

consultation statement march 2011

southend on sea borough council
local development framework



delivering regeneration and growth

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Section 1: Introduction

- 1.1 The Development Management Development Policy Document (DPD) 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 Development Management Proposed Submission document.
- 1.2 The Development Management DPD 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.
- 1.3 The following sections address the requirements of Regulation 27 and also set out how the Development Management 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.

Section 2: Defining Issues and Options – early preparation

LDF Consultations

2.1 The preparation of the Development Management 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 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 major industrial site allocations;
- 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.

Background Studies

2.3 The Development Management 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 Assessment for the Development Management Policies DPD: Scoping Report

2.4 In May 2010, English Heritage, Natural England, and the Environment Agency were invited to comment on the environmental issues in Southend-on-Sea and how they might be affected by matters dealt within the Development Management DPD. At this stage, only English Heritage provided comments. These comments are summarised below.

Summary of English Heritage Comments (Dated 28th June 2010)

The baseline for the historic environment should be reviewed to take account of up-to-date information and data for the historic environment and the new national policy advice contained in PPS5 *Planning for the Historic Environment*.

English Heritage has published guidance on the preparation of SEA/SA reports and this is available on the Historic Environment Local Management (HELM) website. This contains a number of suggestions regarding data sources for baseline information.

In the context of this DPD it would be helpful to assess trends in the quality of development in conservation areas, and whether the Borough's archaeological resource is under threat. A Historic Area Assessment would be helpful to ensure that undesignated and designated heritage assets are properly valued.

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.

Section 3: Regulation 25: Development Management Issues and Options Consultation (21st June 2010 to 9th August 2010)

Summary

- 3.1 The Development Management Issues and Options consultation was held at the same time as the Central Southend Area Action Plan, which also raised a number of development management issues.
- 3.2 Both consultations were open for an 8-week period between 21st June 2010 and 9th August 2010. Both documents were accompanied by a sustainability appraisal that formed part of the consultation documentation.
- 3.3 The Development Management 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 Development Management 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 Development Management 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 Development Management 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 st June 2010 to all contacts on the LDF database to inform them that the Development Management 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 was printed and was made available on request.
	Letters and hard copies of the Development Management Issues and Options consultation document were sent to all of the Southend-on-Sea Borough Councillors on 21 st 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 Development Management Issues and Options consultation document with posters and leaflets were placed at all libraries and Council Offices on 21 st 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 st June 2010. Information was provided on how to obtain hard copies and/or view at deposit points.
	Leaflets produced providing advice on the on-

Method	Action Taken
	<p>line consultation system and left at deposit points/exhibitions.</p> <p>Information about consultation and Links to Borough Council's Web Page placed on SAVS and Renaissance Southend's Web sites on 14th July 2010 – this is to actively target more hard to reach groups.</p>
Publication of Newsletters and/or Leaflets as appropriate	<p>1,000 consultation leaflets were printed.</p> <p>Poster and Leaflets deposited at all Doctors Surgeries on 19th July 2010 in order to potentially target some of the harder to reach groups.</p>
Press Release + newspaper notice	<p>Press Release to local papers issued printed on Friday 2nd July 2010 and Friday 16th July 2010.</p> <p>Advert about public consultation and information about drop in exhibition event in Town Centre (see below) placed in local press on Wednesday 14th July 2010, Thursday 15th July and Friday 16th July 2010. Also advert placed in free weekly paper 14th July 2010 [Evening Echo Essex Enquirer and Southend Standard].</p>
Area Forums/Workshops/exhibitions	<p>Drop in exhibition Victoria Plaza and The Royals Shopping Centres on 17th and 18th July 2010 to target Residents and Visitors to the Town Centre.</p> <p>Permanent Exhibition and Leaflets in Central Library from 19th July to 9th August 2010 to target Residents and Visitors to the Town Centre.</p> <p>Informed the regular breakfast meeting of Planning and Developers Forum held on 24th June 2010 about the Development Management consultation to target the development industry.</p>
Community Groups	<p>Letter sent on 21st June 2010 to all on LDF database to inform that the Development Management Issues and Options consultation document is published for consultation – includes comprehensive coverage of resident / tenants / community associations and societies across the Borough.</p> <p>Information about consultation and links to Borough Council's Web Page placed on SAVS</p>

Method	Action Taken
	and Renaissance Southend's websites on 14 th July 2010.
Councillors	Local Development Framework Working Party briefed about consultation on the Development Management Issues and Options consultation document on the 24 th June 2010. Councillor Drop-in sessions 15 th 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 (www.southend.gov.uk) 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 Consultee Comments

3.8 In general, there was a high level of support for the Development Management Issues and Options consultation document. Approximately 28% of the comments received were in support of the content and suggested options in the Development Management Issues and Options consultation document, whilst only approximately 11.5% objected to the content within the consultation document. Approximately 60% of the comments received were of a general nature. In some instances, these comments put forward ways in which the suggested options within the Development Management Issues and Options consultation document could be improved.

Table 2: Consultation Summary

	Respondents	Objectors	Total Representations	Support	Object	General Comments
Development Management Issues and Options	27	5 (18.5%)	301	84 (28%)	35 (11.5%)	182 (60.5%)

3.9 The following tables provide a summary of the responses made to the Development Management Issues and Options Consultation. The Council's detailed response to each representation received is contained in Appendix 4.

Summary of Comments Received

General Comments (Questions 1-4)

14 representations received - 3 in support, 4 objections and 7 general comments

Generic Comments Received
The DPD missed was the need to plan for the different types of people who use Southend i.e. Residents, Visitors and Workers.
Many new crossing points have been created where traffic will compete for road space and parking.
The currently adopted 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 moving in the opposite direction at the same time.
The emphasis on a positive and proactive approach in pursuit of achieving better development outcomes through the whole Development Management process is welcomed.
The Council should embrace localism as it provides an opportunity for the Council to enhance the quality of life of its residents, enhance the individuality and unique character of Southend and provides the optimum framework to deliver on the long-standing objectives of the Council to deliver improvements to the strategic transport infrastructure network.
The potential of Southend cannot be fully realised without extensive new highway and public transport infrastructure.
An urban extension to Southend is needed to enable the delivery of the strategic transport infrastructure network.
Garon Park could be served by a new link road and associated development could be designed around an expanded park that would form the focus of growth and provide a green lung for both Southend and Rochford.
The Council has not indicated whether it will review its Core Strategy in light of the RSS abolition and PPS3 revision.
Southend should absorb the housing shortfall of neighbouring authorities.
Council should change its housing strategy to maintain a five and fifteen year supply of housing sites.
The current market demand in Southend is now predominantly for family sized homes.
There are housing delivery issues associated with high density urban development on complex brownfield sites.
Draft document contains many broad brush policies that need "tightening up".

No mention of life long learning.
Housing and employment numbers need to be reviewed.
Lower Thames Rowing Club and SMAC scheme could provide physical, recreational and educational facilities at Two Tree Island.
No mention of a park and ride at Leigh Station that serves East Beach park and the Seafront.
Development management issues needs an overall embrace of "Sustainability".
The pre-application discussions text should be drafted as a policy.
The criteria in DM26 should be explicitly used to justify site allocations in the CAAP and other location specific allocations in the DMDPD. Sustainable transport management issues should also be required to be addressed in development proposals.
Support for many of the suggested options but consider that the overall approach is too rigid as most policies will not able to respond either to changing market or to site-specific circumstances.
More consideration should be given towards the current residents and the parts of their lifestyle which will be changed by the proposed plans, such as loss of sea views and how they should be compensated for the loss of amenities.
A telecommunications policy is needed.
Need to take account of PPS5 and ensure that there is evidence about the historic environment and heritage assets in the Southend-on-Sea. Recommend that heritage at risk, including grade II buildings at risk, should form part of the LDF monitoring framework.
Only the very minimum has been done to 'tick the box' in terms of preparing an evidence base. Supporting studies have not been completed.
Need for a study to investigate potential link from a new Victoria station layout with a cheap transport system ie Tram or Land train to the seafront near pier and to Kursaal via central station.
Study needed to look at possibly opening the High street for cars after 5pm.
Design and townscape section does not go far enough with regard to storage and use of rainwater, and reduction of overflows into main system.
Great improvements can be made to freeing streets of traffic if sensible amounts of parking are made available at all new development.
Members, not just the chair, need to be involved in pre-application discussion.

Issue DM1 - Design of Developments (Questions 5-7)

22 representations received - 5 in support, 1 objection and 16 general comments

Summary of Comments Received

Paragraph 3 should be amended to read: 'Ensuring that the requirements of sustainable development are fully reflected in the design and layout to give priority to the needs of pedestrians (including disabled people and those with restricted mobility), cyclists and access to public transport'.

Paragraph 8 should give a clearer commitment to raising design quality standards and ensure the Design & Access Statements are prepared early enough on major schemes to inform the decision making process rather than justify what has already been decided.
The optimisation of the use of land and flexible design policies are required to ensure that areas which are in need of regeneration can be viably developed.
The Council is constrained in meeting the design objectives because they have incorporated the plans devised by Renaissance Southend Ltd.
Until the economy turns around the Council should concentrate on small developments that will improve the lifestyle of Southend Residents, Workers and Visitors.
Quality design and townscape can be achieved without demanding high quality materials in all circumstances. It may be appropriate to use materials that meet other planning and sustainability objectives i.e. locally sourced materials.
Some designs need to be in keeping with the traditional characteristics of the town.
Need to consider siting of developments with regard to solar gain as part of policy.
Flood risk is not included.

Issue DM2 – Tall Buildings (Questions 8-11)

19 representations received - 5 in support, 2 objections and 12 general comments

Summary of Comments Received
Tall buildings are not generally supported.
The Urban Place Supplement to the Essex Design Guide provides some useful advice on the approach to urban design principles that would be appropriate to Southend.
It would be inappropriate to include a level of detail in respect to defined buildings heights.
The suggested option appears a little vague and may need to be tightened up to avoid unintentional loopholes; eg. 'relate well', 'a point of visual significance'.
Use of the 'highest standards of architecture' could conspire to justify a tall building in an inappropriate suburban or remote setting.
Tall buildings should be defined as three storeys.
Suggested option is inflexible and does not allow for tall (or large) buildings to come forward in changing circumstances over the life of the plan.
The policy should allow for tall buildings to come forward on other sites, provided they meet the policy criteria.
Although the policy is entitled "Tall Buildings" the detail in points (i)-(vi) relate to both tall and large building. This may result in criteria being used to assess tall rather than large buildings.
Reference to "scale and character to surrounding buildings" is not appropriate for tall buildings. Tall buildings are different (stand out) from their surroundings or prevailing townscape scale. Therefore they are unlikely to relate to the scale of the surrounding.
The policy should not reference local regeneration.
Tall buildings which conform to the design suggestions will become landmarks and can

enhance the environment.
There is no need to put tall buildings directly on the seafront.
Tall buildings need to be seen in relation to other tall buildings and especially from the Estuary.

Issue DM3 – Intensification of Existing Residential Sites and Areas (Questions 12-15)

13 representations received - 4 in support, 2 objections (includes 2 objections to the alternative approach) and 7 general comments

Summary of Comments Received
Support for the suggested option.
'Parking stress' and 'over concentration' needs to be defined.
Most conversions are unlikely to meet the Lifetime Homes Standard.
Policy needs to be subject to wholesale review in light of the changes to the classification of garden land as Greenfield development in the amendment to PPS3.
The issue of parking should be looked at on a case by case basis.
Particular care needs to be taken in historic areas.
There should not be a numerical benchmark that prevents conversions of existing dwellings under a certain internal size. This should be considered on a site by site basis.
No mention of conversion of Flats into Flats, this will not matter if Homes for Life provides adequate standards of space internally.
There could be an increase in flood risk if intensification of existing residential sites and areas in flood zones is considered.

Issue DM4 – Low Carbon Development and Efficient Use of Resources (Questions 16-21)

34 representations received - 6 in support, 2 in support of the alternative approach, 2 objections, 1 objection to the alternative approach and 23 general comments

Summary of Comments Received
General support for this policy and the principle of increasing energy efficiency and seeking on-site renewable energy.
CSH and BREEAM may pose severe challenges to public and private sector projects in the short/medium term on grounds of both cost and viability. Exceptions should be allowed.
Perceived bias towards the reduction of energy rather than carbon reduction methods.
Leaving the policy to rely on national policy and building regulations alone will mean that development is open to challenge in the areas of carbon and energy reduction.
Government's approach is all that is needed.
Zero carbon developments should not be implement ahead of Government's 2016 target as too challenging for the development industry.

All Councils are supposed to put into their development plans sites that are suitable for renewable energy. The most suitable site we have is between the Pier & Shoebury Boom along the low water mark.
The Thames Gateway is an Eco Region and should lead the way in resource efficiency and climate change mitigation.
The Council's approach needs to be flexible enough to respond to changes in emerging / adopted Government policy.
Support for zero carbon development ahead of Government changes to the Building Regulations in 2016.
The council should encourage the improvements in building refurbishments.
There should be a Borough-wide low carbon standard.
Decentralised energy comes with costly infrastructure which can be a negative barrier for inclusion within developments.
The Council should carry out a resource assessment of the region and identify areas where decentralised energy can be best introduced.
Development should use the lowest carbon energy production technologies.
Development should be assessed to examine whether community scale systems for energy, heating and cooling would be more efficient than relying on centralised supply or micro-generation.
It is possible that power may be most efficiently produced from a centralised location.
Waste that cannot be recycled or reused should be used for energy recovery.
Absence of any information on how and where the Council would seek to facilitate the delivery of decentralised energy networks within specified areas.
The policy options do not adequately address the issue of climate change.
In order to have a valuable effect on sustainable energy policies, a multifaceted approach should be promoted.
A 25% reduction in carbon emissions should be incorporated into development proposals.
Siting of development for maximum solar gain should go in to policy.
Flexibility is required to take account of viability, feasibility and suitability. The policy should not be framed in such a way that will place an undue burden on developers.
The Water Cycle Study might highlight areas where increased water efficiency is required.
Water efficiency measures add a minimal cost to development but can achieve significant results. All developments should aspire to incorporate community water harvesting and reuse systems, which are needed to achieve water use of less than 95l/head/day.
A strategy should be produced that identifies the means of reducing carbon dioxide emissions from direct and indirect sources.
The policy may need to consider carbon use in the construction supply chain, including reuse of construction materials on- and off-site.

Issue DM5 – Southend-on-Sea’s Historic Environment (Questions 23-25)

12 representations received - 2 in support, 1 objection, 1 objection to the alternative approach, 8 general comments

Summary of Comments Received

The suggested policy was generally supported.

Care needs to be taken to ensure the preservation and enhancement of historic areas.

Use of local listing and stringent policies of control is advocated and that attention should also be paid to areas outside historic areas which may impact on them.

The unique design of the houses with balconies should be in a conservation area and subject to preservation.

In Southend the heritage assets require further assessment and appropriate protection and enhancement to ensure that they make a strong contribution in future to local townscape character.

Other issues to consider include: issues relating to coastal erosion, underwater archaeology.

Issue DM6 – Alterations and Additions to Existing Buildings (Questions 26-28)

9 representations received - 3 in support, 0 objections and 6 general comments

Summary of Comments Received

Care needs to be taken when considering alterations and additions in conservation areas.

Exceptions should be made where alterations and extension seek to improve carbon efficiencies.

Alterations and additions to theatre buildings requires complex consideration.

Issue DM7 – Flood Risk and Water Management (Questions 29-32)

13 representations received - 2 in support, in support of the alternative approach, 1 objection and 9 general comments

Summary of Comments Received

A more imaginative approach to flood risk and water management is required.

If there is a major flood, damaged property in low lying areas should not be put back to the same use but the whole area assessed and possibly alternative uses found, such as a yacht basin.

When planning permission is being sought for the development of a property, a separate risk assessment should not be necessary if there is already one for the same post code.

Development proposals in high risk areas should always be accompanied by a flood risk assessment.

The policy needs to take account of Flood and Water Management Act 2010 in terms of SUDS.

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There seems to be a conflict with the Environment Agency flood risk policy.
Council needs to be mindful of the safety of any residents.
New development can provide opportunities for the incorporation of innovative flood defences into the design of the development.
The policy needs 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.

Issue DM8 – Seafront Public Realm and Open Space (Questions 33-36)

21 representations received - 4 in support, 1 in support of the alternative approach, 1 objections, 3 objections to the alternative approach and 12 general comments

Summary of Comments Received
General support of the principle of Seafront Public Realm Policy.
There should be a clear link to the Greenspace and Green Grid Strategy SPD.
Attention should be paid to the historic areas of the Borough to ensure that the public realm sets a good example.
Policy makes reference to high quality design standards which the Council has failed to achieve in recent years.
The Pier and the Kursal Roundabout should be made into an underground road.
Object to alternative options. Seafront needs a policy.
Undercliff - expect good quality design in new development, renovation schemes, streets and urban spaces whilst safeguarding and enhancing local character.
Latest DPD will need to be carefully co-ordinated with the Design and Townscape Guide.
Questions are raised over whether the continuation of general "nice idea policies" is a good idea.
A Seafront bus service link to tramway/land train from Victoria station to pier hill should be included.
Microclimate should be considered.

Issue DM9 – Seafront Character Zones (Questions 37-40)

13 representations received - 3 in support, 2 objections and 8 general comments

Summary of Comments Received
Support given for the retention of the openness and function of the Green Belt.
Policy needs to include reference to enhancing the biodiversity of the nature reserve.
The Sustrans proposals should not detrimentally affect the historic areas such as Leigh Old Town.
The Green Belt in the Two Tree Island Zone is very important and should be maintained.
The Old Town must be maintained as a marine village.
Cliffs below Cliff Parade - This area is not mentioned, but is popular for picnics and visitors to the seafront.

Semi stepped bridge should be made into a smooth ramp so that push chairs and buggies and electric buggies can use it.
Whilst it may be appropriate to define Seaside Character Areas to plan for their future, the current approach is prescriptive and in any event, premature.
Leigh Marshes needs to be changed from Green Belt to a recreation area or public green space.
Need for a park & ride.
Need for more parking for commuters.
Potential for a boat club or café or facilities for camping at Leigh Creek.
Leigh Marsh should not have been included in Green Belt.
Need for a safe pedestrian route from the Leigh Marsh car park into Old Leigh.
Need to extend activities for youth, extend the present skateboard park and put in a refreshment area.
Area North of the golf driving range could accommodate five touring caravans.
There is a wide and diverse range of marine plants that grow alongside the cinder path.

Issue DM10 – Water Recreation (Questions 41-43)

7 representations received - 1 in support, 0 objections and 6 general comments

Summary of Comments Received

Water recreation proposals should be considered on their merits.
Reference to the nationally designated off-shore conservation areas is required.
Water Recreation does not include any reference to the importance of biodiversity interests and, in particular, to issues of loss of inter-tidal habitats and the risk of increased disturbance to birds.

DM11 – Dwelling Mix (Questions 44-46)

15 representations received - 3 in support, 1 in support of the alternative approach, 1 objections, 2 objections to the alternative approach and 8 general comments

Summary of Comments Received

Proposed approach needs to reflect the implications of deliverability difficulties associated with the proposed provision of high density flatted development.
Developers should bring forward proposals for market housing that reflects the profile of households requiring such accommodation. Family sized accommodation should be encouraged where appropriate and agreed at the pre-application stage.
The market should determine the housing mix.
Support for the proposed affordable housing mix and the flexible approach to market housing mix.
Support encouragement of family accommodation but add "where site conditions allow".
The proposed affordable housing mix should not be treated as a definitive mix but rather a

negotiated figure.
Alternative options not considered appropriate.
The Council should endeavour to raise the quality of the very poor condition of property offered for rent in the private sector.
Need to differentiate between housing and dwelling types i.e. Houses and Flats. Houses, 3/4/5 bedrooms. Flats, 1/2/3/4/5 bedrooms. Need to limit numbers of flats.
Bungalows should be avoided in areas of flood risk.
Justification of affordable dwelling mix should have regard to SHMA, specific site feasibility and viability, public funding, affordability criteria and potential for of-site provision.

Issue DM12 – Affordable Housing Tenure (Questions 47-49)

6 representations received - 1 in support, 2 objections and 3 general comments

Summary of Comments Received
Mix of tenure is essential in order to maintain or develop sustainable communities. There is now a wider range of affordable housing options including intermediate rent, rent to HomeBuy, HomeBuy and social rent.
The percentage of social housing differs between areas. The balance should be addressed where appropriate. Greater flexibility is required.
The Market should create the housing mix.
It is important to ensure a range of different types of housing within this category are provided.
The policy requirement for 70% of all affordable housing provision to be social rented on all sites is too high and inflexible.
Policy should refer to the need to take into account the findings of an affordable housing toolkit assessment, local conditions (including existing dwelling mix in the locality), levels of affordability, feasibility of delivery and specific site viability when determining the level of social rented housing within any particular development.
The alternative option is not appropriate.

Issue DM13 – Retention of Residential House Types (Questions 50-52)

6 representations received - 2 in support, 1 in support of the alternative approach, 2 objections and 1 general comment

Summary of Comments Received
Suggested option supported.
The market should determine the housing mix.
Strongly support the protection of bungalows and resistance to conversions.
The option is too inflexible.
The issues of housing need, condition of buildings and feasibility / viability of renovation,

energy efficiency and meeting life homes criteria should be considered in relation to retaining existing bungalows and small family dwellings.

Issue DM14 – Residential Space Standards (Questions 53-56)

9 representations received - 3 in support, 0 objections and 6 general comments

Summary of Comments Received

Support the proposals to ensure all new dwellings meet Lifetime Homes Standards and mirror space standards as set out by HCA ensuring equality of choice for those entering market and affordable housing.

Very poor quality homes in some parts of Kursaal with overcrowding.

Not clear whether the preferred option relates to new build, not just new dwellings.

Policy text should state 'high' quality and not 'highest' quality.

Internal environments should be appropriate for the occupants needs and aspirations.

The policy should not simply promote quantity over quality.

The Council should endeavour to raise the quality of the very poor condition of property offered for rent in the private sector.

The desire to create balanced and healthy neighbourhoods should be a consideration and that minimum space standards may not lead to this if applied without looking at the context.

Space standards will be balanced against other considerations in this plan including the need to create balanced communities and liveable neighbourhoods.

The suggested option for protecting single storey dwellings could be strengthened by an Article 4 direction.

The deletion of "deemed necessary" in the option would be appropriate.

It is doubtful whether further protection could be given to family accommodation as that is too broad a definition.

The desire to create balanced and healthy neighbourhoods should be a consideration and that minimum space standards may not lead to this if applied without looking at the context. Space standards should be balanced against other considerations in this plan including the need to create balanced communities and liveable neighbourhoods.

Issue DM15 – Student Accommodation Space Requirements (Questions 57-59)

5 representations received - 3 in support, 0 objections and 2 general comments

Summary of Comments Received

Agree with suggested option.

Some of the information is out of date and needs updating.

Issue DM16 – Houses in Multiple Occupation (Questions 60-64)

4 representations received - 3 supports, 0 objections and 1 general comment

Summary of Comments Received

Agree that there is an unfair distribution of houses in multiple occupation (HMOs).

Issue DM17 – Specialist Residential Accommodation (Questions 65-67)

3 representations received - 1 in support, 0 objections and 2 general comments

Summary of Comments Received

Groups such as mental health, learning disabilities etc should be included.

Should promote independence and support individuals to live in their own homes.

Southend is a very popular area for retirement which means that there can be costs associated for both health and social care which could explain the disproportionate costs to the Southend area.

The occupancy is generally made up of Southend residents and also residents from other parts of Essex.

Suggested approach supported.

Public buildings should always include accessible toilets for those more severely disabled in addition to standard disabled toilet facilities.

Issue DM18 – Network of Centres (Questions 68-70)

8 representations received - 3 in support, 1 in support of the alternative approach, 1 objection and 3 general comments

Summary of Comments Received

More sophisticated development control policy may be needed and may be required in the Southend Central AAP rather than Development Management DPD.

Support the approach for enhancing the town centre and also the inclusion of sui generis use in the town centre. Support the strategy to have a hierarchy of centres and focus retail development and other uses that attract a large number of people in Southend-on-Sea Town Centre and in District Centres.

Enhancement of the theatres will make a strong contribution to the character of the town and increase the experience of visiting the town as a tourist.

The options provided are based on a retail study completed in 2003. The overall level of future retail provision in the Borough and Town Centre has yet to be determined in the Retail Study.

Care should be taken to ensure the correct balance between shops and other uses and to avoid clustering of like uses.

Although the DM DPD policies are appropriate, more detailed guidance needs to be provided in the Southend Central AAP and other DPD documents and site-specific

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development / design briefs on the appropriate future type, scale and location of retail and other town centre uses.
Support the range of uses proposed in the hierarchy of centres, with some minor changes.
The policy does not link well to the other DMDPD policies including those of mixed use, sustainable development and those seeking centralised energy systems.

Issue DM19 – Shop Frontage Management (Questions 71-74)

9 representations received - 3 in support, 0 objections and 6 general comments

Summary of Comments Received
Support the policy to resist the loss of A1 retail uses in primary shopping frontages. The appropriate level on non-retail frontage should not be a borough-wide figure in the DMDPD.
The appropriate level of retail and non-retail uses in each of the identified primary and secondary shopping frontages should also be informed the Southend-on-Sea Retail Study
The primary and secondary frontages need to be identified on a map base in the Submission Southend Central AAP and other relevant LDDs.
The retail function of the various centres is to be encouraged and should not be jeopardised by excessive non-retail uses.
Whilst the need for A3 type uses is recognised these should be assimilated within the retail elements of the shopping frontages and not clustered.
A more sophisticated development control policy may be needed to implement the preferred policy for the High Street. This should be in the Southend Central AAP rather than Development Management DPD.
There are too many discount shops, no shoe shops and lack of higher end shops.
In Leigh there are concerns with primary shopping frontage area. This should be extended to include Broadway West.
The use of a percentage of the whole centre for non A1 uses could lead to clusters. This should be restricted to individual frontages.
There is a need to clearly define "Primary Shopping Zones" rather than shopping frontages.
Object to overall reduction to 70% Class A1 in the primary shopping frontage.
Primary Shopping Zones should be reviewed to see if the length and extent is appropriate.
The policy should also give special consideration to shopfronts in conservation areas.
Council may wish to consider more detailed shop frontage design guidance in the Development Management DPD or other LDDs

Issue DM20 – Employment Sectors (Questions 75-78)

7 representations received - 2 in support, 0 objection, 1 objection to the alternative approach and 4 general comments

Summary of Comments Received
Support for the suggested option and the identified employment sectors.
Policy should be further tested through the Local Economic Assessment.
Concern about the expansion of the airport and the perceived resulting traffic congestion on Leigh.
Many of the permissions for tourism and leisure development in Southend town centre have lapsed due to lack of operator interest. Further studies are required to ascertain the likely future level of demand for such tourism and leisure developments.
Suggested option contradicts the appropriate locations for a range of town centre uses contained in Table 2.
No site(s) have been identified in the Southend Central AAP for a Visitor Conference Centre. Alternative locations for Conference Facilities could include Southend Football Ground and / or at or near the airport.
The increasing trend towards self-employed working from home has not been considered. These may include space requirements and fast fibre-optic broadband connections etc.
The area referred to as 'North Fringe' needs to be defined.
The employment sector policies have been informed by supply led assessments, rather than informed growth-led strategies. Further analysis is required.

Issue DM21 – Industrial Estates and Employment Areas (Questions 79-81)

11 representations received - 2 in support, 0 objections, 1 objection to the alternative approach and 8 general comments

Summary of Comments Received
The suggested approach is broadly supported as it is consistent with the adopted Core Strategy and the Employment Land Review 2010.
Further clarification is required about the Council's aspirations of sites identified for "maintenance and supply of modern employment floorspace within a mixed use context".
It is understood that the Council accepts the need for some level of enabling development as part of a comprehensive redevelopment of the Prittle Brook Estate, but this has not been expressed clearly in this document.
Viability of redevelopment should be recognised as a key consideration for sites in need of regeneration.
An improvement in the quality of employment floorspace should be given greater weight.
As the employment density for modern business units is greater than with older stock and industrial uses, there will be an opportunity to use a substantial part of the site for the enabling residential development.

Progress Road should be a protected industrial estate.
Support is given to the approach as it only retains industrial estates and employment land which are in desirable locations or which meet other sustainability criteria.
Dispute over the findings of the Employment Land Review.
Objection to the allocation of Grainger Road as a location for the "maintenance and supply of modern employment floorspace". Grainger Road should be reclassified as one of the List 3 sites.
Further clarification is needed on the interaction between this policy and the requirements of DM22.
Shoebury Garrison does not present a suitable opportunity for employment use given its geographical location within the Borough and the poor transport links connecting the site to the rest of the Borough and beyond. There is no demand in this location. This site should be a housing site.
Need to address the needs of self-employed home workers, the provision of starter units for all types of business and workspace / units for Creative Industries.
Enabling development is not expressed clearly within the document. A residential led mixed use scheme at Prittle Brook Estate may be the most appropriate way forward for a comprehensive redevelopment to optimise the use of the site.

Issue DM22 – Employment Uses (Questions 82-84)

9 representations received - 3 in support, 1 objection and 5 general comments

Summary of Comments Received

The suggested policy was supported.

The suggested policy is considered to be overly prescriptive in requiring "at least equivalent" jobs to the existing floorspace. A flexible approach is required.

The redevelopment of old and unsuitable stock will attract investment to the area even if it is providing a lower amount of floorspace than the existing.

The suggested policy is not clearly worded and it is unclear whether the equivalence should be in the type of employment (sector and grade) or number of jobs measured as full time equivalents. Clarification is also required of whether this provision can be made on or off-site or via developer contribution.

The proposed approach should extend to the sites identified for protection and intervention to allow for their review during the life of the Plan to allow for their release where there is no demand for the sites / premises and/ or any prospect of redevelopment.

The requirement for a range of unit sizes provided in any employment proposals should be led by feasibility and viability criteria and if not for a named occupier, should be informed by a market demand assessment.

The approach and the preferred option has focussed on the "traditional" employment uses and areas, which are known to be in major and fundamental decline, The issue of addressing the changing requirements of the occupiers of these traditional types of premises and the needs of different and emerging employment sectors have not been

addressed. These sectors include those identified - cultural and creative industries, the "intellectual sector" including tertiary education and the service sector for the expanded retail and leisure offer in Southend.

Issue DM23 – Visitor Accommodation (Questions 85-88)

8 representations received - 2 in support, 2 objections and 4 general comments

Summary of Comments Received

It has been estimated that there are between 2.5 and 3 million people who live within an hours travel of Southend, because of this fact Southend will always be a day trip destination. No need for this policy.

Support for the suggested policy but with concerns regarding the airport expansion.

Support the approach to restrict out-of-town hotel development to secure new hotels in the town centre, on the Seafront and at the airport and the decision not to designate Hotel Development Zones.

Support the preferred approach, but all applications need to be considered on a site-by-site basis

Consideration should be given to the special location requirements of key sub-sectors such as boutique hotels and serviced apartments. The proposals for the provision of visitor accommodation (as well as those which include the loss of visitor accommodation) should be subject to a demand assessment and supported by viability and feasibility assessments.

Certain types of visitor accommodation may be best located around the key employment areas (including the university) and/or the station.

Southend has many economy bed and breakfast establishments. The Council should encourage this type of accommodation not try to change it.

Other issues to consider may include the type and seasonality of demand and how this is to be addressed in proposals for visitor accommodation; and the specialist needs of conference visitor accommodation.

Issue DM24 – Contaminated Land (Questions 89-91)

4 representations received - 3 in support, 0 objections and 1 general comments

Summary of Comments Received

This policy is generally supported.

The policy could be strengthened by recommending Global Remediation Strategies for certain sites.

If the development of an area is under one ownership and is to be undertaken over a number of years some thought should be given to assessment of the site from a global or strategic perspective and planning long-term sustainable remediation options where appropriate.

The Council may wish to state a policy preference for the type of land remediation - encapsulation, soil cleaning, off site disposal of contaminated soils for various end uses.

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Issue DM25 – Land Instability (Questions 92-94)

4 representations received - 2 in support, 0 objections and 2 general comments

Summary of Comments Received

Susceptible areas should be monitored for the cumulative effects of development.

This policy should make reference to the potential for palaeo-archaeological or environmental evidence to be discovered in areas where the cliffs are unstable.

DM26 – Sustainable Transport Management (Questions 95-97)

9 representations received - 3 in support, 1 objections and 5 general comments

Summary of Comments Received

The proposed approach fails to address the potential for improvements to the strategic transport infrastructure network that could be accommodated through growth in the north of the borough.

General support for the policy.

It is not apparent that the release and retention of the industrial sites under DM21 had due regard to these sustainable transport management objectives.

An aging population in Southend and district has caused many more electric mobility vehicles to use the roads and pavement. The Council should consider this when selecting paving for pedestrian use.

Park and Ride and Bus Lanes should be included.

Issue DM27 – Vehicle Parking Standards (Questions 98-100)

7 representations received - 0 in supports, 0 objections and 7 general comments

Summary of Comments Received

Consideration should be given to future residents and to the displacement of car parking from one area to another rather than simply new additional car parking.

Standards need to reflect demand and also local circumstances.

The policy should require applicants to be innovative about car parking.

Parking should not be an absolute figure and should be expressed as a maxima.

Support intention to distinguish between CSAAP area and rest of Borough.

May need to retain additional flexibility to respond to individual issues on major town centre sites and to take account of overall policy for town centre parking provision publicly available off street and on-street spaces.

Vehicle Parking Standards Table 4 excludes theatres. Consider 1 cycle stand per 40 seats and 1 parking space per 5 fixed seats.

There needs to be more parking facilities in the town centre.

The attempt to discourage private vehicle use has failed and is now inappropriate.

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Need to encourage sustainable traffic movements e.g. encourage bus use, park and ride, to increase rail use within the town and to provide adequate parking for residents.
Need to extend the cycle routes.
The vehicle parking standards need a complete revision to free up our roads for residents and visitors.
Need to review the size of parking areas allowed in front of houses that will accommodate small "Smart" cars.
Food store car parking should be maximised and balanced to ensure that foodstore facilities operate efficiently without adverse effects on the highway network. Car parks associated with food retail developments within or on the edge of centres can also provide short-term car parking facilities for shoppers and visitors to the centre which can serve the town or City centre as a whole.
Car clubs, and financial disincentives should be part of an acceptable solution.
The car park standards for schools causes significant problems when expanding primary schools. There are not any sites or money for new schools so it is necessary to expand existing schools. Parking standards will result in more car parking at the expense of school play area. A flexible policy is needed.

Section 4: Summary of the Sustainability Appraisal for the Development Management Issues and Options

4.1 The following paragraphs provide a summary of the Sustainability Appraisal comments made to each issue raised in the Development Management Issues and Options consultation document.

Issue DM1 - Design of Developments

The suggested preferred option provides a policy to help implement the 'Design and Townscape Guide' SPD as well as providing additional detail to Core Strategy policies CP4 and KP2. The policy should help deliver better design in development. A simple and clearer policy may be more appropriate. Seeking higher density development in the more accessible parts of the Borough will help in the efficient use of land.

Alternatives – Setting less stringent requirements for design is not suitable in seeking sustainable development. Setting minimum density standards in specific locations may help to deliver development that makes the best use of land.

Recommendations – The policy should be succinct. The 'Design and Townscape Design Guide' SPD can be used for detailed matters. Avoid ambiguous wording such as '*satisfactory*'.

Issue DM2 – Tall Buildings

This policy alongside those on the design of development should help make sure that tall buildings do not adversely impact on the Borough. There is the potential for unsuitable or poorly designed buildings to create an adverse impact that could have a detrimental legacy for the area. Using the AAPs to identify suitable sites will help make sure these buildings are in sustainable locations.

Alternatives – Strong control of the location of tall buildings is important.

Recommendations – Tall buildings in particular should involve early and extensive discussion with planning officers and involvement of third parties. For this type of large project a dedicated working group within the council may be necessary to secure good design. More emphasis should be given to the street level impact of these buildings. A definition of a 'tall building' should be given in the explanatory text or policy. The policy should state that these buildings would only be permitted at transport hubs and areas of already high footfall and that the identification of suitable sites will be through the AAPs.

Issue DM3 – Intensification of Existing Residential Sites and Areas

This policy should help in reducing the adverse impacts of intensification of development. The policy approach is compatible with sustainable development. There is the risk that this policy could be applied too strictly with adverse impacts on the delivery of homes to meet the housing needs of the Borough. This type of development can help reduce the need for development on greenfield sites.

Alternatives – The options presented are not strictly viable in terms of national and other policy sufficient being able to control the delivery of this type of development.

Recommendations - Removing the policy is unlikely to have an adverse impact on controlling the impacts of this type of development. Other policies cover similar issues. The criteria for all new homes to be of 'lifetime home standard' are likely to be overly restrictive.

Issue DM4 – Low Carbon Development and Efficient Use of Resources

The policy usefully sets out the range of criteria needed to ensure new development is built to reduce resource dependency and lower the overall increase in resource use that would result from new development. Where the policy proposes going above national targets for carbon reduction this needs to be supported by evidence, such as viability studies. In preference to seeking targets for 'on-site renewables' it may be preferable to seek targets for decentralised energy generation, which encompasses renewables but also other more carbon efficient energy generation. Similarly setting targets for carbon reduction and efficiencies may be preferable and easier to be implemented than energy reductions based on how building regulations are calculated. Development management policies should address issues associated with community heat and power schemes. For instance, new buildings should be designed to be able to connect to community power scheme if one were to become available.

Alternative – Relying only on national policy and building regulations to secure lower carbon development may deliver lower reductions than set out through this policy.

Recommendations - Plan makers should gather additional evidence on viability of achieving higher sustainable construction targets than set by national and regional policy. Targets should be expressed in terms of 'carbon' not 'energy'. Criteria should refer to decentralised energy generation. Criteria could be considered on connections to heat networks, in order to future-proof new buildings. The policy should focus on sustainable construction related to resources, and reference to flooding should be removed to avoid overlapping policies. A policy or criteria on proposed community based decentralised energy or heat networks could be included in the DPD. This could be in conjunction with proposals or identified sites in AAPs.

Issue DM5 – Southend-on-Sea’s Historic Environment

The policy criteria should help in the protection of nationally and locally important historic and archaeological heritage in Southend-on-Sea.

Alternatives –The policy could be more specific to the particular controls on locally important heritage features and other matters that are not addressed in national or regional policy.

Recommendations - The policy may need to differentiate between the level of protection given to locally important features compared to those of national importance. The policy could place greater emphasis on enhancing conservation areas. Criteria could be included to favour the redevelopment of sites in conservation areas that currently detract from their character.

Issue DM6 – Alterations and Additions to Existing Buildings

This policy is positive in terms of ensuring that new alterations and extensions to properties are in keeping with their current character. The policy criteria could include a clause that would look favourably on this type of development if it also served to enhance the character of existing buildings.

Alternatives – If criteria were included in the design policy on alterations and extensions this policy may be unnecessary.

Recommendations - To reduce length and repetition in the DPD this policy could be omitted.

Issue DM7 – Flood Risk and Water Management

The policy permits development in flood risk zones on the seafront. In Southend-on-Sea this is important as the seafront is a major development zone however allowing development in these locations does increase the risk of flooding. The policy proposes measures to deal with this risk. The policy requires that new development in flood risk zones is ‘resistant or resilient’ to flood. To minimise risks development should be ‘resistant and resilient’. It will also need to be part of general infrastructure such as drainage systems to allow water to drain away quickly following a flood.

Alternatives – The option of relying on the PPS25 sequential test would not reflect the particular characteristics of Southend-on-Sea hampering development opportunities. However, this option may be preferable in maximising safety in new development.

Recommendations - Development should be built to be resistant and resilient to flooding. The impact of sea defences on biodiversity could be recognised in the policy.

Issue DM8 – Seafront Public Realm and Open Space

This policy sets out principles for development on the seafront, not necessarily decision-making criteria. The policy is compatible with achieving sustainable development. It will be important to have a design brief(s) for the Seafront in place to specify the exact locations and measures that are needed to bring enhancements to each area.

Alternatives – Including this policy is likely to achieve better outcomes for the area than relying on the design policy alone.

Recommendations - Complete Design Brief(s) for the Seafront at the earliest opportunity as part of a unified urban design strategy for the area. Link this policy with the other policies relating to the Seafront

Issue DM9 – Seafront Character Zones

The AAP area has been divided into separate zones which highlight the particular characteristics and proposals in each area. The Core Strategy is specific about the quantity of development that is to be located in the Seafront. It is not clear from this policy how and where this development will be permitted to contribute to sustainable development in the area.

Alternatives - This policy helps to identify the issues of particular significance to the Seafront zones identified. The zones help the plan be specific about what types of development would be suitable in each area, therefore meeting need in each area.

Recommendations - Design Brief(s) should be prepared for the zones and the Seafront as a whole. This could include specific design guidance for each area. The policy could contain more detail about the location of new development on the Seafront. The policy should acknowledge the biodiversity importance of the Seafront and those locations where it needs to be protected. It should be made clear why the central Seafront and Shoeburyness are not included in the policy.

Issue DM10 – Water Recreation

The policy is quite permissive of new water recreation, subject to views being maintained and other peoples' access not being curtailed. However, the policy should recognise the potential impact of this use on the designated nature conservation sites and beach.

Alternatives – This policy specifically addresses water recreation and may be more effective in controlling this type of development and minimising impacts than relying on other policies relating to design and amenity.

Recommendations - The policy should recognise the potential for this type of development to have adverse impacts on biodiversity.

DM11 – Dwelling Mix

There may be a lack of family sized homes in Southend-on-Sea, although there are also a large number of single person households creating a demand for smaller homes. The policy seeks to ensure a mix of home sizes are provided. This policy should help deliver housing to meet the diverse needs of residents. However, in terms of maximising benefits it is not clear why the specific requirements are not extended to all housing (market and affordable). It could also be argued that setting this ratio of housing sizes is too blunt with different parts of the Borough characterised by very different housing types and needs and homes size will inevitably need to be adjusted in each location.

Alternatives – The sustainability appraisal would support the same targets being set for affordable and market housing. Option 2 states that the lack of control on the size of new homes has led to a proliferation of one and two-bedroom properties. Many of these properties will be market housing, further highlighting the need for the policy to set ratios for all housing types to meet the needs of residents of all incomes. Option 3 puts forward the option of not setting an housing mix for affordable homes. However, stating the ideal mix in policy provides a better starting point for negotiations on mix than having no target. Therefore, the suggested preferred option is most likely to be effective in delivering a mix, even if it is applied flexibly in some instances.

Recommendations - The policy should set the same standards for market and affordable homes to provide a mix of homes to meet all parts of the community. The policy will need to be implemented flexibly to reflect the location of the development and the characteristics of the area.

Issue DM12 – Affordable Housing Tenure

This policy proposes a 70:30 split social rented to intermediate housing. In Southend-on-Sea there is a lack of social rented housing, with private rental market making up the shortfall. The policy could set targets for a higher proportion of social rented housing. Intermediate housing is also important as it helps lower income households enter the housing market. This policy should help people in Southend-on-Sea meet their housing needs.

Alternative - Setting the split required as policy should help make sure sufficient housing is supplied as social rented. An option of a higher proportion of social rented housing could be considered.

Recommendations - Intermediate housing could be defined in supporting text to the policy. A higher proportion of social rented housing could help improve housing quality for renters.

Issue DM13 – Retention of Residential House Types

The principles of this policy relate well to sustainable development, such as providing homes that will meet the needs of the elderly and families. However, it may be difficult to justify this policy in some locations where single homes on larger plots could be replaced by multiple homes that would help meet housing needs in the Borough, making better use of available land. This policy may also be difficult to apply equitably across the area. Much may depend on its interpretation and definition of a 'sustainable neighbourhood', which may imply a mix of housing types or tenures.

Alternative – Pursing this option is unlikely to have any different impacts from the suggested preferred choice, as in each case the decision will be made on whether the home 'contributes to sustainable neighbourhoods'.

Recommendations – This policy could be combined with others such as DM3 'Intensification of Residential Areas' to avoid repetition.

Issue DM14 – Residential Space Standards

This policy has positive implications for creating higher quality homes that provide a good place to live. The size standards should help avoid 'rabbit-hutch' style small homes and make sure homes with more bedrooms have associated increases in communal space to provide rooms for families. The sustainability appraisal supports this policy as it includes market housing. Evidence on the cost of meeting space provisions (* Preliminary study into the cost implications of proposed HCA space and design standards for Affordable Housing Residential Benchmarking – February 2010 (ref R2) Cyril Sweet) shows that for some multiple bedroom properties, the costs of meeting standards can be quite high. This may have an impact on the viability of development, possibly impacting on overall supply or making homes less affordable.

Alternative – The suggested option is preferable to this option as it should ensure that homes are of a good minimum size wherever they are found in the Borough, and covers market and affordable housing.

Issue DM15 – Student Accommodation Space Requirements

This policy supports good quality housing to meet the accommodation and study space needs of students.

Alternatives – This policy widens the universities own accreditation scheme for private landlords to ensure all new student accommodation is of a suitable quality. This approach to delivering these homes is preferable to decisions being made on a site by site basis.

Issue DM16 – Houses in Multiple Occupation

It is important to reduce some of the impacts of HMOs such as rubbish, disrepair and parking problems can result from this type of development. In Southend-on-Sea the concentration of HMOs in some locations has had an adverse impact on the demographic mix, and therefore this policy can be used to prevent over-concentration happening in other areas. If this policy results in it being more difficult and costly for landlords to provide this type of accommodation, this policy may reduce choice for tenants and increase pressure on local authority social rented housing.

Alternatives – To help secure the supply of this type of home decisions should be made on a site by site basis.

Recommendations – The policy should be worded more positively to support this type of housing in the right areas. To help make the DPD more succinct, this policy could be deleted as it is/could be successfully incorporated into other policy, such as design or minimum space standards.

Issue DM17 – Specialist Residential Accommodation

This policy should help support residential accommodation in the locations where it is needed. The policy should also allow future residents to have good access to shops and services without relying on a car or van.

Recommendations – To help make the DPD more succinct, this policy could be deleted as it is/could be successfully incorporated into other policies on housing, design, amenity and parking.

Issue DM18 – Network of Centres

This policy should help in meeting the sustainable development potential for the role of centres. The advantages of this policy approach are to support accessible services for all in a range of centres, including local centres. Limiting the development of high trip generating uses such as large leisure facilities and offices should help to support more sustainable travel choices, as these locations are the most easily access by a variety of methods of travel, including train.

Alternatives - The proposed approach is useful in delivering sustainable town centre development by stipulating what type of use is suitable for each type of centre.

Issue DM19 – Shop Frontage Management

Controlling the use of the town centre to prioritise Class A1 uses is an important part of keeping the focus on the town centre for shopping. Retail is a high trip generating use and therefore focusing it in the most accessible location will help reduce the transport impact. It will be important to ensure that shop fronts, signage and fascias all make a positive contribution to the streetscape, avoiding development that is incompatible with the

character of the area the principles of good design or encourage safety. Allowing temporary uses of shops that have little chance of being let in the medium term can help improve the character of an area.

Alternatives – Protecting retail uses in the town centre as the suggested preferred option is likely to be better in securing sustainable development than the alternative which would rely on the market.

Issue DM20 – Employment Sectors

The town centre remains the focus for much office type development and cultural, creative and education employment. This centralised approach is compatible with sustainable development. Employment with potentially greater amenity impacts, such as manufacturing, is more suited to peripheral locations and on existing industrial estates. This location choice is compatible with sustainable development and protecting health and communities. Specific business types, such as medical industries and aviation, are focused near existing uses of this type. The proposed policy could help support business clusters, protecting employment sites for associated business uses.

Alternatives - The options presented are not in keeping with the identified employment pattern in Southend-on-Sea. Therefore, alternative locations for employment sectors identified is unlikely to be suitable.

Issue DM21 – Industrial Estates and Employment Areas

The planned change, renewal or protection of employment sites is based on a recent evidence report of the Southend-on-Sea Employment Land Review. It is clear to meet modern standards and fulfil their full potential some sites will need to be updated and buildings renewed. Developing planning briefs for these sites should help make sure that future development is compatible with the needs of modern businesses and brings economic benefits to the Borough. Allowing the redevelopment of some sites may be suitable where these sites are extremely underused or unsuitability located – either for the needs of business or causing a significant adverse amenity impact.

Alternatives – The proposed policy appears most suitable for securing sustainable economic development as it is based on the findings of the up-to-date employment land survey.

Recommendations – Policy could potentially address matters of importance to upgrading and the continued maintenance of employment areas and encourage the preparation of design briefs or masterplans.

Issue DM22 – Employment Uses

This policy should help make sure existing employment sites are retained for employment use and there is no loss in employment floorspace. Retaining neighbourhood employment uses, even in predominantly residential areas, can help protect local jobs and the services necessary to serve communities. New vulnerable development should not be located near potentially disruptive employment uses. This restriction is important for sustainable development.

Alternative – The suggested preferred option presents more flexible approaches to managing employment land than the two alternatives. Therefore, this may be most suitable in responding to the characteristics of specific sites in specific locations and sustainable development in Southend-on-Sea.

Recommendations – The policy could specify that new ancillary uses in existing employment area should be of a suitable scale. This is to make sure not too much space is lost to alternative uses.

Issue DM23 – Visitor Accommodation

This policy aims to protect existing visitor accommodation and encourage the development of new accommodation. The aim of the policy is for new accommodation to be provided where it is accessible by public transport. This is compatible with seeking more sustainable tourism. Focused development on the Seafront and central area is also compatible with sustainability development.

Alternative - The suggested preferred locations for visitor accommodation is compatible with sustainable development. If option 1 is followed this could lead to a proliferation of accommodation on the outskirts of the town, incompatible with objectives for more sustainable travel. Due to the changing needs of visitors it would be unsuitable to prevent any loss of existing visitor accommodation. However, test to show that the use is not viable should take into account the viability of the site and not necessarily only the building, especially in the principle tourism areas.

Recommendations – The policy could be more strongly worded to prevent new visitor accommodation being developed in peripheral locations. The policy could specify that viability tests on existing visitor accommodation considers the viability of the site and not necessarily the building. The policy is not very clear on how different types of visitor accommodation will be encouraged, to avoid proliferation of too many similar types of hotel.

Issue DM24 – Contaminated Land

This policy is suitable for protecting new users of potentially contaminated sites from contamination risks. The policy may also help to use previously developed sites, making efficient use of land.

Alternative – The alternative is to not include this policy. Relying on national policy is likely to be as good in achieving sustainable development as this policy.

Recommendations – To create are more succinct DPD this policy may not be needed, as contaminated land issues are well covered in national and regional policy.

Issue DM25 – Land Instability

This policy states that in areas where there may be a risk from land instability an assessment of risk will need to be submitted with a planning application. If necessary the policy also requires that construction must take into account land stability, this may require stabilisation works if necessary. Protecting human safety is of overriding importance in these situations and the most sustainable option.

Alternative – No alternatives are presented for this policy.

Recommendations – It is not clear if any types of development will have to financially contribute to stability works where they would benefit from this type of improvement.

DM26 – Sustainable Transport Management

The aim of the policy to help people make ‘smarter choices’ is supported in seeking more sustainable development. However, the policy wording is not very strong and therefore this policy may miss opportunities for really pushing for more sustainable travel choices to be a feature of all new development.

Alternative – No options are given.

Recommendations – The policy could be more positively worded to be proactive in favouring non-car travel and the ‘smarter choices’ agenda. More detail should be given on what type of development should prepare a Travel Plan and what the expectation of such a plan will be. To help achieve the ‘smarter choices’ objectives this policy will need to be implemented alongside other strategies on parking management and improving public transport and cycling links.

Issue DM27 – Vehicle Parking Standards

This policy sets out the very detailed suggested standards for car parking for different Use Classes in Southend-on-Sea. The standards follow the guidance of the Essex Planning Officers Associate (EPOA), although do deviate from these standard to Southend-on-Sea. In the Central Area the provision of spaces is lower than in other parts of the Borough and EPOA standards, reflecting the relative accessibility of this area by non-car modes. These lower levels of provision are positive in aiming to reduce car use in this location and reduce congestion and environmental impacts. Cycle parking standards are also set out in the policy. This is useful as it emphasises the importance of providing cycle parking as part of new development. The policy should include details on how this cycle parking should be provided, for instance a proportion provided as extra secure, or the need for some locations to include changing facilities.

Alternatives - No options are presented, although more stringent standards could help further reduce car travel.

Recommendations – The parking standards do differ slightly from those developed by the EPOA, therefore some additional information may be needed to justify these and ensure they stand up to scrutiny. More detail should be given on how cycle parking is to be delivered, for example making sure this provision is secure. To help achieve the ‘smarter choices’ objectives this policy will need to be implemented alongside other strategies on parking management and improving public transport and cycling links.

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
Hawkehill 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
Burgess 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/100/490/12/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: Development Management**

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

The Development Management DPD will support the objectives set out in the adopted Southend-on-Sea Core Strategy and will contain detailed policies that planning applications can be assessed against.

The Issues and Options Stage represents the first public participation stage in the production of the Development Management DPD. This Issues and Options Consultation Document seeks to identify all the relevant issues and possible options.

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). Responses in electronic format, via the Council's website, e-mail address or directly to debeeskinner@southend.gov.uk, are welcomed. All responses should be received by the Council by **5pm on Monday 9th 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)

Southend-on-Sea Borough Council

Enterprise, Tourism & The Environment

Andy Lewis Corporate Director

Our ref: TP/490/14/ds

Direct Dial: 01702 215408

Your ref:

Fax No: 01702 339607

Contact name: Ms D Skinner

E-mail: doete@southend.gov.uk

Date: 20 July 2010

Dear Sir/Madam

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

In the past, you have been most helpful in making our other Local Development Framework leaflets available for public inspection at your premises. I am therefore writing to request your assistance once again by making the enclosed leaflets available in your waiting areas.

I hope that is all in order and thank you for your assistance.

Yours faithfully



Technician (Design & Consultation)
Strategic Planning and Transport Policy
Enterprise, Tourism and the Environment

Appendix 3: Notice / Advertisement / 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
- 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

Have your say

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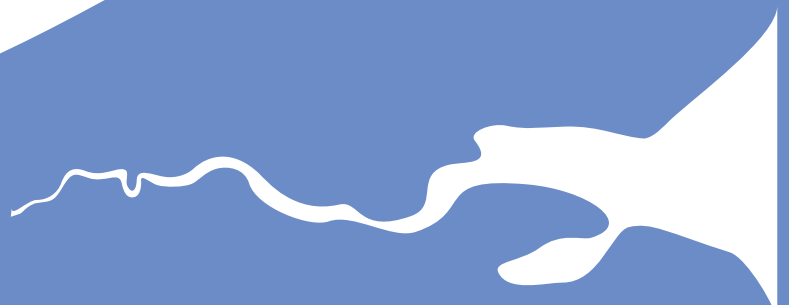
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Have your say

To have your say and view the full reports

- View the documents at your local library or at the Civic Centre.
- Head on line and visit: <http://southend.jdi-consult.net/ldf>.
- Visit the Council's website.
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: Southend-on-Sea Development Management: Public Participation: Issues and Options Regulation 25 (June 2010) – Detailed Summary

Consultation Questions: Consultee Responses

Section 3: Development Policy Context: Generic Questions

1. Has the Council identified all the key development management issues that are relevant to Southend-on-Sea?

Respondent	Respondent's Comment (Detailed Summary)	Council's Response
Herbert Grove Residents	The main point missed was the need to plan for the different types of people who use 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 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.	<p>Comments relate more particularly to the Southend Central AAP issues and options consultation and will be considered within the Central Southend Area Action Plan: Consultation Statement.</p> <p>The Development Management Issues and Options document does not set out any development proposals. The function of this document is to manage development within a sustainable framework.</p> <p>Noted and as such it seeks to balance the needs of the different types of people who use Southend. This evident through the document structure and coverage of development management policies.</p>

Essex County Council	Essex County Council fully supports the preparation of the Development Management DPD. It will provide more detailed guidance which should greatly assist the process of securing high quality sustainable development in support of the strategic vision of the Core Strategy and meeting the needs of the community. The emphasis on a positive and proactive approach in pursuit of achieving better development outcomes through the whole Development Management process is welcomed.	Noted. No further action(s) required.
Anglian Water	On this occasion, I have no comment to make.	Noted. No further action(s) required.
Iceni Projects	Iceni Projects Ltd (Iceni) has been instructed by Cordea Savills on behalf of Colonnade Land LLP (Colonnade) to submit representations to the Development Management Document (DMD) and Southend Central Area Action Plan (SCAAP) Development Plan Documents (DPDs). Colonnade represents the interests of landowners to the north of Southend. Colonnade considers Southend to be one of the most important locations in the Thames Gateway for improving both the local and regional economy. This is based on the potential that exists for Southend to function as a regional city for Essex Thames Gateway and the potential of Southend Airport to develop into a successful regional airport for the sub-region and an economic pole in its own right.	Noted.

	<p>The advent of localism and the changes to the planning system being brought into place by the Government provide an opportunity for the Council to drastically enhance the quality of life of its residents, enhance the individuality and unique character of Southend and provides the optimum framework to deliver on the long-standing objectives of the Council to deliver improvements to the strategic transport infrastructure network.</p>	<p>Through the PPG and PPS policy documents, there has been a long-standing requirement for new development to contribute to the enhancement of the quality of life of its residents and the enhancement of the individuality and unique character of an area. The Core Strategy has been found to be sound and meets the Government's planning policy requirements set out in the PPG and PPS documents. Despite recent changes, these requirements have not changed.</p>
	<p>Colonnade recognises that the potential of Southend cannot be fully realised without extensive new highway and public transport infrastructure and accordingly, Colonnade is promoting an extension of Southend to enable the delivery of significant improvements to the strategic transport infrastructure network that will realise the long-standing objectives of the Council arising from the original Local Transport Plan. The extension of Southend provides an opportunity to plan comprehensively for improvements to infrastructure, including the potential to contribute to improvements to Garon Park. Indeed, Garon Park could be served by a new link road and associated development could be designed around an expanded park that would form the focus of growth and provide a green lung for both Southend and Rochford.</p>	<p>LTP3 has been prepared and an issues and options paper was published for consultation in late 2010 / early 2011.</p>

	<p>The new Government has announced a series of significant changes to the planning system that are material to the Core Strategy and its daughter documents, including the DMD and SCAAP. Whilst the intention of the changes is not to derail or stop the LDF production process, it is inevitable that the implications of the changes will need to be considered by the Council. In the absence of clarification from the Council as to its intended path - principally the choice between continuing with the Core Strategy as adopted (and continuing the production of its daughter documents based on an unaltered strategy), or opting to alter the Core Strategy to take account of the changes. Either way, the Council is expected to: "...quickly signal their intention to undertake an early review so that communities and land owners know where they stand." [guidance issued on 6 July 2010 by the Department for Communities and Local Government]. We await the response from the Council as to its intentions regarding housing targets and reserve the right to comment further on the clarification of its position. If the Council decides the appropriate path is to undertake an early review of the Core Strategy, which for the avoidance of doubt Colonnade considers is the appropriate approach in light of the changes to PPS3 in particular (the reasons for this being clarified below), then the consultation on the DMD and SCAAP should be held in abeyance pending the</p>	<p>On the 15th June 2010, the Southend-on-Sea Cabinet agreed to the principle of amending the Local Development Scheme on the basis of the proposed timetable. This document proposes a review of the Core Strategy with the Regulation 25 stage scheduled for December 2011. In the interim, the Council considers that the adopted housing targets are appropriate for Southend-on-Sea which are supported by a robust evidence base that includes an up-to-date SHLAA. The SHLAA sets out a 10.9 year supply of ready to develop housing sites.</p>
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	<p>outcome of the review.</p> <p>With regard to the housing targets set out in the now revoked East of England Plan, Colonnade would welcome the swift clarification of the intended approach to the housing provision targets in accordance with Government advice.</p>	
	<p>It is also significant that neighbouring authorities are understood to be considering reducing their housing targets with the expectation that Southend will absorb the resultant surplus and it is clear that the Government has confirmed the expectation that authorities will work together to address these, and other, issues. The confirmation of the shortfall in the housing land supply in Rochford, approximately 2.5 years, by the Inspector and the Secretary of State at the recent recovered appeal (ref. APP/B1550/A/09/2118433/NWF), provides a clear indication of the extent of the issues being faced by a neighbouring authority.</p>	<p>There is no expectation that Southend-on-Sea will absorb Rochford's housing requirements. As noted in the representation, the localism agenda and revocation of the Regional Spatial Strategy allows local council's to set their own housing targets based on a robust evidence base. Rochford are currently at an advanced stage of their Core Strategy production, which will set their own housing targets. This document cannot set any housing targets for Southend-on-Sea. Furthermore, it is noted that the Planning Inspector stated in the referenced appeal that it is premature to consider further housing sites as the Rochford Core Strategy is at an advanced stage.</p>
	<p>As to the changes to PPS3, these are considered to be a material change that could fundamentally affect the principal aims of the housing strategy set out in the Core Strategy. As such, Colonnade considers that the Council will need to consider a review of the Core Strategy as a</p>	<p>It is considered that the changes to the planning system notably and change of definition of previously-developed land does not materially delay the programme for the Development Management DPD production.</p>

	<p>result of these changes as a minimum. The change in classification of backlands/gardens and the abandonment of the minimum housing density targets will act to further enhance the need to identify additional housing sites through the planning process. Quite simply, the Council will not be able to rely to any extent on the delivery of windfall sites, the level of development within the Town Centre and Central Area or further intensification of the urban areas to the extent envisaged in the Core Strategy.</p>	
	<p>As such, wholesale changes will be required to the housing strategy to maintain a five and fifteen year supply of suitable, available and viable housing sites. It is significant that there has been growing concern amongst Council Members over town cramming and the provision of a large predominance of flatted developments. The changes to PPS3 do allow the Council to apply greater freedoms in the types and standards of housing (size and densities) sought, provided there is sufficient additional land supply identified to address these improved standards.</p>	<p>On the 15th June 2010, the Southend-on-Sea Cabinet agreed to the principle of amending the Local Development Scheme on the basis of the proposed timetable. This document proposes a review of the Core Strategy with the Regulation 25 stage scheduled for December 2011. In the interim, the Council considers that the adopted housing targets are appropriate for Southend-on-Sea which are supported by a robust evidence base that includes an up-to-date SHLAA. The SHLAA sets out a 10.9 year supply of ready to develop housing sites.</p>
	<p>As clarified below, the current market demand, in Southend and the wider area, is now predominantly for family sized homes. Therefore, the logical conclusion arising from both of the changes to PPS3 is the need to identify further reservoirs of housing land to allow for</p>	<p>The change in definition of previously-developed land is not a strategic issue that needs to be addressed by a Core Strategy. Rather it is a site specific issue that should be addressed by the Development Management DPD. The change of definition only changes the classification of</p>

	<p>sufficient housing growth of the dwelling type/s demanded without the comfort of delivery on windfall sites or minimum targets on those areas identified.</p>	<p>backland development and does not prevent this type of development. The Annual Monitoring Report indicates that the previously-developed land target of 80% and the adopted housing targets have all been met and that the change of definition will not impact upon future housing delivery. This is supported by evidence in the SHLAA.</p>
	<p>With the recent changes to PPS3 in mind, it is relevant to note the findings of the Inspector and Secretary of State in relation to the evidence presented by the appellant regarding the likelihood of high density flatted development schemes being delivered in the current economic climate, specifically in relation to the south Essex sub-region, at the recent appeal by Colonnade for the development of approximately 300 dwellings in East Tilbury (ref. APP/M9565/A/09/2114804/NWF). Evidence was presented by a former Managing Director of a national housebuilder with a significant property portfolio in south Essex, which confirmed that, amongst other issues: * Delivery of new housing in South Essex in recent years has, as a result of buoyant market conditions, limited supply, and vendor expectations, been focussed on flatted development as this was seen by investors as the way to maximise the value of their land; Following the downturn in the economy, there has been a realisation that high density schemes, unless of a scale and location that are highly sustainable and desirable, are not economically</p>	<p>PPS3 allows the Council to seek a mix of housing types and standards. The SHMA provides the evidence of the household need for the borough. Recent amendments to PPS3 do not alter the principles of PPS3 in this respect. The Suggested Option in Issue DM11 seeks a mix of housing types including family housing in accordance with PPS3.</p> <p>Noted. This market demand is supported by evidence in the SHMA. However the Council disagree that this need requires a 'reservoir of housing land to allow for sufficient housing growth'. The SHLAA provides evidence of sites that can meet this need.</p> <p>The SHMA provides evidence to demonstrate that Thurrock and Southend-on-Sea operate within neighbouring but different housing markets. Therefore, in this instance the reference to Thurrock is not considered comparable and consequently the conclusions of the Planning Inspector of the land supply situation of Thurrock and not Southend-</p>

	<p>deliverable in the short or medium term; * Planning supply of flatted product suddenly became the opposite of what little end user demand existed for traditional family housing; In some cases the financial viability of high density schemes that also had high planning gain tariffs, sustainability codes and contemporary design costs was in question even at the height of the market; Due to the financial difficulty being experienced by all house builders at present, the emphasis is on securing land that has the ability to generate turnover with low working capital expenditure. In order to achieve this, the focus is on securing relatively 'clean' land for building and selling family housing product rather than flats, which are less dependent on off-market sales and the buy-to-let investor market. The Inspector's Report confirmed that the above evidence was accepted in making his recommendation that the appeal be allowed. In addition, the Inspector acknowledged the "delivery problems arising in the current economic climate, and from the heavy reliance on the delivery of high density urban development on complex brownfield sites" [IR334] and noted that: "More recently, the additional cost associated with major brownfield schemes has in some cases seen the proportion of affordable housing renegotiated downwards. An example is the Fiddler's Reach scheme at West Thurrock, where viability considerations have restricted the proportion of</p>	<p>on-Sea.</p> <p>It is however recognised that there is a need for a balanced supply of housing types and sizes within a Southend-on-Sea context. This issue has been addressed within the Suggested Option to Issue DM11.</p>
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	<p>affordable housing to 11%." [IR308] It is quite clear from the above, that a heavy reliance on the delivery of housing development on high density brownfield sites brings with it a number of significant complexities, not least the issues of attractiveness to the market and viability, but also the potential to restrict affordable housing delivery, both in real and proportional terms. In accepting the recommendation of the Inspector and allowing the appeal, the Secretary of State verified position adopted by the Inspector and should be taken into account by the Council in the formulation of the policies of the DMD and SCAAP.</p>	
	<p>The proposed approach to a number of the issues contained within the DMD will need to be reconsidered in light of the announcements by the Secretary of State for Communities and Local Government and the Minister for Decentralisation.</p>	<p>Disagree. The issues referred to within this representation have been considered within Development Management Issues and Options document and despite recent announcements by the Secretary of State for Communities and Local Government and the Minister for Decentralisation it is not considered that these issues need to be re-considered.</p>
<p>The Society for the Protection of Undercliff Gardens</p>	<p>We acknowledge receipt of your letter dated 21 June, and very much welcome the long overdue concept of detailed policies that planning applications can be assessed against. Unfortunately the draft document contains many proposals for broad brush policies that are clearly in conflict with this concept and need "tightening up" if it is to</p>	<p>Noted. Amendments will be made to the final policies as necessary.</p>

	succeed.	
Cllr Crystall	Page 15.Q."No mention of life long learning" Agree with the objectives as far as they go, Provision of Life long Education should be one of the aims of the corporate plan..	Noted. Education is addressed within the Issues and options and document. 'Life Long Learning' is a specific issue that is not appropriate within this document and should be addressed within the Corporate Plan.
	SO5 and SO6, numbers will need to be reviewed and reduced.. SO12. and education.	The Strategic Objectives are set out in the adopted Core Strategy and repeated here to underline the Council's objectives with regard to development management policies. The Development Management DPD is not a strategic document and can not amend the Council's Strategic Objectives.
	Lower Thames Rowing Club and SMAC scheme will provide physical, recreational and educational facilities at two tree, as well as Seafront existing.	Noted.
	Strategic objectives . "Park and Ride" All other major towns in East of England have Park and Ride as an essential part of their infrastructure. Leigh station Park and ride to to East beach park and ride along seafront would be a good start .Only one lot of buses needed, terminal at each end.	Noted. The Development Management DPD does not set the site specific transport policies. These issues have been raised as part of the LTP. LTP3 is has been prepared and an issues and options paper was published for consultation in late 2010 / early 2011.
	Development management issues needs an overall embrace of "Sustainability", which relates to all six bullet points.	Noted. The Development Management DPD provides the framework in which to manage Southend-on-Sea's built environment and ensure successful place-making and sustainable development. All development management

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		policies should therefore be read as a whole.
Savills for Inner London Group	The text on the approach to handling applications - pre-application discussions and detail of information to be provided during pre-application stage (page 8, paras 2 and 3) - should be drafted as a policy. This policy on pre-application discussion could be an important Key Performance Indicator for the Annual Monitoring Report. Insert new policy.	Noted. The requirement for pre-application discussions is set out in the Design and Townscape Guide. It is therefore considered that the approach to pre-application discussions should be explained in the supporting text and not policy. This will allow greater flexibility.
	The role and purpose of including the references to the Saved Policies of the Southend on Sea Borough Local Plan under each of the subject chapters has not been explained and is unclear.	The saved policies referenced in the Issues and Options document are those that will be replaced when the Development Management DPD is adopted.
	The criteria in DM26 should be explicitly used to justify site allocations in the CAAP and other location specific allocations in the DMDPD (e.g. DM21 and DM22) and in future LDDs. Sustainable transport management issues should also be required to be addressed in development proposals.	Noted. All development management policies should be read as a whole. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.
Burges Estate Residents Association	Page 5/6. Self evidently the policies which will eventually emerge from this participation exercise will not come into force until Feb 2012 based upon your timetable. Consequently should not the Council be making	The Saved Policies are saved until they are superseded by the LDF documents.

	arrangements to keep the saved policies from the Borough Plan valid until they are superseded to avoid a vacuum	
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2. Do you agree with the suggested policy options?

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	In general we support many of the suggested options, but consider that the overall approach is too rigid, most policies will not be able to respond either to changing market or to site-specific circumstances	Noted. The Council will apply a 'plan, monitor and manage' approach to development to ensure responsiveness to changing market conditions.

3. Are there any other options that you think the Council should consider as well as the ones suggested within this consultation document?

Respondent	Respondent's Comment	Council's Response
Herbert Grove Residents	More consideration should be given towards the current residents and the parts of their lifestyle which will be changed by the proposed plans, such as loss of sea views and how they should be compensated for the loss of amenities.	<p>Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.</p> <p>The preferred option in DM1(2) seeks to take account of the outlook from neighbouring properties of new developments. DM1(2) also seeks to protect the amenity of neighbouring properties in terms of privacy, noise, activity and overshadowing.</p> <p>However, there is no fundamental right to a view in the English planning system and the loss of a view from a particular</p>

		<p>window or indeed, from a property as a whole, would not amount to a loss of a fundamental amenity.</p> <p>The policy wording in DM1(2) will however be strengthened to protect the amenities of neighbouring properties.</p>
<p>Mono Consultants Ltd</p>	<p>We would take this opportunity however to comment that we consider it important that there remains in place a telecommunications policy within the emerging Local Development Framework.</p> <p>We would suggest a policy which reads;</p> <p>Proposals for telecommunications development will be permitted provided that the following criteria are met:</p> <p>-</p> <p>(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;</p> <p>(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;</p> <p>(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the</p>	<p>The Council considers that telecommunications can be addressed by general design policies and national policy.</p>

	<p>possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority. (iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.</p> <p>When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.</p> <p>Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow</p> <p>We are suggesting that a clear and flexible telecommunications policy be introduced in one of the main LDDs. This should be introduced by a short paragraph outlining the development pressures and</p>	
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	the Councils policy aims.	
English Heritage	<p>PPS5 builds on the earlier national guidance for the historic environment and brings it up-to-date based on the principles of heritage protection reform. The following parts are of particular relevance: Policy HE2.1 '...local planning authorities should ensure that they have evidence about the historic environment and heritage assets in their area and that this is publicly documented. The level of detail of the evidence should be proportionate and sufficient to inform adequately the plan-making process.' Policy HE3.1: '...local development frameworks should set out a positive, proactive strategy for the conservation and enjoyment of the historic environment in their area, taking into account the variations in type and distribution of heritage asset, as well as the contribution made by the historic environment by virtue of (inter alia) its influence on the character of the environment and an area's sense of place.' Policy HE3.2 advises that the level of detail contained in a LDF 'should reflect the scale of the area covered and the significance of the heritage assets within it'. Policy HE3.4 states that 'At a local level, plans should consider the qualities and local distinctiveness of the historic environment and how these contribute to the spatial vision in the local</p>	<p>Noted. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.</p>

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	<p>development framework core strategy. Heritage assets can be used to ensure continued sustainability of an area and promote a sense of place. Plans at local level are likely to consider investment in and enhancement of historic places including the public realm, in more detail. They should include consideration of how best to conserve individual, groups or types of heritage assets that are most at risk of loss through neglect, decay or other threats'. The emphasis on a positive, proactive approach to the historic environment in plans is especially noteworthy. We would also highlight the need to understand the significance of heritage assets within the plan area. In the context of the Southend LDF we hope that assessment of the historic environment will be pursued as an important and integral part of the evidence base. Other points from PPS5 worth noting at this stage: - The term 'heritage asset' is now the appropriate term to refer to those parts of the historic environment that have significance, both designated and un-designated. Paragraph 5 provides the definition. - Paragraph 7 of the PPS recognises the positive contribution of heritage assets to local character and sense of place - The historic environment should be integrated into planning policies promoting place-shaping (paragraph 7) -</p>	
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	Policy HE5 refers to the need for monitoring indicators. We recommend that heritage at risk, including grade II buildings at risk, should form part of the LDF monitoring framework.	
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4. Do you think that the Council's evidence base is sufficient to inform the Development Management DPD or do you consider that there is a need for further studies to inform this document?

Respondent	Respondent's Comment	Council's Response
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.	<p>Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.</p> <p>Disagree. The Council has developed a robust set of evidence base documents to inform the Local Development Framework (including the Development Management DPD) that covers an extensive range of topic areas that are specific to Southend-on-Sea.</p> <p>The approach to the regeneration and growth within the Southend Central Area (including central seafront) will be sensitive to the need for innovation within the policy framework, particularly in the Southend Central AAP.</p>
Cllr Crystall	a)Need for a study to link new Victoria station lay-out with a cheap transport system ie Tram or Land train to	Noted. The Development Management DPD does not set the site specific transport policies. These issues should be raised as

	<p>seafront near pier and to Kursaal via central station. This will extend the shopping and leisure offering to city beach from both stations. Could link on return trip to bus station via Seaway. This would make Southend different to all other seaside towns in the South East. Tram/land train could start inside the Victoria station.</p>	<p>part of the LTP and locally specific AAPs. LTP3 is currently being prepared and an issues and options paper was published for consultation in late 2010 / early 2011.</p>
	<p>b). Study to look at possible opening of High street for cars after 5pm.</p>	<p>Noted. The Development Management DPD does not set the site specific transport policies.</p>
	<p>Design and townscape does not go far enough with regard to storage and use of rainwater, and reduction of overflows into main system.</p>	<p>Noted. These issues will be addressed and relevant policies amended as necessary.</p>
	<p>Great improvements can be made to freeing streets of traffic if sensible amounts of parking are made available at all new development, we are a visitor town and want to encourage visitors, and we need to create enough space to accommodate parking spaces for visitors. Present standards are making the situation worse.</p>	<p>Noted. Amendments will be made to ensure there is no increase in on-street parking by providing sufficient parking for residents in development schemes. The DM parking policy will address this matter. The town centre is however subject to Policy CP2 of the adopted Core strategy which seeks to maintain on-street visitor parking.</p>
	<p>Park and ride is essential for SUSTAINABLE regeneration and growth. Members, not just the chair, need to be involved in pre application discussion.</p>	<p>The Development Management DPD does not set the site specific transport policies. These issues should be raised as part of the LTP. LTP3 is currently being prepared and an issues and options paper was published for consultation in late 2010 / early 2011.</p>

Savills for Inner London Group	Do not consider the evidence base to be adequate as the supporting studies have not been completed.	Noted. The evidence base is comprehensive, its findings have been robust and publication is on-going.
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Section 4: Design and Townscape

5. Issue DM1 – Design of Developments: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Planning Perspectives LLP	The proposed approach is supported. In particular, the approach taken towards density is the correct one as this should always be design led and not prescriptive. A comprehensive approach should be taken towards the development of a site, which aims to optimise the use of land whilst taking account of local context. Design policies must be flexible enough to ensure that areas which are in need of regeneration can be viably developed.	Noted. No further action(s) required.
Renaissance Southend Ltd	Renaissance Southend supports the suggested Option for DM1. Suggested that para.3 could be strengthened and amended to read: Ensuring that the requirements of sustainable development are fully reflected in the design and layout to give priority to the needs of pedestrians (including disabled people and those with restricted mobility), cyclists and access to public transport. Para 8. should be strengthened with a	Agree – Policy wording changes required.

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	clearer commitment to raising design quality standards and ensuring the D&A statements are prepared early enough on major schemes to inform the decision making process rather than justify what has already been decided.	
Herbert Grove Residents	As far as they go the suggestions are good, however the Council are constrained in meeting these objectives because they have incorporated the plans devised by Renaissance Southend Ltd. in their development structure and it is considered by Herbert Grove Residents that these plans do not agree with the suggested options.	Noted. The Council seeks to embed high quality design into all developments throughout the borough. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.
Carole Mulroney (Leigh Society)	Option supported	Noted. No further action(s) required.
English Heritage	Issue DM1 Design of Developments Context, p16/17 English Heritage welcomes the Borough Wide Character Study that is being commissioned. We would be pleased to advise on the brief or, if the study is already underway, to comment on the draft report.	Noted.
	We agree with the statement that the density of new schemes should arise from the design rather than be imposed as a constraint at the beginning.	Noted.

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	<p>We note on page 17 that you encourage pre-application discussion involving the local planning authority and the local community. Engagement with other stakeholders and environmental bodies, including English heritage should also be encouraged, where appropriate.</p>	<p>Agree that stakeholders should be consulted where appropriate during pre-application discussions.</p>
	<p>Design of developments - suggested option, p17. English Heritage supports the criteria listed, especially ii) historic development and local vernacular and iii) urban grain and morphology. However, these need to be identified and understood as part of a character study exercise. Design of developments - alternative options 1 to 4, p18 English Heritage agrees that these options are not appropriate in Southend. Relevant Local Plan saved policies, p19 Under saved policies, we consider the heritage policies C1, C4, C5 and C6 should be mentioned.</p>	<p>Noted.</p>
<p>Savills for Inner London Group</p>	<p>Generally support design objectives and criteria for assessment of development proposals. However we consider that the policy is too inflexible and makes no allowance for other factors. The preferred option places high quality of design above all other planning considerations, such as feasibility/viability, in all cases. The policy focuses too much on high-quality architectural design and townscape, at the expense of</p>	<p>The suggested policy option is fully compliant with PPS1 which places high quality design at the heart of the planning system.</p>

	a variety of environmental, social and economic factors that should have a strong influence on the design of sustainable development.	
	(Q7) The policy should be redrafted to include many of the criteria currently included in DM4 and in Sections 8.4- 8.11 (Addressing Resource Minimisation And Carbon Emissions) of the CAAP. Flood risk Passive design for energy efficiency and carbon minimisation Water efficient design and SUDS Energy efficiency - district heat and energy systems Green Travel Plans Part L of Building Regs Zero Carbon developments by 2016	Agree that carbon emissions and resource minimisation are important design issues however disagree that they should be addressed within DM1. These issues are an important component of the Development Management DPD and will contribute to reducing impact upon and adapting to climate change. As such should be addressed within a specific policy.
	These DM policy sections should be removed from DMP4 and CAAP and redrafted as one policy in Design and Townscape SPD, or as an interim measure, in the DMDPD Revise wording for clarity to read: "the Council takes the view that the applicant should demonstrate how the development proposals will take account.... "	Disagree. Given the challenges of adapting to climate change a strong policy approach is needed to address carbon emissions and resource minimisation. An SPD is therefore not an appropriate document to address these issues.
	The detailed design criteria set out in DM1 (1) are very detailed and there is potential for the detail to overlap / or conflict with the policies of the Design and Townscape Guide SPD, and with Policies in Section 8 of CAAP leading to duplication and potential	Disagree. DM1 takes account of the Design and Townscape Guide to ensure that there is no conflict. However agree that the Design and Townscape Guide should be referenced in DM1.

	<p>confusion. Replace the detailed criteria in the numbered bullet points in DM1 (1) with a cross reference to the DTG SPD and ensure that all points are covered in the SPD. If this is not considered appropriate, changes are required to the detail in Policy DM1 (1) subsections as set out below in this table. 1 (1)</p>	
	<p>The links between the development and adjoining / surrounding areas are as important as the links to the wider areas. Suggest policy should address "local context" in addition to the wider context. Suggest policy should include the words "and local" after the word "wider"</p>	<p>Agree. Appropriate amendments will be made.</p>
	<p>1 (vii) - the wording "Natural environment and trees" is inappropriate in an built urban context Add the words "and trees" to sub-para (iv) Replace 1 (vii) with "Ecology and environment "</p>	<p>Agree. Appropriate amendments will be made.</p>
	<p>1 (ix) - there will be locations in the Borough, especially in the Central Area where Council and/or applicant may not want to enhance uses throughout the night</p>	<p>Noted.</p>
	<p>1 (x) "Levels of activity" is ambiguous and may mean either "economic activity" i.e. jobs created on site or "social activity" - pedestrian movements / increased</p>	<p>Noted.</p>

	usage of urban space within and around the site	
	5 - There is no justification for the design of a development particular regard to "Secure by Design" principles over other design objectives. In certain localities these principles could militate against the desire for increased pedestrian linkages and permeability. This criteria should be deleted	Disagree. The Council considers that the design principles in 'Secured by Design' are important in terms of delivering secure and safe neighbourhoods. It is therefore important that these principles are followed.
	6 - All developments required to incorporate high quality materials. Quality design and townscape can be achieved without demanding high quality materials in all circumstances, and it may be appropriate in certain circumstances to allow construction using materials that are not of high quality to meet other planning and sustainability objectives i.e. locally sourced materials. Replace wording "high quality material " with "materials of appropriate quality"	Noted. Appropriate amendments will be made.
	8 - Design and Townscape Guide SPD principles to be followed. This wording should be incorporated into DM1 (1) (see above) We consider that the aspiration for high quality design is laudable, but needs to be tempered by commercial realities. Although we support the thrust of the preferred option, the final draft policy needs to be modified so that the approach, although design-led, is more flexible. The	Noted. Appropriate amendments will be made.

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	policy should allow the design of development proposals to be considered on a site-by-site basis, having regard to local circumstances, the need to meet other objectives within the LDF and any other relevant factors.	
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6. Issue DM1 – Design of Developments: Do you consider the alternative options to be more appropriate? If so, please state why.

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	All developments required to incorporate high quality materials. Quality design and townscape can be achieved without demanding high quality materials in all circumstances, and it may be appropriate in certain circumstances to allow construction using materials that are not of high quality to meet other planning and sustainability objectives i.e. locally sourced materials. Replace wording "high quality material " with "materials of appropriate quality"	Noted. Amendments will be made within the context of securing a high quality townscape.
Burges Estate Residents Association	Page 16. The question of density is an important one but is dealt with in a vague and woolly manner. I do not suggest setting rigid figures but do feel some guidance in the form of ranges reflecting development types would be appropriate.	Disagree. It is considered that density should be context-led and it is considered that setting density levels could undermine the objectives for improving design quality in new developments.

7. Issue DM1 – Design of Developments: Are there any approaches to implementing high quality design in new developments that should be considered by the Council?

Respondent	Respondent's Comment	Council's Response
Herbert Grove Residents	<p>Yes! Since the Central Area Masterplan was adopted the whole economic basis on which it was based has changed. There is now very little prospect of any large amounts of new capital being invested in Southend until growth returns to the economy, this has been estimated to be a five to ten year time frame. This is illustrated by the fact that work has ceased on the Ambassador Hotel and the Nirvana Apartments both prime seafront developments, the company developing Marine Plaza has been reported going into bankruptcy and it seems that the only way Southend united will get a new stadium is if Sainsbury's finance it.</p>	<p>Noted. The purpose of the Development Management DPD is to positively manage in Southend-on-Sea and be used to assess planning applications. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.</p>
	<p>Until the economy turns around The Council can concentrate on small developments that will improve the life style of Southend Residents, Workers and Visitors. Southend Council could run a competition asking for planning suggestions that will improve the environment and condition of the local area at a cost of £500,000 or less. Open to planning professionals and armatures alike a prize of £10,000 could be offered for any suggestions that are taken up.</p>	<p>It is not feasible for the Council to open a planning suggestion competition with a prize in the region of £10,000.</p>

Cllr Burdett	Some designs need to be in keeping with the traditional characteristics of the town as otherwise they will date quickly - the high street furniture is an example of this	Noted. The suggested option in DM1(1) seeks to ensure that all development is based on a thorough understanding of the surrounding context and character of the area and enhancements of public realm.
Cllr Crystall	Need to consider siting of developments with regard to solar gain as part of policy.	Agree. This will be incorporated into the appropriate policy.
Environment Agency	Issue DM1: Question 5 We note that flood risk is not included in the list provided under part 1. Flood risk is addressed in SO15 and policies KP1 and KP2 of the adopted Core Strategy. If you feel there is any way that you can add to these requirements through the Development Management DPD, we would request its inclusion. It is possible that flood risk and making space for water could be covered under "(vii) Natural environment and trees"	It is considered that flood risk is addressed comprehensively by the Core Strategy and national policy. It will be addressed as appropriate within the Development Management DPD.

8. Issue DM2 – Tall Buildings: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Herbert Grove Residents	Yes, however the tall buildings shown on the adopted Central Area Masterplan do not conform to the suggestions.	Noted. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.

Cllr Burdett	I feel we have a problem with a lack of space for development and therefore have no option but to build upwards especially with regard to homes. But I feel our green spaces should be protected.	Noted. Policy CP7 of the Core Strategy protects green space.
Carole Mulroney (Leigh Society)	Great care needs to be taken in historic areas or the surrounding area which may have an impact on them	Noted. Suggested Options DM2(1x) and DM5 requires development (including tall buildings) to sensitively take account of the historic setting. No further action(s) required.
Mrs Jennifer Hircock	No tall buildings whatsoever.	There are a number of tall buildings in Southend-on-Sea with the majority of these being located within the Central Southend area. The Characterisation Study highlights that the central area is a clearly defined tall building location that has scope for further tall buildings. The Design and Townscape Guide provides guidance to ensure that tall buildings make a positive contribution to Southend-on-Sea, taking account of English Heritage and CABE's guidance on tall buildings.
English Heritage	Issue DM2- Tall Buildings, p20 English Heritage and CABE have produced guidance on Tall Buildings and this is referred to (though English Heritage should be referenced). The context section appears to embody much of our advice, however; we do suggest in 1.2 of our publication that the existence of a tall building in a particular location will not, of itself, justify its replacement with a new tall building on the same site, or in the same area. The same process of analysis and	Noted. Appropriate amendments will be made.

	justification should be required as for new sites.	
	Tall Buildings - suggested option, p20/21 WE have some concerns that this appears to look positively on tall buildings overall. The Borough Wide Character Study should inform this policy, and may suggest that no new tall buildings can be assimilated by the borough's townscape. The potential impact on heritage assets should be carefully assessed, and this should be a clear caveat within the policy. Tall Buildings - alternative options, p21/22 These appear to be inconsistent with a well-reasoned policy. We refer to paragraph 4.1 of the joint EH/CABE advice with regard to the definition of a tall building.	Noted. The development management policies should be read as a whole. DM5 considers the historic environment.
Savills for Inner London Group	Generally support approach of preferred option (Q8)	Noted.
Burges Estate Residents Association	Page 21. I cannot argue with the requirements put forward as a basis for approving tall buildings. I just cannot agree that the requirements are robust enough i.e. they are too vague and I doubt it is possible to design a tall building that does not cause a micro climate change nor create wind turbulence. Moreover I do not believe it is possible to accurately assess those factors in a modelling exercise. As a consequence any development proposal is bound to be speculative as to its impact.	These requirements take account of guidance from CABE and English Heritage.

9. Issue DM2 – Tall Buildings: Do you consider the alternative options to be more appropriate? If so, please state why.

Respondent	Respondent's Comment	Council's Response
Renaissance Southend Ltd	No but it should be recognised that the Urban Place Supplement to the Essex Design Guide does provide some useful advice on the approach to urban design principles that would be appropriate to Southend and is not wholly focussed on rural or the vernacular	The adopted Design and Townscape Guide SPD provides guidance in respect to tall buildings. The Urban Place Supplement provides comparable guidance but not to the same level of detail nor is it specific to the particular local Southend context and it would therefore be inappropriate to reference this document in addition to the adopted Design and Townscape Guide SPD.
Savills for Inner London Group	(Q9). 1 "Ensuring that tall buildings would only be permitted in the sites / areas identified in the Area Action Plans". This approach is inflexible and does not allow for tall (or large) buildings to come forward in changing circumstances over the life of the plan and on sites not foreseen in the AAPS This wording should be deleted. The policy should allow for tall buildings to come forward on other sites, provided they meet the policy criteria. Reference to be made to the joint CABE / EH guidance on Tall Buildings July 2007 Although the policy is entitled "Tall Buildings" the detail in points (i)-(vi) relate to both tall and large building. This is confusing and may results in criteria that are not appropriate being used to assess tall rather than large buildings. e.g. (ii) building to relate in "scale and	Noted. Appropriate amendments will be considered in relation to sites outside the central area. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.

	character to surrounding buildings" - not an appropriate criteria to consider introduction of tall buildings. Tall buildings are defined as being different (standing out) from their surroundings or prevailing townscape scale. Therefore they are unlikely to relate to the scale of the surrounding.	
	1) (iv) "Incorporate the highest standards of architecture and materials." - policy too rigid and inflexible Should read "high standard of design" and "appropriate materials" (1) ((vi) "Make a significant contribution to local regeneration" The word "local "is undefined and confusing and should be removed.	Disagree. Tall buildings by their nature will have a significant impact upon the townscape and place-shaping of Southend-on-Sea. They should therefore be an exemplar in design terms. This approach is consistent with guidance provided by English heritage and CABE.

10. Issue DM2 – Tall Buildings: Do you consider that there is a need to define a tall building in terms of number of storeys?

Respondent	Respondent's Comment	Council's Response
Renaissance Southend Ltd	It would be inappropriate to include this level of detail in the Development Management DPD unless there was a physical constraint (eg. Airport Safety Zone) in a given area, or unless the Character Study identified particular evidence/justification for a height limitation.	Noted, but it is considered that a tall building definition is necessary to ensure that a tall building policy is effective.
Herbert Grove Residents	No, Herbert Grove Residents consider that tall buildings which conform to the design suggestions will become landmarks and can enhance the environment.	Noted, but it is considered that a tall building definition is necessary to ensure that a tall building policy is effective.

11. Issue DM2 – Tall Buildings: Are there any other issues relating to tall buildings that the Council should consider?

Respondent	Respondent's Comment	Council's Response
Renaissance Southend Ltd	<p>If the Character Study presently underway is able to provide the rationale where and where not tall buildings may be acceptable this will need to be adopted within a specific DPD and/or AAPs. Should DM DPD describe the process for how the spatial and design issues will become policy?</p> <p>Some of the wording used in the suggested option appears a little vague and may need to be tightened up to avoid unintentional loopholes; eg. 'relate well', 'a point of visual significance' and 'highest standards of architecture' could conspire to justify a tall building in an inappropriate suburban or remote setting.</p>	<p>Noted. Suggest Option DM2 provides the policy in which planning applications for tall buildings will be assessed against. The Development Management DPD will not set out site specific proposals for tall buildings. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.</p> <p>Agree. Policy wording will be amended to strengthen the requirements of the policy.</p>
Herbert Grove Residents	<p>Yes. There is no need to put tall buildings directly on the seafront, there are many sites in Southend where the rise in ground will provide excellent sea views and be near commuter hubs. For example there is no point in putting a Casino in a building with a view, the most successful gambling resort in the world is Las Vegas which overlooks a desert.</p>	<p>Noted. Suggested Option DM2 provides the policy in which planning applications for tall buildings will be assessed against. The Development Management DPD will not set out site specific proposals for tall buildings. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.</p>

Mrs Jennifer Hircock	IF the majority supports tall buildings then it needs to specify no more than say 3 storeys the monstrosity at Westcliff the Leas says it all. Ugly unfinished and totally out of character with the rest of the area.	Noted. It is considered that a tall building definition is necessary to ensure that a tall building policy is effective.
Cllr Crystall	Tall buildings need to be seen in relation to other tall buildings, and to and especially from the Estuary. St Clements Court East would not have been built if the effect on St Clements Church from the Sea had been considered, or from the west approaching Leigh.	Agree. Appropriate amendments will be made. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.

12. Issue DM3 – Intensification of Existing Residential Sites and Areas: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Iceni Projects	Intensification of Existing Residential Sites and Areas: The proposed approach of the policy needs to be subject of wholesale review in light of the changes to the classification of backland and infill land in PPS3.	Disagree. The amendments made to PPS3 in June 2010 state that the definition of previously developed land no longer includes private residential gardens. However the objectives of PPS3 require a flexible, responsive supply of land that is managed in a way that makes efficient and effective use of land. It is considered that the intensification of existing residential sites and areas meets this objective. Paragraph 43 of PPS3 states that at the local level, Local Development Documents should include a local previously developed land target and trajectory. Policy CP8 of the adopted Core Strategy sets a target of 80% of residential development to be on previously developed land. This target allows for a proportion of housing to be made on Greenfield sites. This policy also

		<p>makes allowance for the intensification of existing sites. The proposed approach is fully compliant with the housing supply requirements of PPS3 and adopted Core Strategy Policy CP8. There is no need for a wholesale review of dwelling provision.</p>
Renaissance Southend	<p>Renaissance Southend supports the thrust behind the suggested option to protect existing established residential areas and encourage development to specific locations, such as the town centre, where opportunity and scope exists for new housing. The Character Study should be incorporated to give additional robustness to policy that seeks to protect specific locations from overdevelopment or inappropriate schemes that cumulatively would result in a change in character to the detriment of local amenity.</p>	<p>Noted. Consideration will be given to findings of the 'Character Study' upon its completion.</p>
Herbert Grove	<p>Generally yes but the parking restriction should also be look at on a case by case basis. If conversion is taking place to provide student accommodation then parking should not be required because students do not usually have cars.</p>	<p>Noted.</p>
Cllr Burdett	<p>DM3 - In agreement with a lack of family homes</p>	<p>Noted.</p>

Carole Mulroney (Leigh Society)	Particular care needs to be taken in historic areas to ensure there is no detrimental effect on conservation interests	Noted. This issue is considered in Suggested Option DM5.
English Heritage	Issue DM3 - Intensification of Existing Residential Sites and Areas, p22 The second paragraph on page 23 refers to the cumulative impacts on climate change, surface water flooding and biodiversity. Historic environment should also be included within this list.	Noted. Historic environment is addressed in DM5. All development management policies should be considered as a whole.
Savills for Inner London Group	Need to differentiate in policy terms between additional development, conversion and redevelopment, as different levels of intensification are likely to be appropriate for each of these types of development proposals. In this context it is not clear what is meant by "over intensification"	Agree. Appropriate amendments will be made.
	The requirement for all new homes, including conversions, to meet Lifetime Homes Standards, is too onerous. Redraft policy "should aim to be 100% Lifetime Homes Standards, unless there are special circumstances, which can be demonstrated. "	Noted. Given the social profile of the borough, identified in the SHMA, and the need to plan for balanced and sustainable communities, Lifetime Homes should apply to all developments including conversions where viable and feasible.
	To be consistent with other policies in this DPD and the CAAP the policy on floorspace calculation to support conversion should be on Gross Internal Area, rather than Net Internal Area	Noted

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	There is a potential policy conflict arising from the interaction between these policies on residential intensification and other policies, in particular those on Tall Buildings	Disagree. This policy area relates to securing the efficient use of land within a sustainable context. Tall buildings relates to buildings that are out of scale and context with their surrounds.
Burges Estate Residents Association	Page 23. The analysis of the problems caused by conversion into flats is self evident and begs the question as to why the Council did so little in the past to resist the trend. Given the nature of the problems e.g. increased parking, it is difficult to see how a continued supply of 1 and 2 bed flats can be assured to satisfy the demand. Your suggested option does not deal with the loss of family accommodation, nor loss of private amenity space and is too vague on the concentration of flatted units in a street. Certainly the Council should provide a lower limit on conversions and 125sm seems an appropriate minimum. So far as the protection of bungalows is concerned there needs to be a firmer line taken which, aside from character and appearance, includes going against the grain of the area, intensifying activity levels and adversely affecting the living conditions of neighbours.	Noted. The loss of family accommodation is addressed in Issues DM13. Matters relating to living conditions is addressed in Issue DM1.
	This also should be some protection as to permitted development, in particular utilising roof space, where the extensions are more dominate and are out of keeping with the integrity of the original roof. (i.e. hipped to gable, or a flatted dormer that fits uncomfortably with the existing roof line)	The Development Management DPD can not change Government policy relating to permitted development.

13. Issue DM3 – Intensification of Existing Residential Sites and Areas: Do you consider the alternative options to be more appropriate? If so, please state why.

No comments made

14. Issue DM3 – Intensification of Existing Residential Sites and Areas: Should the Council set a numerical figure that prevents the conversion of dwellings below a given internal floor area as original constructed? The adopted Local Plan currently prevents the conversion of existing dwellings where the existing internal floor area is 125m² or less.

Respondent	Respondent's Comment	Council's Response
Herbert Grove Residents	No, a case by case approach is fairer	Agree. The Council considers that the criteria approach will ensure that conversion of existing dwellings into two or more dwellings will be of a high quality that does not detrimentally impact upon the existing dwelling or wider area. No further action(s) required.

15. Issue DM3 – Intensification of Existing Residential Sites and Areas: Are there any other issues and options relating to the intensification of existing residential sites or areas that the Council should consider?

Respondent	Respondent's Comment	Council's Response
Herbert Grove Residents	Only parking, Southend was designed before the era of the Motor Car so in order to provide quality of like style the Council must provide suitable parking for Residents. The technology exists to provide small underground car parks, perhaps even on a street by street basis if it can be done cheaply enough.	Disagree. The Council does not seek to increase car parking provision as it instead seeks to promote more sustainable forms of transport in line with Government policy. Furthermore, the cost of underground car parking provision as described would be too great and it is unreasonable for the Council to provide car parking for private homes.

		The Southend-on-Sea Parking Policies was adopted in June 2010. This document sets out the Council's general approach to parking.
Renaissance Southend	How is 'parking stress' to be defined? What is definition of 'over concentration'? Could the Character Study help in answering two questions above? Most conversions are unlikely to meet the Lifetime Homes Standard. Is it advisable for the DM DPD to identify which elements are essential?	Noted. 'Parking Stress' and 'Over Concentration' will be defined in the Pre-Submission version of the Development Management DPD.
CLlr Crystall	No mention page 24 of Flats into Flats, this will not matter if Homes for Life provides adequate standards of space internally. We have been caught out with this before. Flats into flats should be a rare exception.	DM3 refers to single dwellings, which includes flats. All dwellings including conversions will be required to meet Lifetime Homes Standards.
Environment Agency	There could be an increase in flood risk if intensification of existing residential sites and areas in flood zones is considered. It could also place further burden on the emergency services by placing more people at risk. We therefore feel that flood risk should be considered in the list under part 1 of the suggested option.	All development management policies will be considered as a whole and alongside the Core strategy and national policy. It is considered that additional flood risk policy is not required.

16. Issue DM4 – Low Carbon Development and Efficient Use of Resources - Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
DPP	<p>The suggested option is comprehensive in its coverage taking the energy hierarchy as its basis whereby efficiency is promoted as the starting point. However it has a bias towards the reduction of energy rather than carbon reduction methods and as such is not in line with the national sustainable policy objectives. In addition, it is felt that a greater importance and weight should be given to this section within the guidelines. This will provide a much clearer and coherent sustainable energy policy throughout the region as a whole and ensure that prospective developments in Southend are as energy efficient as possible. The achievement of the Code for Sustainable Homes and BREEAM Excellent are feasible in general circumstances. However, where exceptions occur and are explained, meaning these targets cannot be achieved, must not be allowed to prejudice the submission. Guidance on the requirements and stages to meet these requirements will also be necessary.</p>	<p>Agree. Greater emphasis will be placed on carbon reduction in the Pre-Submission version of the Development Management DPD.</p> <p>New developments should take account of their impact over their lifetime and not just at the time of the planning application. These standards form an important part of the Council's aim to deliver sustainable buildings, places and communities. They are also in line with national planning and energy policy.</p>
Renaissance Southend	<p>Renaissance Southend supports the policy intention that all non-residential development meets the BREEAM Excellent Standard. However, this may pose</p>	<p>Noted. The Council is committed to delivering a more sustainable Southend-on-Sea with emphasis on: using less energy; supplying energy more efficiently; and the use of</p>

	<p>severe challenges to public and private sector projects in the short/medium term on grounds of both cost and viability. Paras.3, 5 & 6 relate to the Code for Sustainable Homes, BREEAM and Building Regs. Greater clarity is needed on whether the policy will seek to simply meet, or exceed these standards, both regulatory and voluntary. The 10% on site renewables policy reflects the current Adopted Core Strategy but is likely to need review before the DM DPD is adopted re comments on SCAAP.</p>	<p>renewables. The Code for Sustainable Homes and BREEAM standards will contribute and form a vital component in meeting these aims.</p>
Herbert Grove	<p>No, too much policy causes confusion.</p>	<p>Noted. The Council is committed to delivery a more sustainable Southend-on-Sea with emphasis on: using less energy; supplying energy more efficiently; and the use of renewables. The Code for Sustainable Homes and BREEAM standards will contribute and form a vital component in meeting these aims.</p>
Carole Mulrone (Leigh Society)	<p>The highest possible standards should be maintained and incorporated into development schemes</p>	<p>Agree. The Council is committed to delivery a more sustainable Southend-on-Sea with emphasis on: using less energy; supplying energy more efficiently; and the use of renewables. The Code for Sustainable Homes and BREEAM standards will contribute and form a vital component in meeting these aims.</p>
Mrs Jennifer Hircock	<p>Insist on carbon reduction for all new buildings and help support renewable energy in existing homes.</p>	<p>Agree. The Council is committed to delivery a more sustainable Southend-on-Sea with emphasis on: using less energy; supplying energy more efficiently; and the use of renewables. The Code for Sustainable Homes and BREEAM standards will</p>

		contribute and form a vital component in meeting these aims.
Environment Agency	We are in general agreement with the approach set out in the suggested option. We welcome the requirement for a minimum Code Level 4 rating, but this could also go further to require increasing ratings in line with the Government aspiration for zero carbon development by 2016. We are pleased to see a BREEAM rating of 'Excellent' for non-residential development. We welcome all of the measures set out in parts 1-7. We are particularly interested in the water efficiency requirements and reference to your Water Cycle Study should be made and might allow more detailed requirements to be set. We would also recommend that you refer to our Thames Gateway Environmental Standards for further advice on other issues.	Noted.
English Heritage	Issue DM4 - Low Carbon Development and Efficient Use of Resources, p26 We do, in general, support the principles behind this policy, but the background text to this policy deals exclusively with new developments. This policy should also recognise the embodied energy within existing buildings, and should not be used to justify demolition of buildings that make a positive contribution to their surroundings. In this context, the advice in PPS5 HE1.1 is relevant, including the need to	Agree. The Council in line with its partnership with Build with CaRe will incorporate a retrofitting element to this policy.

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	<p>seek the reuse and, where appropriate, the modification of heritage assets so as to reduce carbon emissions and secure sustainable development. English Heritage's guidance 'Energy Conservation in Traditional Buildings' (available on the HELM website) provides further advice on sympathetic adaptation of the existing building stock.</p>	
Savills for Inner London Group	The design criteria do not read across to DM1.	Each development management policy should be read as a whole.
	<p>This requirement, extending to minor developments is unrealistic. Greater emphasis should be placed on passive design to reduce energy consumption during construction and in use, as in the London Plan. The energy reduction attributable to these should be taken into account in determining the level of renewable energy production on site and/or off site contributions to say CHP facilities. This requirement should be subject to feasibility and viability criteria.</p>	Noted. Appropriate amendments will be made.
	<p>This should be an aspiration rather than an absolute requirement. Permission should be granted for schemes where not all buildings meet Code Level 5, provided that they meet other LDF objectives and / or viability information demonstrates that scheme would not come forward otherwise.</p>	Noted. Policy will be amended to reflect national policy.

	An additional criteria should be included referring to the Green Grid Strategy	Agree. Appropriate amendments will be made.
	Generally support suggested option - subject to detailed comments and linking this policy area to DM1. There is no special justification for exceeding national targets in Southend. Need to place greater emphasis on reduction in energy use and consumption through good design and construction. To be reflected in Policy DM4 and DM10 and interrelationship with requirement for 10% renewable energy generation on-site.	Noted.
Burges Estate Residents Association	Page 29. There is every acknowledgement that reducing carbon emissions are crucial. However the Council needs to take care with regard to local or on site energy generation in terms of its visual impact on the local environment. The placing of photovoltaic cells/solar panels on roofs and the growth of small wind turbines threatens the street scene. Moreover there is growing resistance occasioned by the noise, vibration and flicker effect of wind turbines. In order not to unduly constrain development in the Borough I think the Council should await the Govt. changes to the Building Regulations.	Design including noise, vibration and lighting issues are addressed in Issue DM1.

17. Issue DM4 – Low Carbon Development and Efficient Use of Resources: Do you consider the alternative options to be more appropriate? If so, please state why.

Respondent	Respondent's Comment	Council's Response
DPP	No, the practicality of leaving the policy to rely on national policy and building regulations alone will mean that development across the region is open to challenge in the areas of carbon and energy reduction. Likewise insisting that development in the region exceed national requirements leaves the council open to challenge, slows the development cycle down, and encourages developers to look for alternative less onerous sites to develop. It is our opinion that the key to ensuring carbon and energy reduction across the region is consistency and rigorous follow through of the local policy which should be clear and enforceable.	Agree that local policy will play an important role, together with national policy requirements and standards.

18. Issue DM4 – Low Carbon Development and Efficient Use of Resources: Is the Council's approach necessary given the emerging Government policy?

Respondent	Respondent's Comment	Council's Response
DPP	Yes, the removal of the Regional Spatial Strategies (RSS's) and with them the targets for renewable and low carbon energy reduction has shown the government intention to devolve the authority for such	Agree that local policy will play an important role, together with national requirements and standards.

	things to the local level. Therefore it is essential that the council have a clear and detailed policy that allows development to continue at a healthy pace	
Herbert Grove Residents	Yes the Government's approach is all that is needed.	Disagree. National planning policy supports a local approach.
Cllr Peter Wexham	All Councils are supposed to put into their development plans site for renewable energy. The most suitable site we have is between the Pier & Shoebury Boom along the low water mark. This is between 1 mile at the pier & two & a half miles at the boom. If you need reasons why this is suitable I can tell you but for now I think the site is what is needed.	The Development Management document does not set out site allocations. This will need to be addressed through other LDF and corporate policy documents.
Environment Agency	We support the council in taking positive action ahead of Government changes. The Thames Gateway is an Eco Region and should lead the way in resource efficiency and climate change mitigation.	Noted.
Savills for Inner London Group	The Council's approach needs to be flexible enough to respond to changes in emerging / adopted Government policy.	Noted.

19. Issue DM4 – Low Carbon Development and Efficient Use of Resources: Should the Council seek to implement zero carbon developments before the Government's changes to the building regulations in 2016?

Respondent	Respondent's Comment	Council's Response
DPP	No, the building community should be allowed to formulate the best way to meet the target by being given a suitably appropriate timeframe. When the zero carbon target was announced the timeline was set to be challenging for developers. Bringing forwards this date will only reduce the likelihood that a coherent development scheme that can meet the criteria will be constructed within the region.	Noted. The Council will align the policy to national standards whilst still retaining a local approach.
Environment Agency	Issue DM4: Question 19 We would support you should you wish to seek zero carbon development ahead of Government changes to the Building Regulations in 2016.	Noted.
Savills for Inner London Group	The governmental policy objective for all developments after 2016 to be "Zero Carbon" is particularly onerous and is likely to have a significant effect on development delivery. Introducing this into Southend before required and during a market recession, may have a severe negative effect on developments coming forward.	Noted.

20. Issue DM4 – Low Carbon Development and Efficient Use of Resources: Are there any areas of Southend-on-Sea where higher low carbon standards should be sought?

Respondent	Respondent's Comment	Council's Response
DPP	Southend-on-Sea should ensure that new developments within their own region enhance the potential for carbon reduction, providing a clear sign that the improvements in carbon reduction are possible. In addition the council should encourage the improvements in building refurbishments.	Agreed. The policy aims to achieve this. A retrofitting element will be added to the policy.
Savills for Inner London Group	There should be a Borough - wide low carbon standard	Noted. The Council will incorporate a borough-wide Code for Sustainable Homes and BREEAM standard that will achieve this.

21. Issue DM4 – Low Carbon Development and Efficient Use of Resources: Should the Council seek to facilitate the delivery of decentralised energy networks within the specific areas within the borough?

Respondent	Respondent's Comment	Council's Response
DPP	Decentralised energy comes with costly infrastructure which can be a negative barrier for inclusion within developments. By facilitating the delivery of such systems the council can ensure inclusion within the region. It is suggested that the council carry out a resource assessment of the region and identify areas where decentralised energy can be best introduced,	Noted.

	bearing in mind key criteria for optimum performance.	
Environment Agency	<p>Issue DM4: Question 21 Development should use the lowest carbon energy production technologies and reduce inefficiencies in the energy supply to minimise carbon dioxide emissions. Decentralised energy networks could provide the lowest carbon solution. Supply infrastructure and buildings should be adaptable to future innovative technologies. Low carbon producing technologies Assess the development to examine whether community scale systems for energy, heating and cooling would be more efficient than relying on centralised supply or micro-generation. Efficient Energy Production and Supply Community energy systems for heating and cooling allow primary energy resources to be processed, distributed and used more efficiently than generation at either a centralised or micro scale. However, it is possible that power may be most efficiently produced from a centralised location. Waste that cannot be recycled or reused should be used for energy recovery. An assessment should be made at a strategic scale as to whether there are sufficient quantities of non-recyclable waste to support energy from waste facilities. Industrial symbiosis should be encouraged between neighbouring developments to</p>	Noted.

	improve resource efficiency. This symbiosis is the trade of materials, energy, heat, water and other by-products. Please see recommendation ERE3 on Page 23 of our Thames Gateway Environmental Standards for more info.	
Savills for Inner London Group	In the absence of any information on how and where the Council would seek to facilitate the delivery of decentralised energy networks within specified areas in the borough, and alternative options, it is not possible to make a reasoned response to this question.	Noted.

22. Issue DM4 – Low Carbon Development and Efficient Use of Resources: Are there any other issues relating to low carbon development that the Council should consider?

Respondent	Respondent's Comment	Council's Response
DPP	DPP Sustainability have extensive experience in the area of sustainable energy methods; Whilst we welcome the fact that the Southend-on-Sea are in favour of promoting sustainable energy methods, we are of the opinion that the text contained in the draft guidelines lacks clear guidance and does not adequately address the issue of climate change, which should be treated with greater importance and weight; In order to have a valuable effect on sustainable energy policies, a multifaceted approach should be promoted in line with national and European policy.	Agree. Greater weight will be given to passive design measures and Code for Sustainable Homes and BREEAM standards. It is Council's approach to track the targets within national policy.

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	<p>This is best achieved through a requirement to illustrate that a 25% reduction in carbon emissions has been incorporated into development proposals; Energy Statements should be promoted as accompanying documents in planning application pack to clearly illustrate to Southend-on-Sea Borough Council how and if the 25% reduction in carbon emissions has been met.</p>	
Cllr Crystall	<p>Page 28. This is where siting of development for maximum solar gain should go in.</p>	<p>Agree. Greater weight will be given to passive design measures.</p>
Peacock and Smith for WM Morrison	<p>It is acknowledged that a number of Local Authorities are seeking a percentage of onsite renewable energy generation in new development and. in principle, our client supports this approach. However, we consider that any such policy should incorporate an element of flexibility to allow for circumstances where it will not be viable, feasible or suitable 10 incorporate renewable energy equipment to reduce CO2 emissions by a given percentage, or indeed for a development to be zero carbon. We note that paragraph 8 of PPS22 states that local planning authorities may include policies in Local Development Documents that require a percentage of energy requirements to come from onsite renewable energy generation, however this guidance is subject to the caveat that such policies: (i) should ensure that a</p>	<p>The Core Strategy was adopted in 2007. This policy contains the existing requirement for incorporation of a percentage non-renewable energy into developments. This is an energy policy in addition to carbon emission renewable policy. The Development Management DPD will incorporate sustainable design measures.</p>

	<p>requirement to generate on-site renewable energy is only applied to developments where the installation of renewable energy generation equipment is viable given the type of development proposed, its location and design; (ii) should not be framed in such a way as to place an undue burden on developers, for example, by specifying that all energy to be used in a development should come from on-site renewable generation. Accordingly, Wm. Morrison requests that any such policies on renewable energy includes text to confirm that this will be subject to the tests of viability and suitability.</p>	
<p>Environment Agency</p>	<p>The Water Cycle Study might highlight areas where increased water efficiency is required, which in turn will reduce carbon dioxide emissions. Water efficiency measures add a minimal cost to development but can achieve significant results. In addition, all developments should aspire to incorporate community water harvesting and reuse systems, which are needed to achieve water use of less than 95l/head/day. We would also recommend retrofitting strategy. Existing development could be retrofitted with resource efficiency measures to decrease carbon dioxide emissions and mitigate climate change. Implementing measures to reduce water use and improve waste recycling will also help to use resources more</p>	<p>Agree. The policy will incorporate water efficiency measures and a retrofitting element.</p>

	efficiently and reduce carbon dioxide emissions. A strategy should be produced and implemented which identifies: * the means of reducing carbon dioxide emissions from direct and indirect sources; * the funding for retrofitting resource efficiency measures; * who should benefit; and * how the contributions should be administered and measures implemented. Please see recommendation CCM4 on Page 61 of our Thames Gateway Environmental Standards for more info. As mentioned in our response to Question 21 above, supply infrastructure and buildings should be adaptable to future innovative technologies.	
Savills for Inner London Group	The policy may need to consider carbon use in the construction supply chain, including reuse of construction materials on- and off-site.	Agree. Sustainable construction methods will be incorporated into the policy.

23. Issue DM5 – Southend-on-Sea’s Historic Environment: Do you agree with the suggested option?

Respondent	Respondent’s Comment	Council’s Response
Renaissance Southend Ltd	Paras.2&3. The test in a case to alter or demolish a building of special architectural or historic interest is more exacting than the assessment of development either affecting or demolishing a 'locally listed' building or building in a Conservation Area. The narrative implies they are all equally protected and that the	Noted. Further consideration will be given the policy wording at the proposed Submission stage.

	processes are identical. PPG15 sets out the tests.	
Carole Mulroney (Leigh Society)	Great care needs to be taken to ensure the preservation and enhancement of historic areas. The use of local listing and stringent policies of control is advocated. Attention should also be paid to areas outside historic areas which nevertheless may impact on them.	Agreed. DM5 seeks to achieve this.
English Heritage	Issue DM5 - Southend-on-Sea's Historic Environment, p30. We are pleased to see the emphasis that new development should preserve and enhance conservation areas and historic buildings. We also welcome the acknowledgement of the economic benefits of the historic environment. Context In the 2nd paragraph, p30 you refer to historic buildings 'scheduled in the Council's local list'. To avoid any confusion with Scheduled Monuments, you may wish to substitute 'scheduled' with 'identified', or 'set out'. You should also include reference to unscheduled archaeological sites, and direct developers to the Borough Historic Environment Record. Historic Environment - suggested option, p30 English Heritage urges the Borough to take adequate steps to ensure that they have evidence about the historic environment and heritage assets in their area and that this is	Noted. Appropriate amendments will be made.

	<p>publicly documented as required by PPS5, policy HE2.1. Within the Option we suggest a new topic with wording to the effect 'The appraisal of existing conservation areas and potential new designations, as well as surveys to further identify buildings and assets of local importance, with effective policies for the management of all of these assets.' We also recommend the following in the suggested option: Point 1. Add 'The effect on undesignated heritage assets will be assessed and considered when considering development proposals' (see PPS5, policy HE8.1). Point 2. Add 'or their settings'. Point 3. Refer to tests in PPS5, policy HE9.2, which include the need to demonstrate substantial public benefits of change, the need to prove that reasonable uses cannot be found, or uses in the medium term to enable conservation, or grant funding or charitable/public ownership are not possible, or the harm/loss is justified by finding a new use for a site. Point 4. Add after appearance 'or setting of that conservation area.'</p>	
Savills for Inner London Group	<p>Generally support thrust of preferred option. However policy to require full planning applications for developments affecting the setting of locally listed buildings is too onerous and contrary to planning law and governmental guidance. We consider that all the main historical issues have been considered by the</p>	<p>Noted. Appropriate amendments will be made.</p>

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24. Issue DM5 – Southend-on-Sea’s Historic Environment: Do you consider the alternative option to be more appropriate? If so, please state why.

Respondent	Respondent’s Comment	Council’s Response
English Heritage	Historic Environment - Alternative options, p31 English heritage agrees that it would be inappropriate to omit historic environment policies. PPS5 advises that local planning documents should identify a positive and proactive strategy to protect the historic environment. In Southend the heritage assets require further assessment and appropriate protection and enhancement to ensure that they make a strong contribution in future to local townscape character. Historic Environment Development Plan Policy Linkages, p31/32 There are 6 saved local plan policies relating to the historic environment which should be referred to here. These are strong policies and we would like to ensure that the policy coverage that replaces them is appropriate to the positive approach set out in PPS5. While the East of England Plan may not continue to have relevance, for the present we suggest that the historic environment policy ENV6 should be included here.	Noted.

25. Issue DM5 – Southend-on-Sea’s Historic Environment: Are there other historical issues that the Council should consider?

Respondent	Respondent’s Comment	Council’s Response
Herbert Grove Residents	Residents of Herbert Grove and Chancellor Road believe that the unique design of the houses with balconies should be in a conservation area and subject to preservation. These properties were specially designed for the environment in which they sit and should be retained. The adopted RSL plans for St. John's Quarter call for the destruction of this area of Southend, this has resulted in property owners being reluctant to maintain or repair property which lowers the tone of the whole environment. Residents fear that the Council will buy property in this area and board it up leaving it to deteriorate and thus reducing the quality of life in the area and allowing the Council to buy further property lower than current market value.	The characterisation study of the Borough has considered each neighbourhood. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.
English Heritage	English Heritage has published an advice note on seaside towns and their common issues, which you may find useful (available on the HELM website). Other issues you may wish to consider: issues relating to coastal erosion, underwater archaeology (there are over 100 known wreck sites just off the coast of Southend), protection of the Pigs Bay Cold War	Noted. Reference to wreck sites and scheduled monuments will be included in the policy.

	Defence Boom, off Shoebury Ness (Scheduled Monument 35502). Potential impacts on these assets should be considered particularly in relation to water based recreational activity.	
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26. Issue DM6 – Alterations and Additions to Existing Buildings: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Renaissance Southend Ltd	Renaissance Southend agrees with the statement that flooding issues should not impact upon future development with the proviso that detailed flood risk assessments are undertaken before permission is granted. There should be consistency between the DM DPD and the SCAAP on this issue.	This response relates to Issue DM7. Noted. The Council will ensure consistency between the Development Management DPD and the Southend Central AAP.
Carole Mulroney (Leigh Society)	particular care needs to be taken in conservation areas	Noted. The suggested option in Issue DM5 seeks to ensure that development proposals will preserve or enhance the historic areas.
English Heritage	Issue DM6 - Alterations and additions to existing buildings, p32 Alterations and additions- suggested option, p33 English Heritage recommends that extra specific guidance should be provided to inform those considering alterations and additions to listed and locally listed buildings, and buildings in conservation areas.	The development management policies should be considered as a whole and alongside guidance in the Design and Townscape Guide.

Savills for Inner London Group	Generally support thrust of preferred option, as the alternative option is limited. Issues of water and energy efficiency should have been considered by the Council.	Water and energy efficiency is considered in DM4. Each development management policy should be considered as a whole.
Burges Estate Residents Association	Page 33. The suggested option presumes that the parent building has merit which the extension should emulate. That may not be the case and therefore some allowance should be made to ensure an extension respects both the parent building as it is and as its character was.	Noted. Amendments will be made.

27. Issue DM6 – Alterations and Additions to Existing Buildings: Do you consider the alternative option to be more appropriate? If so, please state why.

No Comments

28. Issue DM6 – Alterations and Additions to Existing Buildings: Are there any other issues relating to alterations and additions to buildings that the Council should consider?

Respondent	Respondent's Comment	Council's Response
The Theatres Trust	Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and therefore anticipate policies relating to cultural facilities. Issue DM6: Alterations to Existing Buildings - We have no issue with the suggested option but wish to add that theatres are very complex buildings technically and do need to be very carefully planned both inside and out. They need substantial	Noted. Policy to be amended to included a section relating to the function of existing buildings and their access arrangements.

	<p>development if they are to keep pace with public expectations and the needs of performers and producers and we are keen to help theatre owners do more to improve and adapt their buildings and to attract new audiences. The document should ensure that access to your theatres is not impeded by other proposals, such as those which could prevent disabled access and drop off, parking of trucks and vans for stage get-ins, broadcasting and other uses of theatre spaces. A theatre's economic sustainability relies upon it being able to have unrestricted physical access for users.</p>	
Herbert Grove Residents	<p>Where the alteration is to improve Carbon Emissions exceptions should be made.</p>	<p>Disagree. Issue DM4 seeks to reduce carbon emissions for all new developments. The alterations should always be of a high quality design standard.</p>
Southend-on-Sea Borough Council (Children & Learning Dept)	<p>I have looked at the Car Parking and Cycle Standards on pages 94 and 95. The car park standards for schools give us significant problems with planners when we have to expand primary schools - as we will have to right across Southend as a result of the increased birth rate. There are not the sites or money for new schools so we will have to expand existing schools - already on very tight sites. If the school expands the planners insist on more car parking to meeting the requirements - this means taking away</p>	<p>This response relates to Issue DM27. The comments are noted and further consideration will be given to the parking standards in relation to schools.</p>

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	<p>playground space at the very time we are asking the schools to take more numbers on already restricted sites. More car parking at the expense of school play area is not acceptable. We need to have a more flexible policy. Less of an issue are the cycle standards. We are just building a new secondary school at Belfairs and we will have a new school at Hinguar. To meet planning requirements we will have to provide cycle sheds way in excess of current usage - and the current facilities are there if pupils want them- and with a limited budget cut other more essential things. We need to encourage cycling but not waste resources. Similarly we have schools (eg the grammar schools) where large numbers travel some distance and use public transport. Cycling is not going to be an option for those pupils. I accept and agree with the aspirations and the encouragement but we need to be flexible in the interpretation and not have a rigid guideline. The car parking issue will give the Borough significant problems in the next few years as we try to expand primary places.</p>	
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Section 5: The Seafront

29. Issue DM7 – Flood Risk and Water Management: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Herbert Grove Residents	When planning permission is being sought for the development of a property a separate risk assessment should not be necessary if there already one for the same post code.	Disagree. This approach conflicts with national policy contained in PPS25.
Iceni Projects	Issue DM7 - Flood Risk and Water Management: The proposed approach needs to be revised to accord with the requirements of the Flood and Water Management Act 2010 in terms of SUDS provision and the changes to connectivity arrangements;	Agree. Regard will be given to the Flood and Water Management Act 2010.
Carole Mulroney (Leigh Society)	Development proposals in high risk areas should always be accompanied by a flood risk assessment	Agree.
Environment Agency	Issue DM7: Question 29 We are in general agreement with the approach set out in this suggested option. It should be noted that, under part 1, sustaining the current level of flood risk into the future does not necessarily mean that defences will be (or are able to be) raised. Effective floodplain management is therefore likely to play a major role into the future - this	Noted. Reference to Coastal Change will be added.

	<p>includes effective development control, for example applying the principles of PPS25 including the Sequential Test and the Exception Test, and also effective emergency planning. Under part 3, the recommendations of the TE2100 Plan are also considered as this area overlaps between the SMP and TE2100. The TE2100 Plan has been signed off by our Board of Directors and has been submitted to Defra. Although flood risk and coastal issues are discussed through mention of the linkages with the SMP it doesn't meet the requirements of the new PPS25 supplement on Coastal Change. This recommends that when development is proposed in a Coastal Change Management area it needs to be accompanied by an assessment of the vulnerability of the proposed development to coastal change. The frontage of Southend is at risk from erosion which in turn poses a risk to the structural integrity of the flood defences. This is currently managed through beach recharge. We would recommend that a paragraph is included to ensure it is not only flood risk that is managed but also coastal change, which occurs in this area due to erosion.</p>	
Savills for Inner London Group	It is not clear how the findings of TE2100 and CFMP2008 have been reflected both in DMDPD and CAAP, at this section states that "the level of actual risk	Noted. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation

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	<p>and the areas actually remaining at risk are therefore likely to be much lower than indicated by these maps, subject to the structural integrity of the defences being maintained." The submission drafts of the DMDPD and CAAP should include a plan delineating the flood risk areas that have been agreed with the Environment Agency. Both Plan Documents should set out any constraints on the form of development and / or appropriate uses with the flood risk area, setting out clearly any differences within different areas of risk. The commentary states that "any development proposals within areas of flood risk will require a detailed flood risk assessment, appropriate mitigation measures and agreement with the Environment Agency" This approach and the preferred option, rather than the alternative option, need to be ratified by the Environment Agency prior to the Submission Drafts of the CAAP and DMDPD being published, given the potential conflict with national planning policy on flood risk (PPS 25 and related Practice Guidance). This requirement to provide an FRA should be integrated into the approach (it currently is not) and form part of the overarching design policies (DM1 and Design and Townscape DPD).</p> <p>Given the exceptional circumstances in Southend, we generally support the suggested option, rather than</p>	<p>process and published as part of the Consultation Statement for the SCAAP.</p>
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	<p>relying on the alternative option and sequential and exceptions tests in PPS25. However this suggested option and the approach to considering flood risk must have the full support of the Environment Agency, before the submission Draft of the DMDPD and CAAP are published, so that discussion with the EA on a site by site basis during the life of the Plan are considered in this context.</p>	
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30. Issue DM7 – Flood Risk and Water Management: Do you consider the alternative options to be more appropriate? If so, please state why.

Respondent	Respondent's Comment	Council's Response
Burgess Estate Residents Association	<p>Page 36. There seems to be a conflict with the Environment Agency policy regarding development in flood risk areas. Can one assume that the SFRA due this year which purports to give a better interpretation of flood risk will be accepted by the Environment Agency? While there may be parts of the sea front within the high risk flood area which would benefit from development, the Council needs to be mindful of the safety of any residents and should as part of their policy emphasise the non residential priorities for development.</p>	<p>The flood risk and water management option has taken account of advice provided by the Environment Agency.</p>

31. Issue DM7 – Flood Risk and Water Management: Should there be a specific policy that encourages ways to use the sea defences in a positive and imaginative way to bring about social and economic benefits?

Respondent	Respondent's Comment	Council's Response
Herbert Grove Residents	More imagination beyond that given by RSL is very necessary.	Noted. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.
Environment Agency	Issue DM7: Question 31 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.	Noted.

32. Issue DM7 – Flood Risk and Water Management: Are there any other flood risk issues that the Council should consider?

Respondent	Respondent's Comment	Council's Response
Herbert Grove Residents	If there is a major flood, damaged property in low lying areas should not be put back to the same use but	This does not accord with TE2100 or advice provided by Environmental Agency.

	the whole area assessed and possibly alternative uses found, such as a yacht basin.	
Environment Agency	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. This whole section should be updated in light of the (soon to be) completed SFRA and the TE2100 Plan.	Agree. Amendments will be made.

33. Issue DM8 – Seafront Public Realm and Open Space: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Renaissance Southend Ltd	There should be a clear link in the policy to more detailed proposals to be contained within the Greenspace and Green Grid Strategy SPD	Agree. Reference to the Green Grid will be emphasised.
Cllr Burdett	DM8 -The slot machines in my opinion do not give the impression of high quality. Like character zones - but most day trippers go to the area by the slot machines.	Noted. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.

<p>Carole Mulroney (Leigh Society)</p>	<p>Particular attention should be paid to the historic areas of the Borough to ensure that the public realm sets a good example for private development and enhances the areas.</p>	<p>Partially Agree. The Suggested Option seeks a high quality public realm across the whole of Southend.</p>
<p>The Society for the Protection of Undercliff Gardens</p>	<p>Context. DM8 also contains many generalities under the heading "context" which sounds fine. But, as ever, the devil is in the detail. We are not hopeful in this regard. Site specific design codes. The Council's stated approach in DM8 ["Our approach is"] contains a commitment to ensuring that site specific [e.g. Undercliff Gardens] design briefs and design codes are prepared - which is welcome, but hopefully this will cover all sites in the borough and not just major development sites as suggested. We suggest that all residents wish to live in an area of which they can be proud and not just those affected by major developments. A sense of place. Item 4 confirms a commitment to recognize a sense of place and to retain and protect from any development that would adversely affect their character, appearance and setting. TOO LATE! The approval of the latest planning application for 82 Undercliff Gardens shows a total disregard for this commitment and has wrecked any chance of that policy being implemented in spite of strong written protests by this Society.</p>	<p>Noted. The Development Management DPD will provide a policy basis to inform planning application decisions and ensure high quality development.</p>

<p>Environment Agency</p>	<p>We generally agree with the approach being taken in this suggested option. Public realm and open space along the seafront presents opportunities to tie-in with the Thames Gateway Parklands vision and the wider green-grid initiatives. Under part 1 we would suggest that native planting is sought rather than purely aesthetic planting. Using species of local provenance would maximise the ecological value of sites. As mentioned above, under Part 3, seeking opportunities for the incorporation of innovative flood defences into public realm and open space design 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. Under Part 11 you should also ensure that development will improve and enhance biodiversity and the natural environment. 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</p>	<p>Noted. Appropriate amendments will be made with regard to biodiversity.</p>
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	change.	
English Heritage	<p>In discussing the main functions of the estuary, there is a lack of consideration given to the historic environment, for example the grazing lands to the north of Southend are an area of high historical interest.</p> <p>Issue DM8 - Seafront Public Realm and Open Space The introductory paragraph on page 39 should include mention of the historic environment within the identification of other environmental resources of the area. This should also be brought forward into the bullet-pointed list lower down this page. It could be incorporated into the last two points. Paragraph 2 of the context section states that Seafront Character Zones are identified in DM8 - this should be DM9. Seafront public realm - suggested option, p40 The Seafront's 'special charm' is referred to (approach field, page 40) but a specific reference is needed here, and in the bullet points, to the importance of the protection and enhancement of the historic environment. PPS5 places particular emphasis on the contribution of the historic environment to sense of place. Point 5 (p40) identifies that seafront development should not adversely impact on the Thames Estuary or Southend's</p>	<p>Noted. Consideration has been given to the historic areas within the Southend-on-Sea Borough area.</p> <p>Noted. Historic environment is considered in DM5. Each development management policy will be considered as a whole. Appropriate amendments will be made.</p>

	beaches. This should also consider the impact on landward views from boats.	
Savills for Inner London Group	There are some omissions and suggested changes to the suggested option: No reference to "Green Grid" in suggested approach Green Grid and Green Corridor should be identified in policy text and on plan	Agree. Reference to the Green Grid will be incorporated.
	No reference to "Seaside Character Zones" in suggested approach Seaside Character Zones should be identified in policy text and on plan Design Briefs and Codes may not be appropriate for "all major development sites" For clarity and monitoring purposes, a list of the key development sites for which briefs / codes are to be prepared should be appended to the Submission versions of both the DMDPOD and CAAP	Seafront character zones are addressed in DM9.
	All public realm works should also include consideration of flood risk (point 3) The detailed proposal to enhance Cliff Gardens may be more appropriately included in the CAAP Redraft as policy / proposal in CAAP.	Noted. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.
Burges Estate Residents Association	Page 42. There is nothing specific in the document to suggest that an Article 4 directive is needed. This seems somewhat draconian.	Noted.

34. Issue DM8 – Seafront Public Realm and Open Space: Do you consider the alternative option to be more appropriate? If so, please state why.

Respondent	Respondent's Comment	Council's Response
The Society for the Protection of Undercliff Gardens	An alternative option. Finally we appose the suggested alternative option - which is not to have any policy regarding the seafront, but to rely on vague phrases such as "high quality environment". We can safely forecast that such a leaky policy would collapse under the onslaught of an appeal. We also suggest that there is little evidence that officers and elected members are capable of implementing a vague policy such as this.	Noted.

35. Issue DM8 – Seafront Public Realm and Open Space: Are there any other design considerations that the Council should consider when assessing schemes along the Seafront?

Respondent	Respondent's Comment	Council's Response
The Society for the Protection of Undercliff Gardens	Policy C12. Issue DM8 includes Undercliff Gardens, which this Society was founded to protect in 1946 and refers to saved policy C12 Undercliff Gardens. Our residents care deeply about their local area. They expect good quality design in new development, renovation schemes, streets and urban spaces whilst safeguarding and enhancing local character. Interesting buildings, quality streets, good relationships with existing development, and the use of public art	The Development Management DPD Issues and Options document has been carefully coordinated with the Design and Townscape Guide.

	<p>and landscaping all help to develop local identity and places people are proud of. In the last few years Southend Council have constantly ignored such expectations of our residents which is in direct conflict with the above quotation, taken verbatim from Page 1 of the Council's own Design and Townscape Guide 2009. Clearly a change in fundamental attitude will be required if the latest DPD is to be worth the paper is written on - which may be difficult in the light of the Council entrenched position witnessed over the last decade. Therein lies the conflict of expectation and reality which ensures that residents approach any document relating to design and planning with a jaundiced eye in the light of many years experience during which time Southend Council have widely and consistently ignored their own policies and guidelines. In other words we suggest that Southend Council have "form" and we fear that a change in attitude will be very difficult to implement. For this reason, the latest DPD will need to be carefully co-ordinated with the Design and Townscape Guide to avoid confusion, and eventually a lack of certainty.</p> <p>2. High quality design. DM8 contains many references to "high quality design standards" but the evidence to date is that bland references to high quality design is an ambition which has eluded the Council for many</p>	<p>The development management policy focuses on how high quality development will be achieved. The Council has a continued commitment to improving the quality of the environment in line with national policy.</p>
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	<p>years. We therefore question whether the continuation of general "nice idea policies" based on all embracing phrases is a good idea. We strongly believe that it is the detail of any planning application that is important and hope that at last the Council may be willing to accept this argument.</p>	
Herbert Grove Residents	<p>The road between the Pier and the Kursal Roundabout should be made into an underground road, freeing the surface for pedestrians. Further underground car parking could be incorporated if funding permits.</p>	<p>The principle of increasing pedestrian and recreational space along the promenade is accepted and forms a key element of the Council's 'City Beach' project which is scheduled for completion in March 2011. The Development Management DPD will not set specific transport allocations. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.</p>
Cllr Crystall	<p>Seafront Public realm. Page 39. Park and ride needed and seafront bus service .Link to tramway/land train from Victoria station to pier hill. Adequate parking for sea front. Seaway CP is inadequate in Summer. Long term Strategic objective Rochford, Hockley Rayleigh bypass from East of town to A 130.</p>	<p>These suggestions are of a strategic nature and are not appropriate within the Development Management DPD. The suggestions would be more appropriately put forward to LTP consultation. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.</p>

Savills for Inner London Group	Microclimate should be considered	Noted.
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36. Issue DM8 – Seafront Public Realm and Open Space: Should the Council enforce an Article 4 Direction over the Seafront area to restrict permitted development?

Respondent	Respondent's Comment	Council's Response
Herbert Grove Residents	No - each development should be assessed on its own merit.	Noted.
Savills for Inner London Group	No justification or explanation has been provided.	Noted.

37. Issue DM9 – Seafront Character Zones: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
CPREssex	Suggested Option DM9 With reference to the Sea Front Character Zone relating to Two Tree Island, Leigh Marshes and Belton Hills, we are pleased to see the priority is to maintain the openness and function of the Green Belt. Stronger wording needs to include reference to enhancing the biodiversity of the nature reserves which are such an important part of the landscape here.	Agree. The policy will reflect need to enhance biodiversity of the nature reserves.

<p>Carole Mulroney (Leigh Society)</p>	<p>Care needs to be taken that the Sustrans proposals do not effect the historic areas such as Leigh Old Town detrimentally.</p> <p>The Green Belt in the Two Tree Island Zone is very important and strong policy should be maintained for its protection. Whilst the Old Town must be maintained as a marine village there are some improvements which could be made to the industrial area and these need to be pursued.</p>	<p>Agree</p> <p>Noted.</p>
<p>English Heritage</p>	<p>Issue DM9 - The Seafront Character Zones English Heritage suggests that these zones may need to be defined when the Borough Wide Character Study has been completed and that similarly, the long-term outcomes should evolve from these. We urge that the question of inter-visibility between the zones is considered and the wider settings of assets such as the Pier and Clifftown. Reference could be made to policy HE10.2 of PPS5, and to English Heritage's draft guidance on the Setting of Heritage Assets (available on the English Heritage website). There is currently no indication that any historic landscape characterisation has been done. For example, where Table 1 lists the individual zones, the zone that covers Two Tree Island, Leigh Marshes and Belton Hills also includes Hadleigh Castle Country Park. The analysis of the function of the</p>	<p>The Seafront Character Zones were consulted on and established during the Seafront AAP Issues and Options.</p> <p>The pier and Clifftown will be considered during the Southend Central Area Action Plan.</p>

	<p>zone should include reference to the important heritage assets of the area and their recreational value.</p>	
<p>Savills for Inner London Group</p>	<p>This section of the plan may be premature, given the awaited character analysis Options for each of the Character Areas should have been available for consideration under regulation 25 The draft policies should be written to minimise duplication with policies in the CAAP and other AAPs. There is currently no policy basis for achieving the proposed long term outcomes for each of the Character Areas (Table 1 and Appendix 6) The further modified boundaries of the Seaside Character Zones (following the completion of the Borough Wide Character Study in 2010) should be identified in policy text and on plan in both the Submission Draft of the DMDPD and CAAP Table 1 - Seafront Character Zones is not currently cross references to Appendix 6 and the two elements of the Plan are particularly difficult to understand</p>	<p>The Seafront Character Zones were consulted on and established during the Seafront AAP Issues and Options. There was a general agreement that the proposed Seafront Character Zones provided an appropriate tool in which manage the seafront area.</p> <p>Noted. The proposed outcomes have been drafted to minimise duplication with other policy documents.</p> <p>The Seafront Character Zones will be incorporated onto the Proposals Map.</p>

38. Issue DM9 – Seafront Character Zones: Do you consider the alternative options to be more appropriate? If so, please state why.

Respondent	Respondent's Comment	Council's Response
Cllr Cystall	Cliffs below Cliff Parade. This area is not mentioned, but is popular for picnics and visitors to the seafront. Although an informal area, not groomed like a park, it is a neglected area, hedges rarely cut unless complaints are made regularly by members, steps not kept clean and broken glass not removed. A little tender care would greatly enhance this popular viewpoint of the Estuary and improve the visitor facility which gives access by the bridge to the Cinder Path and Chalkwell /Leigh Old Town.	Noted.
	Footbridge. Page 44. This is a semi stepped bridge that should be made into a smooth ramp so that push chairs and buggies and electric buggies for pensioners can gain access to the foreshore at this halfway point on the route. It would give older sailing club members and residents an opportunity to visit the sailing club, and to access the paddling pool with grandchildren. About a third of residents are pensioners, and their needs have to be considered. The bridge is presently an obstacle for all prams and wheelchairs, and need not be so.	Noted.

39. Issue DM9 – Seafront Character Zones: Do you agree that it is appropriate to define Seafront Character Zones to plan for their future?

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	Whilst it may be appropriate to define Seaside Character Areas to plan for their future, the current approach is prescriptive and in any event, premature. Each character area should be considered and planned independently with consideration of options in each area.	The Seafront Character Zones were consulted on and established during the Seafront AAP Issues and Options.

40. Issue DM9 – Seafront Character Zones: Is there another approach to managing the Seafront Character Zones that the Council should consider?

Respondent	Respondent's Comment	Council's Response
Cllr Peter Wexham	The area of Leigh Marshes needs to be changed from Green Belt to a recreation area or public green space. It states that it is landscaped for sport & football pitches. There have not been any football pitches for over 20 years, it is cut & used as a dogs toilet. There is a massive need for a park & ride. There is a need for more parking for commuters that jam up the residential streets, this could happen in the first field. There could be additional youth facilities to added to the skate park. There could be boot fairs on the site or camping & caravan touring site for visitors. If Leigh creek gets sorted out the area between the fields could	It is noted that Leigh Marshes should be used as a recreation area or public green space. However the Council disagrees that the Green Belt designation should be removed as the two designations are mutually supporting. PPG2 states that the most important attribute of Green Belts is their openness. Once Green Belts have been defined, the use of land in them has a positive role to play in providing opportunities for access to the open countryside for the urban population and to provide opportunities for outdoor sport and outdoor recreation near urban areas.

	<p>be used as a boat club or café or facilities for camping but none of this can happen under the present designation of the site. We should look at what we can do not what we cant do with this area or else it will sit there for another 20 years doing nothing.</p>	<p>The adopted Core strategy protects the extent of the Green Belt. The Development Management DPD is not a strategic document and cannot change the Green Belt boundary.</p>
<p>Cllr Crystall</p>	<p>Page 43. Leigh Marsh should not have been included in green belt. This is the area between the Railway industrial area and Leigh creek. The football pitches are a thin layer of earth on compacted rubbish, and have been unusable for sport for some years. They are mainly used for dog walking and informal games. They need to be used for an extension of parking and for a park and ride base for travel to Southend City Beach, difficult but not impossible with the green belt designation. Suggest green belt designation unusable for Leigh Marsh, informal activity area and "Park and Ride facility" Need to extend activities for youth, extend the present skateboard park and put in refreshment area. Climbing walls?. Need for a safe pedestrian route from the Leigh Marsh car park into Old Leigh. Cllr Wexham prepared a plan, which involved moving the Wire cage by the Marina area about a metre south, and would have cost about £18,000 ten years or so previously. The area North of the golf driving range could accommodate five touring caravans. Need for refreshment facility near slipway at Two Tree,</p>	<p>The adopted Core strategy protects the extent of the Green Belt. The Development Management DPD is not a strategic document and cannot change the Green Belt boundary.</p>

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	Restaurant/café.	
	Page 43. Cinder path. There is a wide and diverse range of marine plants that grow alongside the cinder path on BOTH sides. This should be designated a nature trail, there are probably in excess of forty different marine species along here. Railtrack would need to stop spraying herbicides and council would need to stop removing plants at back of Joscelynes beach, where they made an attractive back drop. A booklet with all the marine plans needs to be prepared for educational use. Footbridge.	This level of detail is not appropriate within the Development Management DPD and should be considered in Biodiversity Action Plan

41. Issue DM10 – Water Recreation: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Carole Mulroney (Leigh Society)	Whilst we support the Preferred Option we consider that all development proposals should be considered on their merits	Noted.

42. Issue DM10 – Water Recreation: Do you consider the alternative options to be more appropriate? If so, please state why.

No comments made

43. Issue DM10 – Water Recreation: Are there any other issues regarding water recreation activities that you think the Council should consider?

Respondent	Respondent's Comment	Council's Response
CPREssex	Suggested Option DM10 - Water Recreation The emphasis on not compromising the enjoyment of other users is fine. We should like to see some reference to the nationally designated off-shore conservation areas, which might be damaged by expansion of motor-powered recreation such as speed boats.	Agee. References to the national designations will be added to the final policy.
Natural England	Natural England is concerned that Issue DM10 - Water Recreation does not include any reference to the importance of biodiversity interests and, in particular, to issues of loss of inter-tidal habitats and the risk of increased disturbance to birds. With this one exception, Natural England considers that the Development Management DPD addresses all of those issues which are within our remit and which are relevant to the scope of the DPD; to a level of detail which is appropriate for the Issues and Options stage of the process.	Agee. References to the national designations and importance of biodiversity will be added to the final policy.
Cllr Crystall	Page 48. No use having byelaws about speed of boats if they are not enforced. A small fast boat capable of appropriate speeds to catch the culprits is necessary.	Noted.

Environment Agency	Issue DM10: Question 43 New and improved facilities for water recreation should not adversely impact upon biodiversity. They should also not compromise flood risk management infrastructure or the ability to maintain this into the future.	Agree. Appropriate amendments will be made.
Burges Estate Residents Association	Page 47. No mention is made about swimming/bathing or water quality or any mention of what measures might be sought to improve facilities for these activities.	It is inappropriate for the Development Management DPD to consider the water quality of the Seafront.

Section 6: Residential Accommodation

44. Issue DM11 – Dwelling Mix: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Iceni Projects	Issue DM11 - Dwelling Mix: The proposed approach needs to reflect the implications of deliverability difficulties associated with the proposed provision of high density flatted development;	The Suggest Option under Issue DM11 does not propose high density flatted development. Indeed it seeks a mix of dwelling sizes including family housing.
Adult & Community Services Southend-on-Sea Borough	Agree with the suggested options that developers should bring forward proposals for market housing that reflects the profile of households requiring such accommodation, that family sized accommodation is encouraged where appropriate and that mix is discussed at pre-application stage. Agree with	Noted.

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Council	suggested guideline mix which mirrors findings of the recent SHMA update and would encourage that this is informed by any future updates of SHMA, local housing needs assessments and informed by upcoming refresh of the Borough's Housing Strategy.	
Herbert Grove Residents	No the market should determine the housing mix	Noted. The Suggest Option under Issue DM11 allows for the market to decide the dwelling mix provided that a range of dwellings sizes and types are provided. The requirement for family housing is necessary considering the shortage of such housing as identified in the Strategic Housing Market Assessment.
Carole Mulroney (Leigh Society)	supported	Noted.
Savills for Inner London Group	Generally support the proposed affordable housing mix, and the flexible approach to market housing mix To be drafted as policy Support encouragement of family accommodation (housing and flats) "where site conditions allow." To be clarified and drafted as policy Support approach which remains flexible to take account of revisions to the Strategic Housing Market Assessment, and which considers "The proposed affordable housing mix should not be treated as a definitive mix but rather a negotiated figure."	Noted.

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	Factors likely to influence housing and tenure mix, including feasibility and viability should be clarified. Text should be drafted as policy in Submission Draft	Noted.
Burges Estate Residents Association	Page 51. The proportion of different dwelling sizes in the suggested option does not appear to relate to the analysis of need. As the document has previously made clear Southend has a very high proportion of 1 and 2 bed properties already and an acute demand for 3 and 4 bed accommodations. Surely the proportion of 3 and 4 bed should be higher at say 30 and 40% and consequently lower for 1 and 2 bed, say 15 and 15%. The concept of a mix of housing types within a specific development to achieve a sustainable community is flawed. No evidence is available to demonstrate the concept works. They are not even achievable within developments of similar housing size let alone mixed dwelling size/types	The suggested option reflects the evidence in the SHMA.

45. Issue DM11 – Dwelling Mix: Do you consider the alternative options to be more appropriate? If so, please state why.

Respondent	Respondent's Comment	Council's Response
Adult & Community Services Southend-on-Sea Borough	Alternative options not considered appropriate in line with Housing Strategy and associated documents.	Noted.

Council		
Herbert Grove Residents	No the market should determine the housing mix	Noted. The Suggest Option under Issue DM11 allows for the market to decide the dwelling mix provided that a range of dwellings sizes and types are provided. The requirement for family housing is necessary considering the shortage of such housing as identified in the Strategic Housing Market Assessment.

46. Issue DM11 – Dwelling Mix: Are there any other housing matters that the Council should consider as a part of this issue?

Respondent	Respondent's Comment	Council's Response
Herbert Grove Residents	The Council should endeavour to raise the quality of the very poor condition of property offered for rent in the private sector.	Agree. This is being undertaken through other Council strategies.
Cllr Crystall	Page 51. Need to differentiate between housing and dwelling types. Houses and Flats. Houses, 3/4/5 bedrooms. Flats, 1/2/3/4/5 bedrooms. Need to limit numbers of flats.	Disagree. This approach does not reflect the evidence within the SHMA. Emphasis will be given to family housing in the policy.
Environment Agency	Issue DM11: Question 46 Ideally bungalows should be avoided in areas of flood risk.	Noted.
Savills for Inner London Group	Other housing matters should be considered in determining dwelling mix Justification of affordable dwelling mix should have regard to SHMA, specific site	Noted.

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	feasibility and viability, public funding, affordability criteria and potential for of-site provision.	
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47. Issue DM12 – Affordable Housing Tenure: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Adult & Community Services Southend-on-Sea Borough Council	Mix of tenure is essential in order to maintain or develop sustainable communities there is now a wider range of affordable housing options including intermediate rent, rent to HomeBuy, HomeBuy and social rent. Also percentage of social housing differs between areas and would seek to redress the balance in these areas where appropriate. To achieve this, greater flexibility is required however would want to ensure social rented accommodation is provided where required. Option to change the definition of the split to 70:30 rented accommodation (incl. social & intermediate products) and shared sale, thereby allowing flexibility within the 70% for agreed tenure split.	Noted.
Herbert Grove Residents	The Market should create the housing mix.	Disagree. In line with national policy, the Council considers that the mix should be determined by policy based on the identified tenure requirements set out in the Strategic Housing Market Assessment.

Carole Mulroney (Leigh Society)	supported - it is important to ensure a range of different types of housing within this category	Noted.
Savills for Inner London Group	The policy requirement for 70% of all affordable housing provision to be social rented on all sites is too high and inflexible, especially having regard to the flexibility in approach set out in the accompanying text. . The drafted policy should refer to the need to take into account the findings of an affordable housing toolkit assessment, local conditions (including existing dwelling mix in the locality), levels of affordability, feasibility of delivery and specific site viability when determining the level of social rented housing within any particular development.	Disagree. A flexible approach is taken within in DM12. The approach considers the findings of the SHMA and includes greater flexibility.
Burgess Estate Residents Association	Page 53. The document makes no mention of the current financial situation and that is understandable. However the financial restraints which will impact on social housing providers are going to make social housing provision very difficult in the short/medium term to the extent that affordable housing tenure is almost an irrelevance. There is no mention otherwise of the whole question of affordable housing and I would have expected some discussion on the matter of on site versus off site provision. In addition the Council will now have to deal very carefully with developers pleading poverty in relation to affordable housing, s106 requirements, etc.	Affordable housing policy is addressed in the Core Strategy.

48. Issue DM12 – Affordable Housing Tenure: Do you consider the alternative options to be more appropriate? If so, please state why.

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	The alternative option is not appropriate.	Noted.

49. Issue DM12 – Affordable Housing Tenure: Are there any other affordable housing considerations that are not addressed in the Southend-on-Sea Core Strategy and have not been considered in this document that the Council should consider?

No comments made

50. Issue DM13 – Retention of Residential House Types: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Adult & Community Services Southend-on-Sea Borough Council	Agree with suggested option	Noted.
Herbert Grove Residents	The market should determine the housing mix.	Disagree. The protection of family housing is necessary considering the shortage of such housing as identified in the Strategic Housing Market Assessment.

Carole Mulroney (Leigh Society)	Strongly support the protection of bungalows and resistance to conversions	Noted
Savills for Inner London Group	The option is too inflexible, although the objective is laudable. The policy when drafted should include wording "loss of bungalows and / or family housing will be resisted, unless their loss is part of redevelopment proposals which make equivalent or improved provision and / or meet other significant regeneration objectives."	Disagree. There is an identified need in the Southend-on-Sea to resist the loss of family housing and bungalows.
Burges Estate Residents Association	Page 56. The suggested option for protecting single storey dwellings could be strengthened by an Article 4 direction as put forward elsewhere for the sea front. The deletion of "deemed necessary" in the option would also help. It is doubtful whether further protection could be given to family accommodation as that is too broad a definition.	Some parts of the Borough have neighbourhoods which are comprised of large areas of bungalows, creating consistent scale and defined character which might easily be broken through intensive redevelopment. In these areas it is likely that development proposals to intensively redevelop sites would be out of character and as such an Article 4 Direction is not necessary to protect this character.

51. Issue DM13 – Retention of Residential House Types: Do you consider the alternative option to be more appropriate? If so, please state why.

No comments made

52. Issue DM13 – Retention of Residential House Types: Are there any other issues relating to single storey dwellings (bungalows) and small family dwellings that the Council should consider?

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	The issues of housing need, condition of buildings and feasibility / viability of renovation, energy efficiency and meeting life homes criteria should be considered in relation to retaining existing bungalows and small family dwellings.	Noted.

53. Issue DM14 – Residential Space Standards: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Adult & Community Services Southend-on-Sea Borough Council	Support the proposals to ensure all new dwellings meet Lifetime Homes Standards and mirror space standards as set out by HCA ensuring equality of choice for those entering market and affordable housing.	Noted.
Cllr Burdett	DM14 - Very poor quality homes in some parts of Kursaal with dreadful overcrowding	Noted.
Carole Mulroney (Leigh Society)	Supported	Noted.

Savills for Inner London Group	<p>In is not clear whether the preferred option relates to new build, not just new dwellings. It may be impossible to meet these standards if conversion of buildings to residential is pursued. Policy text should state that 'high' quality and not 'highest' quality. Internal environments should be appropriate for the occupants needs and aspirations.</p> <p>Policy text should state that 'high' quality and not 'highest' quality. Internal environments should be appropriate for the occupants needs and aspirations.</p>	<p>DM14 states 'all new dwellings' which includes conversions which increase the net number of number of dwellings.</p> <p>Disagree. The living conditions and quality of life of Southend-on-Sea's residents is of utmost importance.</p>
Burgess Estate Residents Association	<p>Page 56. The suggested option for protecting single storey dwellings could be strengthened by an Article 4 direction as put forward elsewhere for the sea front.</p> <p>The deletion of "deemed necessary" in the option would also help. It is doubtful whether further protection could be given to family accommodation as that is too broad a definition</p>	<p>Disagree. This approach is not reflected in the Borough-wide Character Study.</p>

54. Issue DM14 – Residential Space Standards: Do you consider the alternative options to be more appropriate? If so, please state why.

No comments made

55. Issue DM14 – Residential Space Standards: Should the Council incorporate minimum private amenity space standards for residential development into planning policy?

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	The policy should not simply promote quantity over quality. Minimum standard unless it is demonstrated otherwise that the amenity space will be fit for purpose.	Noted.

56. Issue DM14 – Residential Space Standards: Are there any other issues relating to residential standards that the Council should consider?

Respondent	Respondent's Comment	Council's Response
Herbert Grove Residents	The Council should endeavour to raise the quality of the very poor condition of property offered for rent in the private sector.	Agree. The Council is working with landlords to improve the quality of housing within the private rental sector.
Savills for Inner London Group	The desire to create balanced and healthy neighbourhoods should be a consideration and that minimum space standards may not lead to this if applied without looking at the context. Space standards will be balanced against other considerations in this plan including the need to create balanced communities and liveable neighbourhoods.	Disagree. Minimum space standards are an important component of sustainable development as they contribute to the creation of balanced communities and liveable neighbourhoods.

57. Issues DM15 – Student Accommodation Space Requirements: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Cllr Burdett	DM15 - New campus fantastic	Noted.
Adult & Community Services Southend-on-Sea Borough Council	Agree with suggested option	Noted.
Carole Mulroney (Leigh Society)	supported	Noted.
University of Essex	The University welcomes the many positive references to supporting the growth of the University. I note, however, that some of the information in the Development Management document Issue DM15 Student Accommodation Space Requirements is out of date and would be grateful if appropriate amendments are made in future documents.	Noted. Appropriate amendments will be made.

58. Issues DM15 – Student Accommodation Space Requirements: Do you consider the alternative option to be more appropriate? If so, please state why.

No comments made

59. Issues DM15 – Student Accommodation Space Requirements: Are there any other issues regarding student accommodation that the Council should consider?

No Comments made

60. Issues DM16 – Houses in Multiple Occupation: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Cllr Burdett	DM16 - Agree completely - at present there is an unfair distribution of Houses in multiple occupation (HMOs) these people need positive role models which they are not getting if they are all contained within the one area of Kursaal. Around 40% of the remaining un-subdivided houses in parts of Kursaal now seem to be HMOs with no regulation and they at face value appear to cause 90% of the problems in regard to Anti-Social behaviour, drug dealing and cultivation etc we have in the area it would surely be a step in the right direction, the other 10% seems to relate to other private lets, though we do of course have some great tenants who are central to our community. When you consider that our borders to York Road and Hastings Road seem to be at around 80% saturation in terms of	Noted.

	<p>HMO and poorly maintained/managed property owned by a few landlords, even if they are fronting them via others or are Housing Associations, it is a shame that they cannot seem to run these as well as the Rosemead Project, who actively engage with the community which they are part of. It is tiresome that landlords as businesses are able to blight the lives of local residents without fear of any form of sanction. This is after all what these HMOs and Private Lets are, they are not Mr and Mrs Smiths pension plan, they are high profit businesses. If you take the recently converted property in Hastings Road, this has 8 let able units within, which will produce an income of £ 3200 at least per month. A very nice return on a property that sold for £170,000 recently. In fact because of this the Landlord is now sitting on an asset which is worth in excess of £450,000, yet contributes nothing to the overall well being and community of this area.</p>	
<p>Adult & Community Services Southend-on-Sea Borough Council</p>	<p>Agree with suggested option to monitor and control HMO development in the borough. Investigate potential of introducing management scheme before HMO occupation and wider HMO registration dependent on legislation and local resource availability.</p>	<p>Noted.</p>

Carole Mulroney (Leigh Society)	supported	Noted.
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61. Issues DM16 – Houses in Multiple Occupation: Do you consider the alternative options to be more appropriate? If so, please state why.

No comments made

62. Issues DM16 – Houses in Multiple Occupation: Should the Council restrict HMOs in specific areas?

No comments made

63. Issues DM16 – Houses in Multiple Occupation: Is the 10% cap on HMOs within a street appropriate or should another % cap be considered?

No comments made

64. Issues DM16 – Houses in Multiple Occupation: Are there any other issues regarding HMOs that the Council should consider?

No comments made

65. Issues DM17 – Specialist Residential Accommodation: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Adult & Community Services Southend-on-	The client groups i.e. mental health, learning disabilities etc also need to include older people on both pages 64 and 65. Further development should be discouraged as we have a high number of residential	Noted. These comments will be incorporated into the final policy.

<p>Sea Borough Council</p>	<p>homes (both nursing and care) in Southend. We want to promote independence and support individuals in their own homes. The cost of residential accommodation is high and disproportionate with other comparator groups. We also see placements of clients from outside of the area. Southend is a very popular area for retirement which means that there can be costs associated for both health and social care which could explain the disproportionate costs to our area. To decrease this it is important to keep older people healthy, well and independent which means providing the right accommodation and support. Southend-on-Sea has high numbers of residential accommodation for vulnerable adults particularly for older people. The occupancy is generally made up of Southend residents and also residents from other parts of Essex. Provision of some residential accommodation will always be necessary but in essence key governmental drivers promote independent living in all vulnerable adult groups. This would lead to the reduction of current provision as more individuals are supported at home and also the restriction of new builds unless it can be proven that there is no alternative accommodation available in existing establishments for the particular client group if they particularly need residential accommodation. With this</p>	
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	in mind the council seeks to restrict the provision of residential care homes and residential nursing homes.	
Carole Mulroney (Leigh Society)	supported	Noted.

66. Issues DM17 – Specialist Residential Accommodation: Do you consider the alternative options to be more appropriate? If so, please state why.

No comments made

67. Issues DM17 – Specialist Residential Accommodation: Are there any other specialist residential accommodation issues that should be considered?

Respondent	Respondent's Comment	Council's Response
Adult & Community Services Southend-on-Sea Borough Council	When planning public buildings consideration, should always be made to include accessible toilets for those more severely disabled in addition to standard disabled toilet facilities. Good practice dictates these would be in line with 'changing places'. Numbers of changing places units should take into account how many are in the locality and where these would provide the most benefit. 'Changing places' facilities should also be placed outside of the town centre so that they can be accessed in other localities. This will assist in helping vulnerable adults access this community without the	Noted. These comments will be incorporated into the final policy.

	<p>need to return to home if they need to use a facility. This link gives more details: http://www.changing-places.org/ A 'changing places' facility just opened near Chalkwell Park and there is also one planned for city beach.</p>	
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Section 7: Economic Development

68. Issue DM18 – Network of Centres: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
The Theatres Trust	<p>Issue DM18: Network of Centres We support the approach for enhancing the town centre and also the inclusion of sui generis use in the town centre (Table 2). The enhancement of your theatres will make a strong contribution to the character of the town and increase the experience of visiting the town as a tourist. A festival or summer season may be a crucial draw and bring major economic advantage but this will only be possible if suitable venues are available. All theatre buildings are costly to run and maintain but with a diverse range of content and service providers, plus a range of audiences and users to reflect the wider community, it is possible to sustain the long term viability of your theatre buildings. It is also important to ensure that there is a robust policy requiring the</p>	Noted

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	<p>replacement of an existing cultural facility where development would result in their loss. This is particularly so where land values could be higher for other uses. In our experience without such a policy it is impossible to negotiate a proper replacement arts facility. As such, it is something the Council should wish to protect through robust development management policies.</p>	
Renaissance Southend Ltd	<p>That part of the policy relating to the town centre should be informed by the evidence of the Retail Study commissioned by the Council and a more sophisticated development control policy may be needed to implement the preferred policy for the High Street may be required in the SCAAP rather than DM DPD.</p>	<p>Noted. The Southend and Town Centre Study 2011 forms part of the LDF evidence base and will be considered as the Southend Central Area Action Plan and Development Management DPD are progressed. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.</p>
Herbert Grove Residents	<p>The options provided are based on a retail study completed in 2003. The world has changes since then.</p>	<p>An updated Southend and Town Centre Study 2010 has been produced and has informed the development Management DPD</p>
Carole Mulrone (Leigh Society)	<p>Generally supported but care should be taken to ensure the correct balance between shops and other uses and to avoid clustering of like uses</p>	<p>Noted. This comment will be considered as the Development Management DPD is progressed. Linked to policy DM19.</p>

Savills for Inner London Group	We support the strategy to have a hierarchy of centres and focus retail development and other uses that attract a large number of people in Southend-on-Sea Town Centre and in District Centres. Although the DMDPD policies are appropriate, more detailed guidance needs to be provided in the CAAP and other DPD documents and site-specific development / design briefs on the appropriate future type, scale and location of retail and other town centre uses.	Noted. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.
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69. Issue DM18 – Network of Centres: Do you consider the alternative option to be more appropriate? If so, please state why.

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	We generally support the range of uses proposed in the hierarchy of centres, with some minor changes, in particular the inclusion of a list of The policy for Local Centres should include a list of uses appropriate above ground floor level.	Agree. Amendments will be made as appropriate.
	The overall level of future retail provision in the Borough and Town Centre has yet to be determined in the Retail Study. Although the DMDPD policies are appropriate, more detailed guidance needs to be provided in the CAAP and other DPD documents and site-specific development / design briefs on the appropriate future type, scale and location of retail	The Southend and Town Centre Study 2010 forms part of the LDF evidence base and will be considered as the Southend Central Area Action Plan and Development Management DPD are progressed. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement

	and other town centre uses.	for the SCAAP.
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70. Issue DM18 – Network of Centres: Are there any other issues relating to the network of centres that should be considered?

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	The policy does not link well to the other DMDPD policies including those of mixed use, sustainable development and those seeking centralised energy systems. The policy could be strengthened by referring to the need for new developments in Town and Local Centres to include a mix uses from those which are approved and which are appropriate to that location.	Disagree. This policy sets out the acceptable uses for each centre and gives a clear role.

71. Issue DM19 – Shop Frontage Management: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	Although we support the policy to resist the loss of A1 retail uses in primary shopping frontages, the appropriate level on non- retail frontage should not be a borough-wide figure in the DMDPD. The appropriate level of retail and non-retail use in each of the identified primary and secondary shopping frontages should also be informed the Southend-on-Sea Retail Study, which is yet to be completed. The primary and secondary frontages need to be identified	<p>The Southend and Town Centre 2010 has reviewed and carried out health checks on each of the Centres in the Borough. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.</p> <p>A general development management policy is required but if there are any specific requirements then these will be addressed</p>

	on a map base in the Submission Draft CAAP and other relevant LDDs, including development briefs for individual sites. These documents should include appropriate levels of retail and non-retail use for each of the identified primary and secondary shopping frontages.	by the Southend Central AAP.
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72. Issue DM19 – Shop Frontage Management: Do you agree that a proportion of the primary retail frontage should be protected for Class A1 retail purposes?

No comments made

72B. Issue DM19 – Shop Frontage Management: If so do you think the proportion should be 20%, 30% or other? Alternatively do you think there should be no retail protection?

Respondent	Respondent's Comment	Council's Response
Carole Mulroney (Leigh Society)	The retail function of the various centres is to be encouraged and not jeopardised by excessive non retail uses. Whilst the need for A3 type uses is recognised these should be assimilated within the retail elements of the shopping frontages and not clustered.	Noted. This comment will be considered as the DM DPD is progressed. Linked to policy DM19.
Renaissance Southend Ltd	That part of the policy relating to the town centre should be informed by the evidence of the Retail Study commissioned by the Council and a more sophisticated development control policy may be needed to implement the preferred policy for the High	Noted: The Retail Study forms part of the LDF evidence base and has been considered in Development Management DPD and will be considered in the SCAAP. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central

	Street may be required in the SCAAP rather than DM DPD.	AAP preparation process and published as part of the Consultation Statement for the SCAAP.
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73. Issue DM19 – Shop Frontage Management: Do you consider the alternative option to be more appropriate? If so, please state why.

No comments made

74. Issue DM19 – Shop Frontage Management: Are there any other issues relating to shop frontages that the Council should consider?

Respondent	Respondent's Comment	Council's Response
Cllr Burdett	Section 7: There are too many discount shops. There are no shoe shops. We need to be encouraging more fashionable, upmarket shops (Dune, Jones the bootmakers) especially for the new university students. Basildon offers so much more	Noted. The Development Management DPD will not set out any development proposals. The function of this document is to manage development within a sustainable framework. The Southend Central Area Action Plan aspires to improve the quality of the town centre and in so doing seeks to encourage the provision of high quality retail provision. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.
Carole Mulroney (Leigh Society)	We consider that for Leigh there are particular concerns and consider that the primary shopping frontage area should be extended to include Broadway West which is also a vibrant part of the town with many traditional uses. We consider that the use of a percentage of the whole centre for non A1 uses could	The Southend Retail Study 2010 and the Southend Retail Monitoring Report have considered the primary and secondary frontages in the borough. Based on these information further consideration will be give to boundary amendments.

	lead to clusters and excessive numbers and this should be restricted to individual frontages to ensure an even spread of such uses and the retention of the primarily retail nature.	
Cllr Crystall	Page 71 .IMPORTANT There is a need to clearly define "Primary Shopping Zones" rather than shopping frontages. No mention of existing retail A1 use at 80%. I would oppose an overall reduction to 70%,but each PSZ should be reviewed separately to see if the length and extent is appropriate in present market conditions. For example, the Broadway PSZ includes a bit of Elm Road, this seems unnecessary and damaging to these small units. Broadway West might be included, as there are less restaurants there and we might rebalance the excess in the \Broadway with these, to help keep the viability and support present trends without damaging the policy and creating precedents.	The Southend Retail Study 2010 has reviewed and carried out health checks on each of the Centres in the Borough. Consideration will be give to boundary amendments.
English Heritage	Row 3 of the Suggested Option table refers to 'ensuring that new shop frontages are of a high standard of design that is compatible with the architectural style and character of the building'. While we support this, the policy should also give special consideration to conservation areas.	Noted. All development management policies should be considered as a whole.

Savills for Inner London Group	The Council may wish to consider more detail shop frontage design guidance in the DMDPD of other LDD	Disagree. The Council considers that the suggested policy together with the Design and Townscape Guide provides sufficient policy coverage in respect to shop frontages.

75. Issue DM20 – Employment Sectors: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Renaissance Southend Ltd	Renaissance Southend strongly supports the suggested option and the identifies employment sectors. These should be further tested through the Local Economic Assessment before the policy is finalised. Further work should be done with Southend Hospital Trust to identify how best to support this sector in spatial terms before the policy is finalised.	Noted. The policy is informed by robust economic assessment through the Employment Land Review, the Council's Economic and Tourism Strategy and the Southend Local Economic Assessment 2011. The Southend Hospital Trust has been consulted on the policy options.
Carole Mulrone (Leigh Society)	Whilst we support the aims we, like many others, are concerned about the expansion of the airport and the consequent implications for traffic congestion and environmental effects on Leigh	Noted. The Government has approved plans to expand London Southend Airport. The London Southend and Environs Joint Area Action Plan will provide the framework in which to manage the airport's growth.
Savills for Inner London Group	NB we have not reviewed the Southend-on-Sea Economic Development and Outline Tourism Strategy The plan states that "Growth in tourism and leisure has been relatively weak since 2001 however there are a	DM20 has been informed by the Hotels Futures Report 2010. The Southend-on-Sea Local Economic Assessment supports and the findings of the Hotel Futures Report and has informed

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	<p>number (of) tourism and leisure developments in the pipeline which could reverse this trend. In addition there is potential to launch Southend-on-Sea as a conference destination. "</p> <p>We understand that many of the permissions for tourism and leisure development in Southend town centre have lapsed due to lack of operator interest. Further studies are required to ascertain the likely future level of demand for such tourism and leisure developments, including Conference Facilities.</p>	<p>the visitor accommodation policy.</p> <p>The evidence within these documents has informed the locational approach in DM20 and demonstrated that these locations are the most appropriate in terms of sustainability and maximum potential benefits for the town as a whole.</p>
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76. Issue DM20 – Employment Sectors: Do you consider the alternative options to be more appropriate? If so, please state why.

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	<p>Preferred Option Table 3 suggests that retailing; hotels; restaurants; catering; Visitor Conference; other tourism related activities to be located as a preference in Central Southend-on-Sea and The Seafront. No site(s) have been identified in the CAAP for a Visitor Conference Centre, which would be a major land user and have significant transport implications. This table contradicts the appropriate locations for a range of town centre uses contained in Table 2. Further studies and assessments are required of potential alternative locations for Conference Facilities- i.e. at Southend</p>	<p>The evidence within these documents has informed the locational approach in DM20 and demonstrated that these locations are the most appropriate in terms of sustainability and maximum potential benefits for the town as a whole. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.</p>

	<p>Football Ground and / or at or near the airport.</p> <p>Further assessments of options for the location of these uses need to be considered in both the DMDPD and CAAP.</p>	
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77. Issue DM20 – Employment Sectors: Are there any employment sectors that are not mentioned but should be considered?

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	The DMDP does not consider the implications of the increasing trend to the needs of the self-employed working from home, especially those in the cultural and creative sectors. These may include additional space requirements and other facilities including fast fibre-optic broadband connections for appropriate new residential developments.	Agree. Appropriate amendments will be made.

78. Issue DM20 – Employment Sectors: Are there any other issues relating to the employment sectors that the Council should consider?

Respondent	Respondent's Comment	Council's Response
CPREssex	Economic Development Suggested Option DM20 Under both Health and Medical Industries and Manufacturing, Construction and Warehousing 'The Locational Preference' refers to North Fringe. It is not clear exactly what area is meant here. Please would	Noted. An appropriate definition will be considered.

	you have a clearer definition of this area.	
Savills for Inner London Group	The employment sector policies have been informed by supply led assessments, rather than informed growth-led strategies. Further analysis is required to inform the policies of the DMDPD, CAAP and other LDDs	DM20 has been informed by the Hotels Futures Report 2010, Employment Land review and Local Economic Assessment.

79. Issue DM21 – Industrial Estates and Employment Areas: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Planning Perspectives LLP	Please accept the response below as our representations on the Development Management Document. Whilst we have registered with the online system, we have experienced problems with the system and are therefore submitting a response to relevant questions in this letter. All of our representations are made on behalf of Linpac Ltd, which has a land interest in the PrittleBrook Estate (long lease). Question 79 and 81 The suggested approach is broadly supported as it is consistent with the adopted Core Strategy and the Employment Land Review 2010. However, with respect to the sites identified for the "maintenance and supply of modern employment floorspace... within a mixed use context" further clarification is required about the Council's aspirations for these sites. Viability of redevelopment should be	<p>The Council will provide further clarity about the Council's aspiration in respect to "maintenance and supply of modern employment floorspace... within a mixed use context".</p> <p>The Issue of enabling development was addressed within Issue DM22 and will be taken forward in the Development Management DPD.</p> <p>The Employment Land Review states" Prittle Brook Industrial Estate has already been partially cleared and it is recommended that it is retained for continued employment purposes, given the restricted nature of employment land supply within the borough. It is considered that a flexible approach will be needed to enable redevelopment of the site. The Employment Land review recommends that a development brief is produced to ensure that the employment use safeguarded as the major land use, improves site access and</p>

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	<p>recognised as a key consideration for sites in need of regeneration. It is understood that the Council accept the need for some level of enabling development as part of a comprehensive redevelopment of the Prittle Brook Estate, but this has not been expressed clearly in this document. Indeed the Employment Land Review is more explicit in stating that redevelopment of this site should be enabled through a flexible approach to development. The ELR notes that the land would not be allocated today for the same mix of employment uses as exist on the site, and that employment use should not be the only acceptable form of development. It is in fact recommended in the site appraisal of the ELR (Ref EMP017) that a more appropriate buffer between the site and residential uses is required. As part of the recommended flexible approach, it should be acknowledged that an improvement in the quality of employment floorspace will be weighed favourably against the need to maintain the same level of supply. Prittle Brook Estate represents an opportunity to provide new employment uses which meet the Council's aspirations for improving the quality of stock of employment premises, and could meet the demand for more business related jobs over industrial related jobs, as identified in the Employment Land Review. As the employment density for modern business units is</p>	<p>integrate employment uses with surrounding residential and open space uses better". The suggested option reflects this flexible approach. A residential-led scheme will therefore not be appropriate at this site.</p>
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	greater than with older stock and industrial uses, there will be an opportunity to use a substantial part of the site for the enabling residential development. Indeed, a residential led mixed use scheme may in fact be the most appropriate way forward given the context of the surrounding area and the need for a comprehensive redevelopment to optimise the use of the site.	
Renaissance Southend Ltd	Renaissance Southend supports the principle of a managed approach to the existing industrial estates but would recommend that Progress Road be included within Group 1 rather than Group 2 as it is not considered that Progress Road is suitable for a mixed used development and the flexibility on uses implied for Group 2 is inappropriate for Progress Road which should remain in employment and commercial use.	Noted. Agree. Appropriate amendments will be made.
Carole Mulroney (Leigh Society)	no comment	Noted.
Savills for Inner London Group	The plan states "land in employment uses or desirable locations for employment development in market and sustainable terms, needs to be safeguarded or allocated to facilitate economic growth." We support this approach, which logically also includes only retaining industrial estates and employment land which	Noted

	<p>are in desirable locations or which meet other sustainability criteria. Further clarification is required.</p>	
	<p>We dispute the findings of the Employment Land Review. We object to the allocation of Grainger Road as a location for the "maintenance and supply of modern employment floorspace.....within a mixed-use context. A flexible managed approach will be sought at these locations through planning briefs". Given the quality of accommodation on Grainger Road, the impact on the amenity of the surrounding uses and vehicular access problems that have been a consequence of its location within a high density residential context, Grainger Road is not an appropriate location for retaining employment floorspace. The stock of floorspace ageing, the quality of buildings and facilities are poor and there is a lack on modern planning controls over its use. There is little prospect of employment or employment-led redevelopment on feasibility, including access or viability grounds. There is also some potential discrepancy between this proposed policy and the preferred option for Grainger Road in the CAAP which envisages employment - led mixed use development at Grainger Road. Further clarification is required in the Submission Draft DMDPD on the interaction between this policy and the requirement of DM22 in particular</p>	<p>Disagree. The Employment Land Review is a robust independent evidence base document that meets the national requirements for such documents.</p>

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	<p>the requirement to reprovided equivalent jobs under DM22 1(ii) (see below). Does that requirement relate to any redevelopments of the List 2 and List 3 sites? We propose that Grainger Road should be redeveloped for residential use - with a high proportion of family accommodation and affordable housing. It is preferable to see the site brought back to active use and to meet an identifiable need rather than hope that employment will flourish</p> <p>Grainger Road should be reclassified as one of the List 3 sites - those where appropriate non-employment uses will be allowed.</p>	
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80. Issue DM21 – Industrial Estates and Employment Areas: Do you consider the alternative option to be more appropriate? If so, please state why.

Respondent	Respondent's Comment	Council's Response
Planning Perspectives LLP	Please accept these comments in response to the current consultation for the Southend-on-Sea Development Management DPD. The comments are made in respect of Shoebury Garrison, Shoeburyness. Issue DM21 seeks the maintenance and supply of modern employment floorspace at Shoebury Garrison within a mixed-use context. A flexible managed approach is encouraged through the use of Planning Briefs. Historically, the site has been allocated for	Diagree. The Employment Land Review states that: "The Garrison Phase 2 is currently allocated employment land. The existing Phase 1 has several new good quality units available for rent and should be safeguarded. Phase 2 was promoted to the SHLAA and consists of 8.01 Ha of land. To illustrate the potential employment capacity of Phase 2 we have applied the translation model assumptions. At an employment density of 1 job per 20 sq m and a plot ratio of

	<p>Employment Use and benefits from an extant outline planning permission for Bl(a) Office use and Bl(b) Research and Development. On this basis, the site has been marketed for sale for a significant period with little interest. Indeed, the recently published Employment Land Review (May 2010) (paragraph 6.8) acknowledges that "... in the medium term to 2021 there is significantly lower demand for employment land in this location. It is suggested that the site does not present a suitable opportunity for employment use, given its geographical location within the Borough and the poor transport links connecting the site to the rest of the Borough and beyond. Interest has been expressed in the site for residential development and as such a residential lead scheme should be considered in this location. Shoebury Garrison should be removed from Issue DM21 and identified as a residential lead development site. The site provides the potential to build on the existing residential development that has come forward as part of the outline planning permission and provides a suitable opportunity to contribute to Southend's housing targets as a windfall site.</p>	<p>0.3 would provide a business park capable of supporting 48,060 sq m on the Phase 2 site, enough to support 2,403 new jobs. Whilst all employment land in Southend is a valuable commodity. It is considered that in the medium term to 2021 there is significantly lower demand for employment land in this location".</p> <p>"To support Core Strategy objectives, 4.3 ha of the Garrison site will be required and this would support, 25,800 sq m of floorspace to meet future requirement in other urban locations. This however is in excess of demand and could potentially compete with other locations such as the town centre, A127 and central fringe. To meet forecast demand a minimum of 3.2 ha is required to support 19,000 sq m by 2021. The use of remaining land should be determined through the production of the Shoeburyness AAP, which can consider this site alongside other employment sites in Shoeburyness, such as Campfield Road and Vanguard Way. One option is to safeguard the site for employment use for the post 2021 period. This approach has been used by other authorities to safeguard valuable employment land of strategic importance for the long term".</p>
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81. Issue DM21 – Industrial Estates and Employment Areas: Are there any other issues relating to the industrial and employment areas that should be considered?

Respondent	Respondent's Comment	Council's Response
<p>Planning Perspectives LLP (SW)</p>	<p>Please accept these comments in response to the current consultation for the Southend-on-Sea Development Management DPD. The comments are made in respect of Shoebury Garrison, Shoeburyness. Issue DM21 seeks the maintenance and supply of modern employment floorspace at Shoebury Garrison within a mixed-use context. A flexible managed approach is encouraged through the use of Planning Briefs. Historically, the site has been allocated for Employment Use and benefits from an extant outline planning permission for BI(a) Office use and BI(b) Research and Development. On this basis, the site has been marketed for sale for a significant period with little interest. Indeed, the recently published Employment Land Review (May 2010) (paragraph 6.8) acknowledges that "... in the medium term to 2021 there is significantly lower demand for employment land in this location. It is suggested that the site does not present a suitable opportunity for employment use, given its geographical location within the Borough and the poor transport links connecting the site to the rest of the Borough and beyond.</p>	<p>Diagree. The Employment Land Review states that:</p> <p>"The Garrison Phase 2 is currently allocated employment land. The existing Phase 1 has several new good quality units available for rent and should be safeguarded. Phase 2 was promoted to the SHLAA and consists of 8.01 Ha of land. To illustrate the potential employment capacity of Phase 2 we have applied the translation model assumptions. At an employment density of 1 job per 20 sq m and a plot ratio of 0.3 would provide a business park capable of supporting 48,060 sq m on the Phase 2 site, enough to support 2,403 new jobs. Whilst all employment land in Southend is a valuable commodity. It is considered that in the medium term to 2021 there is significantly lower demand for employment land in this location".</p> <p>"To support Core Strategy objectives, 4.3 ha of the Garrison site will be required and this would support, 25,800 sq m of floorspace to meet future requirement in other urban locations. This however is in excess of demand and could potentially compete with other</p>

	<p>Interest has been expressed in the site for residential development and as such a residential lead scheme should be considered in this location. Shoebury Garrison should be removed from Issue DM21 and identified as a residential lead development site. The site provides the potential to build on the existing residential development that has come forward as part of the outline planning permission and provides a suitable opportunity to contribute to Southend's housing targets as a windfall site.</p>	<p>locations such as the town centre, A127 and central fringe. To meet forecast demand a minimum of 3.2 ha is required to support 19,000 sq m by 2021. The use of remaining land should be determined through the production of the Shoeburyness AAP, which can consider this site alongside other employment sites in Shoeburyness, such as Campfield Road and Vanguard Way. One option is to safeguarded the site for employment use for the post 2021 period. This approach has been used by other authorities to safeguard valuable employment land of strategic importance for the long term".</p>
<p>Planning Perspectives LLP (BK)</p>	<p>Question 79 and 81 The suggested approach is broadly supported as it is consistent with the adopted Core Strategy and the Employment Land Review 2010. However, with respect to the sites identified for the "maintenance and supply of modern employment floorspace... within a mixed use context" further clarification is required about the Council's aspirations for these sites. The "flexible, managed approach" is wholeheartedly supported, but this does not tie in particularly well with the aspiration to maintain the same level of employment floorspace at these sites. Viability of redevelopment should be recognised as a key consideration for sites in need of regeneration. It is understood that the Council accept the need for some level of enabling development as part of a comprehensive</p>	<p>The Council will provide further clarity about the Council's aspiration in respect to "maintenance and supply of modern employment floorspace... within a mixed use context".</p> <p>The Issue of enabling development was addressed within Issue DM22 and will be taken forward in the Development Management DPD.</p> <p>The Employment Land Review states" Prittle Brook Industrial Estate has already been partially cleared and it is recommended that it is retained for continued employment purposes, given the restricted nature of employment land supply within the borough. It is considered that a flexible approach will be needed to enable redevelopment of the</p>

	<p>redevelopment of the Prittle Brook Estate, but this has not been expressed clearly in this document. Indeed the Employment Land Review is more explicit in stating that redevelopment of this site should be enabled through a flexible approach to development. The ELR notes that the land would not be allocated today for the same mix of employment uses as exist on the site, and that employment use should not be the only acceptable form of development. It is in fact recommended in the site appraisal of the ELR (Ref EMP017) that a more appropriate buffer between the site and residential uses is required. As part of the recommended flexible approach, it should be acknowledged that an improvement in the quality of employment floorspace will be weighed favourably against the need to maintain the same level of supply. Prittle Brook Estate represents an opportunity to provide new employment uses which meet the Council's aspirations for improving the quality of stock of employment premises, and could meet the demand for more business related jobs over industrial related jobs, as identified in the Employment Land Review. As the employment density for modern business units is greater than with older stock and industrial uses, there will be an opportunity to use a substantial part of the site for the enabling residential development. Indeed, a residential led mixed use scheme may in fact be the most appropriate</p>	<p>site. The Employment Land Review recommend that a development brief is produced to ensure that the employment use safeguarded as the major land use, improves site access and integrate employment uses with surrounding residential and open space uses better". The suggested option reflects this flexible approach. A residential-led scheme will therefore not be appropriate at this site.</p>
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	way forward given the context of the surrounding area and the need for a comprehensive redevelopment to optimise the use of the site.	
Savills for Inner London Group	Policies DM22 and DM23 are combined into one policy The DMDPD (and CAAP and other LDDs) need to address the needs of self-employed home workers, the provision of starter units for all types of business and workspace / units for Creative Industries.	Agree that self-employed home workers, the provision of starter units for all types of business and workspace / units for Creative Industries. Appropriate amendments will be made.

82. Issue DM22 – Employment Uses: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Carole Mulroney (Leigh Society)	Supported	Noted.
Planning Perspectives LLP	Question 82 and 84 Whilst the overall approach is broadly supported, the way this policy is expressed is considered to be overly prescriptive in requiring "at least equivalent" jobs to the existing floorspace. A flexible approach is required in line with the recommendations of the Employment Land Review. The redevelopment of old and unsuitable stock will attract investment to the area even if it is providing a lower amount of floorspace than the existing, and therefore would have a lower potential for job creation	Disagree – allows an alternative employment generating use as part of the mix. It is considered that appropriate new uses could reasonably match the potential job creation of a site on a reduced foot print. This approach will maintain the economic function of the site and is also flexible enough to allow the introduction of appropriate new uses.

	based on notional employment densities.	
Savills for Inner London Group	<p>The Employment Land Review is not available for inspection by the general public.</p> <p>1 (ii) "Provision is made for alternative floorspace to accommodate employment generating uses of at least equivalent jobs to the existing employment floorspace". This is not clearly worded and it is unclear whether the equivalence should be in the type of employment (sector and grade) or number of jobs measured as full time equivalents. Clarification is also required of whether this provision can be made on or off-site or via developer contribution.</p>	Noted. Appropriate changes will be made to make this policy clearer.

83. Do you consider the alternative options to be more appropriate? If so, please state why.

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	The suggested approach is to require a mix of units in all development proposals. Speculative employment development is a thing of the past, without significant public investment and subsidy. The range of unit sizes provided in any employment proposals should be led by feasibility and viability criteria and if not for a named occupier, should be informed by a market demand assessment.	Noted. A range of flexible unit sizes is important to enable commercial buildings and businesses to respond to market conditions and to provide accommodation that supports a balanced economy.

	<p>This preferred option allows for a case to be made in exceptional circumstances to allow the redevelopment of redundant and underused employment buildings and land for non-employment use provided that "it can be demonstrated that there are no prospects of any employment generating use using the site in its current form or within a redevelopment aimed at meeting the accommodation requirements of the key existing and emerging employment sectors in the borough." This approach applies to all sites and properties except those identified for protection and retention - for which the policy approach is too rigid and inflexible. Grainger Road has significant neighbouring use and access problems and should not have been identified as a site for retention and protection. In any event the proposed approach should extend to the sites identified for protection and intervention to allow for their review during the life of the Plan to allow for their release in where there is no demand for the sites / premises and/ or any prospect of redevelopment.</p>	<p>Disagree. The Employment Land Review has undertaken a robust analysis of the borough's industrial and employment sites. The Employment Land Review states that Grainger Road is considered a good opportunity to create a live work development within a historical neighbourhood in central Southend. It is recommended that Grainger Road is protected for employment uses and redeveloped with an employment led scheme.</p> <p>A monitoring aspect will be incorporated into a policy to ensure that each identified sites continues to be fit for purpose during the lifetime of the plan.</p>
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84. Are there any other issues relating to employment uses that should be considered?

Respondent	Respondent's Comment	Council's Response
Planning Perspectives	Whilst the overall approach is broadly supported, the way this policy is expressed is considered to be overly	Disagree – allows an alternative employment generating use as part of the mix. It is considered that appropriate new uses

LLP	<p>prescriptive in requiring "at least equivalent" jobs to the existing floorspace. A flexible approach is required in line with the recommendations of the Employment Land Review. The redevelopment of old and unsuitable stock will attract investment to the area even if it is providing a lower amount of floorspace than the existing, and therefore would have a lower potential for job creation based on notional employment densities.</p>	<p>could reasonably match the potential job creation of a site on a reduced foot print. This approach will maintain the economic function of the site and is also flexible enough to allow the introduction of appropriate new uses.</p>
Savills for Inner London Group	<p>The approach and the preferred option has focussed on the "traditional" employment uses and areas, which are known to be in major and fundamental decline, The issues of addressing the changing requirements of the occupiers of these traditional types of premises and the needs of different and emerging employment sectors have not been addressed. These sectors include those identified - cultural and creative industries, the "intellectual sector" including tertiary education and the service sector for the expanded retail and leisure offer in Southend.</p> <p>Consideration of specific sectoral needs and related site selection criteria are needed for both traditional and for other types of employment uses including those in the leisure, hotel, retail, education, cultural, creative and intellectual sectors. Key issues may include</p>	<p>The Employment Land Review has considered all these issues and made recommendations based on the needs of the future economy.</p> <p>Noted. Consideration has been given within other development management policies.</p>

	<p>accessibility to the primary road network and or public transport, proximity to workforce of other uses, inclusion of other space (research and development, laboratory space, conference facilities, exhibition space etc).</p> <p>A sustainable approach to allocating land for service, warehousing and storage uses needs to be adopted.</p>	
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85. Issue DM23 – Visitor Accommodation: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Herbert Grove Residents	It has been estimated that there are between 2.5 and 3 million people who live within an hour's travel of Southend, because of this fact Southend will always be a day trip destination. The reality of staying in a decent hotel in Southend is that it will cost a couple for room and breakfast the same amount that they can get an all inclusive continental holiday. The Council should embrace Southend for what it is and not waste time and energy changing it into something it can never be.	Disagree. The findings and recommendations of the Hotels Futures Study 2010 were used to inform the suggested policy.
Carole Mulroney (Leigh Society)	support generally but with concerns re the airport expansion	Noted. The Government has approved plans to expand London Southend Airport. The London Southend and Environs Joint Area Action Plan will provide the framework in which to manage the airport's growth.

Savills for Inner London Group	We support the aim to promote economic regeneration development by a variety of means including enhancing the town's role as a cultural and intellectual hub. This includes promoting Southend on Sea as a hotel and conference resort and support the expansion of London Southend Airport. We support the approach to restrict out-of-town hotel development to secure new hotels in the town centre, on the Seafront and at the airport and the decision not to designate Hotel Development Zones.	Noted.
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86. Issue DM23 – Visitor Accommodation: Do you consider the alternative options to be more appropriate? If so, please state why.

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	We support the preferred approach, but comment that all applications need to be considered on a site-by-site basis, within the overall context of the preferred locations. Consideration should be given to the special location requirements of key sub-sectors such as boutique hotels and serviced apartments. The proposals for the provision of visitor accommodation (as well as those which included the loss of visitor accommodation) should be subject to a demand assessment and supported by viability and feasibility assessments.	Noted.

87. Issue DM23 – Visitor Accommodation: Are there any areas where visitor accommodation should be concentrated that are not referred to?

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	Certain types of visitor accommodation may be best located around the key employment areas (including the university) and/or the station.	Partially agree. The Hotel Futures Report 2010 sets out the suggested broad locations where hotels should be located in the best interests of the wider economy.

88. Issue DM23 – Visitor Accommodation: Are there any other visitor accommodation issues that need to be considered by the Council?

Respondent	Respondent's Comment	Council's Response
Herbert Grove Residents	Southend has many economy bed and breakfast establishments; the Council should encourage this type of accommodation not try to change it.	DM23 is based on the findings of the Hotel Futures Report 2010. The approach in DM23 takes account of the positive impact that visitor accommodation has on the wider economy.
Savills for Inner London Group	Other issues to consider may include the type and seasonality of demand and how this is to be addressed in proposals for visitor accommodation; the specialist needs of conference visitor accommodation.	DM23 is based on the findings of the Hotel Futures Report 2010. The approach in DM23 takes account of the positive impact that visitor accommodation has on the wider economy.

Section 8: Environmental Management

89. Issue DM24: Contaminated Land: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Carole Mulroney (Leigh Society)	Support	Noted.
Savills for Inner London Group	We support the preferred approach which we agree meets the requirements of PPG23.	Noted.

90. Issue DM24: Contaminated Land: Is there an alternative option that is more appropriate?

No comments made

91. Issue DM24: Contaminated Land: Are there any other land contamination issues that need to be considered?

Respondent	Respondent's Comment	Council's Response
Environment Agency	Issue DM24: Question 91 We support the wording of the proposed policy. The policy could be strengthened by recommending Global Remediation Strategies for certain sites. If the development of an area is under one ownership and is to be undertaken over a number of years some thought should be given to assessment of the site from a global or strategic perspective and	Noted.

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	planning long term sustainable remediation options where appropriate.	
Savills for Inner London Group	The Council may wish to state a policy preference for the type of land remediation - encapsulation, soil cleaning, off site disposal of contaminated soils for various end uses Contaminated land should also be included policy	The Council consider that this should be considered on a site by site basis.

92. Issue DM25 – Land Instability: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Carole Mulroney (Leigh Society)	Support but would wish to ensure that susceptible areas are monitored for the cumulative effects of development	Agree. Appropriate monitoring is undertaken.
English Heritage	Issue DM25 - Land Instability, p88 This policy should make reference to the potential for palaeo-archaeological or environmental evidence to be discovered in areas where the cliffs are unstable. The proposed monitoring and stabilisation works could also be looked on as an opportunity to record items that might be of interest in the Borough's HER (Historic Environment Record).	Archaeological matters are addressed within DM5. There is no need to repeat the policy requirements here.

93. Issue DM25 – Land Instability: Do you agree that there are no reasonable alternative options? If not, please state why.

No comments made

94. Issue DM25 – Land Instability: Are there any other issues regarding land stability that you think the Council should consider?

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	We support the preferred approach to require an applicant with proposals for development on unstable ground to demonstrate that building can be undertaken safely and that stabilisation measures are both environmentally acceptable and will have no adverse impact upon neighbouring uses. Land instability should also be included policy DM1.	Noted. Land instability is an important issue in Southend-on-Sea and as such requires a specific policy. It would not be appropriate within a general design policy. All development management policies should be considered as a whole.

Section 9: Transport and Accessibility

95. Issue DM26: Sustainable Transport Management: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Iceni Projects	Issue DM26 - Sustainable Transport Management: The proposed approach fails to address the potential for improvements to the strategic transport infrastructure network that could be accommodated through growth in the north of the borough.	The Core Strategy sets out the strategic approach to development. The LTP sets out the strategic transport proposals. It is inappropriate consider strategic transport matters within the Development Management DPD.

Carole Mulroney (Leigh Society)	Support	Noted.
Highways Agency	The Highways Agency has no comments to make on the document other than to support the measures being proposed to encourage the promotion of modal shift from the private car to more sustainable means of transport through the promotion of travel planning, either through individual work place and residential Travel Plans or where appropriate Overarching or Area Wide Travel Plans as detailed in Section 9 of the document.	Noted.
Savills for Inner London Group	We support the full range of measures included in the preferred option.	Noted.
Burges Estate Residents Association	Page 90. Mobility management policies are not about reducing reliance on the car but reducing the attractiveness of the car. Consequently the suggested option 3 makes no mention of parking provision in development proposals and is short sighted as a long term strategy. The management policy is at odds with the requirement to make Southend more attractive to tourists (day trippers or longer term) and shoppers when there are so many more accessible choices.	Issue DM27 considers parking issues. The suggested option is in accordance with the LTP and Council's parking strategy.

96. Issue DM26: Sustainable Transport Management: Do you agree that there are no reasonable alternative options? If not, please state why.

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	It is not apparent that the release and retention of the industrial sites under DM21 had due regard to these sustainable transport management objectives. Clearer cross-reference to this proposed policy needs to be included in the criteria for considering various types of proposals set out in this document including but not exclusively - DM1, DM2, DM 20, DM21, DM22 and DM23.	Disagree. Development management policies should be considered as a whole and therefore there is no need to reference certain policies.

97. Issue DM26: Sustainable Transport Management: Have all the sustainable transport management issues that affect new developments been considered and are there any other transport issues that need to be addressed?

Respondent	Respondent's Comment	Council's Response
Renaissance Southend Ltd	Unable to submit comments on DM27 but would support intention to distinguish between CSAAP area and rest of Borough. May need to retain additional flexibility to respond to individual issues on major town centre sites and to take account of overall policy for town centre parking provision publicly available off street and on-street spaces.	Noted. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.

Herbert Grove Residents	An aging population in Southend and district has caused many more electric mobility vehicles to use the roads and pavement. The use of ornamental bricking on the paths in Southend High Street make using these vehicles very uncomfortable in some areas. The Council should consider this when selecting paving for pedestrian use.	Agree. The final policy will be amended to ensure that the public realm is functional for all users. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.
Cllr Crystall	Page 90. Omission of Park and Ride and Bus Lanes.	This issue will be considered within the LTP.

98. Issue DM27: Vehicle Parking Standards: Do you agree with the suggested option?

Respondent	Respondent's Comment	Council's Response
Savills for Inner London Group	Consideration should be given to future residents and to the displacement of car parking from one area to another rather than simply new additional car parking. Standards need to reflect demand but also local circumstances. Too high or too low could destroy viability. The policy should require applicants to be innovative about car parking and to promote reduction in parking by using incentives. Parking should not be an absolute figure and should be expressed as a maxima.	Noted. The Council considers it important that that parking standards reflects those of the neighbouring districts to ensure no cross-boundary policy conflict.
Burges Estate Residents	Page 93. The parking standards being put forward will inevitably add to the parking stress in a number of locations especially those residential areas close to the town centre where proposed parking standards are	Noted.

Southend-on-Sea Local Development Framework

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99. Issue DM27: Vehicle Parking Standards: Do you consider the alternative option to be more appropriate? If so, please state why.

No comments made

100. Issue DM27: Vehicle Parking Standards: Are there any other parking issues that the Council should consider?

Respondent	Respondent's Comment	Council's Response
The Theatres Trust	Issue DM27: Vehicle Parking Standards Table 4 and Table 5 do not include sui generis class use thereby excluding your theatres. As an indication of other standards, Waveney DC has 1 cycle stand per 40 seats - 1 parking space per 5 fixed seats - adequate turning and loading facilities inc. space for one coach or 16.5m lorry. With regard to transport and parking arrangements for your evening economy we would like to emphasise that the economics of evening cultural and entertainment venues are reliant on audiences being able to get to the venue by car and public transport and being able to park their cars and bikes safely. We would strongly urge any planning policies concerned with parking provision to consider the presence of theatres, cinemas and evening leisure facilities in the locality.	Noted. Appropriate amendments will be made.

Cllr Burdett	Section 9: There needs to be more parking facilities - I know that this issue puts people off travelling into Southend to shop for this very reason.	General parking facilities are set out in the Southend-on-Sea Parking Policies 2010 document.
Cllr Crystall	Page 94. .The attempt to discourage private vehicle use has failed and is now inappropriate. What we need to do is to encourage the use of more sustainable traffic movements, To encourage bus use, to encourage park and ride, to increase rail use within the town and to provide adequate parking for residents so that congestion is eased. We need to extend the cycle routes, this can be achieved cheaply with painted lines in some areas. ie Marine Parade Leigh, where there are parallel footpaths. Southend is a seaside town that is long and thin and overall access without private vehicles is difficult. It has a 180 degree infrastructure. The vehicle parking standards need a complete revision to free up our roads for residents and visitors, we are a visitor town, We need to review the size of parking areas allowed in front of houses that will accommodate small "Smart" cars, that need only a small space. The number of bedrooms in a private house must be relevant to parking needs. We need to move from a negative to a positive policy, now that RSS has gone.	Noted. Appropriate amendments will be made.

<p>Peacock and Smith for WM Morrison</p>	<p>Issue DM27 - Vehicle Parking Standards We note that Table 4 sets out current and proposed options for parking standards by Use Class. For Class A1 use (food retail) within the Central Area AAP the proposed maximum standard is the provision of one space per 18 sqm, and within the rest of the Borough the proposed maximum is one space per 14 sqm. PPG13 states that the maximum car parking standard for food retail of 1,000 sqm gross floorspace and above is one space per 14 sq.m. However paragraph 56 of PPG13 notes that a balance has to be struck between encouraging new investment in town centres by providing adequate levels of parking, and potentially increasing traffic congestion caused by too many cars. It is noted that where retail and leisure developments are located in centre. or on an 'edge of centre' site as defined by PPS6 (now PPS4): 'Local Planning Authorities should consider allowing parking additional to the relevant maximum standards provided the Local Authority is satisfied that the parking facilities will genuinely serve the town centre as a whole and that agreement to this has been secured before planning permission has been granted' In broad terms. therefore, to fulfil the objectives of PPS4, it is necessary for town or City centre retailing to be competitive. To achieve this it must provide sufficient car parking to</p>	<p>Disagree. The parking standards reflect local context which allows for reduced parking in central locations. Where comments relate to issues and options appropriate to the Southend Central AAP, these will be considered as part of the Southend Central AAP preparation process and published as part of the Consultation Statement for the SCAAP.</p>
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	<p>make the store as attractive as other existing stores in the area, and to ensure that foodstore facilities operate efficiently without adverse effects on the highway network. Car parks associated with food retail developments within or on the edge of centres can also provide short-term car parking facilities for shoppers and visitors to the centre which can serve the town or City centre as a whole. The provision of such spaces could enhance the vitality and viability of centres.</p>	
Savills for Inner London Group	<p>Car clubs, and financial disincentives should be part of an acceptable solution.</p>	Noted.