p>The Council should re-consult on the Issues and Options Central Area Action Plan once the Retail Study has been published in order to enable representations to be submitted in full knowledge of the contents of this document.</p>	<p>NOTED. The Retail Study of 2003 underpinned the spatial development and Town Centre Strategies in the adopted Core Strategy. The SCAAP Issues and Options Report presented a preferred approach to the fundamental regeneration of the Town Centre based on the Core Strategy which seeks to focus retail development in the town centre, broadened retail offer, in association with significant increase in employment and residential population and other unique Southend attributes such as the further and higher education hub, cultural capital and the seafront.</p> <p>The reliability of the expenditure and population data sets, which forecast growth in retail is based upon, reduces over time and it is necessary to provide a policy framework that is flexible enough to meet demands over the long term whilst at the same time set out a spatial framework to accommodate this and mesh it with the other strands of development opportunities and needs associated with town centre</p>
	Montague Evans	<p>Summary The Central Area Action Plan has been prepared in advance of the Council's Retail Study.</p>	



		Respondent	Summary of Rep	Council Response
			The Retail Study comprises an important part of the evidence base when considering an AAP which addresses the town centre and its future development. The preparation of the AAP is therefore considered to be premature relative to the publication of the Retail Study. The Council's experience when the retail elements of the Fossett's Farm and Roots Hall developments were being considered should reinforce the need to ensure that policy is produced in a robust way.	development. The Issues and Options Report therefore articulated the preferred approach to a spatial framework for this regeneration based on the Southend Regeneration Framework and Central Area Master Plan (produced by the former Renaissance Southend LTD). The latter was adopted by the Council in 2008. The Central Area Masterplan was commissioned by RSL in June 2006, and its development progressed through the following stages: Stage 1: Baseline Report: Project appreciation, baseline research and analysis and identification of strengths, weaknesses and opportunities. Stage 2: Options Identification Report: Identification and evaluation of physical development options. Stage 3: Draft Final Report: Identification of preferred options Stage 4: Final Report: Publication of Central Area Masterplan The Retail and Town Centre Study 2011 reinforces this approach
<b>Section 3 Key Challenges to be addressed</b>				
<b>Option Box 2 - Are there further opportunities which could be explored and developed through this Area Action Plan?</b>				
		A Thomas	I do not support any loss of parking from the area being discussed, nor agree the railway is a major obstacle, it's a minor in the Clifftown /Elmer sector only.  The educational elements should not be confined purely to the current area and Elmer but be across the town centre.  I believe that within the central town centre and seafront areas there is scope for good quality apartments and some high rise (10+) storeys but with adequate parking.  The foreshore is a vital asset that needs developing to improve the tourist offer and for residents to better understand	Comments noted. Town Centre Parking strategy within the AAP will maintain parking levels to support vitality and viability of the Town Centre. Noted Agree, AAP will establish approach to tall buildings and housing will be encouraged in appropriate locations. Vehicle Parking Standards are set out in the emerging Development Management DPD Agree – The AAP should promote the tourist offer along the seafront and the biodiversity capital should be enhanced through information systems
		Highways Agency	Promotion of modal shift from private car to more sustainable means of transport including the promotion of travel planning.	Noted – promoted in SCAAP and Local Transport Plan and other Local Development Framework Documents.
		Cllr Burdett	2.13 Is there a difference between "seeking improvement" and "influencing decision making"? Our preference is for SBC to be committed to holding our partners (eg C2C) to account.	This is a quote from the Core Strategy which has been adopted by Southend Borough Council. It is something which the Council can encourage partners to do unless there is a potentially primary legislation to say otherwise.
		Cllr Burdett	3.4 Recent multi coloured building opposite Sainsbury is a perceived eye saw for some residents. SBC must be careful in this respect. Younger generation like the design.	Noted – what is deemed to be good design may be a subjective issue. The Council has a design team to comment on all planning applications and has an adopted Design and Townscape Guide SPD to outline Design Principles. Projects may also be referred to CABE or design review panels for further opinion.
		Cllr Burdett	3.11 and 3.15 Good words but in reality some struggle as no discounts are available to use empty retail and office spaces.	Noted – there is an opportunity for this but would not be addressed through this document. It would be for the appropriate team within the Council to work with the landlord of these developments to promote them and get them back

	Respondent	Summary of Rep	Council Response
			into use using various methods.
	Cllr Burdett	3.13 Renaissance Southend Limited activity is an empty pledge. Will they continue to exist under the new government.	Southend Renaissance Ltd no longer exist as a company.
	Cllr Burdett	3.14 SBC is desperate for this we need the entrepreneurial spirit of the FE and HE sector.	Noted – the SCAAP will encourage this to further development Southend as a Cultural and Intellectual hub.
	Cllr Burdett	3.18 to 3.20 are surprisingly sparse! Why	The document will expand on these themes within the individual sections of the SCAAP. This section provides the context of what Southend is and can be in the future.
	Cllr Burdett	3.27 How is under provision measured? Why are we conceding such an important aspect if our towns ecology? This section needs clarification and re writing.	The SCAAP will ensure that there is more green and open space provided in the central area of Southend and ensure that the best use is made of the natural asset which is the seafront, whilst ensuring that biodiversity and designations are respected and protected.
	Cllr Burdett	3.28 This will never happen (It is already happening!). Why does SBC need Renaissance? It is reinventing itself every day!	It is something which is happening but we need to ensure that there is a long term plan for its renaissance to make sure that development and conservation sit side by side.
	Renaissance Southend Ltd	The identification of opportunities and constraints draws heavily on the analytical work presented in the Central Area Masterplan (CAM), which is welcomed. The inclusion of the Gateway Neighbourhoods is supported but greater clarity is needed to define their role and what action is needed to justify inclusion in the AAP.	Noted – this will be brought forward in the pre-submission version of the SCAAP.
	Herbert Grove Residents Association	Southend has a very defined visitors season and no out of season attractions. The Council should consider the provision of a major venue for 'out of season' activities. The Lido on the beach at Le Touquet or the Pyramids centre in Blackpool should be considered.	Noted – these ideas will be explored and be developed where appropriate for the next stage of the SCAAP. A Lido provides an excellent opportunity to develop facilities along the central seafront area.
	SBC Adult & Community Services	Cultural opportunities to enhance the visitor experience, linking with leisure and tourist accommodation.	Noted – there will be good opportunities for this to occur.
	English Heritage	Historically Southend has prospered by attracting visitors. We feel this role has had a profound influence on its character and that this should be taken into account when making future decisions. Policy HE2 of PPS5 advises local planning authorities to ensure that they have evidence about the historic environment and heritage assets in their area to adequately inform the plan-making process.	Noted – this evidence base has been used to inform development of the SCAAP, including conservation area appraisals and a Borough wide Character Study.
	English Heritage	The statement in paragraph 3.28 that tall buildings may "create new iconic buildings and spaces" has not been justified. An urban characterisation process could identify existing iconic buildings and spaces (e.g. the Pier, Royal Terrace, Palace Hotel and The Cliffs) and assess their existing contributions, and whether there is capacity for additional large structures or interventions.	The submission version of the Development Management DPD will contain policy to address the siting and location of tall buildings to ensure that they are not harmful to the historic environment. Design principles including height, massing and bulk are addressed in the Design and Townscape Guide and will be addressed for specific proposals in the SCAAP through Development and Planning Briefs.
	EEDA	It is not clear from each of the individual assessment of quarters and key sites in section 7 of the report what the cumulative impact might be and the impact upon the broader objectives to improve the economic viability, viability and diversity of the town centre. EEDA would encourage more explicit analysis in this respect.	Noted
	Burges Estates Residents Association	1. Page 14/15. It is difficult to envisage Southend town centre as a major retail centre. The advent of Lakeside and Blue Water has sealed Southend's fate as a retail centre of choice for durable goods. This is unlikely to be reversed with Southend's anti-car transport	Southend is designated as a major retail centre. The status has been threatened by the development of out of town and edge of town retail developments. Southend needs to ensure

	Respondent	Summary of Rep	Council Response
		policy, the cheap end shops catering for day trippers and the failure of the multi nationals to expand their ranges upwards. Perhaps it is only as a niche type shopping environment as the document suggests that the centre can survive. But the addition as proposed of more bulky food shops is not my idea of how the centre should perform nor in my opinion will it "enhance the town centre's appeal to the catchment population or visitors further afield".	that it can complete as a sub-regional centre with Chelmsford and Basildon. It would be difficult to complete with shopping centres which offer free parking such as Lakeside and Bluewater. The retail study has identified capacity for additional convenience and comparison floorspace in the town centre including bulky food shops. The approach is not anti-car, it encourages other forms of sustainable transport in addition to the car.
	Burges Estates Residents Association	Page 19. The summary of opportunities and constraints misses one major constraint and challenge and that is the inability or lack of resources to maintain that which exists. In the context of opportunities to enhance the High Street, improve landscaping, indeed a whole range of public infrastructure works, Southend is incapable of basic maintenance. Have a look at the new works to the seafront from the pier to the Kursaal. Already the new paving is stained, dirty and unattractive. The base of the pier bridge has weeds growing. Even the High Street paving is scruffy. There is no point in pursuing these opportunities for improvement unless and until the Council is able to demonstrate it has the resources and inclination to fund the whole life costs of projects.	The SCAAP will aim to protect, maintain and enhance the built and natural environment of Southend. It will be for the Council to ensure that public works are maintained or ensure that those responsible for non-Council works are maintained to the appropriate standard. However maintenance programme cannot be addressed by this document.
	Burges Estates Residents Association	Page 22 para 1. Whereas we need a wider range of shops to sustain Southend as a regional centre, I do not equate that with requiring more shopping floor space overall. The internet is taking its toll on High Streets and Southend is struggling to fill what is currently available.	The Retail Study demonstrates that there is capacity for additional floorspace in Southend Town Centre over the plan period. It will be possible for high streets to exist alongside internet shopping sites.
	Iceni Projects	Colonnade considers the intention to deliver "true sustainability" [para 2.16] through this strategy are at risk. The failure to plan and provide for the needs of residents and take account of the economic considerations of delivery mean that development, and the associated regeneration and improvements to infrastructure that accompanies it, will not come forward. The potential here for greater gain will be undermined as a result of the unintended consequences of the SCAAP if it is allowed to proceed unaltered.	The Council considers that the SCAAP provides enough flexibility to deliver the regeneration and growth which is required in the town centre to deliver an urban renaissance. There is capacity for housing and employment in the centre as well as the development of the cultural, leisure and tourism related activities to create a vibrant centre. The town centre has excellent transport connections with two railway stations, a travel centre and routes for cycling and walking. The focus on the town centre and development within the existing urban area is the focus of the adopted Core Strategy.
	Conservation Association Westcliff Seaboard	We believe that our 'lost community spirit in our towns and cities today is caused by a lack of identification with an area. Everything runs into everything else, except from wholly identifiable areas (e.g. Leigh-on-Sea, Milton). Identifying current 'community areas' and new ones and building their identities will, we believe lead individuals toward a closer community feeling and more mutual co-operation and interest.	Noted – The SCAAP will look to improve the public realm and improve accessibility through and between locations within the central area and links with other areas. It is important that a sense of place and community is created and that people feel part of and identify with their environment.
	Conservation Association Westcliff Seaboard	We do need to focus on the small design and 'bottom-up thinking', as well as on the 'grand designs'. It will be the availability of smaller, specialist shops and the uniqueness of their setting, which will distinguish Southend as a 'special shopping' centre, instead of just, another town centre.	The SCAAP will look to encourage all types of employment development in the central area. Niche retail will be focused in certain areas of the town centre. There will be different scales of development to ensure that the needs of all sections of the community are catered for in terms of residential and commercial requirements. The Retail Study identified that there is a market for small, niche commercial and retail development as well as large scale.
	Conservation Association Westcliff	'Tall' buildings are not necessarily the right approach to an iconic town centre. Visitors will not come to Southend to view the tall buildings, they will come to see 'something different'	As above.

	Respondent	Summary of Rep	Council Response
	Seaboard	that they cannot find in Chelmsford, or Basildon, or Bluewater, etc. It's creating that 'special buzz' - Like the lanes in Brighton, or for new build - Gehry's unique buildings. The bland square-box glass designs just won't do it - Although excellent buildings with sea vistas just might.	The submission version of the Development Management DPD will contain policy to address the siting and location of tall buildings to ensure that they are not harmful to the historic environment. Design principles including height, massing and bulk are addressed in the Design and Townscape Guide and will be addressed for specific proposals in the SCAAP through Development and Planning Briefs.
	Conservation Association Westcliff Seaboard	We believe that there is a great opportunity to revive Hamlet Court Road as a special shopping centre again. It has the character, but it is presently over-burdened with restaurants. A mixed use would enhance the whole Westcliff area.	Noted – this matter is outside the scope of the SCAAP but will be addressed through the emerging Development Management DPD.
	Conservation Association Westcliff Seaboard	We believe that this has been missing recently. Building which involve people inter-action (covered walkways, shops at street level) are vastly preferable to blank glass walls. Building like this - just fill the space - They don't offer new interesting space.	Agreed – SCAAP will address the issue of creating active street frontages in the town centre and central area.
	Conservation Association Westcliff Seaboard	(See A1-A4 general comments above) Tall is not necessarily good - 'smart' is better.	Please see response to comments on Tall Buildings above. Sustainability will be a key feature of development within the central area and Southend as a whole.
	Conservation Association Westcliff Seaboard	'Bulky food outlets sounds like a recipe for disaster - Opportunities for smaller, distinct, specialist restaurants give us 'differentiation' - Otherwise we are in danger of creating 'Basildon-on-Sea'.	Noted – there will be scope for large commercial development as well as smaller niche development according to the Southend Retail Study.
	Conservation Association Westcliff Seaboard	Southend should perhaps consider taking a development route which is focused on new high-tech opportunities (Nano technology, Green technology) linked into our educational future focus. This could act as a magnet for incoming investment, which can start on a small-scale and be housed in a new 'nursery' units in and around Southend Airport (and possibly on ex-military sites at Shoeburyness). It could also magnify the educational focus greatly.  (Obviously 3.15 supports this).	Noted – development around Southend Airport will be planned through the London Southend Airport and Environs Joint Area Action Plan and at Shoeburyness through the Shoebury Area Action Plan.  High tech companies will be encouraged in the town centre along with expansion of the educational offer.
	Conservation Association Westcliff Seaboard	'Yes', identification of micro-sites e.g: High Street opposite the Royals on the North to Alexander Road - This is a unique site forming a 'min-lanes' area - similar to Brighton. Another option is development of the Kursaal as a 'Covent Garden type' mini centre, but it would need good strong links back to the High Street, or development of the 'Golden Mile' as retail/restaurants area. A diagonal road would also help if it stretched to the Kursaal and opened up that vista, perhaps as a wide, stepped pedestrian avenue, with shops.	The SCAAP will look to encourage all types of employment development in the central area. Niche retail will be focused in certain areas of the town centre along the lines of Brighton Lanes. There will be different scales of development to ensure that the needs of all section of the community are catered for in terms of residential and commercial requirements. The Retail Study identified that there is a market for small, niche commercial and retail development as well as large scale.
	South Westcliff Community Group	Unique Victorian and Edwardian streetscape and vistas - Need to be very carefully preserved - Both short views and long views - In the High Street, there are still some key well designed upper stories with features we will not see again.	Noted – protection and enhancement of heritage assets will be expressed in the SCAAP.
	South Westcliff Community Group	We believe that our 'lost community spirit in our towns and cities today is caused by a lack of identification with an area. Everything runs into everything else, except from wholly identifiable areas (e.g. Leigh-on-Sea, Milton). Identifying current 'community areas' and new ones and building their identities will, we believe lead individuals toward a closer community feeling and more mutual co-operation and interest.	Noted – The SCAAP will look to improve the public realm and improve accessibility through and between locations within the central area and links with other areas. It is important that a sense of place and community is created and that people feel part of and identify with their environment.
	South Westcliff	We do need to focus on the small design and 'bottom-up thinking', as well as on the	The SCAAP will look to encourage all types of employment

	Respondent	Summary of Rep	Council Response
	Community Group	'grand designs'. It will be the availability of smaller, specialist shops and the uniqueness of their setting, which will distinguish Southend as a 'special shopping' centre, instead of just, another town centre.	development in the central area. Niche retail will be focused in certain areas of the town centre along the lines of Brighton Lanes. There will be different scales of development to ensure that the needs of all section of the community are catered for in terms of residential and commercial requirements. The Retail Study identified that there is a market for small, niche commercial and retail development as well as large scale.
	South Westcliff Community Group	'Tall' buildings are not necessarily the right approach to an iconic town centre. Visitors will not come to Southend to view the tall buildings, they will come to see 'something different' that they cannot find in Chelmsford, or Basildon, or Bluewater, etc. It's creating that 'special buzz' - Like the lanes in Brighton, or for new build - Gehry's unique buildings. The bland square-box glass designs just won't do it - Although excellent buildings with sea vistas just might.	As above.  The submission version of the Development Management DPD will contain policy to address the siting and location of tall buildings to ensure that they are not harmful to the historic environment. Design principles including height, massing and bulk are addressed in the Design and Townscape Guide and will be addressed for specific proposals in the SCAAP through Development and Planning Briefs.
	South Westcliff Community Group	2.11 We believe that there is a great opportunity to revive Hamlet Court Road as a special shopping centre again. It has the character, but it is presently over-burdened with restaurants. A mixed use would enhance the whole Westcliff area.	Noted – this matter is outside the scope of the SCAAP but will be addressed through the emerging Development Management DPD.
	South Westcliff Community Group	2.14 We believe that this has been missing recently. Building which involve people interaction (covered walkways, shops at street level) are vastly preferable to blank glass walls. Building like this - just fill the space - They don't offer new interesting space.	Agreed – SCAAP will address the issue of creating active street frontages in the town centre and central area.
	South Westcliff Community Group	3.4 (See A1-A4 general comments above) Tall is not necessarily good - 'smart' is better.	Please see response to comments on Tall Buildings above. Sustainability will be a key feature of development within the central area and Southend as a whole.
	South Westcliff Community Group	3.10 'Bulky food outlets sounds like a recipe for disaster - Opportunities for smaller, distinct, specialist restaurants give us 'differentiation' - Otherwise we are in danger of creating 'Basildon-on-Sea'.	Noted – there will be scope for large commercial development as well as smaller niche development according to the Southend Retail Study.
	South Westcliff Community Group	3.11 Southend should perhaps consider taking a development route which is focused on new high-tech opportunities (Nano technology, Green technology) linked into our educational future focus. This could act as a magnet for incoming investment, which can start on a small-scale and be housed in a new 'nursery' units in and around Southend Airport (and possibly on ex-military sites at Shoeburyness). It could also magnify the educational focus greatly.  (Obviously 3.15 supports this).	Noted – development around Southend Airport will be planned through the London Southend Airport and Environs Joint Area Action Plan and at Shoeburyness through the Shoebury Area Action Plan.  High tech companies will be encouraged in the town centre along with expansion of the educational offer.
	South Westcliff Community Group	'Yes', identification of micro-sites e.g: High Street opposite the Royals on the North to Alexander Road - This is a unique site forming a 'min-lanes' area - similar to Brighton. Another option is development of the Kursaal as a 'Covent Garden type' mini centre, but it would need good strong links back to the High Street, or development of the 'Golden Mile' as retail/restaurants area. A diagonal road would also help if it stretched to the Kursaal and opened up that vista, perhaps as a wide, stepped pedestrian avenue, with shops.	The SCAAP will look to encourage all types of employment development in the central area. Niche retail will be focused in certain areas of the town centre. There will be different scales of development to ensure that the needs of all section of the community are catered for in terms of residential and commercial requirements. The Retail Study identified that there is a market for small, niche commercial and retail development as well as large scale.
	BNP Paribas Real Estate	Option Box 2 (General) We do not consider there are any further explicit opportunities that should be explored in	Noted – the SCAAP in conjunction with the emerging Development Management DPD covers this issue. The

	Respondent	Summary of Rep	Council Response
		the AAP. However, we do consider that there should be a focus on the provision of residential accommodation in the Town centre and housing standards, design, massing and amenity standards that would be required. We would however require flexibility within the standards, to accommodate site specific circumstances.	proposal sites in the town centre will have Development Briefs to guide development and allow flexibility.
	Savills	Central Seafront, a key policy area is not clearly defined. The "Central Seafront" should be defined on a plan base. We support the proposal to develop the retail circuit and widen the town centre to the area east of Chichester Road.	Noted – The SCAAP will include clear policy for the seafront area.
	Savills	Options for key locations / potential sites for tall buildings have not been set out for early consideration by the public and stakeholders.	The SCAAP and Tall Buildings policy in the Development Management DPD will outline locations and suggestion criteria to determine where tall building are appropriate in relation to the existing environment. Consideration will need to be given to heritage assets as well as the existing urban grain and value. Development Briefs will allow the opportunity to determine the scope of tall buildings in the SCAAP area on key development sites.
	Savills	Section 6 - 6.10 We wholly support the principles of increasing the development capacity of the town centre, encouraging a greater diversity of activity over an extended day and aiming for a "greater residential population at Southend's heart". Consideration may need to be given whether all of these principles apply to all the Quarters - for example the extension of activity into the evening and night may not be appropriate in all of the proposed Neighbourhood Quarters.	Noted – further consideration will be given to this.
	Environment Agency	Specific policies in this AAP could help in achieving leisure and tourism aspirations in the central seafront areas whilst improving the flood defence infrastructure affording protection to the whole town. New development can provide opportunities for the incorporation of innovative flood defences into the design of the development. This would not only afford protection to the development, but could also make better use of the riverfront areas. The TE2100 Plan provides a vision for this area where improvements to the flood risk management system provide amenity, recreation and environmental enhancement. This could also positively contribute to the Thames Gateway Parklands vision. Development should also improve and enhance biodiversity and the natural environment. For example, where flood defences are to be redesigned or improved as part of a development, their design can add to the ecological value of the area. Setting back defences in some areas could also allow for foreshore habitat enhancement or recreation to mitigate for the impacts of coastal squeeze brought about by climate change.	Agree. The Central Seafront should be subject to detailed thematic and site specific policies that combine to achieve leisure and tourism and address aspirations flood defence. The policy approaches within TE2100 and other flood risk management policies will underpin this approach. Plans should also be made to embed a series of enhanced linked functional open and green space in the Central Area within the TGSE Green Grid and Parklands visions Noted. There are no currently identifiable opportunities to set back defences within the central seafront area – however, all opportunities should be explored to not only negate, but enhance the biodiversity and natural environment of the seafront and central area. An HRA will ensure that that designations along the foreshore are respected.
	Montagu Evans	The Council is currently in the process of preparing a Retail Study, which we understand is expected to be published shortly. The AAP states that the contents of the Retail Study will inform the submission version of the document The findings of the Retail Study will be an important consideration when deciding how much additional floorspace can be supported in order to ensure that adequate sites are identified. In these circumstances we consider that the current consultation is premature prior to the publication of the Retail Study. The soundness tests of PPS12 require that in order for an LDF document to be justified it should be founded on a robust and credible evidence base. As the Central Area Action Plan currently stands it is not founded on such an evidence base because the Retail Study is the only independent assessment which can	NOTED. The Retail Study of 2003 underpinned the spatial development and Town Centre Strategies in the adopted Core Strategy. The SCAAP Issues and Options Report presented a preferred approach to the fundamental regeneration of the Town Centre based on the Core Strategy which seeks to focus retail development in the town centre, broadened retail offer, in association with significant increase in employment and residential population and other unique Southend attributes such as the further and higher education hub, cultural capital and the seafront.

	Respondent	Summary of Rep	Council Response
		<p>determine the appropriate retail strategy. This is particularly important in Southend where there are competing out of centre schemes to consider.</p> <p>The Council should re-consult on the Issues and Options Central Area Action Plan once the Retail Study has been published in order to enable representations to be submitted in full knowledge of the contents of this document.</p>	<p>The reliability of the expenditure and population data sets, which forecast growth in retail is based upon, reduces over time and it is necessary to provide a policy framework that is flexible enough to meet demands over the long term whilst at the same time set out a spatial framework to accommodate this and mesh it with the other strands of development opportunities and needs associated with town centre development.</p> <p>The Issues and Options Report therefore articulated the preferred approach to a spatial framework for this regeneration based on the Southend Regeneration Framework and Central Area Master Plan (produced by the former Renaissance Southend LTD). The latter was adopted by the Council in 2008. The Central Area Masterplan was commissioned by RSL in June 2006, and its development progressed through the following stages:</p> <p>Stage 1: Baseline Report: Project appreciation, baseline research and analysis and identification of strengths, weaknesses and opportunities.</p> <p>Stage 2: Options Identification Report: Identification and evaluation of physical development options.</p> <p>Stage 3: Draft Final Report: Identification of preferred options</p> <p>Stage 4: Final Report: Publication of Central Area Masterplan</p> <p>The AAP should articulate the requirement of the Plan to provide for extra retail capacity required over the plan period based on the updated Retail and Town Centre Study published in 2011. This should be based on a flexible spatial strategy which identifies how and where additional retail floorspace can be accommodated without being rigid in terms of floorspace per site.</p>
<b>Section 4 Vision for Southend Central Area</b>			
<b>Option Box 3 - Do you consider that these Objectives for the Area Action Plan reflect the challenges and opportunities in the Central Area having regard to national and local priorities for the Borough?</b>			
	A Thomas	Yes but needs more on culture and promoting design excellence is not enough you have actively oppose poor design at the same time.	Agree - reference to cultural facilities should be included. Objective 5 promotes design excellence.
	Cllr Burdett	Section 4 Is good. The two to three large eye sores on the seafront. These include two large arcades on the western side of the Marine parade. The abandoned land owned by Rembrant is on the market for over £2million pounds. Can the council purchase these as investment and turn them into an educational facility (eg school building; library or learning zone).	These sites will be considered as part of the SCAAAP if they are within the boundary – otherwise they will be determined by the Development Management DPD. It will be a decision for the Council and outside the scope of this document whether they wish to secure any land for development in the future.
	Renaissance Southend Ltd	The vision and objectives are largely consistent with those in the CAM and are supported, especially greater emphasis on sustainability. It is suggested that a specific regeneration objective could be included along following lines: 'to accelerate the process of regeneration by allowing underused and underexploited sites to come forward for development, creating value, increasing investor confidence and kickstarting a virtuous	Noted.

	Respondent	Summary of Rep	Council Response
		cycle of improvement.'	
	Herbert Grove Residents Association	Although Herbert Grove Residents support these objectives we worry about there application by a Council and Planning department that have not studied other successful seaside towns apart from Brighton.	Noted – the Council has considered and observed the regeneration of other seaside locations such as Brighton.
	Conservation Association Westcliff Seaboard	In para 4.3, linked to our comments above, English Heritage suggests that under (2) the objectives should be to conserve those buildings and public realm that already contribute. A detailed Public Realm survey would be helpful to inform the final strategy or spatial option.	Agreed – the Boroughwide Character Assessment and Conservation Area Appraisals have aided this process and have informed the development of the SCAAP. The Council are keen to improve the setting of existing buildings of value within the central area.
	Conservation Association Westcliff Seaboard	Yes', bearing in mind 'micro planning' for people's enjoyment and 'bottom-up thinking' which meets 'top down thinking'.	Noted
	South Westcliff Community Group	Yes', bearing in mind 'micro planning' for people's enjoyment and 'bottom-up thinking' which meets 'top down thinking'.	Noted
	Cllr Gilbert	1) Objective 4 should be strengthened to include a specific reference to preserving the mature trees that we still have left in the central area. Planting saplings cannot make up for the loss of mature trees for many, many years, even assuming the trees survive to maturity. The council has alienated significant sections of the community by removing mature trees, and further destruction of healthy trees will damage public approval for any regeneration plans.	Noted – improvements to the public realm and the setting of buildings and streets is a key consideration and objective of the SCAAP. Urban greening and the development of more green space will be intrinsic to the plans.
	Cllr Gilbert	2) The Action Plan should include particular reference to facilities for young people. Opportunities for outdoor recreation, eg a skateboard park, should be encouraged, and the administration's previous commitment to a recreational pool in the centre of Southend should be restated.	Noted – opportunities for leisure pursuits for all ages will be included in the document. The central seafront area provides the opportunity to develop specific facilities for young people.
	Savills	The bullet point list should be expanded to include objectives on bringing forward sustainable development building only on sites that are stable addressing potential flood risk in the planning and development of proposals	These elements are an intrinsic part of the document as it moves forward. Sustainable Development lies at the heart of the planning system and this document. Flood risk is addressed in the Core Strategy at a strategic level and in the SCAAP for the central seafront area. All major proposals will be required to submit a flood risk assessment. The issues of land stability will be addressed through the SCAAP and Development Management DPD.
	Savills	We support the objective "to increase the number and diversity of people living within the town centre and adjoining residential areas by bringing into use empty or underused floorspace and by building more homes..."	Noted
	Environment Agency	Flood risk and water efficiency are two issues that could be incorporated into objective 4.	Agreed. These issues should be included within Objective 4
<b>Option Box 4 Do you agree that the Evaluation Criteria set out above are the right ones to test the overarching Spatial Options?</b>			
	A Thomas	yes	Noted
	Society for the Protection of Undercliff Gardens	Many shops are empty, which may be due to allegedly high business rates.	Noted. Creating a vital and viable retail sector will require a combination of actions including increasing jobs and residents within the town centre and providing a framework of attractive walkable streets and other attractions. The recent Southend Retail and Town Centre Study reinforces the preferred approach as set out in the Issues and Options Report and provides a robust health check of Southend Town Centre.



	Respondent	Summary of Rep	Council Response
	Renaissance Southend Ltd	The Regeneration Framework played a key role in informing the CAM and the use of the Regeneration Framework criteria for evaluation purposes in the AAP is supported	Agreed.
	Herbert Grove Residents	Although Herbert Grove Residents support these objectives we believe that the plan proposed by RSL did not have the necessary experience of other successful seaside towns and offered poor and unimaginative solutions to the problems identified.	The CAM included a creative approach to the development of the central area and was subject to significant consultation to identify the opportunities and suggest how the area could be regenerated.
	SBC Adult & Community Services	Agree that Evaluation Criteria are the right ones but consider adding 'exploit SSBC land ownership' under residential theme. Need to delete duplication 'Respond to forecast demand in core markets' which is named twice under residential theme.  Under Culture suggest add 'Develop and encourage creative industries'.  Movement and Transport: No mention of improving accessibility for disabled people or those with limited mobility	Noted – these suggestions will be considered in the preparation of the publication document.
	English Heritage	In para 4.3, linked to our comments above, English Heritage suggests that under (2) the objectives should be to conserve those buildings and public realm that already contribute. A detailed Public Realm survey would be helpful to inform the final strategy or spatial option.	Noted. Objective 3 sets the positive aspiration for how buildings and public realm will contribute to the Aim of the AAP
	EDDA	In developing the action plan further, the Council will no doubt consider the ELR recommendations and particularly that sites should be protected for employment uses as part of a comprehensive regeneration strategy to provide for modern employment floorspace as part of mixed use redevelopment schemes. The ELR suggests that the following business accommodation is protected at: * Victoria Avenue office quarter * Elmer Square * Clarence Road/Alexandra Street * St John's Quarter * Warrior Square * London Road	Noted and agreed. It is important that the Council retains employment land for demand in the short term and the long term. Mixed used redevelopment will ensure that area are vibrant at all times and contribute to the regeneration of the town centre.
	Burges Estate Residents Association	para 8 seeks to make town centre living more appealing to families. That is always going to be difficult on a variety of levels. The noise, the lack of parking, the likely absence of homes with adequate private amenity space. This against a backdrop of wishing to increase the centre's vibrancy (i.e., noise).	Urban locations can be designed to appeal to families – it is possible to include town houses and large apartments in the town centre that have appropriate storage space and parking to make town centre living practical. The Development Management DPD will include residential space standards to ensure that development allow for appropriate storage space that is required by families.
	Conservation Association Westcliff Seaboard	Yes', except I would add options under Employment and Offices to promote: Small combined shops, with workshop space behind the shops to encourage artisans to create, train and sell unique designs in Southend. Plus, also the creation of small design development workshops to enable small-scale advanced technology prototyping.	Noted.
	South Westcliff Community Group	'Yes', except I would add options under Employment and Offices to promote: Small combined shops, with workshop space behind the shops to encourage artisans to create, train and sell unique designs in Southend. Plus, also the creation of small design development workshops to enable small-scale advanced technology prototyping.	Noted.

	Respondent	Summary of Rep	Council Response
	Savills	The Plan should include overarching criteria relating to all potential uses relating to flood risk. land stability, delivering sites for key space users, delivering mix of housing types, sizes and tenures; delivery in changing market circumstances and planning decisions having regard to feasibility, viability and deliverability. It is not clear here and elsewhere in the Plan what is meant by the terms "develop leisure" and "develop leisure offer".	Noted – the SCAAP will be developed to make it clear what will be required of development in the central area. The SCAAP must be read in conjunction with the Core Strategy which addressed flood risk at a spatial level and the emerging Development Management DPD which includes policies relating to mix of housing types, sizes and tenures etc. The SCAAP will also include policy relating to flood risk where appropriate.
	Environment Agency	Additional evaluation criteria that could be included in "Public realm and Movement" are "improve biodiversity/the natural environment" and "improve urban drainage" (where the Water Cycle Study/SFRA or Surface Water Management Plan indicate that this should be achieved.	Noted; these considerations have underpinned the preferred approach and will continue to inform policy formulation.
<b>Section 5 Spatial Options</b>			
<b>Option Box 5 - Are there any significant sustainability or viability reasons why the Borough Council should reject at this stage the City by the Sea option?</b>			
	Burges Estates Residents Association	Page 25 et al. The three options as set out are not mutually exclusive but can be seen, especially in the current economic situation, as short, medium and long terms options and are therefore supportable.	Noted
	A Thomas	I support the city by the sea but the question requires an answer other than agree or not, I cannot see any reasons why this option should be rejected	Noted
	Cllr Burdett	Are based on the authors opinions. Footnotes with objective reference would help to create the feeling of the reading not being led to option 3	Noted – Option 3 has been suggested as a preferred option after development of the evidence base and past consultation which suggested this as an appropriate way forward. The evidence base has been drawn from consultation responses to the Town Centre AAP and the Seafront AAP and the CAM.
	Renaissance Southend Ltd	No and the preferred spatial option correlates with the conclusions reached in the CAM options report. A note of caution should be added on achievability of this scale of transformation within the life of the AAP given the current market conditions and this will need careful consideration in the Delivery & Implementation Plan	Noted – it is accepted that this is a long term plan and it will be reviewed at appropriate times to assess market conditions and allow some flexibility.
	Herbert Grove Residents Association	Herbert Grove residents believe that current plan based on the RSL proposals would ruin, rather than enhance the environment. A better, more adventurous plan is needed.	It is considered that this plan is appropriate and the objectives seek to regenerate and transform the central area into a vibrant and successful destination. Representations have suggested that there is significant support for the approach.
	English Heritage	The preferred "City by the Sea" option appears to embody many of the aspirations that the other two options in this section incorporate. We would urge, however, that the concept of producing alternative "circuits" to the High Street is fully evaluated. Option 1 focuses on the street as the heart of Southend. We feel that the street contains, or connects, a number of historic landmarks and spaces, and that its vitality should not be threatened (as has happened in other towns in the region) by well intentioned proposals to form alternative quarters, or circuits.  The continued demand for physical expansion of the retail and restaurant industries may not be as assured in the future	Noted. The AAP seeks to knit new and expanded retail / cultural / walking circuits to the existing quality environment and does not seek to overlay new forms where not appropriate. For example the historic core / Clifftown Quarter takes the existing form, grain and quality as a benchmark for future development/improvements whilst protecting all that is good already. Where new forms are being sought, permeability and high standards of design that have regard to their surroundings will be required. Noted
	Conservation	No. This looks like the best option, provided it doesn't lead to 'meaningless' over-	Noted.

	Respondent	Summary of Rep	Council Response
	Association Westcliff Seaboard	development. If a key focus is on 'new quarters' and centres of interest, without the 'soulless' blank walls (Glass or brick). The balance between 'city' and 'town' is 'interesting' and worrying - Expanding the feel of Southend, without losing its heart and integrity would seem to be a strong challenge.	
	Conservation Association Westcliff Seaboard	6.15 We are against tall landmarks on the water's edge. This destroys the 'horizontal nature' of the coast and suggests a Costa- Del-Sol - type approach. A really awful example is the 'Nirvana' building on the Western Esplanade, which has significantly downgraded the whole area and the long coastal views too.	Noted – tall buildings will be sited in appropriate locations and where they will not impact negatively on the existing environment. Tall buildings may be appropriate to provide focus and identity to a location. There is no intention to create a 'Costa-Del-Sol'. The Development Management DPD will provide a criteria for appropriate circumstances and location of a tall building.
	South Westcliff Community Group	No. This looks like the best option, provided it doesn't lead to 'meaningless' over-development. If a key focus is on 'new quarters' and centres of interest, without the 'soulless' blank walls (Glass or brick). The balance between 'city' and 'town' is 'interesting' and worrying - Expanding the feel of Southend, without losing its heart and integrity would seem to be a strong challenge.	Noted.
	South Westcliff Community Group	6.15 We are against tall landmarks on the water's edge. This destroys the 'horizontal nature' of the coast and suggests a Costa- Del-Sol - type approach. A really awful example is the 'Nirvana' building on the Western Esplanade, which has significantly downgraded the whole area and the long coastal views too.	Noted – tall buildings will be sited in appropriate locations and where they will not impact negatively on the existing environment. Tall buildings may be appropriate to provide focus and identity to a location. There is no intention to create a 'Costa-Del-Sol'. The Development Management DPD will provide a criteria for appropriate circumstances and location of a tall building.
	Cllr Gilbert	Clearly the economic situation and the financial cutbacks cast doubt on whether large scale physical regeneration projects are viable. Local residents are deeply sceptical of such plans. Given these constraints, it may be that change of a more evolutionary character is the best that we can achieve.	The SCAAP is a long term plan for the regeneration of the town centre and central seafront area. It will plan for development beyond the present economic climate.
	Savills	Option 1 and Option 2 need to be set out in greater detail to allow for meaningful assessment and comment by the public. In the absence of such detail, it is also not possible to comment on the options assessment in the SA.	The Issues and Options SCAAP is developed from the responses received to early incarnations of this document i.e. the Town Centre AAP and Seafront AAP. In addition the Council adopted the Central Area Masterplan which formed part of the evidence base for the strategic approach to the SCAAP. The CAM was subject to significant consultation along with the two AAP's. These documents assisted the development of the preferred approach suggested in Option 3. The approach of Option 1 and Option 2 were considered in greater detail earlier incarnations and the responses, as well as the evidence base, suggested that Option 3 should be promoted as a preferred Option. An SA was produced for all the stages of AAP production and discusses the Options.
	Savills	Section 5 The rationale for the choice of the preferred option has been given by a comparative analysis against Options 1 and 2, (for example Option 3 is stated as being "more comprehensive" than the other options) for which more detail need to be provided.	See above.
	Savills	Section 5 Further information and detail is required to be able to make an informed comment on this. The sustainability and viability assessments of the three options have not been set out	See above – the SCAAP is based on a comprehensive evidence base and has been informed by the Local Transport Plan and Core Strategy amongst other documents to ensure

	Respondent	Summary of Rep	Council Response
		in sufficient detail. The assessments should be informed by the findings and proposals in the Integrated Transport Scheme and other key baseline documents, currently being prepared.	that it has a compatible with key objectives for Southend.
	Savills	Section 5 10 new urban Quarters that have been identified. The more detailed analysis in section 7.8 indicates that the St John's Central Seafront and Eastern Esplanade Quarter (8) is "fragmented" (see below). There are also three separate Neighbourhood Gateway Quarters, each with different urban form, characteristics and planning issues to be address in the CAAP. It may be more appropriate to treat these Quarter as a series of smaller or sub -quarters and plan each accordingly.	Noted – this approach will be considered for layout at the next stage.
	Montagu Evans	The development of the Seaway site and the Queensway and Southchurch site (see Option10) will increase the number of anchors at each end of the High Street. This will serve to strengthen and enhance the existing retail circuit. The City by the Sea approach will create a number of developments which will be attractive to investors and provide the ability to respond to an increased demand for additional retail floorspace and develop new anchors.	Noted. The AAP will take forward this approach within a strong and flexible policy framework
<b>Section City 6 By The Sea - The Concept</b>			
<b>Option Box 6 Will the above Strategy for development, urban design and built form deliver the concept of the City by the Sea?</b>			
	A Thomas	yes in time	Noted
	Essex County Council	It is noted that the preferred option, 'The City by the Sea' option, is described as the most ambitious of the three options put forward in the document. The success for this option will be dependent on the strength and effectiveness of, and continued commitment to, the implementation and delivery mechanisms to be further elaborated in the final version of the document	Noted. Identifying delivery mechanisms and funding sources to assist delivery of the AAP will be essential as will a detailed Implementation and Monitoring framework
	Cllr Burdett	Section 6 I do not like the title City by the Sea. You must be careful not to create a vision that residents do not want. Everyone knows that the portrayal of cities relate to high crime, pollution and overcrowding.  I think a vision more suited to southend is : " Safety and fun by the sea" or " smiles on sea".	Noted – the concept summarises the ambition of the SCAAP at this stage.
	Cllr Burdett	If we need inward investment and more local spending goods and services must be reasonably priced and high quality. Getting rid of rat infested HMOs like the one of the corner of Pleasant Road and Marine Parade would be a start	Noted – it is the ambition of this document to improve the public realm. HMO's will need to be addressed outside of the planning system.
	Cllr Burdett	6.5 . - iii. As Kursaal ward councillor I am deeply offended by the narrative: Kursaal estate and its environs. The author needs to re word with the correct title. Gateway neighbourhoods have the most socially and economically deprived communities. They should form the corner stone of any economic re vitalisation in my opinion	Noted – the correct language will be used at the next stage.
	Cllr Burdett	6.10 I disagree entirely with this sorry. Why does overcrowding make sense? If I am wrong re word "Southends Heart" to Southend as a whole.	Noted
	Cllr Burdett	I don't agree with quarters and circuits.	Noted
	Cllr Burdett	6.13 to 6.16 is very good.	Noted
	Renaissance Southend Ltd	Need for more detail on Gateway Neighbourhoods  Clarification needed on role of Chichester Road as 'second shopping street', and links to	Noted – further detail about the gateways will be included as the document develops.

	Respondent	Summary of Rep	Council Response
		transport related issues	
	Herbert Grove Residents	Southend needs a plan for the future to be Futuristic not based on architecture from the sixties and ideas from the fifties.	Agreed – conservation and heritage will also need to be considered as part of the future development.
	The Theatres Trust	Option 3 City by the Sea Out of the three options this seems most pertinent to Southend although we are disappointed that none of the new Quarters make any specific reference to developments that will gain this objective. Most of the proposals could relate to improvements for any town centre and it is unfortunate that the Palace Theatre is not sited within any of the new Quarters as it would be an obvious choice to play a leading role in the 'cultural hub'. However we note the 'scope to upgrade' the Cliffs Pavilion outdoor space and look forward to being consulted on the planning application.	Noted – the Palace Theatre is outside the scope of this document. The upgrading of the Cliff's Pavilion will aid the regeneration of the centre area.
	English Heritage	The preferred "City by the Sea" option appears to embody many of the aspirations that the other two options in this section incorporate. We would urge, however, that the concept of producing alternative "circuits" to the High Street is fully evaluated. Option 1 focuses on the street as the heart of Southend. We feel that the street contains, or connects, a number of historic landmarks and spaces, and that its vitality should not be threatened (as has happened in other towns in the region) by well intentioned proposals to form alternative quarters, or circuits. The continued demand for physical expansion of the retail and restaurant industries may not be as assured in the future.	Noted. The AAP seeks to knit new and expanded retail / cultural / walking circuits to the existing quality environment and does not seek to overlay new forms where not appropriate. For example the historic core / Clifftown Quarter takes the existing form, grain and quality as a benchmark for future development/improvements whilst protecting all that is good already. Where new forms are being sought, permeability and high standards of design that have regard to their surroundings will be required.
	English Heritage	This section explains the preferred option further. Whilst reiterating the comments made above, we support the aims to improve connections and permeability, and to improve the qualities of townscapes, spaces and frontages as well as repairing buildings. However, here again we would question the need for further new landmarks, especially tall buildings, without justification. The world famous landmark of the Pier, which is in your council's ownership, is in desperate need of regeneration and yet is only briefly touched upon. The advices contained in PPS5, policy HE3.4 is relevant here, in particular, that plans at a local level should include investment and enhancement of historic places, including the public realm.	Noted. The AAP will, in association with other policies in the Development Management DPD and guidance in the Design and Townscape Guide, provide a framework for protecting and enhancing existing landmarks whilst supporting the creation of new ones within a strict policy framework. Tall buildings will be subject to Development Management DPD Policy DM4.
	Burges Residents Association	Page 35. Although in many respects the concept can be supported, there seems an obsession in trying to achieve links between the town centre and the seafront. Aside from day trippers it would useful to know whether you have survey information that large numbers of residents actually combine activities that feature both locations in a single trip. My experience is they do not.	In order to aid regeneration of, and attract visitors to the town centre and central seafront area, it will be important to create a link between the two areas. It is essential for the local economy that visitors to the seafront have easy access to the town centre to allow the opportunity for spend. Creating links between the two areas will also allow for combined activities and improve the quality of the public realm.
	South Westcliff Community Group	Maybe, or it could deliver 'Basildon-on-Sea' unless it is very well thought through as a quality, pedestrian experience.	Noted
	Conservation Association Westcliff Seaboard	Maybe, or it could deliver 'Basildon-on-Sea' unless it is very well thought through as a quality, pedestrian experience.	Noted
	Savills	Para 1.7 The scale at which the plan is available is inadequate to determine into which Character Areas particular sites fall.	Agree - The quarters should be realigned to reflect a more coherent entity and enable a more effective planning framework

		Respondent	Summary of Rep	Council Response
			<p>We object in general to the approach to demarcation of the boundaries between each of the Central Quarters, which splits sites and will difficult to interpret on the ground. The boundaries should more closely follow site / ownership boundaries and / or other physical features such as roads. In particular we object to the boundary between Central Quarter 8 (St John's, Central Seafront and Eastern Esplanade) and Central Quarter 10 (Gateway Neighbourhoods).</p> <p>The St Johns, Central Seafront and Eastern Esplanade do not form nor are planned to be a coherent Central Quarter.</p> <p>We propose an amendment to the boundary between CQ8 and CQ10 so that the site to the eastern end of the Esplanade falls wholly within CQ8.</p> <p>St Johns, Central Seafront and Eastern Esplanade should be considered as separate quarters and delineated separately on the AAP map. Consideration should be given to having separate policy approaches for each of the three Gateway Neighbourhoods.</p>	<p>Agree - the seafront will be treated as a coherent planning entity within which specific areas will have a different role whilst at the same time reflecting the common relationship they have with the seafront. This will allow the framework for Tylers Quarter to be more fully integrated with its relationship with the Town Centre retail circuits. Both quarters will need to acknowledge the interrelationship i.e. between the town centre and Seafront</p>
		Savills	<p>Section 6</p> <p>The Council should consider clarifying the future policy relationship between and status of the Central Area Masterplan (CAM) and the CAAP. The preferred Option ("City by the Sea") relies heavily on CAM and requires knowledge of that document for the text of the issues and options draft of the CAAP to be meaningful.</p> <p>The submission draft CAAP should be written as a stand-alone policy document that can be read and understood without cross-reference to the CAM, which will not form part of the LDF.</p>	<p>Agreed – this approach will be used to form the policy document. The CAM (which has been adopted by the Council) and the Town Centre and Seafront AAP's have been used to develop the policy approach for this document. They have been subject to significant consultation and form part of the evidence base which has informed the preferred approach. The SCAAP will form part of the LDF.</p>
		Savills	<p>6.13 - Integration</p> <p>We support the main objective of the Plan to more strongly connect the town centre to the seafront, extends the town centre, increasing routes for movement in a delta form between the High Street and the water's edge and activity.</p> <p>This objective should be redrafted as one of the main objectives in para 4.3. The defined town centre should include Tyler's Avenue, Marine Parade and Eastern Esplanade.</p>	<p>Noted – the defined town centre should include those areas which form the defined shopping area – this has and will be informed by the Retail Study. There will be areas outside of this defined area which will be strategically important to the regeneration of the central area however, which will include uses which are not appropriate, such as the leisure and tourism functions which exist on Marine Parade and Eastern Esplanade.</p>
		Savills	<p>6.15 - Landmarks</p> <p>We support the approach of the CAM to propose a rationale for the location of tall landmark structures at:</p> <ol style="list-style-type: none"> <li>1. Gateway sites</li> <li>2. Stand alone buildings at the water's edge on Eastern Esplanade</li> <li>3. Victoria Avenue</li> </ol> <p>This rationale should have been brought forward as options for their location in the CAAP Potential locations and/or specific sites for tall buildings should be identified in the submission draft CAAP and the options for their location subject to a Sustainability Assessment</p> <p>There should be clear links between the CAAP and DMDPD for the policies and locations for Tall Buildings.</p>	<p>Noted – this approach will be brought forward – the link between the tall buildings policy for the Development Management DPD and SCAAP will be apparent. Proposals sites will be brought forward through Development Briefs to determine appropriate development.</p>
		Savills	<p>The Strategy for development, urban design and built form may not deliver the concept of the City by the Sea as it has not identified potential sites or included key locational criteria for some of the key deliverables, especially those requiring a large site and / or with specific locational needs.</p>	<p>Proposals sites will be included in the document – these will be developed further through Development Briefs. The document will include a delivery plan.</p>

	Respondent	Summary of Rep	Council Response
		The Plan should identify potential sites and/ or include key locational criteria for some of the key deliverables / uses that require a large site of have specific locational needs. The Plan should address delivery issues (both general and specific) as part of this site identification; the delivery approach should include a commitment by the Council to use their statutory powers to assemble sites, if required.	
	Environment Agency	You will need to ensure that all sources of flood risk identified in your updated SFRA, Water Cycle Study and in the future by your Surface Water Management Plan are taken into consideration in the further development of this option.	Agreed. Both thematic policies and site specific policies should address all sources of flood risk in the Central Area.
	Environment Agency	Section 6 We are pleased to see that the proposed land uses and visions for those areas subject to tidal flood risk are compatible	Noted
<b>The Quarters and Key Sites</b>			
<b>7.1 The Victorias</b>			
<b>Option Box 7 – Alternative options could include:</b>			
<b>7a Allow the amount of office space to significantly reduce, in favour of a more residential community and/or</b>			
<b>7b Encourage further and higher education provision</b>			
	A Thomas	7b Encourage further and higher education provision I would again support educational use but not in totality.	Noted, the future needs for education facilities will be considered within the objectives and development principles set out in the SCAAP for the Victoria Gateway Neighbourhood.
	Renaissance Southend Ltd	7a Allow the amount of office space to significantly reduce, in favour of a more residential community A reduction and preferably demolition of a significant element of the existing office stock on the east side of Victoria Avenue is essential in creating a new and vibrant neighbourhood. This will need to be set out in a Development Brief for this area to ensure piecemeal or inappropriate development does not undermine the need for a comprehensive approach to secure change and enhanced values.  A strong set of urban design principles will be needed to reconcile some of the issues likely to arise between refurbishment and/or redevelopment in this quarter	Agreed
	Renaissance Southend Ltd	7b Encourage further and higher education provision The Plan needs to be sufficiently flexible to incorporate the needs of the HE/FE sector, and indeed other educational needs, as part of a comprehensive mixed use development	Agreed
	Herbert Grove Residents	7a Allow the amount of office space to significantly reduce, in favour of a more residential community Why not allow the market to decide on the use? The Council policy to object to the new developments in this area has created a wasteland.	The area will be developed through a Development Brief which will be subject to consultation to guide appropriate development in the area. The Local Plan policy for the area was for employment uses and it is only in recent years that a new approach has been considered through the development of the SCAAP.
	Herbert Grove Residents	7b Encourage further and higher education provision Why not allow the market to decide on the use? The Council policy to object to the new developments in this area has created a wasteland.	As above.
	SBC Adult & Community services	7a Allow the amount of office space to significantly reduce, in favour of a more residential community	Agreed – a mixed use approach will be applied in the area. The Victoria Avenue Development Brief will set the principles.

	Respondent	Summary of Rep	Council Response
		Whilst the preferred option for mixed use development is favourable to creating sustainable communities there is a demonstrable demand for housing/ affordable housing in the area and this may prove a more viable long term solution for the quarter. Need to recognise importance of Victorias to delivering high number of residential units, potential for increased high quality, high density, mixed tenure residential development and future exploitation of key	
	English Heritage	7b Encourage further and higher education provision In the "Victorias" we agree that the civic complex, including the Library, has significance, and we urge that proposals recognise their status and incorporate them as a key component.	Noted.
	Burges Estates	7a Allow the amount of office space to significantly reduce, in favour of a more residential community Page 39. The leading land use identified is workspace. This expression is used to indicate small scale activities of a craft nature for example. I cannot believe it is intended not to retain or at least encourage some office development to remain albeit in a form which is sustainable in terms of its potential uses. I do not think this point is made sufficiently clear.	The intention is to create a mixed use development articulated through the SCAAP and Victoria Avenue Development Brief. The SCAAP will ensure that employment land is maintained but other uses will make the area more vibrant at all times.
	Conservation Association Westcliff Seaboard	7a Allow the amount of office space to significantly reduce, in favour of a more residential community 7a	Noted.
	South Westcliff Community Group	7a Allow the amount of office space to significantly reduce, in favour of a more residential community 7a	Noted.
<b>7.2 London Road Broadway</b>			
<b>Option Box 8 – -Should Sainsburys decide to vacate their site, alternative options could include:</b>			
<b>8a - Redevelop with a smaller scale scheme comprising expansion of leisure and entertainment uses and a substantial area of public green space and/or</b>			
<b>8b – Relocate the Odeon Cinema to allow a comprehensive scheme to integrate Queensway and the High Street with active frontages to north and south. and/or</b>			
<b>8c - Realign the Queensway Road corridor to the north to provide for a larger developable area at the Sainsburys site and potentially create a second frontage onto Queensway and/or</b>			
<b>8d - Redesign London Road to make it a more pleasant environment for people whilst retaining access for dropping off and picking up, taxis and night time car access to bars and restaurants. and/or</b>			
<b>8e - Redevelop an area between the Odeon Cinema and Sainsburys to provide an urban 'pocket park'.</b>			
	A Thomas	8c - Realign the Queensway Road corridor to the north to provide for a larger developable area at the Sainsbury site and potentially create a second frontage onto Queensway - yes	The AAP should include a policy framework to accommodate a realigned Queensway and maximise the development opportunities in this quarter
	A Thomas	8b - Relocate the Odeon Cinema to allow a comprehensive scheme to integrate Queensway and the High Street with active frontages to north and south Yes or relocate the cinema to the seaway area to allow the same.	Noted. The AAP should be able to capture alternative proposals within an overall framework for the Quarter. Permeability between Queensway and the High Street should be promoted in association with the provision of active frontages at ground floor.
	A Thomas	8d - Redesign London Road to make it a more pleasant environment for people whilst retaining access for dropping off and picking up, taxis and night time car access to bars and restaurants. agree but the drop off does not have to be beyond east of college way and taxi facility does not have to be quite so near the high street and so many- there could be a facility for taxi waiting nearer Sainsbury with just one taxis at a time waiting near the Odeon	The AAP should include a policy framework to promote a redesigned London Road whilst ensuring appropriate taxi facilities, and encourage uses at ground floor such as cafes and bars.
	A Thomas	8e - Redevelop an area between the Odeon Cinema and Sainsbury to provide an urban 'pocket park'. the mini car park behind the bank would be ideal	Noted. The AAP should set out a flexible policy approach that can achieve objectives should Sainsbury's not relocate.



	Respondent	Summary of Rep	Council Response
			The AAP will include provision for linear park on realigned Queensway and enhancement of Victoria Circus public space to maximise development opportunities
	A Thomas	8a - Redevelop with a smaller scale scheme comprising expansion of leisure and entertainment uses and a substantial area of public green space -  would be a wasted opportunity	Noted
	Renaissance Southend Ltd	8a - Redevelop with a smaller scale scheme comprising expansion of leisure and entertainment uses and a substantial area of public green space - This would fail to realise the opportunity on one of the few sites with development potential in the AAP and the area north of London Road should be the subject of a separate Development Brief as part of the AAP	Agree, however the AAP should set out a flexible policy approach that can achieve objectives should Sainsbury's not relocate.
	Renaissance Southend Ltd	8b - Relocate the Odeon Cinema to allow a comprehensive scheme to integrate Queensway and the High Street with active frontages to north and south Unlikely to be viable in short to medium term and CAM proposal for refacing Odeon building to north may no longer be achievable with current Victoria Gateway scheme.  Having said this RSL recognises that the rear of the Odeon Building (as opposed to the activity within) currently does little to support the attractiveness or vibrancy of the Victoria Gateway area, and would therefore support in principle actions to improve this.	Noted – there are opportunities to expand and develop the Odeon site to create an active frontage to Queensway to introduce a more vibrant environment. It will be explored through the SCAAP.
	Renaissance Southend Ltd	8c - Realign the Queensway Road corridor to the north to provide for a larger developable area at the Sainsbury site and potentially create a second frontage onto Queensway This option was shown in the Stage 4 Report for Victorias Public Realm prepared by RSL in 2008. It is supported subject to the caveat that there is sufficient value in extending the developable area to justify costs of realigning Queensway. Needs testing through preparation of Development Brief.	Noted – there is an opportunity to redevelop the Sainsbury's site if they move to the Roots Hall site. It will be considered as a potential proposal site and include a Development Brief.
	Renaissance Southend Ltd	8d - Redesign London Road to make it a more pleasant environment for people whilst retaining access for dropping off and picking up, taxis and night time car access to bars and restaurants. Essential part of overall public realm strategy for Victorias and London Road, shown in Stage 4 report in 2008. This includes the pedestrianisation of London Road east of College Approach with the taxi rank 'relocated a short distance to the west' (p70 Stage 4 Report). It is important to emphasise this point and the general issue of more limited vehicular access east of College Approach as important in facilitating a 'more pleasant environment for people'.	Noted – these points will be considered in the preparation of the approach to this quarter – it is a measure that has potential to benefit the area significantly.
	Renaissance Southend Ltd	8e - Redevelop an area between the Odeon Cinema and Sainsbury to provide an urban 'pocket park'. This needs to be considered as part of a Development Brief for the area	Agreed.
	Herbert Grove Residents	8a - Redevelop with a smaller scale scheme comprising expansion of leisure and entertainment uses and a substantial area of public green space Herbert Grove Residents believe that this development is an issue for the local people.	Noted. This is an issue for local people, which is why a public consultation is taking place on the SCAAP to ensure local people are given an opportunity to get involved. A Development Brief will also be considered.
	Herbert Grove Residents	8b - Relocate the Odeon Cinema to allow a comprehensive scheme to integrate Queensway and the High Street with active frontages to north and south Herbert Grove Residents believe that this development is an issue for the local people.	As above.

	Respondent	Summary of Rep	Council Response
	Herbert Grove Residents	8c - Realign the Queensway Road corridor to the north to provide for a larger developable area at the Sainsbury site and potentially create a second frontage onto Queensway Herbert Grove Residents believe that this development is an issue for the local people.	As above.
	Herbert Grove Residents	8e - Redevelop an area between the Odeon Cinema and Sainsbury to provide an urban 'pocket park'. Herbert Grove Residents believe that this development is an issue for the local people.	As above.
	Conservation Association Westcliff Seaboard	8a - Redevelop with a smaller scale scheme comprising expansion of leisure and entertainment uses and a substantial area of public green space 8a,8b, 8d	Noted
	Conservation Association Westcliff Seaboard	8b - Relocate the Odeon Cinema to allow a comprehensive scheme to integrate Queensway and the High Street with active frontages to north and south 8a, 8b, 8d	Noted
	Conservation Association Westcliff Seaboard	8d - Redesign London Road to make it a more pleasant environment for people whilst retaining access for dropping off and picking up, taxis and night time car access to bars and restaurants. 8a, 8b, 8d	Noted
	South Westcliff Community Group	8a - Redevelop with a smaller scale scheme comprising expansion of leisure and entertainment uses and a substantial area of public green space 8a, 8b, 8d	Noted
	South Westcliff Community Group	8b - Relocate the Odeon Cinema to allow a comprehensive scheme to integrate Queensway and the High Street with active frontages to north and south 8a, 8b, 8d	Noted
	South Westcliff Community Group	8d - Redesign London Road to make it a more pleasant environment for people whilst retaining access for dropping off and picking up, taxis and night time car access to bars and restaurants. 8a, 8b, 8d	Noted
	Cllr Gilbert	8a - Redevelop with a smaller scale scheme comprising expansion of leisure and entertainment uses and a substantial area of public green space Should Sainsbury's relocate, option 8(a) is favourable, given the scarcity of public green space in the area, though option 8(b) would have considerable benefits if practical.	Agreed
	Montagu Evans	This site currently includes the Sainsbury's store and a number of development options are considered should the Sainsbury's store close. None of the considered options include the retention of the site within a retail use. This should be considered, given the constrained nature of the High Street area. This site presents one of the few sites in close proximity to the town centre where additional retail development could be developed once all in-centre options have been developed. The site should be considered as comprising a site which is still suitable for retail development and this should be included within the AAP.	The preferred approach for this site is to facilitate a substantial employment focussed development based on provision of new modern Grade A. This is predicated on the need to redevelop the outmoded office space on Victoria Avenue, which is currently stifling new opportunities, to a viable and attractive location. These locations have been identified as this site in association with Warrior Square and Queensway/Southchurch Road Quarter. New larger format retail units are preferred on the Tylers Avenue Site to expand a new circuit in the south east.  Nevertheless, the approach on this site whether Sainsbury's move or not will be to require secondary frontages and active complementary uses at ground floor, along with a Market on a newly pedestrianised London Road frontage and creation of

	Respondent	Summary of Rep	Council Response
			enhanced event space at Victoria Circus. This will enhance and reinforce the northern retail circuit.
<b>7.3 The High Street</b>			
<b>Option Box 9</b>			
<b>9a - Concentrate retail activity in the northern and southern sections of the High Street (in and around The Victorias and The Royals shopping centres) with cafes, bars, restaurants, banks and building societies and smaller scale retail uses in the central part of the High Street and/or</b>			
<b>9b – Extend major retail activity into the St John’s Quarter including the central seafront or</b>			
<b>9c - Follow a laissez-faire policy that allows the market to determine where retail and other town centre uses should be located in and along the High Street</b>			
	A Thomas	10a - Comprehensively redevelop the area to provide new commercial office and residential uses linked to and including a large supermarket led development scheme on the former B&Q site on Short Street I oppose a new supermarket on the B&Q site as this will detract from high street. I approve of some good quality residential, retail, office or civic use or health use in this area.	Noted. There are advantages to the planned redevelopment of the Central Area in accommodating additional food retail floorspace in this edge of town centre location and this approach is supported by National Policy and the Council’s Retail Study 2011
	A Thomas	10b - Limit redevelopment to the north side of Southchurch Road to include a new multi storey car park at the eastern end. a new multi storey here is appropriate but the whole of Southchurch road from Queensway west needs pulling down and sorting out not just the north bit.	Noted, whilst opportunities for additional parking should be explored in this area as part of a broader mixed use development. Recent Studies have been developing proposals for multi storey car park on the Warrior Square Site and this will be promoted within the AAP. Regeneration of this area should be a key objective for this quarter.
	Renaissance Southend Ltd	10a - Comprehensively redevelop the area to provide new commercial office and residential uses linked to and including a large supermarket led development scheme on the former B&Q site on Short Street The introduction of a retail led mixed use scheme on the B&Q site could be a positive benefit to this end of the town centre and High Street and provide a much needed boost for Victorias Shopping Centre. Given the segregation created by Queensway it will require careful integration with both the Victoria Gateway scheme and the Victorias Shopping centre to be beneficial to the overall regeneration objectives for the town centre	Agreed.
	Renaissance Southend Ltd	10b - Limit redevelopment to the north side of Southchurch Road to include a new multi storey car park at the eastern end. RSL do not consider this option and Option 10a to be mutually exclusive. Notwithstanding re-development of the B&Q site a separate plan for re-invigorating Southchurch Road, including a mix of uses and redevelopment of Queensway House is required.	Noted – these comments have been considered in the approach to this area for the next stage of the SCAAP.
	Herbert Grove Residents Association	10a - Comprehensively redevelop the area to provide new commercial office and residential uses linked to and including a large supermarket led development scheme on the former B&Q site on Short Street Herbert Grove Residents believe that the idea to provide a major car park in this area far from the seafront and retail areas is ridiculous, who would use it?	It is considered that this will be used by people visiting the town centre and the central seafront with improved access.
	SBC Adult & Community Service	10a - Comprehensively redevelop the area to provide new commercial office and residential uses linked to and including a large supermarket led development scheme on the former B&Q site on Short Street Support new residential development in conjunction with regeneration of existing residential areas.	Noted
	Conservation Association Westcliff Seaboard	10a - Comprehensively redevelop the area to provide new commercial office and residential uses linked to and including a large supermarket led development scheme on the former B&Q site on Short Street	Agreed

	Respondent	Summary of Rep	Council Response
		10a	
	South Westcliff Community Group	10a - Comprehensively redevelop the area to provide new commercial office and residential uses linked to and including a large supermarket led development scheme on the former B&Q site on Short Street 10a	Agreed
	DPP	10a - Comprehensively redevelop the area to provide new commercial office and residential uses linked to and including a large supermarket led development scheme on the former B&Q site on Short Street We consider the supermarket is an appropriate use for the B&Q site and would result in several benefits to the site and surrounding area. The proposal would bring a much needed quality convenience store to an existing vacant site within the town centre which would help support the vitality and viability of the centre. The proposal would also bring hundreds of jobs to the centre and would include sustainability features such as a CHP plant, roof lights, rainwater harvesting and timber cladding.	Noted. This policy approach will promote a large format food store on a the former B&Q site.
	DPP	10a - Comprehensively redevelop the area to provide new commercial office and residential uses linked to and including a large supermarket led development scheme on the former B&Q site on Short Street Option 10a of the document states the area should be comprehensively redeveloped to provide new commercial office and residential uses linked to and including a large supermarket led development scheme on the former B&Q site. We agree with this option and in particular that the former B&Q site is suitable for a supermarket led development. As you may be aware, Tesco are in the process of preparing a planning application for a new store on stilts on the B&Q site and a new Youth Centre to the north of the Royal Mail site along Short Street (see enclosed Masterplan for further information). The application is due to be submitted in the end of August 2010.	The authors are aware of this application.
	DPP	10a - Comprehensively redevelop the area to provide new commercial office and residential uses linked to and including a large supermarket led development scheme on the former B&Q site on Short Street In terms of the assessment of retail proposals, the proposed development has been assessed in terms of sequential issues and impact of existing town centres in line with the recently adopted PPS4. There have been no sequentially preferable sites identified that are suitable, available and viable for retail development and there would be no adverse impact on the town centres. Rather, the proposed store would draw trade into the town centre from large out-of-centre stores and would result in a significant improvement to the convenience provision within the town centre. The proposed development would have the added benefit of encouraging linked trips between from customers to and from the town centre (especially with the proposed new pedestrian bridge), thus further enhancing the vitality and viability of the town centre.	Noted. This policy approach will promote a large format food store on a the former B&Q site
	DPP	10a - Comprehensively redevelop the area to provide new commercial office and residential uses linked to and including a large supermarket led development scheme on the former B&Q site on Short Street Whilst Tesco are not against the comprehensive redevelopment of the remainder of the	A phased approach to development would be considered for this area unless it would be possible to bring forward comprehensive development (if appropriate).

	Respondent	Summary of Rep	Council Response
		Queensway and Southchurch area, any future policy should stress that development in the area will be piecemeal in nature and the redevelopment of the whole area would not be expected to be delivered through one planning application	
	DPP	10a - Comprehensively redevelop the area to provide new commercial office and residential uses linked to and including a large supermarket led development scheme on the former B&Q site on Short Street Recommendations To summarise, we support Option 10a which advocates a supermarket led development on the former B&Q site on Short Street. However, the policy should specify that the redevelopment of the Queensway and Southchurch area will be brought forward by piecemeal development and not one planning application covering the whole area.	Noted. This policy approach will promote a large format food store on a the former B&Q site.
	Montagu Evans	The identification of this site for a large foodstore is therefore in accordance with an identified need. Without the finalised Retail Study it is not possible to comment on the appropriate scale of the proposed foodstore. However, there is general policy support for such a development based on the changing role of Southend. Given the constrained nature of the High Street this offers one of the few opportunities available for the establishment of this form of retail development which will support the High Street as well as claw back expenditure lost to existing and proposed foodstores. The proposed foodstore will provide a second anchor at the northern end of the High Street to balance the creation of a second anchor at the southern end of the High Street. The creation of additional anchor attractions will serve to enhance the overall role of Southend and create and increase in the number of people passing between the anchor points to enhance the existing retail circuit.	Noted. The AAP will take forward the approach that supports a foodstore in this location. The Retail Study in 2003 supported this approach and circumstances have not changed significantly with regard to foodstores in the town centre to alter this position. Indeed the Retail and Town Centre Study 2011 findings endorse this approach.
	Montagu Evans	Option 10a is seeking to bring forward the comprehensive regeneration of the area whilst Option 10b is seeking partial redevelopment of the area. In order to ensure that the proposed foodstore is brought forward in a timely fashion Option 10b is supported. This will enable the new foodstore to be brought forward to the benefit of local residents and businesses. The requirement to bring forward a comprehensive redevelopment of the area will require a comprehensive masterplan and land assembly. Undertaking this work will delay the provision of the foodstore. It would be necessary to ensure that the proposed foodstore was well integrated with the existing High Street in order to encourage linked trips between the two.	Noted. This policy approach will promote a large format food store on a the former B&Q site.

#### 7.5 Elmer Square

**Option Box 11 – Alternative options were considered during the preparation of both the Central Area Masterplan and the development brief described above. Given the status of the development brief it is no longer appropriate to consider alternative options.**

	A Thomas	Alternative options were considered during the preparation of both the Central Area Masterplan and the development brief described above. Given the status of the development brief it is no longer appropriate to consider alternative options. You seem happy enough to reconsider things elsewhere- London Rd Broadway etc so why not here?	Noted. Proposals for Elmer Square have progressed further than those being considered within Issues and Options Report for London Road Broadway.
	Renaissance Southend Ltd	Alternative options were considered during the preparation of both the Central Area Masterplan and the development brief described above. Given the status of the development brief it is no longer appropriate to consider alternative options. Agreed. The principles are well established in the CAM and subsequently endorsed in the Development Brief approved in 2008	Noted.
	Burges Estates	Alternative options were considered during the preparation of both the Central Area	Noted. Proposals for Elmer Square have progressed to

	Respondent	Summary of Rep	Council Response
	Residents Association	Masterplan and the development brief described above. Given the status of the development brief it is no longer appropriate to consider alternative options. Page 49. It makes sense to see this area become the focus for education especially with the loss of half the multi-storey car park. However I am a little surprised to see mention of a library. Can it be? the current library in Victoria Ave. is outmoded, no longer viable? Surely it cannot be considered for replacement only on the basis of being a few hundred yards up the road? No justification is given for the replacement and on that basis it cannot be supported and in the context of severe restraint on public expenditure this issue needs to be rethought even in the longer term.	become an educational hub, to include a new teaching facility for the College, new research and learning facilities and a joint public and academic library to replace the existing Central Library. This will bring the library to the heart of the central area, combining it with the flourishing academic offer surrounding Elmer Square. A comprehensive development brief will be brought forward for Victoria Avenue in the form of an SPD, which together with site specific policies which will be brought forward within the AAP, will provide the framework for this quarter.
<b>7.6 Warrior Square Car Park</b>			
<b>Option Box 12 – What new facilities should be introduced into this area to enhance its vitality and viability?</b>			
	Mrs Maxine Kinder	Please no more bars in this area as already saturated and impacts on our lives. Housing for private residents with minimal social housing, but residential development would be of benefit	Noted. The AAP will provide a mixed use approach to the Warrior Square site, including office and residential uses, car parking, complimented by an enhanced public realm which builds on the historic character of the existing residential streets that form the Warrior Square Conservation Area.
	A Thomas	This site should contain mixed use to include good quality open market housing, offices, larger retail stores, discreet parking and some cafes/bars (not late night) to overlook the park. It could support a couple of 10/12 storey really smart residential buildings but predominantly open market not affordable as we need to bring residents to Southend town centre who have some money to spend to raise its profile and to attract better shops and stop the decline to 3rd rate retailing.	Agree. The AAP should promote a mixed use approach and maximise the opportunities afforded by Warrior Square Gardens. The approach to affordable housing is set out in the Core Strategy. Other issues related to type and size of housing is detailed in the emerging Development Management DPD.
	Renaissance Southend Ltd	The Warrior Square Quarter should reflect the principles in the CAM with the introduction of new housing and an element of employment and commercial uses that would benefit from the enhancements to Warrior Square Garden. This could include new civic uses if appropriate. Improved links to the High Street to create a new circuit will be essential to viability as will flexibility on overall mix and type of development. The Development Brief will need to make provision for suitable replacement of existing parking provision as part of the development or elsewhere within the town centre.	Noted. The AAP will provide a mixed use approach to the Warrior Square site, including office and residential uses, car parking, complimented by an enhanced public realm which builds on the historic character of the existing residential streets that form the Warrior Square Conservation Area. This should include a focus on enhancing links with the town centre and other quarters within the central area, to create a new circuit. The AAP will focus civic functions in the Victoria Avenue quarter, which should be enhanced through the AAP and Victoria Avenue SPD.
	Herbert Grove Residents	All the plans proposed by RSL so far have been short sighted, for instance an underground car park under Warrior Square to service the retail at the centre of the town and the local residence could easily be incorporated. One Herbert Grove Resident believes that the software used for design by RSL has no capacity to include topography and any underground development.	Noted. A Car Park Capacity Study will be undertaken to inform proposals.
	Herbert Grove Residents	All the plans proposed by RSL so far have been short sighted, for instance an underground car park to service the retail at the centre of the town and the local residence could easily be incorporated. One Herbert Grove Resident believes that the software used for design by RSL has no capacity to include topography and any underground development	Noted. A Car Park Capacity Study will be undertaken to inform proposals.
	Burges Estates Residents Association	Page 51. I get no pleasure from reminding you that the square is within a conservation area and yet has been allowed to deteriorate to the degree it has. It is not acceptable to spend public money and then not look after what has been constructed. It leaves one	Noted. The Warrior Square Conservation Area showcases the earliest of Southend's residential development in the late 18 <sup>th</sup> and early 19 <sup>th</sup> centuries. This character should be preserved

		Respondent	Summary of Rep	Council Response
			sceptical of all the fine words in this and other documents about improving the appearance of Southend. If you do not have the money to maintain it don't do it! As to any new facilities I understood the swimming pool was very popular, centrally located, and convenient for bus routes and for day trippers if the seaside weather is not so hot. A logical choice to enhance the areas vitality and viability.	and enhanced. The AAP will contain a strategy for the preservation and enhancement of the historic environment in the central area, and site specific proposals for Warrior Square will bring forward improvements to the public realm and set objectives to create a high quality mixed use area which builds on and enhances Warrior Square Gardens and the historic quality of the streets which form the Warrior Square Conservation Area.
		Conservation Association Westcliff Seaboard	The car Park tends to be a 'dead area', but the gardens are uplifting, perhaps a similar 'look' for the street on the other side (s), would transform that street. At the moment it is a car park, 'concrete' area. Certainly a green swathe with trees would make a difference.	Noted. The AAP will provide a Public Realm and Environmental Quality Strategy that will set the framework within which the enhancement and linkage of existing public realm and open space, and the creation of new space, will be managed within the Central Area.
		South Westcliff Community Group	The car Park tends to be a 'dead area', but the gardens are uplifting, perhaps a similar 'look' for the street on the other side (s), would transform that street. At the moment it is a car park, 'concrete' area. Certainly a green swathe with trees would make a difference.	Noted. The AAP will provide a Public Realm and Environmental Quality Strategy that will set the framework within which the enhancement and linkage of existing public realm and open space, and the creation of new space, will be managed within the Central Area.
<b>7.7 Clifftown</b>				
<b>Option Box 13 - What additional facilities should be introduced into this area to enhance its vitality and viability?</b>				
		A Thomas	The area should include the old cinema and a few other sites like the snooker hall and the larger building off Market Place south so as to extend the area better into the High street, This are should be predominately small niche retail in Alexandra area and commercial and residential in Clarence rd car park area. I would not support a market area. agree with the rest.	Noted – the AAP will promote an approach to the Clifftown Quarter that builds on its current character and heritage.
		Renaissance Southend Ltd	<ol style="list-style-type: none"> <li>1. RSL recognises important potential of this area for developing a range of small scale commercial and cultural/creative uses to complement the traditional High Street offer</li> <li>2. The AAP needs to consider the long term needs for off street parking in this quarter if the existing sites are to be brought forward for development</li> <li>3. Programme of environmental improvements to continue initial works in Clifftown Road</li> </ol>	Agreed. The AAP will contain development principles for Clifftown, which will seek to create an area with strong cultural identity, encouraging independent retailing, café culture, restaurants, bars and small studio style workshops that compliment the fine historic grain of the area. An Impact and Enabling Study for the development of Clarence Road car park, with particular reference to delivering a new car park for the area and mixed use developments, will be brought forward to inform future development of key sites within the Clifftown Quarter. The AAP will contain a Public Realm and Environmental Quality Strategy which will be used to inform environmental improvements within the central area.
		SBC Adult & Community Services	Not clear how parking requirements will be met and also how the network of lanes & mews will support deliveries to business premises.	Noted. An Impact and Enabling Study for the development of Clarence Road car park, with particular reference to delivering a new car park for the area and mixed use developments, will be brought forward to inform future development of key sites within the Clifftown Quarter. Planning and Development Briefs will be brought forward for key sites to guide development, servicing / delivery needs will be addressed on a site per site basis as development briefs and planning applications come forward.

	Respondent	Summary of Rep	Council Response
	English Heritage	In Clifftown we support your aspirations including the creation of a new square in front of Central Station and the recognition that the fine grain historic street form should lead any regeneration proposals.	Noted.
	English Heritage	In Clifftown we support your aspirations including the creation of a new square in front of Central Station and the recognition that the fine grain historic street form should lead any regeneration proposals.	Noted.
	Conservation Association Westcliff Seaboard	The ideas here are good so long as a 'village' feel can be created with 'pedestrian scaled' buildings and squares - Sounds very good, as this area does have a 'down energy'.	Noted.
	South Westcliff Community Group	The ideas here are good so long as a 'village' feel can be created with 'pedestrian scaled' buildings and squares - Sounds very good, as this area does have a 'down energy'.	Noted.
<b>7.8 St Johns, Central Seafront and Eastern Esplanade</b>			
<b>Option Box 14 – Provision should be made to actively regenerate the ‘Golden Mile’ based on options for planned intervention into the existing built form by either:</b>			
<b>14a - minimal intervention leading to loss of a few units to allow a punch through from seaway car park area to the esplanade or</b>			
<b>14b - greater intervention by removal of substantial number of units to allow a new ‘street’ with retail opportunities at right angles to the seafront and facilitate the broader ‘Spanish steps concept. or</b>			
<b>14c - removal of all units except for quality buildings i.e. nationally and locally listed buildings</b>			
	A Thomas	14a - minimal intervention leading to loss of a few units to allow a punch through from seaway car park area to the esplanade 14b is preferable, but this is the minimum intervention that is going to work as it needs to be opened up to fully exploit both the 'golden mile' and seaway opps.	Noted
	A Thomas	14b - greater intervention by removal of substantial number of units to allow a new 'street' with retail opportunities at right angles to the seafront and facilitate the broader 'Spanish steps concept. Probably the best compromise is as outlined in my comment in 14c.	The AAP should set out a policy framework that promotes major investment in revitalising /regeneration the Golden mile whilst protecting and celebrating buildings of heritage value.
	A Thomas	14c - removal of all units except for quality buildings i.e. nationally and locally listed buildings it might be appropriate to retain one or 2 extra buildings here that are lively and full of light at night as clearly they add vitality but the arcades are currently over dominant. there are also some decent buildings that are not listed etc eg the liberty belle which could be revitalised so I would prefer a compromise between b and c options	
	Renaissance Southend Ltd	14a - minimal intervention leading to loss of a few units to allow a punch through from seaway car park area to the esplanade Minimal intervention may not secure sufficient control or the ability to manage the seafront uses to create value for any redevelopment of the Seaway site. The future for this section of the seafront is one of the challenges RSL believes needs to be addressed by the AAP to help inform the approach to any redevelopment in this area.	
	Renaissance Southend Ltd	14b - greater intervention by removal of substantial number of units to allow a new 'street' with retail opportunities at right angles to the seafront and facilitate the broader 'Spanish steps concept. see comments on 14a - this approach could work but needs to be worked through as part of a comprehensive development brief and further viability testing.	Noted. The Central Seafront Strategy of the AAP will set out in detail the objectives and development policies for the area covering Western Esplanade, the Pier, the Golden Mile and Eastern Esplanade. The strategy for Tylers Avenue quarter and the Strategy for the Central Seafront will be developed with full regard to how these areas can be fully integrated. All development proposals will be expected to protect buildings



	Respondent	Summary of Rep	Council Response
			of historical importance, particularly Listed and Locally Listed Buildings and respect their setting and character.
	Renaissance Southend Ltd	14c - removal of all units except for quality buildings i.e. nationally and locally listed buildings see comments under 14b - unlikely to be viable in current market and more selective approach may be more deliverable. However, some flexibility is needed to ensure deliverability and the AAP should avoid being too prescriptive on this issue	Noted.
	Herbert Grove Residents	14b - greater intervention by removal of substantial number of units to allow a new 'street' with retail opportunities at right angles to the seafront and facilitate the broader 'Spanish steps' concept. Somebody in planning has a thing about 'Spanish steps' Why not reduce the height of Lucy Road to Esplanade level and allow the traders to have retail units at the rear of the seafront and a walk through from a same level car park on the current Seaway site. Herbert Grove Residents believe that the whole RSL plan for St. Johns Quarter is devoid of imagination.	Noted. The Spanish Steps concept will be brought forward by the AAP as a means of facilitating a new public space combined with new active frontages on the seaward side of the Royals as part of major development proposals on Eastern Esplanade and Seaway Car Park. The Spanish Steps approach is considered to be an appropriate way forward for the remodelling of the urban form as it will create a series of public and semi-public terraces that negotiate the level change from Tyler's Avenue through Seaway car park to Marine Parade.
	Herbert Grove Residents	14c - removal of all units except for quality buildings i.e. nationally and locally listed buildings Why not have a proposal to stop all visitors to Southend, the effect would be almost the same.	Noted.
	Herbert Grove Residents	14a - minimal intervention leading to loss of a few units to allow a punch through from seaway car park area to the esplanade The currently adopted Council plans mix late night revellers from the night clubs and pubs through newly created residential arrears such as the St. John's Quarter whereas the current layout provides the Seaway Car park as a buffer between revellers and residents.	Noted. The AAP will take forward a policy approach that encourages mixed use development within this area, together with remodelling of the urban form and enhancement to the public realm, which together will provide a range of uses for both the day and night time economies.
	English Heritage	14a - minimal intervention leading to loss of a few units to allow a punch through from seaway car park area to the esplanade Under part 7.8 (St. John's eastwards) English Heritage urges that you give more prominence to the role that the existing conservation areas at Kursaal and Eastern Esplanade have in contributing to local distinctiveness and legibility. Kursaal is of course already a landmark, and the seafront terrace of listed fishermen's' cottages along the Esplanade are the only reminder of pre-railway old Southend. This area would benefit from appraisal, and possibly extension. The area around St. John's Churchyard certainly requires special attention and we are pleased that a brief has been commissioned for this area. The adjoining seafront could, as stated, be said to represent a significant defining feature of the Southend identity that should be celebrated. It includes some listed buildings as well as others of local significance, with the overlying layer of later twentieth century commercialism. All of these elements need to be properly understood before any decisions are made as to future actions.	Noted. The AAP will provide a policy framework to ensure the protection of Conservation areas in this Quarter and show how they can contribute to local distinctiveness and inform future development.
	EEDA	14a - minimal intervention leading to loss of a few units to allow a punch through from seaway car park area to the esplanade The AAP acknowledges the difficulty in integrating the land use of St Johns with the seafront area due in part to the diverse nature of the spatial land use and the topography. The AAP should look to identify interactions between the quarters and key sites identified in the AAP. In particular there should be ease of movement between the St Johns quarter, seafront, university and Victoria Road	Noted. The 'Spanish Steps' approach will be taken forward by the AAP, and is considered to be an appropriate way forward for the remodelling of the urban form as it will create a series of public and semi-public terraces that negotiate the level change from Tyler's Avenue through Seaway car park top Marine Parade. The AAP will address the issues of circuits and access between the Quarters.

	Respondent	Summary of Rep	Council Response
	Burges Estates Residents	14a - minimal intervention leading to loss of a few units to allow a punch through from seaway car park area to the esplanade Page 57. Reference is made to "new provision for buses". What precisely does this mean? It is only within the past few years that new facilities were created. The regeneration of the Golden Mile should be achieved with minimal intervention. The continuity of the Golden Mile is a key component of its vitality, vibrancy and attraction and should be retained.	Noted. The Central Seafront Strategy of the AAP will set out in detail the objectives and development policies for the area covering Western Esplanade, the Pier, the Golden Mile and Eastern Esplanade.
	Conservation Association Westcliff Seaboard	14b - greater intervention by removal of substantial number of units to allow a new 'street' with retail opportunities at right angles to the seafront and facilitate the broader 'Spanish steps' concept. 14b	Noted. This approach will be taken forward by the AAP.
	South Westcliff Community Group	14b - greater intervention by removal of substantial number of units to allow a new 'street' with retail opportunities at right angles to the seafront and facilitate the broader 'Spanish steps' concept. 14b	Noted. This approach will be taken forward by the AAP.
	Savills	14b - greater intervention by removal of substantial number of units to allow a new 'street' with retail opportunities at right angles to the seafront and facilitate the broader 'Spanish steps' concept. The subsection on "Existing Form" recognises that "The main problem is the diverse nature of the component parts and the challenging topography which in part contributes to the fragmentation of the Quarter." This quarter is treated in the submission draft CAAP as three separate quarters, with a slightly different policy approach in each.	Noted. The Central Seafront Strategy of the AAP will set out in detail the objectives and development principles for the area covering Western Esplanade, the Pier, the Golden Mile and Eastern Esplanade. The strategy for Tylers Avenue quarter and the Strategy for the Central Seafront will be developed with full regard to how these areas can be fully integrated.
	Savills	14a - minimal intervention leading to loss of a few units to allow a punch through from seaway car park area to the esplanade Marine Parade and Eastern Esplanade is adjacent to and has relatively good direct pedestrian access to the improved City Beach area. Marine Parade and Eastern Esplanade should be a residential-led mixed use area potentially including a number of tall buildings, making best use of this prime waterfront location with seaside views unparalleled in Southend. This should comprise leisure, retail and seaside related uses on ground and upper floors, with high density residential development above. This form of development would meet the CAAP objectives of protecting seaside uses, increasing vitality and day /year round usage and, through good design, could help integrate the isolated residential areas to the east into the central area.	Noted. The approach to tall buildings will be taken forward by the Development Management DPD, with the AAP containing site specific policies and a framework within which tall buildings will be assessed within the central area.
	Savills	14a - minimal intervention leading to loss of a few units to allow a punch through from seaway car park area to the esplanade There is only limited and unexplained reference to the "Theme Park" and the regeneration of "Golden Mile" (Option Box 14). Neither of these areas are shown on a map base or described in detail in the Plan. Further explanation is required of the "Golden Mile" including clear policy objectives.	Noted. The Central Seafront Strategy of the AAP will set out in detail the objectives and development policies for the area covering Western Esplanade, the Pier, the Golden Mile and Eastern Esplanade.
	Savills	14c - removal of all units except for quality buildings i.e. nationally and locally listed buildings The redevelopment of Marine Parade and Eastern Esplanade, retaining only those building worthy of retention (in terms of listing or quality of design) would be a prime catalyst in the regeneration of Southend This issue is covered by PPS5	Noted. The AAP will provide a policy framework to ensure the protection of Conservation areas in this Quarter and show how they can contribute to local distinctiveness and inform future development.

	Respondent	Summary of Rep	Council Response
	Montagu Evans	The text in relation to this option makes reference to the potential for the creation of a new retail circuit providing a high quality retail offer to complement the High Street and states that Seaways has the potential to become a new retail, residential and leisure mixed use hub. In terms of providing a linkage between any new and proposed retail circuits an approach should be adopted which ensures sufficient linkages between the two are provided which will encourage pedestrian circulation. Any additional retail circuit should complement and enhance the existing retail circuit.	Noted. The preferred approach will be taken forward in a strong and flexible policy framework
<b>7.9 Western Esplanade</b>			
<b>Option Box 15 – What additional facilities should be introduced into this area to enhance its vitality and viability?</b>			
	A Thomas	a few more cafes and bars jutting over the shore would be good. current kiosk offer is poor the slip should be filled with the museum and supporting car park restaurant shop etc. the other slips could accommodate a boutique hotel, conference facilities, a Greek style open air theatre etc. car parking essential. improved pavement, lighting, more palms or trees in central parking area and improved seating. opp for sculptures to reflect the marine life and better signage of seashore/mud reserve.	Agree – The AAP should set out the policy framework to promote the stabilisation of the Cliff Slip whilst encouraging a new museum and cultural facility; provision of facilities that complement the passive recreational nature of the area; promote appropriate enhancements to the landscaping and Cliff and Shrubbery Gardens, streetscape and interpretive board for the marine and biodiversity assets and public art strategy. Retention of seafront parking should also be addressed whilst allowing for better pedestrian links
	Renaissance Southend Ltd	The CAM drew a clear distinction between the areas east and west of the pier and identified the more passive recreational potential for the Western Esplanade. The proposed new museum in the Cliffs would complement this approach and could incorporate some underground parking to ease pressures on o street parking and allow for a programme of public realm enhancements of the Esplanade and promenade on this side of the pier	Agree. The AAP will identify opportunities to reduce the impact of the road and parking as a barrier by rolling forward the success of the City Beach scheme on Marine Parade. The AAP will bring forward a policy approach for the Cultural Centre and New Southend Museum, which will include car parking and cycle parking facilities.
	English Heritage	The adjoining seafront could, as stated, be said to represent a significant defining feature of the Southend identity that should be celebrated. It includes some listed buildings as well as others of local significance, with the overlying layer of later twentieth century commercialism. All of these elements need to be properly understood before any decisions are made as to future actions.	Noted. The AAP will include a strategy for the Historic Environment which, together with the Central Seafront Strategy that will be included within the AAP, will provide a comprehensive framework for understanding the historic significance of listed buildings, including the Pier, and how new development should seek to address their setting and context.
	Conservation Association Westcliff Seaboard	This area requires great care in order to retain the best of its Victorian/Edwardian, even Georgian feel. Further development could possibly destroy its unique feel.	Noted. The AAP will include a strategy for the Historic Environment which, together with the Central Seafront Strategy that will be included within the AAP, will provide a comprehensive framework for understanding the significance of heritage assets in this location, and how new development should seek to enhance their setting and context. All development proposals will be expected to protect buildings of historical importance, particularly Listed and Locally Listed Buildings and respect their setting and character.
	South Westcliff Community group	This area requires great care in order to retain the best of its Victorian/Edwardian, even Georgian feel. Further development could possibly destroy its unique feel.	Noted. The AAP will include a strategy for the Historic Environment which, together with the Central Seafront Strategy that will be included within the AAP, will provide a comprehensive framework for understanding the significance of heritage assets in this location, and how new development

	Respondent	Summary of Rep	Council Response
			should seek to enhance their setting and context. All development proposals will be expected to protect buildings of historical importance, particularly Listed and Locally Listed Buildings and respect their setting and character.
	Savills	We fully support the City Beach public realm improvement and the proposals for the second phase of City Beach from the Kursaal to Esplanade House	Noted.
	Savills	We agree that further investigations are required for potential major development sites on the sea front at Marine Plaza and Esplanade House. However, the land-use / mix and delivery of proposals for these sites should have been included in the issues and options report and subject to early consultation and the sustainability assessment We propose mixed use development of these sites and adjoining areas (see above). This will provide retail / leisure uses on ground and upper floors with residential above; the scheme should include tall buildings. This approach accords with the aims and objectives for the area as set out in the emerging CAAP and the proposals outlined for the adjoining Council owned site - Seaways car park.	Noted.
<b>7.10 Gateway Neighbourhoods</b>			
<b>Option Box 16 – The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by:</b>			
<b>16a (i) - Enhancing gateway environments to the town complementing its role as a business and visitor destination</b>			
<b>16a (ii) - Providing for new and improved residential neighbourhoods to meet identified housing needs.</b>			
<b>16a (iii) - Providing for new and improved social care, recreational and community uses</b>			
<b>16a (iv) - Reinforcing the business function of the town centre and providing local employment opportunities and/or</b>			
<b>16e - The Gateway Neighbourhoods should be developed as discreet entities with regeneration focussing on the needs of the existing communities with particular attention to protecting existing employment areas from loss.</b>			
	A Thomas	16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by being improved to encourage better landlords and tenants, smarter properties and tidier front gardens. Those areas not immediately on the town centre could support some decent affordable housing. Small scale work and jobs, pocket parks should be increased as should a programme of neighbourhood renewal with street scene issues on the top of the list. Southend will never improve unless these areas are dragged up.	Agree, the AAP should promote a sustainable mixed community with appropriate enhancements to the environment and amenities
	A Thomas	16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by, 16a (i) - Enhancing gateway environments to the town complementing its role as a business and visitor destination yes	Agree, this is an important Gateway to the Town.
	A Thomas	16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by, 16a (ii) - Providing for new and improved residential neighbourhoods to meet identified housing needs. yes but not too much new build affordable as there is an abundance of existing properties that can become attractive and affordable. no more conversions to flats or hmo's	Noted. The approach to sustainable communities in this neighbourhood should reflect a balanced approach to tenure types and sizes. The Affordable housing requirement for any development is set out in Core Strategy Policy CP8.
	A Thomas	16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by, 16a (iii) - Providing for new and improved social care, recreational and community uses no - too much institutional uses here already, planning should look to remove these uses asap once a property is empty. Support more parks.	Noted, however to create and maintain sustainable communities an appropriate level of infrastructure is required. In particular this area will be an appropriate location for a new primary school when population growth requires it.
	A Thomas	16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for	Noted. Existing and new communities will need to have

	Respondent	Summary of Rep	Council Response
		the town centre by, 16a (iv) - Reinforcing the business function of the town centre and providing local employment opportunities very much so, some small hotel and b&b use is appropriate.	access to employment. Existing employment locations should be protected where appropriate and new development opportunities should address employment regeneration needs, such as providing small scale, move-on space for entrepreneurs.
	A Thomas	16b - The Gateway Neighbourhoods should be developed as discreet entities with regeneration focussing on the needs of the existing communities with particular attention to protecting existing employment areas from loss. In part but not all existing employment areas are in suitable locations and cause inconvenience to residents and hold back the residential improvement of an street/area. the areas as defined can do the roles as in I-iv but can still keep their identity and still compliment the town centre the one does preclude the other.	Noted. Existing and new communities will need to have access to employment. Existing employment locations should be protected where appropriate and new development opportunities should address employment regeneration needs, such as providing small scale, move-on space for entrepreneurs.
	Renaissance Southend Ltd	16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by, 16a (I) - Enhancing gateway environments to the town complementing its role as a business and visitor destination Not an appropriate objective for these areas, which are essentially residential with some small scale employment uses, many of which are redundant or not suitable for current day commercial needs .	Noted.
	Renaissance Southend Ltd	16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by, 16a (iv) - Reinforcing the business function of the town centre and providing local employment opportunities Support for refurbishment subject to issues of viability	Noted. The Gateway Neighbourhoods, whilst requiring regeneration in their own right, will support the objectives of the town centre as a whole.
	Renaissance Southend Ltd	16b - The Gateway Neighbourhoods should be developed as discreet entities with regeneration focussing on the needs of the existing communities with particular attention to protecting existing employment areas from loss. Agree with first part but not second, the latter does not necessarily follow the former, given proximity to town centre opportunities. Further work is needed to define more clearly the Council's objectives for including these areas within the AAP and evidence is required of what the existing communities feel is most important to their future sustainability and regeneration.	Noted – these areas should support the town centre as the focus of regeneration and employment in the central area. However the Gateway Neighbourhoods also have a role to play in providing employment opportunities.
	SBC Adult & Community Services	16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by, 16a (ii) - Providing for new and improved residential neighbourhoods to meet identified housing needs. Clearly capacity for the Gateway Neighbourhood areas to meet a portion of housing need of the central area in existing redundant commercial areas. However, growth needs to be balanced and ensure that not all affordable housing development is pushed out of Central Area to these neighbourhoods but that affordable provision is balanced across the wider areas and new provision takes account of existing housing tenures/styles in given area. The identified Gateway neighbourhoods cover a large area and do not share the same characteristics in terms of residential density and tenure make-up. New residential developments need to complement existing communities	Agreed. Affordable housing should be available across the central area including the town centre to ensure that needs are met. The Council would wish to avoid a concentration of affordable housing in one or a number of places. It should co-exist with market housing in most cases, if possible.
	SBC Adult & Community Service	16b - The Gateway Neighbourhoods should be developed as discreet entities with regeneration focussing on the needs of the existing communities with particular attention to protecting existing employment areas from loss. Agree with proposals	Noted. However there is a need to ensure that these communities function well on their own but support and compliment the wider function and needs of the town centre and Southend.

	Respondent	Summary of Rep	Council Response
	Open Planning	<p>16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by responding to what is existing in the area, particularly if this is predominantly residential.</p> <p>Favouring mixed-use development, which provides both housing and employment (in any form). In such cases, the type of employment use should not be specified within the policy rather considered on a site by site basis. The requirements of employers is ever evolving and changing and this should be taken into account when determining applications (e.g. There is less demand these days for light industrial, warehouse and storage and more demand for office, leisure and retail)</p>	<p>Noted. The policy will guide development and allow some flexibility within the policy however there are certain areas, within neighbourhoods, where employment uses need to be protected to ensure that there is a future supply and capacity. Planning applications will need to be in alignment with the development plan and determined within the context of the plan. The ELR has identified where employment land should be maintained and retained. This document has informed the approach taken in the SCAAP.</p>
	Open Planning	<p>16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by, 16a (ii) - Providing for new and improved residential neighbourhoods to meet identified housing needs.</p> <p>The area along and around Kenway is designated in the Draft SCAAP as a Gateway Neighbourhood. This area has undergone significant change recently and although was once predominantly light industrial, is now predominately residential. This area would therefore now better suite residential use. Additionally, there is little demand for the remaining types of light industrial use which is evident from the number of abandoned sites. This may be due to the poor access (e.g. via small residential streets) and/or a change in demand for the type of accommodation that exists.</p>	<p>The ELR provides an assessment of the need and capacity of existing employment land and recommends which areas will be needed to secure future employment and those which may be suited to other uses or should consider a more mix development approach. The emerging Development Management DPD describes the Council approach to employment and industrial areas, including those behind Sutton Road. The approach taken in the SCAAP recognises the changing nature and function of parts of these neighbourhoods. Development Briefs will be used where appropriate to determine the types and function of development.</p>
	Open Planning	<p>16b - The Gateway Neighbourhoods should be developed as discreet entities with regeneration focussing on the needs of the existing communities with particular attention to protecting existing employment areas from loss.</p> <p>The Gateway Neighbourhood should respond to what is existing in the area, particularly if this is predominantly residential.</p> <p>The Gateway Neighbourhood could in addition favour mixed-use development, which provides both housing and employment (in any form). In such cases, the type of employment use should not be specified within the policy rather considered on a site by site basis.</p>	<p>Noted. The policy will guide development and allow some flexibility within the policy however there are certain areas, within neighbourhoods, where employment uses need to be protected to ensure that there is a future supply and capacity. Planning applications will need to be in alignment with the development plan and determined within the context of the plan. The ELR has identified where employment land should be maintained and retained. This document has informed the approach taken in the SCAAP.</p>
	Open Planning	<p>16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by, 16a (iv) - Reinforcing the business function of the town centre and providing local employment opportunities</p> <p>The Gateway Neighbourhood should respond to what is existing in the area, particularly if this is predominantly residential.</p>	<p>Noted – see above.</p>
	Conservation Association Westcliff Seaboard	<p>16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by, 16a (l) - Enhancing gateway environments to the town complementing its role as a business and visitor destination</p> <p>16a (i), 16a (iv), 16e (Combination)</p>	<p>Noted</p>
	Conservation Association Westcliff	<p>16b - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by, 16a (iv) - Reinforcing the business function of the town centre and</p>	<p>Noted</p>

	Respondent	Summary of Rep	Council Response
	Seaboard	providing local employment opportunities 16a (i), 16a (iv), 16e (Combination)	
	South Westcliff Community group	16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by, 16a (l) - Enhancing gateway environments to the town complementing its role as a business and visitor destination 16a (i), 16a (iv), 16e (Combination)	Noted
	South Westcliff Community group	: 16b - The Gateway Neighbourhoods should be developed as discreet entities with regeneration focussing on the needs of the existing communities with particular attention to protecting existing employment areas from loss. 16a (i), 16a (iv), 16e (Combination)	Noted
	South Westcliff Community group	16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by Development of the gateway neighbourhoods should focus on the needs of existing communities. These communities have had to bear the brunt of the problems associated with living close to an urban centre, including overcrowding, noise and anti-social behaviour. The needs of the people living their now should be put first.	Noted – it is the intention of the Council to see these areas regenerated to provide a good environment for the residents and workers, including improvements to the public realm as well as new residential development, where appropriate, and the retention of functioning employment areas to meet present and future demand.
	Cllr Gilbert	16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by Development of the gateway neighbourhoods should focus on the needs of existing communities. These communities have had to bear the brunt of the problems associated with living close to an urban centre, including overcrowding, noise and anti-social behaviour. The needs of the people living their now should be put first.	Noted – see above.
	Indigo Planning	16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by The Issues and Options Regulation 25 consultation builds on the foundations of the Pre-Submission Issues and Options Report published in January 2007 and sets out a vision and Preferred Option for the Central Area of Southend. The consultation document identifies that Sainsbury's existing town centre store at London Road is located in Central Quarter 2 (London Road Broadway), whilst the Roots Hall football ground is located in Central Quarter 10 (Gateway Neighbourhoods).	Noted
	Indigo Planning	16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by Whilst the consultation document identifies that there is some uncertainty over Sainsbury's finding an alternative site (supporting text in Central Quarter 2), there is no mention that if they do find an alternative site they will retain a town centre presence within London Road area. Nor is there any mention of the redevelopment proposals for Roots Hall football ground in the text for Central Quarter 10. Given that there is a resolution to grant planning consent for the redevelopment of Roots Hall football ground, we consider that the Central AAP should address this. Given the regeneration potential at the London Road site we would consider it premature for the Council to potentially prejudice this significant town centre opportunity by allocating other sites, which are sequentially less preferable, for town centre uses.	Agreed – London Road site and Roots Hall will be included as proposals sites for the next stage of the SCAAP. London Road will be promoted as a landmark mixed use development. The intentions of the Roots Hall planning application will be acknowledged in that proposals site.

	Respondent	Summary of Rep	Council Response
	Savills	16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by The character of each of the three main Gateway Neighbourhoods that have been identified are very different and each face different local issues and challenges. Each Gateway Neighbourhood should be separately assessed and have a separate policy approach. Generally support approach in Option 16e, but should seek to protect existing employment areas from loss only where there the planning benefits would be greater than allowing their redevelopment for alternative uses, especially family accommodation.	Agreed – a policy approach will be applied to each of the Gateway Neighbourhoods.
	Savills	16b - The Gateway Neighbourhoods should be developed as discreet entities with regeneration focussing on the needs of the existing communities with particular attention to protecting existing employment areas from loss. Regeneration should focus on site specific issues and the needs of the existing communities, rather than giving particular attention to protecting existing employment areas from loss.	Noted. The AAP seeks to address the particular challenges facing older communities adjacent to the core town centre. These Gateway Neighbourhoods are facing structural change in terms of land use, economic decline, degraded urban fabric and dereliction. The AAP will set out the policy framework to enable the enhancement gateway environments to the town, complementing its role as a business and visitor centre, providing future opportunities to meet affordable and more specialised housing needs and new recreational and community uses.
	Savills	16a - The Gateway Neighbourhoods should play a key role in meeting the objectives for the town centre by Reinforcing the business function of the town centre and providing local employment opportunities is not necessarily a key role for all (or any) of the Gateway Neighbourhoods.	Noted. The AAP seeks to address the particular challenges facing older communities adjacent to the core town centre. These Gateway Neighbourhoods are facing structural change in terms of land use, economic decline, degraded urban fabric and dereliction. The AAP will set out the policy framework to enable the enhancement gateway environments to the town, complementing its role as a business and visitor centre, providing future opportunities to meet affordable and more specialised housing needs and new recreational and community uses. The AAP will pave the way for ensuring the 'room to grow' modern business facilities can be accommodated in gateway neighbourhoods in order to facilitate functioning, sustainable, mixed use communities.
<b>Section 8 Development Management</b>			
<b>Option Box 17 17a - Are the planning policies in the Core Strategy DPD, with the guidance in the Design and Townscape Guide SPD and Building Regulations sufficient to meet the challenge of climate change &amp; bring about as significant reduction in carbon emissions? and / or</b>			
<b>17b - Should the borough wide Development Management DPD currently being prepared contain detailed development management policies for all development including the central area? or</b>			
<b>17c - Should there be a suite of policies in the submission version of this Plan relating to the particular challenges and opportunities presented by the regeneration and growth ambitions for the central area?</b>			
	A Thomas	17a - Are the planning policies in the Core Strategy DPD, with the guidance in the Design and Townscape Guide SPD and Building Regulations sufficient to meet the challenge of climate change & bring about as significant reduction in carbon emissions? –  these could be given greater significance as DPD or as part of core strategy, which needs updating to better reflect affordable housing being a local issue.	The Development Management DPD will set out the detailed development management for all development including that in the Central Area. These will address in more detail climate change and carbon reduction. However, specific issues need to be addressed within the central area, which will be set out on a thematic basis or for specific proposal sites.
	A Thomas	17b - Should the borough wide Development Management DPD currently being prepared	The Development Management DPD will set out the detailed



	Respondent	Summary of Rep	Council Response
		contain detailed development management policies for all development including the central area? –  yes	development management approach for all development including that in the Central Area. However, specific issues need to be addressed within the central area either on a thematic basis or within a development site to which the AAP will set out the policy requirements.
	A Thomas	17c - Should there be a suite of policies in the submission version of this Plan relating to the particular challenges and opportunities presented by the regeneration and growth ambitions for the central area? –  or b above which ever the faster!	
	The Theatres Trust	17b - Should the borough wide Development Management DPD currently being prepared contain detailed development management policies for all development including the central area? –  Option Box 17: yes to 17b - development management policies should provide specific criteria to determine planning applications for the whole borough including the central area.	
	Renaissance Southend Ltd	17a - Are the planning policies in the Core Strategy DPD, with the guidance in the Design and Townscape Guide SPD and Building Regulations sufficient to meet the challenge of climate change & bring about as significant reduction in carbon emissions? –  Summarises need for wider policy background but raises issue of viability impacting on deliverability in short to medium term.	Noted.
	Renaissance Southend Ltd	17b - Should the borough wide Development Management DPD currently being prepared contain detailed development management policies for all development including the central area? –  Yes, as those within the Core Strategy will need refreshing.	The Development Management DPD will set out the detailed development management for all development including that in the Central Area. However, specific issues need to be addressed within the central area either on a thematic basis or within a development site to which the AAP will set out the policy requirements. Policies within the Core Strategy, to which the AAP is in conformity with, are still relevant and up to date having a plan period until 2021.
	Renaissance Southend Ltd	17c - Should there be a suite of policies in the submission version of this Plan relating to the particular challenges and opportunities presented by the regeneration and growth ambitions for the central area? –  RSL do not believe the Central Area should be singled out for 'extra policies'. SPD should be capable of taking account site context so that applicability of policies will be a product of context, scale and intensity.	The Development Management DPD will set out the detailed development management for all development including that in the Central Area. However, specific issues need to be addressed within the central area via thematic policies and/or detailed policies for proposal sites within the AAP.
	Conservation Association Westcliff Seaboard	17a - Are the planning policies in the Core Strategy DPD, with the guidance in the Design and Townscape Guide SPD and Building Regulations sufficient to meet the challenge of climate change & bring about as significant reduction in carbon emissions? –  17a & 17b & 17c	The Development Management DPD will set out the detailed development management policies for all development including that in the Central Area. These will address in more detail climate change and carbon reduction. However, specific issues need to be addressed within the central area either on a thematic basis or within a development site to which the AAP will set out the policy requirements.
	Conservation Association Westcliff Seaboard	17b - Should the borough wide Development Management DPD currently being prepared contain detailed development management policies for all development including the central area? –	The Development Management DPD will set out the detailed development management policies for all development including that in the Central Area. However, specific issues

	Respondent	Summary of Rep	Council Response
		17a & 17b & 17c	need to be addressed within the central area either on a thematic basis or within a development site to which the AAP will set out the policy requirements.
	Conservation Association Westcliff Seaboard	17c - Should there be a suite of policies in the submission version of this Plan relating to the particular challenges and opportunities presented by the regeneration and growth ambitions for the central area? -  17a & 17b & 17c	The Development Management DPD will set out the detailed development management policies for all development including that in the Central Area. However, specific issues need to be addressed within the central area either on a thematic basis or within a development site to which the AAP will set out the policy requirements.
	South Westcliff Community group	17a - Are the planning policies in the Core Strategy DPD, with the guidance in the Design and Townscape Guide SPD and Building Regulations sufficient to meet the challenge of climate change & bring about as significant reduction in carbon emissions? –  17a & 17b & 17c	The Development Management DPD will set out the detailed development management policies for all development including that in the Central Area. These will address in more detail climate change and carbon reduction. However, specific issues need to be addressed within the central area either on a thematic basis or within a development site to which the AAP will set out the policy requirements.
	South Westcliff Community group	17b - Should the borough wide Development Management DPD currently being prepared contain detailed development management policies for all development including the central area? –  17a & 17b & 17c	The Development Management DPD will set out detailed development management policies for all development including that in the Central Area. However, specific issues need to be addressed within the central area either on a thematic basis or within a development site to which the AAP will set out the policy requirements.
	South Westcliff Community group	17c - Should there be a suite of policies in the submission version of this Plan relating to the particular challenges and opportunities presented by the regeneration and growth ambitions for the central area? –  17a & 17b & 17c	The Development Management DPD will set out detailed development management policies for all development including that in the Central Area. However, specific issues need to be addressed within the central area either on a thematic basis or within a development site to which the AAP will set out the policy requirements.
	BNP Paribas Real Estate	17b - Should the borough wide Development Management DPD currently being prepared contain detailed development management policies for all development including the central area? –  Option Box 17 (development management policies) We consider that the AAP should contain detailed development management policies for all development, including the central area, however s stated in Option Box 2, there should be flexibility taking into account the range of sites, each with their associated site constraints, within the town centre.	The Development Management DPD will set out the detailed development management policies for all development including that in the Central Area. However, specific issues need to be addressed within the central area either on a thematic basis or within a development site to which the AAP will set out the policy requirements.
	Savills	17a - Are the planning policies in the Core Strategy DPD, with the guidance in the Design and Townscape Guide SPD and Building Regulations sufficient to meet the challenge of climate change & bring about as significant reduction in carbon emissions? –  Section 8.1 - 8.10 These sections overlap significantly with the policies of the proposed DMDPD. This duplication is likely to lead to future confusion. The comments below (Options 17-25) relate to the policies as they should appear in the DMDPD. The DM policies should be redrafted and included in the DMDPD, with a cross-reference provided in the CAAP.	Disagree. The Development Management DPD will set out detailed development management policies for all development including that in the Central Area. These will address in more detail climate change and carbon reduction. However, specific issues need to be addressed within the central area either on a thematic basis or within a development site to which the AAP will set out the policy requirements. The policy documents will be read clearly alongside other along with other Local Development Documents.

	Respondent	Summary of Rep	Council Response
	Savills	17a - Are the planning policies in the Core Strategy DPD, with the guidance in the Design and Townscape Guide SPD and Building Regulations sufficient to meet the challenge of climate change & bring about as significant reduction in carbon emissions? –  Policies as proposed are unlikely to bring a significant reduction in carbon emissions.	The Core Strategy, Design and Townscape Guide SPD and Building Regulations together with the proposed Development Management DPD will contain policies in relation to carbon emissions in the built environment that will apply across the Borough and seek to facilitate a reduction in carbon emissions.
	Savills	17b - Should the borough wide Development Management DPD currently being prepared contain detailed development management policies for all development including the central area? –  DMPD should contain all the DM policies for the Central Area.	The Development Management DPD will set out the detailed development management policies for all development including that in the Central Area. However, specific issues need to be addressed within the central area either on a thematic basis or within a development site to which the AAP will set out the policy requirements.
	Savills	17c - Should there be a suite of policies in the submission version of this Plan relating to the particular challenges and opportunities presented by the regeneration and growth ambitions for the central area? –  There should be site specific policies for the Central Area, set out in Design / Development Briefs, rather than a suite of generic policies for the Central Area. Any Central Area specific DM policies should be set out in the DMDPD.	The Development Management DPD will set out the detailed development management for all development including that in the Central Area. However, specific issues need to be addressed within the central area either on a thematic basis or within a development site to which the AAP will set out the policy requirements.
	Montagu Evans	With regard to meeting the challenge of climate change and in order to bring about a significant reduction in carbon emissions there should be recognition that there are fewer viable options for reducing carbon emissions where existing buildings are being refurbished. The particular challenges and opportunities for the existing buildings within the town centre should be recognised and where owners are looking to enhance the existing building stock there should be recognition of the sustainability and affordability of introducing carbon reduction technologies into these schemes.	Noted. The Development Management DPD will set out the Council's policy approach to Low Carbon Development and Efficient use of Resources, in association on with the requirements of the policies in the Core Strategy. A flexible pragmatic approach will be adopted for conversions, extensions and/or alterations to existing building whilst encouraging the incorporation/retrofitting of sustainability measures.
	Environment Agency	17c - Should there be a suite of policies in the submission version of this Plan relating to the particular challenges and opportunities presented by the regeneration and growth ambitions for the central area? –  We would advise that the Development Management DPD covers all development, including that covered by this AAP (please see our response to that DPD). If higher standards are to be sought then specific policies in this AAP would be acceptable	Agree. The Development Management DPD, in conjunction with the Core Strategy, will contain a suite of policies to address the challenges of climate change and seek to reduce carbon emissions. Principles of sustainable development underpin the ambitions and objectives for the AAP.
<b>Addressing resource minimisation and carbon emissions</b>			
<b>Option Box 18 In order to address resource minimisation and carbon emissions:</b>			
<b>18a - The refurbishment option should be seriously considered particularly where the existing building makes a positive contribution to local character or where it can form the basic building block of a new development. or</b>			
<b>18b - Refurbishment should only be the first option in the case of listed buildings and or the wider historic environment and / or</b>			
<b>18c – The Plan should require the concept of 'Passive House' to be applied to all new residential development and/or</b>			
<b>18d - The Plan should express the need to significantly reduce carbon emissions in line with or above government and any locally agreed targets and</b>			
<b>18e - All new development and refurbishments should achieve water resource minimisation by systems that minimise water consumption.</b>			
<b>18f – All new development and refurbishments should employ the principles of SUDS which provide an alternative approach to managing runoff from buildings and hard standings.</b>			
	A Thomas	18a - The refurbishment option should be seriously considered particularly where the existing building makes a positive contribution to local character or where it can form the basic building block of a new development. –	Agreed. The Development Management DPD will address this issue.

	Respondent	Summary of Rep	Council Response
		where sensible	
	A Thomas	18b - Refurbishment should only be the first option in the case of listed buildings and or the wider historic environment –  no we need to encourage it to be more widespread	Noted. The Development Management DPD will address this issue.
	A Thomas	18c - The Plan should require the concept of 'Passive House' to be applied to all new residential development –  very strongly support	Noted. The Development Management DPD will include policies on standards required for Code for Sustainable Homes and BREEAM.
	A Thomas	18d - The Plan should express the need to significantly reduce carbon emissions in line with or above government and any locally agreed targets -  Insulation above buildings regs is important to prevent fuel poverty later, insulation is far more important than generation	Noted. The Development Management DPD will include policies on standards required for Code for Sustainable Homes and BREEAM.
	A Thomas	18e - All new development and refurbishments should achieve water resource minimisation by systems that minimise water consumption. –  where practical	Noted. The Development Management DPD will include policies on standards required for Code for Sustainable Homes and BREEAM and address issues relating to water efficiency.
	A Thomas	18f - All new development and refurbishments should employ the principles of SUDS which provide an alternative approach to managing runoff from buildings and hard standings. –  new yes, refurb where sensibly possible	Noted. This issue is addressed within a strategic policy within the Core Strategy and built upon in the Development Management DPD. Specific requirements / approach within the Central Area will be addressed within the AAP.
	The Theatres Trust	18a - The refurbishment option should be seriously considered particularly where the existing building makes a positive contribution to local character or where it can form the basic building block of a new development. –  Option Box 18: yes to 18a - Many historic buildings have lost their original use and have been adapted over time to new uses. It is important for the survival of buildings to have a viable use but conversion schemes can have a detrimental impact on their historic fabric and character. The alterations necessary to continue the use of a building must be balanced against the impact on the historic fabric and character of the building and the Council should ensure that new uses respect the existing features of a building. The new use must adapt to the building not the other way round and involve the least amount of intervention.	Agreed, refurbishments will be considered against all policies within the Local Development Framework for Southend-on-Sea. These include Borough wide policies on the historic environment contained within the Development Management DPD. The SCAAP will further build upon these policies and provide a more detail approach for the historical assets within the central area.
	Renaissance Southend Ltd	18a - The refurbishment option should be seriously considered particularly where the existing building makes a positive contribution to local character or where it can form the basic building block of a new development. –  Agree. Refurbishment in these cases is good recycling but only if other planning objectives are not compromised.  Given that much of Southend's architectural heritage has been lost since the 1960s, RSL supports this principle. Retaining quality and characterful existing buildings will support Southend's distinctiveness, referenced as important under 3.9. RSL are aware of the current Urban Characterisation work being undertaken by Urban Practitioners on behalf	Agreed, refurbishments will be considered against all policies within the Local Development Framework for Southend-on-Sea. These include Borough wide policies on the historic environment contained within the Development Management DPD. The SCAAP will further build upon these policies and provide a more detail approach for the historical assets within the central area. This has been informed by evidence base documents including the Southend-on-Sea Borough Wide Character Study (2010).

	Respondent	Summary of Rep	Council Response
		of the Council, and we assume that this work will guide the identification of buildings which make a 'positive contribution'.	
	Renaissance Southend Ltd	<p>18c - The Plan should require the concept of 'Passive House' to be applied to all new residential development –</p> <p>No. The Building Regs will deliver zero carbon and the Code for Sustainable Homes is a more holistic measure of sustainable development than PassivHaus. Moreover, there is no logic in just concentrating on homes.</p> <p>In reality, the construction industry is not geared up to deliver air-tight buildings and will concentrate (if it has to) on meeting the demands of the Building Regs.</p>	Noted. The Development Management DPD will include policies on standards required for Code for Sustainable Homes and BREEAM which apply to the central area.
	Renaissance Southend Ltd	<p>18d - The Plan should express the need to significantly reduce carbon emissions in line with or above government and any locally agreed targets –</p> <p>As above, although justifiable it may be unnecessarily ambitious leading up to 2016 and beyond to make development conditions in Southend even harder than they are at present.</p>	Noted. The Development Management DPD will include policies on standards required for Code for Sustainable Homes and BREEAM which apply to the central area.
	Renaissance Southend Ltd	<p>18e - All new development and refurbishments should achieve water resource minimisation by systems that minimise water consumption. –</p> <p>Being delivered by Building Regs. and Water Regs.</p>	Noted. The Development Management DPD will include policies on standards required for Code for Sustainable Homes and BREEAM which apply to the central area. It will also include policies specifically regarding water efficiency based on relevant evidence.
	Renaissance Southend Ltd	<p>18f - All new development and refurbishments should employ the principles of SUDS which provide an alternative approach to managing runoff from buildings and hard standings. –</p> <p>As above, but Borough-wide SPD would be useful and many councils have adopted this approach.</p>	Noted. This issue is addressed within a strategic policy within the Core Strategy and built upon in the Development Management DPD. Specific requirements / approach within the Central Area will be addressed within the AAP
	Conservation Association Westcliff Seaboard	<p>18a - The refurbishment option should be seriously considered particularly where the existing building makes a positive contribution to local character or where it can form the basic building block of a new development. –</p> <p>18a, 18c, 18e</p>	Noted
	Conservation Association Westcliff Seaboard	<p>18c - The Plan should require the concept of 'Passive House' to be applied to all new residential development</p> <p>18a, 18c, 18e</p>	Noted
	Conservation Association Westcliff Seaboard	<p>18e - All new development and refurbishments should achieve water resource minimisation by systems that minimise water consumption.</p> <p>18a, 18c, 18e</p>	Noted
	South Westcliff Community group	<p>18a - The refurbishment option should be seriously considered particularly where the existing building makes a positive contribution to local character or where it can form the basic building block of a new development.</p>	Noted

	Respondent	Summary of Rep	Council Response
		18a, 18c, 18e	
	South Westcliff Community group	: 18c - The Plan should require the concept of 'Passive House' to be applied to all new residential development  18a, 18c, 18e	Noted
	South Westcliff Community group	18e - All new development and refurbishments should achieve water resource minimisation by systems that minimise water consumption.  18a, 18c, 18e	Noted
	Cllr Gilbert	18a - The refurbishment option should be seriously considered particularly where the existing building makes a positive contribution to local character or where it can form the basic building block of a new development. –  Refurbishment of existing buildings should always be the first option for both economic and environmental reasons.	Noted
	BNP Paribas Real Estates	18d - The Plan should express the need to significantly reduce carbon emissions in line with or above government and any locally agreed targets –  Option Box 18 (Carbon Emissions) With regards to resource minimisation and carbon emissions we are of the view that major developments (10 or more units), should provide an element of Sustainable Urban Drainage (SUDS), where feasible and viable. We agree that in such circumstances, SUDS should be sought in areas of flood risk to manage runoff from buildings and hardstandings.	Sustainable Urban Drainage is addressed within a strategic policy within the Core Strategy and built upon in the Development Management DPD. Specific requirements / approach within the Central Area will be addressed within the AAP.
	Savills	18a - The refurbishment option should be seriously considered particularly where the existing building makes a positive contribution to local character or where it can form the basic building block of a new development. –  Refurbishment or redevelopment should be a development decision based on site specific issues including local character, listed buildings and overall feasibility and viability.	Noted. Refurbishments will be considered against all policies within the Local Development Framework for Southend-on-Sea. These include Borough wide policies on the historic environment, Low Carbon and Development and Efficient Use of Resources as contained within the Development Management DPD. The SCAAP will further build upon these policies and provide a more detail approach for the historical assets within the central area. This has been informed by evidence base documents including the Southend-on-Sea Borough Wide Character Study (2010). The feasibility and viability of resource minimisation and climate change policies set out in the Development Management DPD will be taken into account.
	Savills	18b - Refurbishment should only be the first option in the case of listed buildings and or the wider historic environment –  support	Noted.
	Savills	18c - The Plan should require the concept of 'Passive House' to be applied to all new residential development –  Passive House is not explained in the Plan. The use of passive design should be encouraged and set against renewable energy targets and subject to viability and feasibility.	Noted. The Development Management DPD will include policies on standards required for Code for Sustainable Homes and BREEAM which apply to the central area.

	Respondent	Summary of Rep	Council Response
	Savills	18d - The Plan should express the need to significantly reduce carbon emissions in line with or above government and any locally agreed targets –  Object - the Plan should not seek to exceed government Targets on carbon emissions	Noted. The Development Management DPD will include policies on standards required for Code for Sustainable Homes and BREEAM which apply to the central area.
	Savills	18e - All new development and refurbishments should achieve water resource minimisation by systems that minimise water consumption. Water resource minimisation should not be an absolute target. –  We recognise the great importance of water conservation in this part of the country but water resource minimisation should be considered alongside other sustainability measures and should be subject to feasibility and viability.	Noted. The Development Management DPD will include policies on standards required for Code for Sustainable Homes and BREEAM that apply to the central area. It will also include policies specifically regarding water efficiency based on relevant evidence. These policies will be applied where it is feasible and viable.
	Savills	18f - All new development and refurbishments should employ the principles of SUDS which provide an alternative approach to managing runoff from buildings and hard standings.  Support use of SUDS within new developments; use in refurbishment needs to be subject to feasibility.	Noted. This issue is addressed within a strategic policy within the Core Strategy and built upon in the Development Management DPD. Specific requirements / approach within the Central Area will be addressed within the AAP.
	Environment Agency	18d - The Plan should express the need to significantly reduce carbon emissions in line with or above government and any locally agreed targets We agree with the inclusion of options d-f.	Noted. The Development Management DPD will include policies on standards required for Code for Sustainable Homes and BREEAM and when used in conjunction with the Core Strategy DPD will address National policy requirements.
	Environment Agency	18f - All new development and refurbishments should employ the principles of SUDS which provide an alternative approach to managing runoff from buildings and hard standings. –  We agree with the inclusion of options d-f.	Agree. The AAP will require all development to have regard to surface drainage and require SuDS in all development above single property scale in line with National Policy and based on the findings of the Council's emerging SWMP and PFRA.
	Montagu Evans	Options 18 and 19 - Addressing resource minimisation and carbon emissions Where existing buildings are refurbished within the town centre recognition should be given to the additional costs associated with accommodating these technologies into existing buildings. In some instances it is not always practical to introduce these technologies and there should be recognition that it this is not always possible.	Noted. The Development Management DPD will set out the Council's policy approach to Low Carbon Development and Efficient use of Resources, in association with the requirements of the policies in the Core Strategy. A flexible pragmatic approach will be adopted for conversions, extensions and/or alterations to existing building whilst encouraging the incorporation/retrofitting of sustainability measures
<b>Local Energy generation</b>			
<b>Option Box 19 The Plan should include policies that encourage the provision of more local energy generation and distribution systems either by:</b>			
<b>19a - Allocating a site for a local energy generation building, and /or</b>			
<b>19b - Requiring all new development to make a contribution to the provision of local energy generation building and/or ensure that appropriate infrastructure is provided within new development to ensure future connectivity to such a system and / or</b>			
<b>19c - Encouraging the provision of combined heat and power systems and community heating as part of larger new development. If so what threshold size would be viable? and / or</b>			
<b>19d - Increasing the percentage of total energy needs of all new development to be provided on site from renewable sources, from 10%. If so what level should be expected?</b>			
	A Thomas	19a - Allocating a site for a local energy generation building,-  we should concentrate on insulation and generation via ground, water air source and solar/photovoltaic NOT turbines	Agree – Core Strategy and Development Management DPD now address this issue
	A Thomas	19b - Requiring all new development to make a contribution to the provision of local energy generation building and/or ensure that appropriate infrastructure is provided	Agree - Core Strategy and Development Management DPD now address this issue

		Respondent	Summary of Rep	Council Response
			<p>within new development to ensure future connectivity to such a system –</p> <p>this should come into force someway on from now- better to ensure the money goes into insulation and low emission- passive house</p>	
		A Thomas	<p>19c - Encouraging the provision of combined heat and power systems and community heating as part of larger new development. If so what threshold size would be viable? –</p> <p>Again better insulation and emission control is more important than generation. Ground and water source could and should be viable on virtually any new build from individual to far more. Air source should be the first choice in apartments of any number even house conversions.</p>	Agree - Core Strategy and Development Management DPD now address this issue
		A Thomas	<p>19d - Increasing the percentage of total energy needs of all new development to be provided on site from renewable sources, from 10%. If so what level should be expected? –</p> <p>I do not support turbines at all, ground air water source should be the aim and it should deal with all the energy needs of a property not a %.</p>	Noted - Core Strategy and Development Management DPD now address issues concerning Low Carbon Development and Efficient Use of Resources and Renewable energy generation.
		Renaissance Southend Ltd	<p>19a - Allocating a site for a local energy generation building, -</p> <p>As above, and allocations of sites for RE infrastructure need to follow the assessment of the strategic opportunities. Energy from Waste, CHP from renewable and fossil fuels, private wire and local ESCO's would be part of the mix.</p>	Agree - Core Strategy and Development Management DPD now address this issue.
		Renaissance Southend Ltd	<p>19c - Encouraging the provision of combined heat and power systems and community heating as part of larger new development. If so what threshold size would be viable? –</p> <p>As above; this is a technical decision that is not appropriate for planning policy. Larger developments would consider these and other options in meeting the carbon emission requirements that will exist at the time. Communal heat and power can occur at a very small scale of a few homes to a whole town and the economy of scale combined with CO2 emission ceilings will dictate the solution.</p>	Noted - Core Strategy and Development Management DPD now address this issue.
		Renaissance Southend Ltd	<p>19d - Increasing the percentage of total energy needs of all new development to be provided on site from renewable sources, from 10%. If so what level should be expected? –</p> <p>As above; 10% is now too low and is being over-taken by BRs and other councils. Notwithstanding this, there will be only an 18 month gap between adoption of this DPD and zero carbon BRs so a higher target in the interim, with the current pace of new permissions may be considered superfluous. However, if a high target was wanted, 20% on-site renewable energy is very easily attainable using micro-generation technologies and Part L of current B. Regs.</p>	Noted - Core Strategy and Development Management DPD now address this issue.
		Renaissance Southend Ltd	<p>19b - Requiring all new development to make a contribution to the provision of local energy generation building and/or ensure that appropriate infrastructure is provided within new development to ensure future connectivity to such a system –</p> <p>19b</p>	Agree - Core Strategy and Development Management DPD now address this issue.
		Conservation Association Westcliff	<p>19b - Requiring all new development to make a contribution to the provision of local energy generation building and/or ensure that appropriate infrastructure is provided</p>	Agree – The Core Strategy and Development Management DPD now address this issue.



	Respondent	Summary of Rep	Council Response
	Seaboard	within new development to ensure future connectivity to such a system  19b	
	South Westcliff Community group	19a - Allocating a site for a local energy generation building,-  The energy needs of new developments should be supplied by renewable to the maximum practical extent. We should support micro-generation.	Noted – The Core Strategy and Development Management DPD now address this issue
	Cllr Gilbert	19c - Encouraging the provision of combined heat and power systems and community heating as part of larger new development. If so what threshold size would be viable? –  Option Box 19 (Renewable Energy) The plan should include policies that encourage the provision of more local energy generation and distribution systems, however, would argue that this should only be applicable to major developments (10 or more units, or 1000 sq m); it should be subject to viability; and there should not be an additional requirement to provide on site renewable energy.	Noted – The Core Strategy and the Development Management DPD address issues concerning Low Carbon Development and Efficient Use of Resources and Renewable energy generation.
	BNP Paribas Real Estates	19a - Allocating a site for a local energy generation building, -  Support allocation of site for local energy generation on one of many Council - owned sites in Southend.	Noted – The Core Strategy and Development Management DPD now address this issue.
	Savills	19b - Requiring all new development to make a contribution to the provision of local energy generation building and/or ensure that appropriate infrastructure is provided within new development to ensure future connectivity to such a system –  Potentially support contribution towards off site local generation facilities, provided that contribution payable is off-set against other provision. On-site provision of connection infrastructure should only be required for permissions granted following the Council securing a site, designing the facilities and allocating funds for construction.	Noted – The Core Strategy and the Development Management DPD address issues concerning Low Carbon Development and Efficient Use of Resources and Renewable energy generation.
	Savills	19c - Encouraging the provision of combined heat and power systems and community heating as part of larger new development. If so what threshold size would be viable? –  The inclusion of a threshold size for requiring development to include a combined heat and power system is inappropriate. The viability and feasibility of such systems depends on the mix of uses with differing peak usages to make them feasible and effective.	Noted – The Core Strategy and Development Management DPD address issues concerning Low Carbon Development and Efficient Use of Resources and Renewable energy generation.
	Savills	19d - Increasing the percentage of total energy needs of all new development to be provided on site from renewable sources, from 10%. If so what level should be expected? –  A 10% TARGET rather than an absolute requirement is realistic.  Greater policy weight should be given to reduced energy use through energy efficient layout and design and during construction and usage.	Noted – The Core Strategy and Development Management DPD address issues concerning Low Carbon Development and Efficient Use of Resources and Renewable energy generation.
	Montagu Evans	Options 18 and 19 - Addressing resource minimisation and carbon emissions Where existing buildings are refurbished within the town centre recognition should be given to the additional costs associated with accommodating these technologies into existing buildings. In some instances it is not always practical to introduce these	Noted. The Development Management DPD will set out the Council's policy approach to Low Carbon Development and Efficient use of Resources, in association on with the requirements of the policies in the Core Strategy. A flexible

	Respondent	Summary of Rep	Council Response
		technologies and there should be recognition that it this is not always possible.	pragmatic approach will be adopted for conversions, extensions and/or alterations to existing building whilst encouraging the incorporation/retrofitting of sustainability measures.
<b>Maximise travel choice and encourage sustainable travel to work patterns</b>			
<b>Option Box 20 In order to maximise travel choice and encourage sustainable travel to work patters:</b>			
<b>20a - use the production of the Local Transport Plan 3 to develop an accessibility plan for the central area to deliver the Plan objectives for transport including the reduction of congestion and carbon emissions and</b>			
<b>20b – set vehicle parking standards in the central area to encourage sustainable modes of transport by restricting the provision of residential parking spaces provided and discouraging parking provision for workers in commercial development or</b>			
<b>20c - Provide adequate parking for all residents and visitors and / or</b>			
<b>20d – apply different vehicle parking standards in the character areas and gateway neighbourhoods and / or</b>			
<b>20e – ensure that space for, and the operation of, car clubs is an integral part of residential development Travel Plans</b>			
	A Thomas	20a - use the production of the Local Transport Plan 3 to develop an accessibility plan for the central area to deliver the Plan objectives for transport including the reduction of congestion and carbon emissions –  rather depends on LTP3, there should be some markers put into this doc.	The AAP will include a Central Area Transport and Access Strategy building on LTP3 and include the policy framework within the quarters to ensure delivery.
	A Thomas	20b - set vehicle parking standards in the central area to encourage sustainable modes of transport by restricting the provision of residential parking spaces provided and discouraging parking provision for workers in commercial development –  Strongly object, allow for adequate parking for residential, visitors, shoppers and workers.	Noted - Vehicle Parking Standards are set out in the Development Management DPD.
	A Thomas	20c - Provide adequate parking for all residents and visitors –  strongly support- this will require better planned development, better planned streets, fewer dwellings- good all round	Agree - Vehicle Parking Standards are set out in the Development Management DPD.
	A Thomas	20d - apply different vehicle parking standards in the character areas and gateway neighbourhoods –  no parking is a major problem, it has to be provided off road for all new build and future conversions. The paid for Town centre car parks and on street parking should be for visitors and shoppers, workers car parking should be provided for within a short walk and permits for residents to park on street should be phased out in central Town centre areas.	Vehicle Parking Standards are set out in the Development Management DPD. Visitor car parking should be addressed through a car parking strategy within the AAP and promoted through Quarter specific development principles and site specific proposals
	A Thomas	20e - ensure that space for, and the operation of, car clubs is an integral part of residential development Travel Plans –  as well as not instead of adequate parking provision. Adequate means min of 1 space per dwelling and 2 spaces per 4 bed dwelling	Smarter choices and Vehicle Parking Standards are addressed within the Development Management DPD.
	The Theatres Trust	20d - apply different vehicle parking standards in the character areas and gateway neighbourhoods –  Option Box 20: 20d would be fair as different areas require separate treatments. Your local public transport must be more than adequate if residents and visitors are to be able to access the varied sectors. The evening economy will require car parking while the retail sector should be able to rely on public transport between shopping areas and residential areas.	Vehicle Parking Standards are set out in the Development Management DPD. Visitor car parking should be addresses through a car parking strategy within the AAP and promoted through Quarter specific development principles and site specific proposals. The AAP will include a Transport and Access Strategy incorporating the issue of public transport.

	Respondent	Summary of Rep	Council Response
	Renaissance Southend Ltd	<p>20b - set vehicle parking standards in the central area to encourage sustainable modes of transport by restricting the provision of residential parking spaces provided and discouraging parking provision for workers in commercial development –</p> <p>Agreed - this is an important part of the strategy in tackling congestion and the dominance of the car in key areas of the town centre. Through LTP3 it should be possible to come to an evidence based view on the impact that current parking levels in the town centre have in terms of contributing to congestion, and therefore limiting the viability of more sustainable transport choices.</p>	Noted - Vehicle Parking Standards for the Borough, including the central area, are set out in the Development Management DPD. The AAP builds upon LTP3.
	Renaissance Southend Ltd	<p>20a - use the production of the Local Transport Plan 3 to develop an accessibility plan for the central area to deliver the Plan objectives for transport including the reduction of congestion and carbon emissions –</p> <p>Agreed - RSL have responded to the LTP3 Evidence Base and Issues and Options with specific reference to congestion in relation to the town centre.</p>	Noted. The AAP will include Transport and Access Strategy for the central area, building on LTP3.
	Renaissance Southend Ltd	<p>20c - Provide adequate parking for all residents and visitors –</p> <p>This need not necessarily be a different approach to that articulated under 20b - it is an evidence based approach that is required to identify what constitutes 'adequate parking'. This can come through LTP3 as suggested above.</p>	Noted - Vehicle Parking Standards for the Borough, including the central area, are set out in the Development Management DPD.
	Renaissance Southend Ltd	<p>20b - set vehicle parking standards in the central area to encourage sustainable modes of transport by restricting the provision of residential parking spaces provided and discouraging parking provision for workers in commercial development –</p> <p>Regarding the 'character areas' it would be worthwhile examining whether the current availability of on-street parking in many part of the town centre has a detrimental impact upon 'character areas', for instance Clifftown</p>	Noted - Vehicle Parking Standards for the Borough, including the central area, are set out in the Development Management DPD.
	Renaissance Southend Ltd	<p>20e - ensure that space for, and the operation of, car clubs is an integral part of residential development Travel Plans –</p> <p>Agreed - this could include provision for electric vehicles, including charge points throughout the town centre.</p>	Smarter choices and Vehicle Parking Standards are addressed within the Development Management DPD.
	Conservation Association Westcliff Seaboard	<p>20c - Provide adequate parking for all residents and visitors 20c, 20d, 20e</p>	Noted
	Conservation Association Westcliff Seaboard	<p>20d - apply different vehicle parking standards in the character areas and gateway neighbourhoods 20c, 20d, 20e</p>	Noted
	Conservation Association Westcliff Seaboard	<p>20c - Provide adequate parking for all residents and visitors 20c, 20d, 20e</p>	Noted
	South Westcliff Community group	<p>20c - Provide adequate parking for all residents and visitors 20c, 20d, 20e</p>	Noted
	South Westcliff Community group	<p>20d - apply different vehicle parking standards in the character areas and gateway neighbourhoods 20c, 20d, 20e</p>	Noted

	Respondent	Summary of Rep	Council Response
	South Westcliff Community group	20e - ensure that space for, and the operation of, car clubs is an integral part of residential development Travel Plans 20c, 20d, 20e	Noted
	Savills	20a - use the production of the Local Transport Plan 3 to develop an accessibility plan for the central area to deliver the Plan objectives for transport including the reduction of congestion and carbon emissions –  This option cannot be assessed in the absence of Local Transport Plan 3.	Noted. The AAP will build upon LTP3.
	Savills	20b - set vehicle parking standards in the central area to encourage sustainable modes of transport by restricting the provision of residential parking spaces provided and discouraging parking provision for workers in commercial development –  We support the approach of setting vehicle parking standards in the central area to encourage sustainable modes of transport by restricting the provision of residential parking spaces provided and discouraging parking provision for workers in commercial developments. The Council may wish to consider using lower car parking standards in central area and use a maximum of say 0.75 car parking spaces per dwelling and higher cycle parking standards. These lower car parking requirements could be used in areas with good public transport / pedestrian accessibility and /or linked to green travel plans or improved local public transport and cycle facilities. This approach would be more in line with the guidance in PPG13 unlike the County Council's targets of a MINIMUM of 2 spaces per dwelling.	Noted - Vehicle Parking Standards for the Borough, including the central area, are being taken forward in the Development Management DPD.
	Savills	20c - Provide adequate parking for all residents and visitors –  This option which uses the phrase "adequate parking "is vague and subjective and not necessarily an alternative to Option 20b.	Noted
	Savills	20d - apply different vehicle parking standards in the character areas and gateway neighbourhoods –  Different parking standards in character areas and Gateway Neighbourhoods should have regard to accessibility to public transport.	Noted
	Savills	20e - ensure that space for, and the operation of, car clubs is an integral part of residential development Travel Plans-  Car Clubs may be an appropriate part of residential development Travel Plans, subject to demand analysis. The Plan should be backed by evidence of likely demand for and feasibility / viability of car clubs.	Noted. Smarter choices and Vehicle Parking Standards are addressed within the Development Management DPD.
	Montagu Evans	20c - Provide adequate parking for all residents and visitors Option 20 - Travel Recognition should be given to the role that centrally located and well managed car parks can play in creating the opportunity for linked trips. These provide an important role in the functioning of the town centre and should be supported.	Noted. The approach to car parking in the AAP will be to provide new well managed car parks located closer to the access roads with strong attractive pedestrian linkages to the Town centre retail circuits and attractions. Vehicle Parking Standards for development will be in the Development Management DPD.

**Addressing biodiversity, green space provision and the green grid**

	Respondent	Summary of Rep	Council Response
<p><b>Option Box 21 In order to address biodiversity, green space provision and the green grid in the Plan:</b>  <b>21a) - New development should recognise the ecological importance of wildlife features and open space as part of their design. and</b>  <b>21b) - The Plan should identify areas for new public open space and 'pocket parks' to serve to local community within the character zones and gateway neighbourhoods together with a green grid strategy that links new and existing open space and</b>  <b>21c) - The Plan should have particular regard to the sensitivities of the biodiversity interests of the estuary by:</b>  <b>21c (i) Promoting construction techniques and the timing of construction that is sensitive to the vulnerability of biodiversity interests on the seafront and/or</b>  <b>21c (ii) Restrict all development south of the seawall or</b>  <b>21c (iii) Provide clear criteria for any such development to mitigate its impact and enhance the biodiversity and recreational amenities in the estuary</b></p>			
	A Thomas	<p>21a) - New development should recognise the ecological importance of wildlife features and open space as part of their design. –</p> <p>Within the realms of common sense the area in question is the town centre of an urban area- knitting in some green corridors where possible is sensible but should not be a determining factor.</p>	Noted, the need to provide for interlinked functional green space to relieve pressure on the biodiversity interests of the foreshore, provide for a pleasant central area environment, providing heat sinks within the urban environment and improve walking and cycling within the central area should be promoted within the AAP.
	A Thomas	<p>21b) - The Plan should identify areas for new public open space and 'pocket parks' to serve to local community within the character zones and gateway neighbourhoods together with a green grid strategy that links new and existing open space -</p> <p>in the peripheral areas yes but in the core too and central seafront probably not too realistic- plant trees and look after the shore</p>	Noted, the need to provide for interlinked functional green space to relieve pressure on the biodiversity interests of the foreshore, provide for a pleasant central area environment, providing heat sinks within the urban environment and improve walking and cycling within the central area should be promoted within the AAP
	A Thomas	<p>21c) - The Plan should have particular regard to the sensitivities of the biodiversity interests of the estuary by:</p> <p>applying common sense and not overdoing it.</p>	Noted. The AAP should build on the enhancement and protection policies set out in the Core Strategy where relevant to quarters and sites within the Central Area and particularly the seafront. It should also address the need for interlinked functional green space to relieve pressure on the biodiversity interests of the foreshore
	A Thomas	<p>21c) - The Plan should have particular regard to the sensitivities of the biodiversity interests of the estuary by:,</p> <p>21c (i) Promoting construction techniques and the timing of construction that is sensitive to the vulnerability of biodiversity interests on the seafront</p> <p>yes where these issues actually exist also construction should respect residents first and foremost.</p>	Noted. The AAP should build on the enhancement and protection policies set out in the Core Strategy where relevant to quarters and sites within the Central Area, particularly the seafront.
	A Thomas	<p>21c) - The Plan should have particular regard to the sensitivities of the biodiversity interests of the estuary by:</p> <p>21c (ii) Restrict all development south of the seawall -</p> <p>why, if it can be sensibly and sensitively incorporated it would provide great advantage.</p>	Noted. The international designation of the foreshore will dictate the ability to build south of the seawall and will need to be addressed. The AAP should build on the enhancement and protection policies set out in the Core Strategy where relevant to quarters and sites within the Central Area and particularly the seafront.
	A Thomas	<p>21c) - The Plan should have particular regard to the sensitivities of the biodiversity interests of the estuary by:,</p> <p>21c (iii) Provide clear criteria for any such development to mitigate its impact and enhance the biodiversity and recreational amenities in the estuary -</p> <p>agree but not if it becomes too onerous</p>	Noted. The international designation of the foreshore will dictate the ability to build south of the seawall and will need to be addressed. The AAP should build on the enhancement and protection policies set out in the Core Strategy where relevant to quarters and sites within the Central Area and particularly the seafront.
	Renaissance Southend Ltd	<p>21a) - New development should recognise the ecological importance of wildlife features and open space as part of their design.</p>	Noted. The need to provide for interlinked functional green space to relieve pressure on the biodiversity interests of the

	Respondent	Summary of Rep	Council Response
		Wildlife will flourish in appropriate habitats - so there should be greater focus on the development of habitats within the urban area. This will also have a positive impact on values of new builds etc.	foreshore, provide for a pleasant central area environment, providing heat sinks within the urban environment and improve walking and cycling within the central area should be promoted within the AAP.
	Conservation Association Westcliff Seaboard	21b) - The Plan should identify areas for new public open space and 'pocket parks' to serve to local community within the character zones and gateway neighbourhoods together with a green grid strategy that links new and existing open space  Agreed. The town centre is currently under provided for in terms of open space and the AAP should support the creation of new public areas where possible. This could link to the Green space and green grid strategy DPD	Noted. The need to provide for interlinked functional green space to relieve pressure on the biodiversity interests of the foreshore, provide for a pleasant central area environment, providing heat sinks within the urban environment and improve walking and cycling within the central area should be promoted within the AAP.
	Conservation Association Westcliff Seaboard	21a) - New development should recognise the ecological importance of wildlife features and open space as part of their design.  21a, 21b, 21c(iii)	Noted
	Conservation Association Westcliff Seaboard	21b) - The Plan should identify areas for new public open space and 'pocket parks' to serve to local community within the character zones and gateway neighbourhoods together with a green grid strategy that links new and existing open space  21a, 21b, 21c(iii)	Noted
	Conservation Association Westcliff Seaboard	21c) - The Plan should have particular regard to the sensitivities of the biodiversity interests of the estuary by:, 21c (iii) Provide clear criteria for any such development to mitigate its impact and enhance the biodiversity and recreational amenities in the estuary  21a, 21b, 21c(iii)	Noted
	Cllr Gilbert	21c) - The Plan should have particular regard to the sensitivities of the biodiversity interests of the estuary by:  See above regarding trees. Development South of the sea wall should not be permitted.	Noted. The international designation of the foreshore will dictate the ability to build south of the seawall and will need to be addressed. The AAP should build on the enhancement and protection policies set out in the Core Strategy where relevant to quarters and sites within the Central Area and particularly the seafront.
	BNP	21a) - New development should recognise the ecological importance of wildlife features and open space as part of their design.  Option Box 21 (Biodiversity) We consider that in order to address biodiversity, green space provision and the green grid, new developments should recognise the ecological importance of wildlife in their design. However, there should not be a requirement to further enhance or provide opportunities for nature conservation unless developments are of a large scale (i.e. major developments). There should be flexibility for sites, such as ours, located within the heart of the town centre, which may be able to provide green roofs, roof gardens and/or bird boxes. Further, we do not consider that developments should be restricted in particular areas, unless the areas in question are specifically designated protected areas for nature conservation purposes.	Noted – however all development should assess how they can add value to biodiversity and green space within the urban area and contribute/link to the Greengrid. It will be a cumulative approach that will ensure that these issues are addressed appropriately. Obviously the Council will consider the circumstances of each site before making a decision on how a contribution may be made by a site. An environmental impact assessment will help to evaluate impact on nature conservation, as well as an HRA where necessary.
	Savills	21a) - New development should recognise the ecological importance of wildlife features and open space as part of their design.	Noted – these suggestions will be considered during the drafting of the policy in the SCAAP.

	Respondent	Summary of Rep	Council Response
		Recognition of wildlife features should be an integral part of the design of development schemes. For clarity insert "new and existing" before wildlife features.	
	Savills	21b) - The Plan should identify areas for new public open space and 'pocket parks' to serve to local community within the character zones and gateway neighbourhoods together with a green grid strategy that links new and existing open space -  Concept of green grid and location of pocket parks in character zones and gateway areas. Potential locations should be identified in Submission Draft CAAP for consultation and subject to SA.	Agreed – the SCAAP pre-submission version will illustrate the general indicative locations of these new open spaces and gateways. They will be subject to a SA, as will the rest of the document.
	Savills	21c) - The Plan should have particular regard to the sensitivities of the biodiversity interests of the estuary by:  The terms "estuary" and "seafront" are used in the options and require clarification (see in particular Option 21 c (I) which is unclear) Option 21c (I) and 21c (iii) should be redrafted to clarify that restriction on the timing and construction techniques and to potential mitigation relate only to developments south of the sea wall on not on all sites on the sea front.	The proposal map to accompany the pre-submission version of the SCAAP will illustrate the European designations and other sensitive biodiversity areas. Mitigation measures will be required if necessary for sites within a certain distance of European sites. They will be required to carry out a HRA to determine whether the effects are significant or not.
<b>Addressing Flood Risk</b>			
<b>Option Box 22 Do you agree that the Core Strategy DPD provides sufficient policy guidance at this stage with regard to flood risk?</b>			
	A Thomas	yes, we need to be able to develop out our opportunities, awareness and mitigation not prohibition	In line with updated National Policy since the Core Strategy was adopted - the AAP will need to address all forms of flood risk with appropriate thematic and site specific policy guidance.
	Anglian Water	Along with adherence to SUDS policy we would also want to see a strict strategy of betterment of the existing surface water situation, to be achieved by separation and also through no connection of surface water (Brownfield or Greenfield development) into either combined sewers or existing foul sewers	Noted. The AAP will be informed by relevant evidence base documents and consultation in establishing an approach to sustainable drainage.
	Anglian Water	The Southend area has significant issues associated with surface water in both the combined and foul sewage network, therefore to enable development to proceed we would look for astringent SUDS policy to be in place with regards to any development or redevelopment proposals. We would also look for any new development or redevelopment to be in line with Planning Policy Statement 25: Development and Flood Risk (PPS25) and Approved Document H of the Building Regulations 2000 (as amended) (H3).	Noted. National Policy forms part of the Development Plan for Southend. The AAP avoids repeating National Policy. The AAP will be informed by relevant evidence base documents and consultation in establishing an approach to sustainable drainage within the Central Area.
	Renaissance Southend Ltd	No there needs to be specific reference to the approach to be taken in areas of the AAP that are within identified Flood Risk to ensure that those risks are mitigated in a way that does not preclude appropriate development as part of the overall regeneration of the commercial seafront. Such policies should be endorsed by the EA.	Agreed. A flood risk policy will be developed in association to the central seafront.
	Conservation Association Westcliff Seaboard	yes	Noted
	South Westcliff Community group	yes	Noted
	Savills	The Core Strategy does not provide sufficient policy guidance at this stage with regard to	Noted. The AAP will further develop a central area approach

	Respondent	Summary of Rep	Council Response
		flood risk. General guidance on flood risk should be included in the DMDPD; detailed guidance, which has been sanctioned by the Environment Agency, should be included in the CAAP for all Character Areas and key development sites - linked to the range of uses that are proposed on each site and the impact on the form of development.	to flood risk based on relevant evidence base documents.
	Environment Agency	This will depend very much on the findings of the SFRA review, Water Cycle Strategy and Surface Water Management Plan currently being produced. The proposed Development Management DPD also provides additional clarification on some points. We will be in a position to advise further following the completion of the studies currently being undertaken.	Noted. The AAP will need to address flood risk from all sources and specific to the Central Area in line with National Policy and based on the findings of the Council's SFRA and emerging SWMP and PFRA.
<b>Addressing Housing Growth</b>			
<b>Option Box 23 In order to deliver the number of homes the community requires in the Central Area the Plan should base its development strategy on:</b>			
<b>23a – delivering the scale of dwelling units suggested by past density levels (i.e. the market) or</b>			
<b>23b - reflect a review of densities based on what is appropriate in the different Quarters and neighbourhood gateways. i.e encourage larger family houses in the Neighbourhood Gateways and higher density 'condominium' apartments in the town centre. and</b>			
<b>23c) - What approaches should be considered to address specific issues facing other existing residential areas in the Plan particularly to the east of the High Street?</b>			
	A Thomas	23a - density is not necessarily the problem it is quality that's needs to be improved and the market provided it is delivering good design, good sustainability credentials and complies with the design and townscape guide should be left to determine the density.	The AAP should make provision for the delivery of targets set out within the Core Strategy. Development management policies for design and dwelling mix will be set out in the Development Management DPD. The design and Townscape Guide provides detailed guidance for the design of all development.
	A Thomas	23b - Based upon the policies above and design and townscape guide this should occur	The AAP should make provision for the delivery of targets set out within the Core Strategy. Development management policies for design and dwelling mix will be set out in the Development Management DPD. The design and Townscape Guide provides detailed guidance for the design of all development.
	A Thomas	23c) - a restriction on conversion from single unit to more, no more institutional or hmo uses, zoning- areas of terraced dwellings, areas of taller buildings, etc and the requirement for all future development to be at passive house level , to provide a contribution to off site affordable (roof tax) and towards open space in the locality.	The AAP should make provision for the delivery of targets set out within the Core Strategy. Development management policies for design and dwelling mix will be set out in the Development Management DPD. The design and Townscape Guide provides detailed guidance for the design of all development.
	Renaissance Southend Ltd	23a - There has been little recent development upon which to base any such bench marking. There are a large number of unimplemented consents in the town centre, most of which are unlikely to be viable in current form and will require re-planning	Noted. The Southend Annual Monitoring Report outlines that circa 830 additional dwellings have been built in the central area between 2001 and March 2010.
	Renaissance Southend Ltd	23b - Given the SHLAA and CAM identify theoretical capacities that exceed the targets set in the Core Strategy, it would not appear necessary at this stage to be prescriptive about density, which should be a function of the dwelling types for which there is a market or need and the overall urban design approach taken in each quarter to reflect existing character, as well as potential for change/improvement. Design quality is the essential pre-requisite of enhancing value and ultimately the desirability of living in Central Southend.	Noted. Development management policies for design and dwelling mix will be set out in the Development Management DPD. The design and Townscape Guide provides detailed guidance for the design of all development.
	Renaissance Southend Ltd	23c) - This should be informed by a detailed assessment of the Character Area Study currently	Noted. The AAP makes provision for the delivery of targets set out within the Core Strategy. Policies for dwelling mix,



		Respondent	Summary of Rep	Council Response
			being carried out by the Council and more detailed consultation with the local community on needs and aspirations	residential standards and Design will be set out in the Development Management DPD. The Design and Townscape Guide provides detailed guidance for the design of all development.
		SBC Adult & Community Services	23b - Promotion of higher density, but not individually smaller residential developments in the Central Area Quarters is preferable and reflects the wider City by the Sea aspiration (intensification). Consider the Gateway Neighbourhoods are often better placed to meet the need to provide family sized accommodation but that each site should be considered on own merits. Whilst provision of lower density accommodation will reduce capacity of total new build it is more important to ensure that new developments meet local housing need in terms of size & tenure (informed by SHMA, local housing needs studies and housing strategy)	Noted. The AAP makes provision for the delivery of targets set out within the Core Strategy. Policies for dwelling mix, residential standards and design will be set out in the Development Management DPD. The Design and Townscape Guide provides detailed guidance for the design of all development.
		Iceni Projects	23b - Paragraph 8.12: Capacity estimates in the central area are based on high-density flatted development, which has been the trend in the town;	Noted
		Iceni Projects	23b - There is increasing concern about the quality and size of dwelling provision in the town	Noted
		Iceni Projects	23b - Paragraph 8.14: The average split between houses and flats has been 25%/75% Paragraph 8.14: It is apparent that living space is not sufficient to meet family needs;	Noted
		Iceni Projects	23a - Paragraph 8.16: Since 2001 the provision of affordable housing has been consistently low, both in terms of meeting housing needs and the regional targets; and Paragraph 8.16: Development of the central area will be critical to the provision of future affordable housing.	Noted
		Conservation Association Westcliff Seaboard	23a - 23a, 23b (Mixed Approach)	Noted. Policies for dwelling mix, residential standards and design will be set out in the Development Management DPD.
		Conservation Association Westcliff Seaboard	23b - 23a, 23b (Mixed Approach)	Noted. Policies for dwelling mix, residential standards and design will be set out in the Development Management DPD.
		South Westcliff Community group	23a - 23a, 23b (Mixed Approach)	Noted. Policies for dwelling mix, residential standards and design will be set out in the Development Management DPD.
		South Westcliff Community group	23b - 23a, 23b (Mixed Approach)	Noted. Policies for dwelling mix, residential standards and design will be set out in the Development Management DPD.
		Savills	23a - Density levels need to increase to meet demand and sustainable development needs. C - 1124 - 149 - 23a - delivering the scale of dwelling units suggested by past density levels (i.e. the market) -	Noted. Policies for dwelling mix, residential standards and design will be set out in the Development Management DPD. The AAP makes provision for the delivery of targets set out within the Core Strategy DPD. The AAP will identify Proposals Sites where subsequent Development Briefs will be produced that further outline appropriate housing numbers and densities based on relevant evidence.
		Savills	23b - reflect a review of densities based on what is appropriate in the different Quarters and neighbourhood gateways. i.e encourage larger family houses in the Neighbourhood	Noted. Policies for dwelling mix, residential standards and design will be set out in the Development Management DPD.

		Respondent	Summary of Rep	Council Response
			Gateways and higher density 'condominium' apartments in the town centre. –  A range of housing densities is appropriate. We particularly support the encouragement of family accommodation (both houses and larger apartments) in the Neighbourhood Gateways and higher density "condominium" apartments in the town centre	The AAP will identify Proposals Sites where subsequent Development Briefs will be produced that further outline appropriate housing numbers and densities based on relevant evidence
		Savills	23b - reflect a review of densities based on what is appropriate in the different Quarters and neighbourhood gateways. i.e encourage larger family houses in the Neighbourhood Gateways and higher density 'condominium' apartments in the town centre. –  We propose that Grainger Road should be redeveloped for residential use - including family accommodation and affordable housing - as a new residential quarter close to the town centre. See also comments on draft DMDPD.	Disagree – The Employment Land Review that is a robust independent evidence base document recommends that the site should be protected for employment purposes.
		Savills	23c) - What approaches should be considered to address specific issues facing other existing residential areas in the Plan particularly to the east of the High Street?  This is a question rather than an option.	Noted.
		Montagu Evans	Options 23, 24 and 25 - Addressing housing growth, need and affordable housing Whilst the provision of housing is recognised as being important and has an important role to play in the creation of a diverse and active mixed community it is important to ensure that the specific characteristics of individual locations are considered carefully. There should be an explicit recognition of where, in allocating sites, the retail use is the primary reason for that location because of the site's location in relation to the town centre's boundary, as well as the limited availability of sites. In this way, while mixed use development (incorporating residential for example) may be preferable, it should not be at the expense of risking the delivery of the primary retail use. If this happens, the inadvertent effect is that it can increase the likelihood of out of centre retail development being brought forward successfully because town centre sites have had to be discounted because of the difficulties of their viable delivery.	Agree. The spatial strategy for each key land use should be clearly articulated in AAP policies and transferred to detailed development principles for quarters and proposal sites
		Montagu Evans	Careful consideration should be given to the role that the existing built fabric can play in the future regeneration of the centre, and there should be recognition that the refurbishment of existing buildings cannot always reduce carbon emissions to the same extent that can be achieved in new builds. Residential development needs to be sensitively located in order to ensure that there are no conflicts between the land uses. Housing is recognised as being a sensitive land use, and therefore caution needs to be exercised whether mixed use development is appropriate on every identified site.	Noted. Clear development principles which address the sensitivities of adjacent residential properties and the amenities of proposed new residential accommodation will be included within the AAP. In addition DM Policy 8 - 'Residential Standards' in the Development Management DPD will provide a policy framework that will ensure that consideration of residential standards and quality are addressed in any mixed use scheme.
<b>Type of Homes</b>				
<b>Option Box 24</b>				
		A Thomas	24a - Rely on the Development Management policies relating to size and type of housing that will be set out in the Development Management DPD and apply across the Borough. –  no it needs referencing here for town centre and central seafront to reinforce it. minimum lifetime standard sizes, parking requirements, suitability of well sized apartments, suitability of tall buildings.	Development management policies for design and dwelling mix will be set out in the Development Management DPD. The Design and Townscape Guide provides detailed guidance for the design of all development.
		A Thomas	24b - Set out specific standards for different types of dwellings with minimum room sizes and requirements for storage to meet the particular objectives for the area.	Development management policies for design and dwelling mix will be set out in the Development Management DPD.

	Respondent	Summary of Rep	Council Response
		with minimum of lifetime standards	The Design and Townscape Guide provides detailed guidance for the design of all development.
	A Thomas	24c - There should be a different approach to the size and type of dwelling between the town centre and Gateway Neighbourhoods i.e. larger units and or family homes focussed in the Gateway Neighbourhoods with apartments primarily in the town centre.  agree but not exclusively, there are some locations in gateway areas where apartments of a good size could go.	Development management policies for design and dwelling mix will be set out in the Development Management DPD. The Design and Townscape Guide provides detailed guidance for the design of all development. Development briefs will be prepared to establish the most appropriate development of a site, applying the development principles set out in the AAP.
	SBC Adult & Community Service	24a - Rely on the Development Management policies relating to size and type of housing that will be set out in the Development Management DPD and apply across the Borough. All dwellings should be subject to the space standards as set out in Development Management policies dependent on the size (number of bedrooms) of property. As outlined in response to Option Box 23 it is considered reasonable for a general distinction to be made between type/size of properties in town centre (apartments) and neighbourhood gateways (larger family).	Agreed.
	SBC Adult & Community Service	24c - There should be a different approach to the size and type of dwelling between the town centre and Gateway Neighbourhoods i.e. larger units and or family homes focussed in the Gateway Neighbourhoods with apartments primarily in the town centre. All dwellings should be subject to the space standards as set out in Development Management policies dependent on the size (number of bedrooms) of property. As outlined in response to Option Box 23 it is considered reasonable for a general distinction to be made between type/size of properties in town centre (apartments) and neighbourhood gateways (larger family).	Development management policies for design and dwelling mix will be set out in the Development Management DPD. The Design and Townscape Guide provides detailed guidance for the design of all development
	Conservation Association Westcliff Seaboard	24b - Set out specific standards for different types of dwellings with minimum room sizes and requirements for storage to meet the particular objectives for the area. 24b & 24c	Development management policies for design and dwelling mix will be set out in the Development Management DPD. The Design and Townscape Guide provides detailed guidance for the design of all development
	Conservation Association Westcliff Seaboard	24c - There should be a different approach to the size and type of dwelling between the town centre and Gateway Neighbourhoods i.e. larger units and or family homes focussed in the Gateway Neighbourhoods with apartments primarily in the town centre. 24b & 24c	Development management policies for design and dwelling mix will be set out in the Development Management DPD. The Design and Townscape Guide provides detailed guidance for the design of all development
	South Westcliff Community group	24b - Set out specific standards for different types of dwellings with minimum room sizes and requirements for storage to meet the particular objectives for the area. 24b & 24c	Development management policies for design and dwelling mix will be set out in the Development Management DPD. The Design and Townscape Guide provides detailed guidance for the design of all development
	South Westcliff Community group	24c - There should be a different approach to the size and type of dwelling between the town centre and Gateway Neighbourhoods i.e. larger units and or family homes focussed in the Gateway Neighbourhoods with apartments primarily in the town centre. 24b & 24c	Development management policies for design and dwelling mix will be set out in the Development Management DPD. The Design and Townscape Guide provides detailed guidance for the design of all development
	Cllr Gilbert	24a - Rely on the Development Management policies relating to size and type of housing that will be set out in the Development Management DPD and apply across the Borough. We should definitely use all powers to ensure that the maximum number of larger family homes are built in any gateway development.	Agreed.
	BNP Paribas Real Estates	24b - Set out specific standards for different types of dwellings with minimum room sizes and requirements for storage to meet the particular objectives for the area. Option Box 24 (Housing Mix)	Development management policies for design and dwelling mix will be set out in the Development Management DPD. The Design and Townscape Guide provides detailed

		Respondent	Summary of Rep	Council Response
			In order to deliver the type of homes required in the central area, we agree with 24c in that there should be a different approach to sites which provide dwellings in the town centre and sites that provide dwellings in surrounding neighbourhoods. Larger units and family homes should be re-focused to be provided within the Gateway neighbourhoods and apartments primarily in the town centre. In this regard, housing in Gateway neighbourhoods could accommodate, low density, larger units and family housing with amenity space; whereas residential accommodation within the town centre would easily provide high density housing in close proximity to varying amenities and would also provide natural surveillance ('eyes on the street'), vitality and vibrancy with the Town Centre.	guidance for the design of all development. Development briefs will be prepared to establish the most appropriate development of a site, applying the development principles set out in the AAP.
		BNP Paribas Real Estates	24b - Set out specific standards for different types of dwellings with minimum room sizes and requirements for storage to meet the particular objectives for the area. Option Box 24 (Housing Standards) In order to deliver the type of homes the 'community' requires in the Central Area, the Plan should set out specific standards for different types of dwellings with minimum room sizes and requirements for storage to meet the particular objectives for the area. In principle, we support the need for a mix of residential unit sizes. However, there should be flexibility for conversions which may be restricted due to the built form.	Development management policies for design and dwelling mix will be set out in the Development Management DPD. The Design and Townscape Guide provides detailed guidance for the design of all development. Development briefs will be prepared to establish the most appropriate development of a site, applying the development principles set out in the AAP.
		Savills	24a - Rely on the Development Management policies relating to size and type of housing that will be set out in the Development Management DPD and apply across the Borough. All policies relating to sizes and type of housing should be included in the DMDP, including those for the CAAP. Different standards may be appropriate in different areas across the borough, including the Character Areas and Gateway Neighbourhoods.	Development management policies for design and dwelling mix will be set out in the Development Management DPD. The Design and Townscape Guide provides detailed guidance for the design of all development.
		Savills	24b - Set out specific standards for different types of dwellings with minimum room sizes and requirements for storage to meet the particular objectives for the area. All policies on size standards for various types of housing should be included in the DMDP, including those for the CAAP.	Development management policies for design and dwelling mix will be set out in the Development Management DPD. The Design and Townscape Guide provides detailed guidance for the design of all development.
		Savills	24c - There should be a different approach to the size and type of dwelling between the town centre and Gateway Neighbourhoods i.e. larger units and or family homes focussed in the Gateway Neighbourhoods with apartments primarily in the town centre. Approach for varying types of accommodation within different parts of the CAAP and support focus for family accommodation (both flats and houses) in Gateway Neighbourhood and apartments primarily in the town centre. Specific policies for each of the Gateway Neighbourhood and Character Areas should be strengthened.	Development management policies for design and dwelling mix will be set out in the Development Management DPD. The Design and Townscape Guide provides detailed guidance for the design of all development. This DPD will ensure that sizes and types of dwelling are appropriate to their location. Development briefs will be prepared to establish the most appropriate development of a site, applying the development principles set out in the AAP.
<b>Affordable Housing</b>				
<b>Option Box 25 In order to provide for future affordable housing needs the Plan should;</b>				
<b>25a - promote a higher percentage of affordable housing and reduce the threshold size to which it should apply within the AAP area e.g. 35% on all sites above 15 units. or</b>				
<b>25b - consider focussing the provision of affordable housing in the Neighbourhood Gateways by requiring higher level of provision in these areas whilst at the same time reducing the requirement to form affordable housing in the town centre. or</b>				
<b>25c - set an overall numerical target for affordable homes to be accommodated in the plan area and this should be proportioned between the different development areas according to their role and function.</b>				
		A Thomas	25a - promote a higher percentage of affordable housing and reduce the threshold size to which it should apply within the AAP area e.g. 35% on all sites above 15 units. – no but all except owner occupied development should contribute via a roof tax on a	Noted, development of CIL will need to be taken forward separately for the Borough as a whole. Affordable Housing need has not changed significantly since the adoption of the Core Strategy and the approach to tenure type and mix as set

	Respondent	Summary of Rep	Council Response
		sliding scale to be ringfenced for provision of new and or improvement to or refurbishment of existing properties.	out in Core Policy CP8 is considered to still be relevant and appropriate to local circumstances. Therefore the AAP will not set out different policy requirements for Affordable Housing to those adopted in the Core Strategy. The proposed Development Management DPD will provide more detail on the tenure mix between social rented accommodation and intermediate housing.
	A Thomas	25b - consider focussing the provision of affordable housing in the Neighbourhood Gateways by requiring higher level of provision in these areas whilst at the same time reducing the requirement to form affordable housing in the town centre. –  agreed, the town centre must be uplifted.	Noted. Affordable Housing need has not changed significantly since the adoption of the Core Strategy and the approach to tenure type and mix as set out in Core Policy CP8 is considered to still be relevant and appropriate to local circumstances. Therefore the AAP will not set out different policy requirements for Affordable Housing to those adopted in the Core Strategy. The proposed Development Management DPD will provide more detail on the tenure mix between social rented accommodation and intermediate housing.
	A Thomas	25c - set an overall numerical target for affordable homes to be accommodated in the plan area and this should be proportioned between the different development areas according to their role and function. –  in principle agree but it how its done that is relevant	Noted. Affordable Housing need has not changed significantly since the adoption of the Core Strategy and the approach to tenure type and mix as set out in Core Policy CP8 is considered to still be relevant and appropriate to local circumstances. Therefore the AAP will not set out different policy requirements for Affordable Housing to those adopted in the Core Strategy. The proposed Development Management DPD will provide more detail on the tenure mix between social rented accommodation and intermediate housing.
	Renaissance Southend Ltd	25a - promote a higher percentage of affordable housing and reduce the threshold size to which it should apply within the AAP area e.g. 35% on all sites above 15 units. –  a more onerous policy for affordable housing would further reduce marginal viability and is likely to deter private investment in an area where current values are still relatively low	Noted. Affordable Housing need has not changed significantly since the adoption of the Core Strategy and the approach to tenure type and mix as set out in Core Policy CP8 is considered to still be relevant and appropriate to local circumstances. Therefore the AAP will not set out different policy requirements for Affordable Housing to those adopted in the Core Strategy. The proposed Development Management DPD will provide more detail on the tenure mix between social rented accommodation and intermediate housing.
	Renaissance Southend Ltd	25b - consider focussing the provision of affordable housing in the Neighbourhood Gateways by requiring higher level of provision in these areas whilst at the same time reducing the requirement to form affordable housing in the town centre. –  Mixed tenure will always be the preference but the AAP must reflect the need for flexibility on the type and cost of affordable where the viability may be affected. Existing policies already reflect this but it needs restating for the avoidance of doubt.	Noted. Affordable Housing need has not changed significantly since the adoption of the Core Strategy and the approach to tenure type and mix as set out in Core Policy CP8 is considered to still be relevant and appropriate to local circumstances. Therefore the AAP will not set out different policy requirements for Affordable Housing to those adopted in the Core Strategy. The proposed Development Management DPD will provide more detail on the tenure mix between social rented accommodation and intermediate housing.

	Respondent	Summary of Rep	Council Response
	Renaissance Southend Ltd	<p>25c - set an overall numerical target for affordable homes to be accommodated in the plan area and this should be proportioned between the different development areas according to their role and function. –</p> <p>Probably unachievable and difficult to implement. Reconciling the Borough's need for affordable housing, given the proportion of future housing that is identified as being delivered in Central Southend is a key challenge for the AAP, particularly given the need to stimulate investment in town centre with development that is viable. It can only be done as part of a more considered strategy for the delivery of affordable housing across the whole Borough.</p>	Noted. Affordable Housing need has not changed significantly since the adoption of the Core Strategy and the approach to tenure type and mix as set out in Core Policy CP8 is considered to still be relevant and appropriate to local circumstances. Therefore the AAP will not set out different policy requirements for Affordable Housing to those adopted in the Core Strategy. The proposed Development Management DPD will provide more detail on the tenure mix between social rented accommodation and intermediate housing.
	SBC Adult & Community Service	<p>25a - promote a higher percentage of affordable housing and reduce the threshold size to which it should apply within the AAP area e.g. 35% on all sites above 15 units. –</p> <p>Given the potential capacity of the central area in helping to meet the affordable housing needs of the Borough there is clearly a need to maximise the amount of affordable housing delivered. With a greater number of larger scale sites there is potential to achieve the higher percentages of affordable housing needed to meet local needs. Increasing the percentage of affordable housing on larger sites could help to increase number of affordable housing units delivered in line with continuing flexible approach to viability on scheme by scheme basis.</p>	Noted. Affordable Housing need has not changed significantly since the adoption of the Core Strategy and the approach to tenure type and mix as set out in Core Policy CP8 is considered to still be relevant and appropriate to local circumstances. Therefore the AAP will not set out different policy requirements for Affordable Housing to those adopted in the Core Strategy. The proposed Development Management DPD will provide more detail on the tenure mix between social rented accommodation and intermediate housing.
	SBC Adult & Community Service	<p>: 25b - consider focussing the provision of affordable housing in the Neighbourhood Gateways by requiring higher level of provision in these areas whilst at the same time reducing the requirement to form affordable housing in the town centre. –</p> <p>This option not favourable, believe that affordable housing should remain an integral part of creating sustainable communities within the town centre and development in the Gateway Neighbourhoods should build-on and not replace Town Centre affordable housing provision. In respect of contribution but as above the delivery location should be flexible and at the discretion of the council. If we increase the affordable in the town centre without taking into account and addressing the existing 'affordable' residential offer first we will not achieve the vibrant retail and café culture we are seeking.</p>	Noted. Affordable Housing need has not changed significantly since the adoption of the Core Strategy and the approach to tenure type and mix as set out in Core Policy CP8 is considered to still be relevant and appropriate to local circumstances. Therefore the AAP will not set out different policy requirements for Affordable Housing to those adopted in the Core Strategy. The proposed Development Management DPD will provide more detail on the tenure mix between social rented accommodation and intermediate housing.
	SBC Adult & Community Service	<p>25c - set an overall numerical target for affordable homes to be accommodated in the plan area and this should be proportioned between the different development areas according to their role and function. –</p> <p>A spatial approach to affordable housing delivery providing indicative numbers of affordable housing capacity within each quarter is a positive proposal and could build upon the work contained within the SHLAA focusing more on neighbourhood level (provided this takes into account points raised in 25a and 25b)</p>	Noted. Affordable Housing need has not changed significantly since the adoption of the Core Strategy and the approach to tenure type and mix as set out in Core Policy CP8 is considered to still be relevant and appropriate to local circumstances. Therefore the AAP will not set out different policy requirements for Affordable Housing to those adopted in the Core Strategy. The proposed Development Management DPD will provide more detail on the tenure mix between social rented accommodation and intermediate housing.
	SBC Adult & Community Service	<p>25a - promote a higher percentage of affordable housing and reduce the threshold size to which it should apply within the AAP area e.g. 35% on all sites above 15 units. –</p>	Noted. Affordable Housing need has not changed significantly since the adoption of the Core Strategy and the approach to tenure type and mix as set out in Core Policy

		Respondent	Summary of Rep	Council Response
			It should be at the discretion of the Council to determine where the and how the provision is made- on site/off site or as a capital sum etc. Flexibility is important. All development other than for personal occupation should contribute to affordable housing, small build units of under 9 should have sliding scale of payment.	CP8 is considered to still be relevant and appropriate to local circumstances. Therefore the AAP will not set out different policy requirements for Affordable Housing to those adopted in the Core Strategy. The proposed Development Management DPD will provide more detail on the tenure mix between social rented accommodation and intermediate housing.
		Burges Estates Residents Association	<p>25c - set an overall numerical target for affordable homes to be accommodated in the plan area and this should be proportioned between the different development areas according to their role and function. –</p> <p>Page 63 et al. The Development Management DPD should contain Policies covering all development together with the Core Strategy, SPD and Building Regs. should be adequate. The tendency to encourage mixed uses particularly in the central area must be exercised with care. We need to remind ourselves as to why zoning was introduced in the first place and avoid potential problems of incompatibility. On the question of sustainability and energy production little is said about the visual impact of local generation schemes. Conservation areas apart this is a significant visual factor and a fast increasing one. You cannot maximise travel choice (option box 20) by restricting parking spaces for residents and visitors. This will prove counter productive. Besides it is fundamentally wrong to discourage car usage by discouraging car ownership. Adopt option 20c. The development strategy on housing (option box 23) should aim to provide for sustainable communities by a mix of housing types. However the emphasis in the centre should be away from family housing which would be better provided in the surrounding neighbourhoods. Moreover that is likely to be the market orientated option. Sustainable communities are about providing a range of housing types and tenure within a neighbourhood. Raising thresholds, changing foci may have the effect of creating ghettos. On balance option 25c is to be supported</p>	<p>Noted. Affordable Housing need has not changed significantly since the adoption of the Core Strategy and the approach to tenure type and mix as set out in Core Policy CP8 is considered to still be relevant and appropriate to local circumstances. Therefore the AAP will not set out different policy requirements for Affordable Housing to those adopted in the Core Strategy. The proposed Development Management DPD will provide more detail on the tenure mix between social rented accommodation and intermediate housing.</p> <p>Issues of sustainability, design and transport are addressed in the Development Management DPD, Design and Townscape Guide SPD and the Core Strategy. Specific site proposals in the SCAAP will provide the opportunity for the Development Brief to determine issues of sustainability and design in more detail.</p>
		Iceni Projects	<p>25b - consider focussing the provision of affordable housing in the Neighbourhood Gateways by requiring higher level of provision in these areas whilst at the same time reducing the requirement to form affordable housing in the town centre. –</p> <p>Accordingly, Colonnade considers that the only realistic means of addressing both the market and affordable housing needs of the borough in the short, medium and longer term is to consider a revision to the strategy of focussing growth in the central area to the exclusion of growth in housing to the north of the borough. Previous representations from Colonnade have made clear the benefits of a balanced apportionment of growth to the north of the borough, which will address housing need and provide for desperately needed improvements to the strategic transport infrastructure network.</p>	The focus of regeneration and growth is within the existing urban area. This is the approach in the adopted Core Strategy. Development outside of the existing urban area would dilute the focus and threat this objective. The existing urban area has access to a good public transport and services and facilities and is therefore a much more sustainable option for development. It will be possible to provide a good tenure mix in the existing urban area with policies to address this in the Development Management DPD and specific guidance in future Development Briefs proposed in the SCAAP.
		Conservation Association Westcliff Seaboard	<p>25c - set an overall numerical target for affordable homes to be accommodated in the plan area and this should be proportioned between the different development areas according to their role and function. –</p> <p>25c</p>	Noted.

	Respondent	Summary of Rep	Council Response
	South Westcliff Community group	25c - set an overall numerical target for affordable homes to be accommodated in the plan area and this should be proportioned between the different development areas according to their role and function. –  25c	Noted.
	Cllr Gilbert	25a - promote a higher percentage of affordable housing and reduce the threshold size to which it should apply within the AAP area e.g. 35% on all sites above 15 units. –  We support higher percentage of affordable housing in all developments, and a lower threshold. We also believe that a proportion of new developments should be not just affordable, but social-rented.	Noted .
	BNP Paribas Real Estates	25c - set an overall numerical target for affordable homes to be accommodated in the plan area and this should be proportioned between the different development areas according to their role and function. –  We agree that in order to provide for future affordable housing needs, the Plan should set an overall numerical target for affordable homes to be accommodated within the Plan area and that this should be proportioned between the different development areas according to their role and function. However, affordable housing should only be required on sites of 15 or more units, subject to flexibility and viability. Overall, there should be an appropriate and sustainable balance between jobs, infrastructure and housing, especially in the town centre. In this regard, we wish to promote our clients site for residential led mixed use redevelopment. The site would be ideal for retail/commercial uses at the ground floor with residential use on the upper floors, which would provide a mixed use development in keeping with local and national policies.	Noted. Affordable Housing need has not changed significantly since the adoption of the Core Strategy and the approach to tenure type and mix as set out in Core Policy CP8 is considered to still be relevant and appropriate to local circumstances. Therefore the AAP will not set out different policy requirements for Affordable Housing to those adopted in the Core Strategy. The proposed Development Management DPD will provide more detail on the tenure mix between social rented accommodation and intermediate housing.
	Savills	25a - promote a higher percentage of affordable housing and reduce the threshold size to which it should apply within the AAP area e.g. 35% on all sites above 15 units. –  The level of affordable housing on any site should be determined primarily by an economic assessment / Affordable Housing Toolkit up to a target provision of 35% affordable housing. As an absolute requirement on all sites this level of affordable housing is only appropriate if it can be assumed that housing grant is available. . Consideration should be given to the draft policy stating that "Where appropriate the Council will require up to 35% of housing in new developments to be affordable. In determining the amount of affordable housing in any area the Council will have regard to specific local circumstances, including existing dwelling stock (size and tenure) in the locality, feasibility and viability, as well as the availability of housing grant. Where appropriate the affordable housing may be provided off-site or by commuted payment."	Noted. Affordable Housing need has not changed significantly since the adoption of the Core Strategy and the approach to tenure type and mix as set out in Core Policy CP8 is considered to still be relevant and appropriate to local circumstances. Therefore the AAP will not set out different policy requirements for Affordable Housing to those adopted in the Core Strategy. The proposed Development Management DPD will provide more detail on the tenure mix between social rented accommodation and intermediate housing.
	Savills	25a - promote a higher percentage of affordable housing and reduce the threshold size to which it should apply within the AAP area e.g. 35% on all sites above 15 units. –  The DMDPD issues and options report (DM12) suggests an indicative affordable housing	Noted. Affordable Housing need has not changed significantly since the adoption of the Core Strategy and the approach to tenure type and mix as set out in Core Policy CP8 is considered to still be relevant and appropriate to local

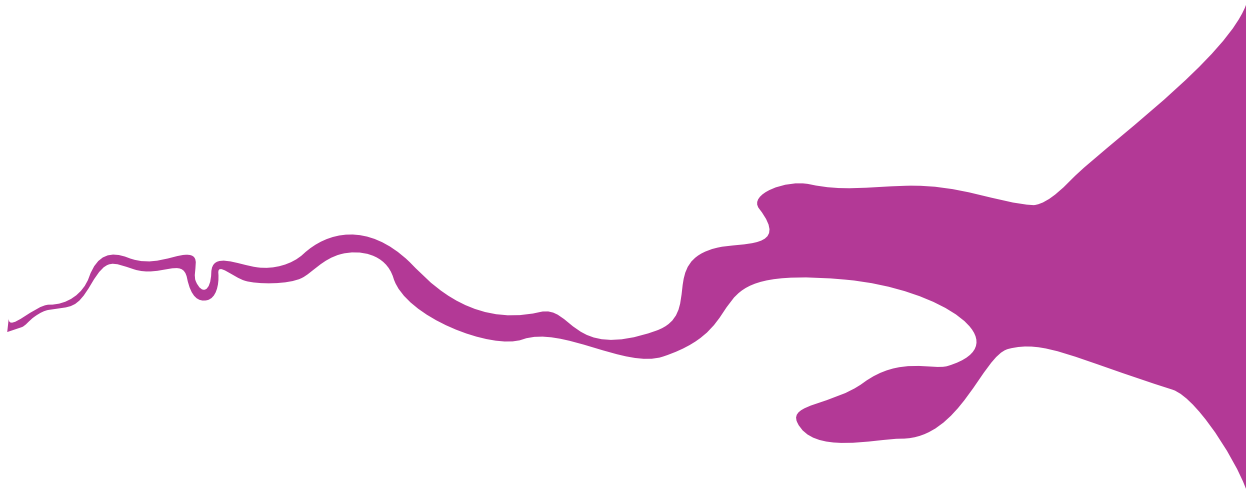


	Respondent	Summary of Rep	Council Response
		tenure mix of 70:30 social rented accommodation to intermediate housing. Further clarity is required on whether it is intended that this mix should apply to the CAAP. This level of social rented housing the CAAP area is inappropriate and may work against the regeneration objectives in the central area and Gateway Neighbourhoods. The level of social rented housing to be provided on any particular site should have regard to local circumstances and to wider regeneration issues, especially those that are particular to the central area.	circumstances. Therefore the AAP will not set out different policy requirements for Affordable Housing to those adopted in the Core Strategy. The proposed Development Management DPD will provide more detail on the tenure mix between social rented accommodation and intermediate housing.
	Savills	25b - consider focussing the provision of affordable housing in the Neighbourhood Gateways by requiring higher level of provision in these areas whilst at the same time reducing the requirement to form affordable housing in the town centre. –  The amount and tenure mix of affordable housing in any area should have regard to specific local circumstances, including existing dwelling stock (size and tenure) in the locality, feasibility and viability, as well as the availability of housing grant.	Noted – the tenure mix is based on evidence supplied by the Strategic Housing Market Assessment and Housing Needs Assessment for Southend and the wider area. It is considered that a mix of 70:30 social rented accommodation to intermediate housing is appropriate to Southend as a whole. The SHMA undertook an assessment of affordable dwelling need and consequently set out a recommended affordable dwelling mix for Southend-on-Sea. The recommended affordable mix is incorporated into policy, but this proportion should not be treated as a definitive mix but be used during negotiations.
	Savills	25c - set an overall numerical target for affordable homes to be accommodated in the plan area and this should be proportioned between the different development areas according to their role and function. –  support	Noted.
<b>Securing additional services and facilities required as a result of housing growth</b>			
<b>Option Box 26 Where should new services and facilities be located? Please indicate a preferred location i.e. Quarter or neighbourhood for each service or facility. Are there any more that should be considered?</b>			
	A Thomas	New employment around periphery of town and in town centre and central seafront. additional school spaces in existing schools, pocket parks/green space in every possible location. health needs on periphery of town centre in the gateway areas. Find a way to keep the residential homes etc for Southend residents, restrict inward migration from London etc to those with jobs. put southend residents first/ proper audit of what Southend needs	The AAP will make policy provision for specific requirements where known (primary school and health care centre) and introduce a thematic policy for infrastructure provision in relation to the demand arising from development. The need for functional / linked open space and public art will also be identified
	A Thomas	depends on outcome of a proper audit of need	The AAP will make policy provision for specific requirements where known (primary school and health care centre) and introduce a thematic policy for infrastructure provision in relation to the demand arising from development. The need for functional / linked open space and public art will also be identified
	Renaissance Southend Ltd	Has a detailed audit been carried out to establish what is needed to meet anticipated demands from future development?	The AAP will make provision for new services and facilities within proposal sites and via a development strategy, providing a flexible, criteria-based approach for key uses. This will be informed by relevant evidence base documents, council departmental plans and consultation from key stakeholders and the community. An implementation and

		Respondent	Summary of Rep	Council Response
				<p>monitoring framework will be included within the AAP that sets out new local services and community facilities and demonstrates deliverability.</p> <p>A Development Delivery DPD will also be developed for strategic infrastructure provision, outside of this AAP, for the Borough as a whole.</p>
		Renaissance Southend Ltd	<p>Student accommodation could be incorporated as part of any residential or mixed use scheme.</p> <p>Victoria Avenue Development Brief is likely to identify potential location for new primary school.</p> <p>Open space should be planned as an integral element on all the major sites within each Quarter.</p> <p>Warrior Square has been identified as potential location for health facilities.</p>	<p>Comments noted. The AAP will establish an approach for the provision of additional student accommodation based on need.</p> <p>The AAP will make provision for new education facilities and explore the appropriate uses and redevelopment of the Victoria Avenue based on evidence and results of relevant consultation.</p> <p>The APP will set out an approach to the provision of open space within proposal sites and as part of the development strategy for the central area.</p> <p>Potential and appropriate uses for Warrior Square will be examined and set out as part of the proposal site having regard to relevant evidence and consultation.</p>
		Conservation Association Westcliff Seaboard	Locally evaluated per area, as required	Noted
		South Westcliff Community group	Locally evaluated per area, as required	Noted
		Savills	<p>The location of community and social facilities should have regard to current local provision (addressing location, quantity and quality) and existing and forecast need / shortfall.</p> <p>Further assessment of existing local provision and forecast need is required to support the Submission Draft CAAP. Where possible and appropriate, such facilities should be located within the areas and communities they are intended to serve.</p> <p>The suggested provision of these facilities needs to be the subject of a Sustainability Assessment.</p>	<p>Noted. The AAP will make provision for new services and facilities within proposal sites and via a development strategy, providing a flexible, criteria-based approach for key uses. This will be informed by relevant evidence base documents, council departmental plans and consultation from key stakeholders and the community. An implementation and monitoring framework will be included within the AAP that sets out new local services and community facilities and demonstrates deliverability.</p> <p>A Development Delivery DPD will also be developed for strategic infrastructure provision, outside of this AAP, for the Borough as a whole.</p> <p>A Sustainable Appraisal incorporating Strategic Environmental Assessment will be carried out for the submission version of the AAP.</p>
		Savills	There are a range of other facilities which require similar consideration - public car parks,	Points noted. The AAP will make provision and provide an

	Respondent	Summary of Rep	Council Response
		transport interchanges, major leisure users, etc	approach towards to a range of facilities, including public car parks, transport interchanges and leisure uses.
<b>Section 9 Delivery and Monitoring</b>			
<b>Option Box 27</b>			
<b>27a - Market forces dictate delivery in terms of future development</b>			
<b>27b - Public/Sector Partnership through Development Agreements, Joint Venture Partnerships or Local Asset Backed Vehicles (LABVs)</b>			
<b>27c - Public Sector led, with the local authority as principal land owner taking lead to 'derisk' individual sites and procure developments on a site by site basis.</b>			
	A Thomas	27a - Market forces dictate delivery in terms of future development - subject to quality etc	Points noted. The AAP will identify the Council's approach to delivering regeneration on sites within its ownership including the Local Liability Partnership. In addition funding sources through the HCA and LSTF have been identified and successfully bid for the short to medium term. An implementation and monitoring framework will be included within the AAP to demonstrate deliverability.
	A Thomas	27b - Public/Sector Partnership through Development Agreements, Joint Venture Partnerships or Local Asset Backed Vehicles (LABVs) - might help kickstart something but frankly unlikely to be available in near future	
	A Thomas	27c - Public Sector led, with the local authority as principal land owner taking lead to 'derisk' individual sites and procure developments on a site by site basis. - this may be necessary to kick start regeneration of neighbourhoods	
	Renaissance Southend Ltd	27a - Market forces dictate delivery in terms of future development - Unlikely given recent evidence and current market conditions. Some intervention and stimulus will be required to establish investor confidence	
	Renaissance Southend Ltd	27b - Public/Sector Partnership through Development Agreements, Joint Venture Partnerships or Local Asset Backed Vehicles (LABVs) - Probably essential, especially given extent of Council owned land in town centre in order to stimulate market. HCA will be an essential partner	
	Renaissance Southend Ltd	27c - Public Sector led, with the local authority as principal land owner taking lead to 'derisk' individual sites and procure developments on a site by site basis. - Public sector sharing risk is likely to be part of the solution but also part of 27b, not just on a site by site basis	
	Conservation Association Westcliff Seaboard	27b - Public/Sector Partnership through Development Agreements, Joint Venture Partnerships or Local Asset Backed Vehicles (LABVs) - 27b	

appendix 6  
responses on the sustainability appraisal  
seafront AAP and town centre AAP





Sustainability Appraisal: Seafront Area Action Plan – Joint Scoping Report – Summary of Issues

Key Issue	Response
<b>Seafront AAP</b>	
<i>Nature Conservation and Biodiversity</i>	
<p>A continued assessment through the plan preparation process, including the need for appropriate assessment, will be needed to ensure the proposals of the AAP do not adversely affect the European Sites and internationally designated nature conservation sites along the coast.</p>	<p>Noted. Nature conservation, and flood risk within the central seafront area will be addressed in line with Government guidance and taken forward as part of the preparation of either the SCAAP or Borough Wide Development Management DPD (DM DPD). The AAP itself will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment if required] to ensure protection of environmental designations in particular.</p>
<p>Under question 3 (6) it may be useful to have a specific AAP policy on nature conservation protection and enhancement from new development in the Seafront area to highlight aspects of the biodiversity interest of the area that are in particular need of protection and that particular types of development, or development in particular locations, should actively aid habitat enhancement.</p>	
<p>Any new economic development (including the 250 additional jobs expected to be developed in the AAP area) should not cause harm to the natural environment and biodiversity importance. New development should be appropriate to the area and appropriately located along the coast so as not to cause harmful pressure points on the biodiversity resource.</p>	
<p>Where development would impact on the foreshore particular care will have to be taken to ensure the protection of the integrity of protected sites.</p>	
<p>Development on internationally protected sites needs to take into account the direct impact on the site as well as impacts of waste water, sewerage and rain water run-off to ensure these are managed so as not to cause harm.</p>	
<p>The approach to public realm and open space should help to create a high quality Thames frontage in the Borough. All improvements should be in keeping with the adjacent areas of high nature conservation value. Planting in parks and landscaping should use species in keeping with the nature conservation interest of the area as well as those resilient to the</p>	

impacts of climate change.	
Deliver improvements to the sea defences at Shoeburyness to ensure impacts to nature conservation are minimised and new development in this area incorporates biodiversity elements.	Noted. This will be taken forward within the Shoeburyness AAP.
Improvements to the Cinder Path will need to ensure biodiversity elements are not harmed.	Noted. This falls outside of the AAP area and will be taken forward as part of the DM DPD.
<i>Flood Risk and Coastal Defences</i>	
The risk of overtopping during storm events remains and there is therefore a need to control vulnerable development in the area.	Noted. Flood risk within the central seafront area will be addressed in line with Government guidance and taken forward as part of the preparation of either the SCAAP or Borough Wide Development Management DPD (DM DPD). The AAP itself will be subject to a Sustainability Appraisal that assesses each option against a variety of sustainability criteria. It will also be assessed under the Habitats Regulations [including Appropriate Assessment if required] to ensure protection of environmental designations in particular
Defences should be managed and maintained as part of a comprehensive shoreline and coastal management plan.	
Where defences include beach replenishment, consider the wider sustainability implications including the source of the replenishment material and the suitability of this type of protection. If there are areas where hard sea defences are no longer the best option, other options should be considered. The AAP could be used to ensure that consideration is given to these matters and innovative coastal management schemes used if appropriate.	
<i>Land Stability</i>	
Land will need to be stabilised to protect the existing built environment in the area of the cliffs, ensuring that any loss of open space is replaced elsewhere.	Noted.
<i>Culture and Tourism</i>	
Improvements to the Seafront tourist buildings, including kiosks and beach huts, should be consistent along the coast to bring a unified appearance to the area.	Noted. This will be taken forward as part of the proposed DM DMD. At present, the Design and Townscape Guide SPD1 contains specific guidance on the design of beach huts within the Borough, ensuring a consistent approach is adopted.
Ensure the protection of overnight accommodation and encourage improvements to the quality of this provision to promote Southend as a high quality tourist destination.	Noted. This will be taken forward as part of the proposed DM DPD.
New large scale leisure and tourist attractions should be developed to be accessible by public transport to reduce reliance on car travel.	Noted. It is intended that this will be taken forward by the DM DPD in conjunction with the Southend-on-Sea Local Transport Plan (LTP).

<i>Residential Accommodation</i>	
Reconsider policies protecting family houses from sub-division and the development of flats to meet the housing needs of the Borough and provide more affordable accommodation. Considering each scheme on its merits could be the preferred approach.	Noted. The approach to residential conversions will be informed by the SHMA, and will form part of the policy approach of the DM DPD.
<i>Transport and Movement Routes</i>	
Support improved walking and cycling routes along the Seafront, including a segregated Sustrans route.	Noted. It is intended that this will be taken forward by the DM DPD in conjunction with the Southend-on-Sea Local Transport Plan (LTP).
Review car parking along the Seafront, removing overprovision to make land available for alternative public space and leisure uses in combination with public transport improvements, particularly to the area east of the Pier.	



SA / SEA: Southend Central Area Action Plan – Issues and Options – Summary of Issues

Key Issue	Response
<b>Southend Central AAP</b>	
<p>Nature Conservation / Biodiversity – resources within the built up environment are limited and it is therefore important to conserve and enhance existing resources, create new ones, and protect and enhance wildlife corridors.</p>	<p>Noted.</p> <p>Southend’s Local Biodiversity Action Plan is a direct result of an international agreement called the Convention on Biological Diversity. It describes and monitors the species which are apparent in Southend.</p> <ul style="list-style-type: none"> <li>• <b>SCAAP Objective 4</b> sets out the Council’s objectives for biodiversity and environmental quality. This is taken forward by <b>Policy CS4</b> of the SCAAP, which provides the policy context for ensuring development on the foreshore does not adversely affect the RAMSAR, SPA or SSSI designated sites, and <b>Policy CS5</b> outlines the Council’s commitment to ensuring the quality and cleanliness of the beach and foreshore are maintained, including the protection and enhancement of all parks, gardens and other significant areas of green space, and integrating the protection and interpretation of biodiversity interests.</li> <li>• <b>Policy PR1</b> sets out the Council’s commitment to implementing a rolling programme of high quality new and enhanced open spaces in the central area, in order to enhance the quality of the environment and provide positive biodiversity benefits. Through Policy PR1 the Council will require all open spaces within the central area to be integrated within a wider green grid network.</li> </ul>
HRA – further work will be required in developing the policies for Central Southend to ensure	A Screening Report (SR) has been undertaken that

<p>there are no adverse impacts on protected sites. Those of international significance must be protected from development that would threaten their integrity (although it is noted that the key threat is out of the control of the LDF, being caused by built development limiting the natural movement of the coastal mudflats inland).</p>	<p>considers the need for an Appropriate Assessment (AA) known for the purpose of the SR as a HRA, in compliance with the EU Habitats Directive, as part of Southend's Local Development Framework. The HRA screening exercise considers whether the approach to a plan or project is likely to have a significant effect on the conservation objectives of a European site.</p>
<p>Natural Environment – development in the centre, and throughout Southend, has the potential to have an adverse impact on the internationally designated areas of the foreshore. The potential for impacts and the need to avoid harm to protected areas is not recognised within the AAP and needs to be addressed.</p>	<p>Noted.  SCAAP <b>Objective 4</b> sets out the Council's objectives for biodiversity and environmental quality. This is taken forward by <b>Policy CS4</b> of the SCAAP, which provides a detailed policy response to issues affecting nature conservation and biodiversity. It provides the Council with the policy framework to ensure that all development proposals are accompanied by an appropriate assessment and associated documentation to guarantee that the foreshore designations (SSSI, RAMSAR, and SPA) are respected and that there is no negative impact to them. Development proposals which are likely to have an adverse impact on a SSSI will not be permitted unless exceptional circumstances are demonstrated, as set out within Policy CS4. In these cases, the Council will consider applying planning conditions or legal obligations to secure the protection, conservation and enhancement of the SSSI.</p>
<p>Flood risk – although direct tidal inundations is largely mitigated for through sea flood defences, tidal effects on the Borough's rivers may present a greater risk.</p>	<p>Noted.</p> <ul style="list-style-type: none"> <li>• <b>Policy IF3</b> of the SCAAP sets out the Council's requirements, through its role in determining planning applications, for requiring that FRA's</li> </ul>
<p>Climate Change – the AAP will need to address the impacts of climate change including water resource deficiencies, increased flood risk (from sea and rivers), risk of subsidence</p>	

<p>through changing soil moisture levels.</p>	<p>accompany planning applications, for consideration by the Council as Lead Local Flood Authority, in areas of Local Flood Risk. All development should also have regard to surface drainage.</p> <ul style="list-style-type: none"> <li>• <b>Policy CS3</b> of the SCAAP provides a policy framework for ensuring all major development in Flood Zone 1 and all new development in Flood Zone 2 and 3 (3a and 3b) provide Flood Risk Assessments. Within Flood Zone 3b, functional floodplain, only water compatible uses and essential infrastructure (PPS25 Table D3) will be permitted, unless the site specific recommendations in the SFRA state otherwise. The policy outlines that within all areas of the central seafront area development proposals should include SUDS to reduce surface water run-off. This Policy is to be read in conjunction with <b>Southend Core Strategy Policy KP1</b> and <b>KP2</b> and <b>Development Management Policy DM6</b>.</li> </ul>
<p>Open Space – constrained Borough boundaries and the need for new housing is putting pressure on open space within the built up area.</p>	<p>Noted. <b>Policy PR1</b> sets out the Council’s commitment to implementing a rolling programme of high quality new and enhanced open spaces in the central area, in order to enhance the quality of the environment and provide positive biodiversity benefits. Through Policy PR1 the Council will require all open spaces within the central area to be integrated within a wider green grid network.</p>
<p>Design briefs / masterplans - for City Beach, Warrior Square and the St John’s / Heygate area will need to feed into plan making when complete.</p>	<p>Noted.  <b>City Beach: Policy CS8</b> of the SCAAP sets the policy context for development on Eastern Esplanade and City Beach Gateway. This has been developed with consideration for the proposals established for City Beach Phase 2.</p>

	<p><b>Warrior Square: Policy DP5</b> of the SCAAP sets out the development principles for Warrior Square, addressing the principles of the RSL development brief and the £1.5m regeneration project of Warrior Square Gardens. <b>Proposal Site Policy PS5a</b> and <b>PS5b</b> provide a detailed policy framework for the redevelopment of the Warrior Square Car Park Proposal Site and Whitegate Road Proposal Site.</p> <p><b>Tylers Avenue: Policy DP7</b> of the SCAAP provides development principles for the Tylers Avenue quarter. The St John's / Heygate area is contained within this quarter. The objectives and proposals for Tylers Quarter have been developed as a result of a holistic approach, which considered the CAM, RSL's Regeneration Framework, Retail Study and ELR.</p>
<p>Design Quality – although the underlying quality of the natural and built environment is high in many areas, parts of central Southend are characterised by a low quality in the built environment, this should be addressed.</p>	<p>Noted.</p> <ul style="list-style-type: none"> <li>• The Council's commitment to good design is outlined within the Core Strategy Policy CP4, and has been taken forward by the Design and Townscape Guide SPD, which provides a practical basis to help the Council resist poor quality development. The DM DPD will provide an additional framework by which development proposals will have to demonstrate design quality.</li> <li>• <b>Policy PR1</b> of the SCAAP sets the basis for ensuring high quality new and enhanced open spaces are created within the central area, and Policy PR2 provides a detailed framework for providing public realm enhancements in the central area.</li> <li>• The importance of ensuring high quality design, both of the built and natural environment, in the central</li> </ul>

	<p>area is also addressed from a heritage and conservation perspective within <b>Policies HE1, HE2, HE3, HE4, HE5</b>. Development Principles for each of the Quarters have also been identified within the SCAAP, which seek to ensure the design quality of the central area is enhanced; these should be read alongside other policies set out in the SCAAP.</p>
<p>Traffic – levels are increasing within the Borough, with consequences for air quality, any new development must help to limit any increase by putting forward a change to travel patterns through the spatial strategy.</p>	<p>Noted.</p> <ul style="list-style-type: none"> <li>• The SCAAP contains a suite of policies which form the Transport and Access Strategy for the Central Area, within the context of LTP3 and supporting documents, which seek to improve transport access and connectivity for all.</li> <li>• <b>Policy TA2</b> provides the policy context within which the Council will work in partnership with public transport operators, businesses, residents and transport users to encourage a shift to travel by bus or rail for journeys between 5km and 10km, as well as promoting improvements to the public transport infrastructure and services and improving connectivity between bus and rail by promoting Smart Card ticketing across the Borough.</li> <li>• <b>Policy TA3</b>, through the implementation of Proposal Sites and policies within the SCAAP, the determination of planning applications and other initiatives / partnership working, focuses on encouraging a shift to sustainable transport modes, such as walking and cycling for journeys to/from the town centre that are less than 5km.</li> </ul>
<p>Transport Mode – the AAP supports new development in central Southend, this could lead to increased demand for car travel. Therefore traffic, transport and accessibility proposals will need to demonstrate how they will successfully secure a mode shift away from car travel.</p>	
<p>Water – the shortage of potable water supply that is and will be experienced in the East of England (south Essex in particular) must be taken into account in new development, with</p>	<p>Noted. This has been addressed by Policy DM2 of the Development Management DPD, which has been</p>

<p>water efficient design incorporated into the design.</p>	<p>developed in relation to the findings of the Essex Thames Gateway Water Cycle Study: Scoping Study 2009.</p>
<p>Resources – the promotion of sustainable construction needs to be enforced within the SCAAP. It will need to ensure that new development is more energy and water efficient, with low carbon energy sources used wherever feasible. In all redevelopment areas every attempt should be made to retain existing buildings, or at least the building materials for re-use on site.</p>	<p>Noted. This approach has been taken forward by Policy DM2 of the Development Management DPD, in accordance with the Core Strategy DPD.</p>
<p>Relationship with wider Southend – consideration should be given to the impacts on economic objectives for the airport environs and other proposed business locations, including those in neighbouring authorities.</p>	<p>Noted. The SCAAP reflects the spatial vision and objectives of the Core Strategy DPD and includes more detailed policies and proposals to deliver regeneration and growth within this area. The objectives for the central area have been developed in accordance with the wider objectives for the Borough as a whole, with the aim of the SCAAP being to transform the image of Southend through sustainable economic growth, development and social provision, and for it to be independently recognised as a popular location for businesses, residents and visitors.</p>
<p><b>SA of SCAAP Objectives</b></p>	
<p>Town Centre – within the objectives for the SCAAP, the role of the town centre in a wider Southend context should be elaborated on to show how development in this location will compliment the development objectives of other areas.</p>	<p>Noted. The Core Strategy DPD spatial strategy Policy KP1 (plan period 2001-2021) makes provision for a large share of the Borough’s new growth and regeneration to be focused in the central area of the Borough. The purpose of the SCAAP is therefore to give more detailed consideration to how and where employment led regeneration and growth, as identified by the Core Strategy to 2021, can sustainably be accommodated within with town centre, central seafront area and surrounding gateway neighbourhoods. It is vital that Southend’s strategic role as a location for business, shopping, services, culture, leisure and</p>

	<p>community facilities, and higher and further education is maintained and its range of attractions enhanced so that it retains its diversity and vitality in line with its status as a sub regional centre. The development proposals set out within the SCAAP have been developed in accordance with the spatial strategy for the Borough set out by Policy KP1 of the Core Strategy.</p>
<p>Retail Growth – coverage should be widened within the objectives to ensure there is a range of retail premises on offer within the central area, helping to reduce the need to travel by car.</p>	<p>Noted.</p> <ul style="list-style-type: none"> <li>• <b>Objective 1</b> of the SCAAP seeks to improve and transform the economic vitality, viability and diversity of Southend Town Centre by encouraging the establishment of a wider range of homes, businesses and shops whilst providing new opportunities for recreation and leisure. The Core Strategy DPD states that Southend Town Centre will remain the first preference for all forms of retail development and for other town centre uses. The Retail Study (2011) concluded that the retail hierarchy and classification of centres as set out by the Core Strategy is appropriate and that the existing Town Centre Shopping Area as defined by the BLP Proposal Map is appropriate and therefore does not require alteration.</li> <li>• <b>Policy DS1</b> of the SCAAP provides the policy framework for ensuring that the Council, through its role in determining planning decision and other initiatives, will work with private sector partner and land / property owners to provide 50,000m<sup>2</sup> additional retail floorspace for comparison goods by 2020 through the promotion of development on a number of the Proposal Sites identified within the</li> </ul>

<p>Biodiversity – the objectives aren't comprehensive in their coverage of sustainability issues, matters relating to the protection of the natural environment are poorly covered. Despite the high quality biodiversity of the foreshore, immediately adjacent to the centre, protecting this is not mentioned as an objective, nor is enhancing / creating new urban green spaces.</p>	<p>SCAAP.</p> <p>Noted.</p> <ul style="list-style-type: none"> <li>• Southend's Local Biodiversity Action Plan is a direct result of an international agreement called the Convention on Biological Diversity. It describes and monitors the species which are apparent in Southend.</li> <li>• SCAAP <b>Objective 4</b> sets out the Council's objectives for biodiversity and environmental quality.</li> <li>• This is taken forward by <b>Policy CS4</b> of the SCAAP, which provides the policy context for ensuring development on the foreshore does not adversely affect the RAMSAR, SPA or SSSI designated sites, and <b>Policy CS5</b> outlines the Council's commitment to ensuring the quality and cleanliness of the beach and foreshore are maintained, including the protection and enhancement of all parks, gardens and other significant areas of green space, and integrating the protection and interpretation of biodiversity interests.</li> <li>• <b>Policy PR1</b> sets out the Council's commitment to implementing a rolling programme of high quality new and enhanced open spaces in the central area, in order to enhance the quality of the environment and provide positive biodiversity benefits. Through Policy PR1 the Council will require all open spaces within the central area to be integrated within a wider green grid network.</li> </ul>
<p>Flood Risk – could be addressed as an objective.</p>	<p>Noted.</p> <ul style="list-style-type: none"> <li>• <b>Policy IF3</b> of the SCAAP sets out the Council's requirements, through its role in determining</li> </ul>



	<p>planning applications, for requiring that FRA's accompany planning applications, for consideration by the Council as Lead Local Flood Authority, in areas of Local Flood Risk. All development should also have regard to surface drainage.</p> <ul style="list-style-type: none"> <li>• <b>Policy CS3</b> of the SCAAP provides a policy framework for ensuring all major development in Flood Zone 1 and all new development in Flood Zone 2 and 3 (3a and 3b) provide Flood Risk Assessments. Within Flood Zone 3b, functional floodplain, only water compatible uses and essential infrastructure (PPS25 Table D3) will be permitted, unless the site specific recommendations in the SFRA state otherwise. The policy outlines that within all areas of the central seafront area development proposals should include SUDS to reduce surface water run-off. This Policy is to be read in conjunction with <b>Southend Core Strategy Policy KP1</b> and <b>KP2</b> and <b>Development Management Policy DM6</b>.</li> </ul>
<p>Heritage – no objectives relate to the protection / enhancement of the built heritage of the area.</p>	<p>Noted. SCAAP <b>Objective 3</b> sets out the Council's recognition of the unique assets of the Central Area, including its built heritage. <b>Policies HE1-HE7</b> set out the policy context for development affecting the historic environment in the Central Area.</p>
<p>Leisure and Tourism – Southend's role as a visitor and leisure destination is not addressed, yet this is an essential part of the local economy, and should be supported / expanded.</p>	<p>Noted. SCAAP Objective 1 sets out the Council's objectives for improving and transforming the economic vitality, viability and diversity of Southend Town Centre by encouraging the establishment of a wider range of homes, businesses and shops whilst providing new opportunities for recreation and leisure. This objective is taken forward by <b>Policy DS6</b>, which provides the policy</p>

	<p>framework for the provision of facilities for culture, leisure, tourism and entertainment with the central area. Tourism remains an important driver to Southend as a whole and the town centre specifically. The support and expansion of the leisure and tourism industries has been taken forward by Policies DM10 and DM12 the Development Management DPD, which has been developed in conjunction with the findings of the Southend Local Economic Assessment (2010) and Southend-on-Sea Hotel Future Report (2010).</p>
<p><b>SA of Spatial Options</b></p>	
<p>Option 1: Strengthening the Status Quo.</p> <ul style="list-style-type: none"> <li>▪ Would not take advantages of wider environmental improvements that could help to raise the overall image of Southend, limiting potential to attract inward investment;</li> <li>▪ Miss opportunities for mixed use regeneration of the town centre, including additional education and cultural facilities and new housing;</li> <li>▪ Overall scale of development may reduce impacts on natural resource use and the natural environment;</li> <li>▪ Lack of enhancement to public transport and improved movement routes is unlikely to encourage people to use more sustainable transport modes;</li> <li>▪ Unlikely to have any great benefit for the economic sustainability of the town, nor will it help to meet social sustainability objectives.</li> </ul>	<p>Noted. This Option has not been taken forward as part of the SCAAP.</p>
<p>Option 2: Reinforcing the Urban Circuits.</p> <ul style="list-style-type: none"> <li>▪ Would help to create a High Street of a quality to attract national retailers, improving links to adjacent streets could help increase the attractiveness of the town centre for shopping and would support retail businesses;</li> <li>▪ No residential element is included and therefore the objectives of delivering new homes/supporting a more mixed use and vibrant town centre are not met;</li> <li>▪ Risks not being bold enough in seeking the full regeneration potential in missing opportunities to create a high quality town centre that is successful in improving the image of Southend.</li> </ul>	<p>Noted. This Option has not been taken forward by the SCAAP.</p>

<p>Option 3: City by the Sea (Preferred Option).</p> <ul style="list-style-type: none"> <li>▪ Would see the largest amount of redevelopment and therefore the greatest use of natural resources. New buildings must use energy and water more efficiently than existing ones to ensure net benefits in the medium or longer term;</li> <li>▪ May be risky to implement, particularly in a recession. However, having a joined up approach for the central area that sets out development potential should be beneficial in the long-term;</li> <li>▪ Will bring about a large amount of change and as such there is a need to ensure it is delivered in conjunction with other plans and strategies for the area to avoid adverse impacts (e.g. SERT improvements, travel and parking management, and tourism strategies);</li> <li>▪ The SCAAP should ensure that the objective for growth in central Southend does not adversely impact upon the objectives for growth in other areas.</li> </ul>	<p>Noted.</p> <ul style="list-style-type: none"> <li>• Policy DM2 of the Development Management DPD provides the policy context for ensuring that all development proposals in the Borough make the fullest contribution to minimising energy demand and CO<sup>2</sup> emissions in accordance with the energy hierarchy set out within Policy DM2.</li> <li>• The SCAAP as been developed in accordance with the Core Strategy and LTP3, in addition to other plans and strategies, to ensure development within the central area contributes towards the wider strategy for Southend.</li> <li>• <b>Policies TA1-TA5</b> of the SCAAP set out the transport and access strategy for the central area, with Policy TA1 having specific focus on the delivery of SERT.</li> </ul>
<p><b>SA of Quarters and Key Sites</b></p>	
<p>Transport and Movement Routes.</p> <ul style="list-style-type: none"> <li>▪ Non-car travel access to the centre could be improved, emphasising walking routes. Currently there are areas where permeability is poor, which discourages walking;</li> <li>▪ Needs to improve safety through greater segregation of pedestrians/cyclists and cars. Risks to pedestrian safety in this respect should be recognised, with clear pedestrian priority;</li> <li>▪ To secure sustainable development it will be important to ensure that the quantity of car parking levels is not increased.</li> </ul>	<p>Noted. LTP3 addresses cycling and walking as part of its broader integrated transportation strategy. This has been progressed within <b>Policies TA1-TA5</b> which form the transport and access strategy for the central area within the SCAAP. Policy TA3 sets out the policy context for encouraging a shift to sustainable transport modes, including walking and cycling for journeys under 5km to and from the town centre, and the improvement of pedestrian and cycle routes and signage in and around the town centre. Policy TA4 identifies the principles of the Council's town centre car parking strategy.</p>
<p>Residential Development and Communities.</p> <ul style="list-style-type: none"> <li>▪ To ensure the housing delivered is of the type needed and in the right location the AAP will need to include more detail on residential development;</li> <li>▪ Include details and requirements within the AAP of how community facilities and services</li> </ul>	<p>Noted.</p> <ul style="list-style-type: none"> <li>• The Core Strategy DPD Policy KP1 and CP8 set out the spatial distribution, type and scale of regeneration and housing growth in the Borough.</li> </ul>

will be provided to meet needs of existing and future town centre residents;

- If homes and services are not provided to meet the needs of the population there could be an adverse impact in regard to delivering sustainable development;
- The Core Strategy only requires affordable housing be delivered on sites of 50+ units, but it is unlikely that many developments in the town centre will meet this threshold. Affordable homes must be provided – recommend including a higher target (based on a lower threshold) for affordable housing in the town centre;
- Walking and cycling links should be improved to promote walking / cycling between Neighbourhood Gateways and the town centre.

The Core Strategy requires at least 2,000 net additional new homes to be provided within the central area during the plan period of 2001-2021.

**Policy DS8** of the SCAAP provides more detail as to how and where this growth can sustainably be accommodated in the central area whilst meeting other town centre objectives. Residential led mixed use development will be taken forward at Proposal Site PS9a and PS10b.

- **Policy DS7** outlines the policy context for the provision of community facilities in the central area.
- In regard to affordable housing, Policy CP8 of the Core Strategy sets the strategic policy for the provision of affordable housing in the Borough, requiring 30% of all development to be affordable on site of 50 units or more or 2ha or more, and 20% on site of 10-49 units or 0.3 ha up to 1.99ha. Smaller sites will be required to make a financial contribution to fund off-site provision of affordable housing.
- **Policy TA3** forms part of the transport and access strategy for the central area, and sets the policy context for ensuring that through the implementation of the proposal sites and policies within the SCAAP, in their determination of planning applications and through other initiatives and partnership working, a shift to sustainable modes such as walking and cycling for journeys to/from the town centre are encouraged, walking and cycling routes set out within LTP3 are maintained, extension and linked, and pedestrian and cycle routes in and around the

<p>The Built Environment.</p> <ul style="list-style-type: none"> <li>▪ The AAP includes the possibility of tall buildings or other landmark buildings to be developed as part of the centre regeneration. Any new tall/landmark building should be designed to compliment the town centre, taking into account how appropriate high densities are for the location, the need to avoid overshadowing and to create vibrant streets;</li> <li>▪ Warrior Square and Clifftown Conservation Areas – recent development, or poor use of land, has detracted from the wider setting of these historic heritage areas.</li> </ul>	<p>town centre are improved.</p> <p>Noted.</p> <ul style="list-style-type: none"> <li>• The adopted Design and Townscape Guide SPD sets out design guidance on tall buildings, which has been taken forward by Policy DM4 of the Development Management DPD, which identifies that along the seafront tall buildings should be restricted to the central area. Key evidence base documents, including the Borough Wide Character Study, also provide commentary on the positioning of tall buildings within the Borough. These documents have been used to inform the SCAAP, within which a strategy has been created to inform the development and location of landmark buildings within the central area (<b>Policy PR5</b>).</li> <li>• The policy context for development affecting the historic environment in the central area has been established by <b>policies HE1-HE6</b> of the SCAAP.</li> </ul>
<p>Education and Culture.</p> <ul style="list-style-type: none"> <li>▪ There are positive benefits of delivering new higher education / learning facilities in the town centre, but the AAP should be careful to avoid conflicting land uses in order to maintain a balance in the type of facilities and retail offer available;</li> <li>▪ New cultural facilities need to work with existing communities and visitor representatives to identify the right kind of facility.</li> </ul>	<p>Noted.</p> <ul style="list-style-type: none"> <li>• SCAAP <b>Objective 6</b> focuses on the expansion of the presence of the University of Essex and South Essex College and the establishment of Southend as an important regional centre for learning. This Objective is taken forward by <b>Policy DS5</b> which seeks to focus the development of further/higher education provision to Proposal Site PS3a. Policy DS5 has been developed in accordance with the SCAAP's approach to the development of community facilities within the central area, which together are essential to creating sustainable communities providing for education, health, culture,</li> </ul>

	<p>recreation and religion.</p> <ul style="list-style-type: none"> <li>• SCAAP <b>Objective 1</b> sets out the Council’s objectives for improving and transforming the economic vitality, viability and diversity of Southend Town Centre by encouraging the establishment of a wider range of homes, businesses and shops whilst providing new opportunities for recreation and leisure. This objective is taken forward by <b>Policy DS6</b>, which provides the policy framework for the provision of facilities for culture, leisure, tourism and entertainment with the central area. <b>Proposal Area Policy CS7a</b> provides the policy framework for the development of a cultural central and new Southend museum in the central seafront area.</li> </ul>
<p>Employment.</p> <ul style="list-style-type: none"> <li>▪ To ensure the benefits of inward investment in the physical employment infrastructure support local enterprise and raise local skills levels, new office development could be required to contribute to local training provision;</li> <li>▪ The new creative and cultural quarter in Clifftown and near Southend Central Station should be tailored to the needs to small local businesses;</li> <li>▪ The growth of central Southend as an employment destination needs to be taken into account in conjunction with the potential for growth in other parts of the Borough, such as the land near to the airport. Focus should remain on the town centre however as to deliver sustainable development central office locations are preferable.</li> </ul>	<p>Noted. The identification of land for employment will have regard for the emerging spatial development strategy which meets strategic land use requirements in the central area, taking into account the findings of key evidence base documents including the SHLAA/ELR and Retail Study.</p>
<p>Leisure and Recreation.</p> <ul style="list-style-type: none"> <li>▪ Consideration must be given to meeting the needs of central Southend residents – new and existing housing in this area means open space is needed for formal and informal recreation, which needs to be incorporated into new development;</li> <li>▪ The AAP will need to quantify the leisure floorspace needs as well as identifying type;</li> <li>▪ Maintaining a range of hotels to cater for diverse needs in an important part of</li> </ul>	<p>Noted.</p> <ul style="list-style-type: none"> <li>• <b>Policy PR1</b> sets out the Council’s commitment to implementing a rolling programme of high quality new and enhanced open spaces in the central area, in order to enhance the quality of the environment and provide positive biodiversity benefits. Through</li> </ul>

<p>delivering sustainable tourism in Southend, the potential for new hotels / conference centres could therefore also be included within area specific proposals.</p>	<p>Policy PR1 the Council will require all open spaces within the central area to be integrated within a wider green grid network.</p> <ul style="list-style-type: none"> <li>• It is not the purpose of the SCAAP to quantify leisure floorspace needs or type. Applications for leisure development will be considered on a site per site basis, in line with the policies contained within the Development Management DPD and the site specific policies of the SCAAP.</li> <li>• The DM DPD provides a framework for proposals for new visitor accommodation in the Borough, addressing the findings of the Southend-on-Sea Local Economic Assessment 2010, and Southend-on-Sea Hotel Futures Report 2010 which highlights the need to prioritise hotel development within the Southend Central Area and close to the Seafront (together with potential in and at London Southend Airport).</li> </ul>
<p>Sustainable Construction.</p> <ul style="list-style-type: none"> <li>▪ The large amount of redevelopment proposed through the AAP will require a significant use of natural resources. To reduce these impacts it's essential the new development is designed to reduce it overall natural resource demands;</li> <li>▪ Potential to deliver some of the energy needs from local, low carbon sources, including community heat and power schemes which may be suitable as part of larger redevelopment areas, such as university campuses or new office redevelopments;</li> <li>▪ Wind and tidal energy should be considered as viable options for meeting energy needs of the central area;</li> <li>▪ New buildings and refurbishments must incorporate water efficiency measures, including reuse of rainwater or greywater;</li> <li>▪ Consideration could be given in the AAP to how proposals for specific Quarters and Key Sites could further reduce resource use, going beyond existing policy requirements.</li> </ul>	<p>Noted. This has been taken forward by Policy DM2 of the Development Management DPD which sets the development management framework for the Borough as a whole. Development within the central area must have regard for the policy requirements set out within the DM DPD.</p>

<p>The Natural Environment.</p> <ul style="list-style-type: none"> <li>▪ The AAP does not cover matters relating to the protection and enhancement of the natural environment – it is essential that natural resource assets are addressed, including the protection of internationally designated nature conservation sites, water quality and trees and planting;</li> <li>▪ New development must not adversely impact on the internationally designated nature conservation sites, evidence needs to be in place to demonstrate this has been addressed. A Habitats Regulations screening assessment will be needed to show how impacts on biodiversity have been taken into account;</li> <li>▪ Site specific proposals for the Quarters and Key Sites should set out how nature conservation will be integrated into development;</li> <li>▪ The town centre currently has poor provision of public open space, with the exception of the seafront, the AAP could include proposals to improve the quality of existing areas. The existing green space of Warrior Square could also be enhanced and its role for biodiversity and informal recreation space improved.</li> </ul>	<p>Noted.</p> <ul style="list-style-type: none"> <li>• A Screening Report (SR) has been undertaken that considers the need for an Appropriate Assessment (AA) known for the purpose of the SR as a HRA, in compliance with the EU Habitats Directive, as part of Southend’s Local Development Framework. The HRA screening exercise considers whether the approach to a plan or project is likely to have a significant effect on the conservation objectives of a European site.</li> <li>• <b>Policy PR1</b> sets out the Council’s commitment to implementing a rolling programme of high quality new and enhanced open spaces in the central area, in order to enhance the quality of the environment and provide positive biodiversity benefits. Through Policy PR1 the Council will require all open spaces within the central area to be integrated within a wider green grid network.</li> <li>• Warrior Square Gardens have been the subject of a £1.5m regeneration project including new landscaping and the construction of a new café. Policies <b>DP5</b> and <b>PS5a</b> of the SCAAP provide a police framework for the future development of Warrior Square and Warrior Square car park proposal site.</li> </ul>
<p><b>SA of Development Management Policies</b></p>	
<p>Avoid repetition or conflict with the Core Strategy Policy by making the AAP policies location or development type specific.</p>	<p>Noted.</p>
<p>Including DM policies for the SCAPP in advance of the preparation of the DM DPD will ensure the delivery of more sustainable development in the short term. Once the DMD DPD is prepared there may need to be a review of policy to remove duplication / conflict.</p>	<p>The DM DPD has been produced prior to the SCAAP and as such contains specific policies to guide sustainable development within the Borough.</p>



<p>Policies on specific criteria for delivery of larger development sites should be included within the AAP. This could include specific targets for affordable housing provision, specific design criteria, sustainable construction principles and / or low carbon energy.</p>	<ul style="list-style-type: none"> <li>• Site specific policies have been included within the SCAAP, providing development objectives for the proposal sites identified within the SCAAP.</li> <li>• Policy DM2 of the Development Management DPD provides the policy framework for the Borough as a whole, laying the foundations for low carbon development and the efficient use of resources.</li> </ul>
<p>Resource Use and Carbon Emissions Policy:</p> <ul style="list-style-type: none"> <li>▪ Setting a blanket policy for refurbishment over renewal is unlikely to be the most sustainable choice. Subject to suitable sustainable construction and environmental protection policies being in place, redeveloped buildings have the potential to offer better resource efficiency in their operation, which could be difficult to achieve in refurbishment;</li> <li>▪ To ensure sustainability benefits, it will be necessary to make sure demolition materials are re-used, preferably on site;</li> <li>▪ The decision to refurbish should be made on a site by site basis to ensure the buildings existing contribution to the character of the town centre is considered;</li> <li>▪ Larger sites could present greater opportunities for sustainable construction, and setting carbon reduction or sustainable construction targets above national targets has the potential to deliver sustainability benefits for the wider Borough (but this will require an evidence base to prove it will be financially viable and not stall the delivery of development).</li> <li>▪ A scheme for district energy could be established for central Southend.</li> </ul>	<p>Noted. This has been taken forward by Policy DM2 of the Development Management DPD. Due to the lack of a robust evidence base on this issue, the Council has not been able to stipulate carbon reduction targets above national targets within policy DM2 of the DM DPD.</p>
<p>Transport and Traffic.</p> <ul style="list-style-type: none"> <li>▪ The AAP has a role to play in implementing transport and parking strategies for central Southend. The AAP can help to identify and secure funding for schemes (e.g. through developer contributions), and guide development to provide the necessary infrastructure for travel/transport improvements;</li> <li>▪ Reducing car parking spaces can help to achieve a shift from car use – but parking is only one part of achieving this and needs to be delivered in tandem with improvements to other types of transport provision (e.g. building new residential development in very accessible locations, building them car free so residents rely on car clubs);</li> <li>▪ Car parking management for all town centre parking should be used to help make bus</li> </ul>	<p>Noted.</p> <ul style="list-style-type: none"> <li>• Parking issues have been addressed within LTP3 (strategy period of 15 years from 2011) which has been used to inform the transport and access strategy for the central area within the SCAAP (<b>Policies TA1-TA5</b>).</li> <li>• <b>Policy TA4</b> sets out the Council’s approach to parking management within the town centre, which has been developed in line with the priorities set out within LTP3 and supporting documents. Large public</li> </ul>

<p>travel competitive, but delivered carefully to ensure pricing / availability of spaces does not push shoppers to other town centres/locations;</p> <ul style="list-style-type: none"> <li>▪ It will be important to ensure people commuting to the town centre for work do not drive, therefore new office/employment/commercial development should only have very limited employee parking.</li> </ul>	<p>car parks will be located to the edge of the town centre in order to intercept traffic on the approach to the town centre, with access routes being short and well signposted. Policy TA4 also provides the Council with a policy opportunity to progressively reduce and manage the availability of on-street parking alongside the improvement in bus frequency and punctuality.</p> <ul style="list-style-type: none"> <li>• All new development proposals within the central area must have regard for Policy DM16 of the Development Management DPD on vehicle parking standards and the provision of S106 contributions.</li> </ul>
<p>Biodiversity and the Green Grid.</p> <ul style="list-style-type: none"> <li>▪ There is a risk that intensification of uses in central Southend could be to the detriment of the quality of the natural environment, therefore policy options for promoting open space and ecological improvements in the area are strongly supported in terms of sustainable development.</li> </ul>	<p>Noted.</p> <ul style="list-style-type: none"> <li>• The AAP will need to be in conformity with the Core Strategy DPD and as such the environmental and urban renaissance policy context is established.</li> <li>• <b>Policy PR1</b> sets out the Council's commitment to implementing a rolling programme of high quality new and enhanced open spaces in the central area, in order to enhance the quality of the environment and provide positive biodiversity benefits. Through Policy PR1 the Council will require all open spaces within the central area to be integrated within a wider green grid network.</li> </ul>
<p>Flood Risk.</p> <ul style="list-style-type: none"> <li>▪ Avoiding location vulnerable development in areas of flood risk is essential, and development will have to follow advice in PPS25, which should be sufficient to prevent/manage flooding in the area.</li> </ul>	<p>Noted.</p> <ul style="list-style-type: none"> <li>• <b>Policy IF3</b> of the SCAAP sets out the Council's requirements, through its role in determining planning applications, for requiring that FRA's accompany planning applications, for consideration by the Council as Lead Local Flood Authority, in areas of Local Flood Risk. All development should</li> </ul>

	<p>also have regard to surface drainage.</p> <ul style="list-style-type: none"> <li>• <b>Policy CS3</b> of the SCAAP provides a policy framework for ensuring all major development in Flood Zone 1 and all new development in Flood Zone 2 and 3 (3a and 3b) provide Flood Risk Assessments. Within Flood Zone 3b, functional floodplain, only water compatible uses and essential infrastructure (PPS25 Table D3) will be permitted, unless the site specific recommendations in the SFRA state otherwise. The policy outlines that within all areas of the central seafront area development proposals should include SUDS to reduce surface water run-off. This Policy is to be read in conjunction with <b>Southend Core Strategy Policy KP1</b> and <b>KP2</b> and <b>Development Management Policy DM6</b>.</li> </ul>
<b>Other Comments</b>	
<i>Content</i>	
<p>The Issues and Options AAP does not outline exactly what the AAP will contain. The AAP should contain allocation and policies for delivering development in the central area, and these will need to clearly set out what type of development will be expected in which locations in order to meet varying needs and to deliver the growth anticipated through the Core Strategy.</p>	<p>Noted. The AAP has been produced in conformity with the Core Strategy.</p>
<p>Development needs to be quantified in terms of floorspace needs – quantification is identified as an important part of preparing proposals for town centres to deliver sustainable economic growth, as set out within PPS4.</p>	<p>Noted.</p> <ul style="list-style-type: none"> <li>• This issue has been addressed by Policies DM10 and DM11 of the Development Management DPD, which was informed by key evidence base documents including the Retail Study, ELR, SHLAA and SHMA.</li> <li>• <b>Policy DS1</b> of the SCAAP contains a policy framework for the provision of 50,000m<sup>2</sup> of additional retail floorspace for comparison goods by</li> </ul>

	2021 with focus on delivery within the Proposal Sites identified within Policy DS1.
The AAP could contain specific design guidance to ensure new development is delivered as part of a comprehensive design vision for the town centre.	The Design and Townscape Guide SPD provides a comprehensive approach to the design quality expected from all development within the Borough. This has been progressed by Policy DM1 of the Development Management DPD which sets out the development management policies relating to design quality for the Borough.
<i>Implementation</i>	
The AAP has an essential role to play in showing how the multiple proposals and regeneration schemes for central Southend will be delivered and how they will be implemented.	Noted.
The AAP will need to provide details on the proposals, including who is responsible for delivery, partner organisations funding and timescales.	Noted.

SA / SEA: Town Centre Area Action Plan – Joint Scoping Report (2007) – Summary of Issues

Key Issue	Response
<b>Town Centre AAP</b>	
<i>Boundary Designations</i>	
There needs to be a clear definition of the boundaries of the Seafront and the Town Centre AAPs.	Noted. A preferred Boundary for the AAP will be tested through further consultation having regard to potential development pressures, comments made and the findings of the SHLAA and ELR (including 'Call for Sites') and Retail and Town Centre study.
A defined Central Business District boundary policy would allow for the control of uses within the town centre, enabling the protection of existing residential amenity in the Town Centre. Identifying 'Home Zones' could also be considered to benefit local communities as well as protecting health and safety.	Noted. The need for a 'town centre' boundary and its extent will be explored by examining the opportunity areas and their character, their functional relationship, and their contribution to meeting the requirements of PPS6. This will be informed by the Borough Council's Retail and Town Centre Study findings.
<i>Strategic Objectives</i>	
There is a need to establish a vision and objectives for the Town Centre to use as a tool in providing a common understanding of what is wanted from development in the area, considering objectives on issues such as the promotion of sustainable travel modes, making efficient use of land and enhancing the built environment.	Noted.
<i>Open / Green Space and Tree Planting</i>	
There is a need to incorporate new open / green space into the Town Centre to improve the quality of the area and aid the adaptation to climate change, as well as supporting the Thames Gateway and South Essex Green Grid Strategy. There should	Noted. It is intended that this will be covered by the DM DPD together with a public realm strategy within the AAP to address these issues.

<p>be a clear vision for these areas which defines their purpose to ensure they are properly designed and used.</p>	
<p>There is a lack of tree planting in the central area - tree planting (species that are drought resistant and able to cope with high summer temperatures) in new development should be encouraged to help cool urban areas through shading and heat absorption.</p>	<p>Noted. This is addressed within the Core Strategy, Policy CP4: The Environment and Urban Renaissance, and Saved BLP Policy C14: Trees, Planted Areas and Landscaping. The Design and Townscape Guide SPD1 builds upon this policy, outlining the Council's aspirations for development within the Borough, with specific regard paid to the importance of tree planting. This could be brought forward through the AAP within a Public Realm Strategy.</p>
<i>Retail</i>	
<p>Retail development needs to be prioritised in appropriate areas to restrict uses that would detract from the character of these areas. Ensure that retail use is the major use in the prime shopping frontages may help to achieve this, restricting change of use to banks and building societies and controlling restaurants and cafes.</p>	<p>Noted. The need to create and maintain a functioning retail circuit within the town centre will be explored further as part of the overall consideration of a spatial development strategy and the opportunities of the identified Character Areas. Their role and interrelationships will be explored with consideration given to strategic land use needs and the findings of the SHLAA, ELR, and Retail and Town Centre Study.</p>
<p>For secondary frontages it may be suitable to maintain a more relaxed approach to the control of banks and building societies, restaurants and cafes. Although maintaining or enhancing restrictions on control of drinking establishments and hot food takeaways may be suitable to ensure issues of noise, litter and antisocial behaviour are mediated.</p>	
<i>Leisure and Cultural Facilities</i>	
<p>The AAP needs to support an improved night time economy, in combination with Seafront uses, to enhance the character of the Town Centre into the evening and provide economic opportunities. It is important to ensure these uses do not harm residential amenity however.</p>	<p>Noted. PPS6 encourages a wide range of uses appropriate to a town centre location. Leading and supporting land uses appropriate to the opportunities within the character areas will be taken forward as the AAP is progressed and will</p>

	have regard to the functional relationship between each quarter and objectives for the central area.
Improving cultural facilities will have benefits for residents and in terms of attracting visitors. Accessible locations in the Town Centre near existing attractions may be most suitable for achieving benefits both groups. This type of development may be suitable at the Market Place.	Noted. This will be explored by the DM DPD and further refined as the AAP is progressed.
There needs to be growth and support of the University campus to provide accessible education to residents.	Noted. This will be explored by the DM DPD and further refined as the AAP is progressed.
The Character Zones that have naturally grown up within the Town Centre through clusters of similar uses should be retained as they contribute to the mix of uses within the Town Centre and preserve particular characteristics of each area, avoiding conflict of use. Allowing a degree of flexibility in such Zones will allow adaptation to the changing needs of the Town Centre.	Noted. The Character Areas and surrounding neighbourhoods provide a robust basis for taking forward a spatial development strategy in the SCAAP. Strategic sites opportunities will be identified and their role and interrelationships will be explored further having regard to strategic land use needs. This will be informed by the findings of the SHLAA, ELR, Retail Study, Borough Wide Character Study within the context of a preferred spatial development strategy for the AAP.
<i>Employment Land</i>	
Protect major employment sites within the Town Centre, including the protection of industrial land, to support the continued economic sustainability of Southend. There is a limited supply elsewhere in the Borough and pressure from alternative uses. The presumption should remain on retaining employment land and only releasing it for uses that would benefit the wider community.	Noted. The Core Strategy DPD Policy KP1 and CP1 set out the spatial distribution, type and scale of regeneration and employment growth in the Borough. These policies depend on maximising the contribution of existing employment sites whilst recognising the opportunities for change that can be delivered through AAPs for the key growth and regeneration areas. The functional value of existing employment land and premises and opportunities

	for new employment development within the town centre will be explored in the next stage of the AAP preparation having regard to the need for a spatial development strategy which meets the strategic land use requirements in the central area, the findings of the SHLAA/ELR and Retail and Town Centre study and comments received.
<i>Residential Development</i>	
New housing development in the Town Centre should make efficient use of land - mixed use development could be appropriate in very central locations.	Noted. This will be informed by the SHMA and developed further within the DM DPD.
It may be appropriate to remove any existing policy that protects family homes and restricts flatted developments within the town centre. There is a proven need in the Town Centre for smaller one and two bed units. Increasing housing density through sub-division and flatted developments would help to achieve sustainability benefits relating to reduced car use, and would result in the more efficient use of land.	Noted. This will be informed by the SHMA and developed further within the DM DPD.
Protection should be given to existing residential properties to ensure housing in the area is relatively affordable and to meet housing needs.	Noted. This will be informed by the SHMA and developed further within the DM DPD.
<i>Transport and Movement Routes</i>	
Retain routes and sites already identified to provide high quality public transport to and from the Town Centre. Use the AAP to reduce car travel to the Town Centre for all uses through the provision of new facilities and a joined up approach to public transport provision.	Noted. Highway issues will be taken forward having regard to the Southend LTP particularly where there are interrelationships between the Town Centre, Seafront and wider borough.
Park and ride facilities could form part of this, but it is preferential from a sustainability perspective to ensure people make their entire trip by public transport. If developed, they should integrate well with existing public transport routes to maximise their benefits.	Potential for Park and Ride Facilities will be explored as part of the LTP. Parking issues will be explored further in conjunction with the preparation of the LTP, utilising the borough wide transport model and the more
There is a need to rationalise and reorganise off street car parking within the Town	



Centre to enhance the environment and release land for other uses. There should be no net increase.	detailed visualisation model for the town centre. This will be progressed within the AAP. The Southend LTP will address cycling and walking as part of its broader integrated transportation strategy.
Lack of linkages between transport modes - it will be important to ensure different transport modes are interlinked to encourage greater use in preference of the car.	
Undertake a periodic review of residents parking schemes to limit on street parking for commuters in residential neighbourhoods.	
The AAP should maintain the road hierarchy established in the LTP to allow for the free flow of traffic and inclusions of priority bus routes.	
Cycling and Walking movement routes and connections through the Town Centre are vital to encourage alternatives to car use. The AAP needs to put an emphasis on this. Any schemes should be linked to the Seafront AAP.	
<i>Design</i>	
AAP policies should be restricted to those that add site specific detail to design and protection principles, and should avoid repetition with other DPDs, criteria based policies and the Design and Townscape Guide SPD.	Noted.
Are all designations, such as frontages of townscape merit, still relevant? Any area locally designated for historical importance should be reviewed before inclusion within the AAP to ensure it is still worthy of conservation.	Noted. This will be developed as part of the AAP through the production of a Heritage Assessment and Environmental Quality and Public Realm Strategy, which will address these issues.
Tall Buildings - a specific tall building policy may not be necessary, instead each application could be determined on its own merits in the context of the design policy and principles of the LDF.	Noted. The issue of tall buildings is addressed by the Design and Townscape Guide SPD, and will be further developed within the DM DPD, and will be explored by key evidence base documents including the proposed Borough Wide Character Study.