



southend central area action plan (scaap)
consultation statement - regulation 22
submission version

march 2017

local development framework
delivering regeneration and growth

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Section 1: Introduction

- 1.1 This Consultation Statement has been prepared to comply with the requirements of Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulation 2012. It details how the Council has dealt with consultations, how representations have been sought and how representations have been received and addressed in preparing the Southend Central Area Action Plan (SCAAP).
- 1.2 The Plan sets out detailed policies for a wide range of issues for the Central Area of the town, against which planning applications will be assessed, including those for shopping, housing, transport and the natural environment. It also identifies a number of Opportunity Sites for development. These will replace a number of Saved Policies from the 1994 Borough Local Plan.
- 1.3 This statement sets out:
 - Which bodies and persons were invited to make representations under Regulation 18;
 - How those bodies and persons were invited to make representations under Regulation 18;
 - A summary of the main issues raised by the representations made pursuant to Regulation 18;
 - How the representations made pursuant to Regulation 18 have been taken into account; and
 - The number of representations made pursuant to Regulation 20 and a summary of the main issues raised in those representations.
- 1.4 As such, for each stage in the production of the SCAAP, this document sets out: the methods the Council employed to ensure community involvement; groups, organisations and bodies who were invited to make representations; a summary of the main issues raised; and how representations have influenced the plan-making process.

Section 2: Statement of Community Involvement

- 2.1 Southend-on-Sea Borough Council has an adopted Statement of Community Involvement (SCI), which sets out how the Council will involve the local community and other interested parties in the planning process.
- 2.2 The SCI was adopted in June 2013 following public consultation. Southend Borough Council first adopted a SCI in November 2007 and this document represents the second update that has been undertaken to reflect new planning legislation. The SCAAP was prepared in compliance with the respective SCI's adopted by the Council and the relevant planning regulations.

Section 3: Consultation Process Overview

- 3.1 The Southend Central Area Action Plan (SCAAP) has been subject to an extensive process of consultation which in turn has helped to shape the plan.
- 3.2 There have been four main versions of the SCAAP:
- SCAAP Issues and Options June 2010
 - SCAAP (Superseded) Proposed Submission September 2011
 - SCAAP Preferred Approach December 2015
 - SCAAP Submission Version November 2016
- 3.3 Box 1 below summarises common consultation issues and themes raised prior to commencement of the SCAAP. Of particular note are the Town Centre AAP and Seafront AAP – these were consulted upon in 2007¹ and as a result of the responses received and development pressures a new boundary was proposed to encompass the Southend Central Area. This led to the SCAAP Issues and Options document being consulted upon in 2010.

Box 1: Common consultation issues and themes raised prior to commencement of the SCAAP

A number of consultation events on other planning documents prior to the formal commencement of the SCAAP helped inform the initial preparation of the document and provide important context, this included consultation on 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;*
- *Design and Townscape Guide SPD; and*
- *Central Area Masterplan 2007.*

A number of common themes and issues were raised by the general public and stakeholders during these consultations and during sustainability appraisal. 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;*

¹ A copy of the representations received and Council response on the Town Centre AAP (2007) and Seafront AAP (2007) is set out in the SCAAP Consultation Statement (September 2011), which is available on the Council's website:

http://www.southend.gov.uk/download/downloads/id/1577/scaap_consultation_statementpdf.pdf

- *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 existing bungalows and small family houses;*
- *Ensuring that national environmental designations are taken into account in planning decisions.*
- *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;*
- *Every attempt should be made to bring biodiversity enhancements to the Town Centre;*
- *New urban open space, including new green space, could be provided in the town centre;*
- *Provision for improving the overnight visitor accommodation should be included to encourage longer stays and higher visitor spend.*

Issues and Options Version (June 2010)

- 3.5 The purpose of the Issues and Options stage (Consultation – 21st June 2010 to 9th August 2010) was to explore the spatial options for Southend Central Area and how detailed policies and proposals could guide regeneration in a sustainable manner. The document set out the relevant issues with a suggested policy option and reasonable alternative policy options. The Council wanted to gather stakeholder's views about the general direction of proposed policy to meet Southend specific issues.
- 3.6 A range of activities were implemented to advertise the consultation and encourage participation. Details of this consultation stage are explained in Section 4 of this statement.

Proposed Submission Version (September 2011)

- 3.7 Taking account of the feedback from the public consultation the (Superseded) Proposed Submission SCAAP was published so that representations could be made in relation to soundness and legal compliance between 5th September 2011 and 17th October 2011. The purpose of this consultation was to allow representations to be made in relation to 'soundness' and 'legal compliance'.

- 3.8 Further preparation of the SCAAP since the Superseded Proposed Submission version was delayed owing to significant changes to national planning policy and guidance, the need to produce further supporting evidence in addition to dedication of resources to deliver the London Southend Airport and Environs Joint Area Action Plan (JAAP) and Development Management Document, which have both been successfully examined and now adopted. The representations made were extremely valuable and provided the Council with a number of helpful suggestions that would then improve the plan. Details of the superseded proposed submission consultation are outlined in Section 5 of this statement.

Preferred Approach Version (December 2015)

- 3.9 A Preferred Approach version of the SCAAP was consulted upon (under Regulation 18) between 18th December 2015 and 15th February 2016 - this document included a number of amendments to the first Proposed Submission SCAAP to ensure the document remained in conformity with national policy and guidance, reflected new evidence, and continued to take account of previous representations. Details of the Preferred Approach consultation are outlined in section 6.

Revised Proposed Submission Version (November 2016)

- 3.10 The Revised Proposed Submission version of the SCAAP was published so that representations could be made in relation to soundness and legal compliance between 3rd November 2016 and 16th December 2016. The purpose of this consultation was to allow representations to be made in relation to 'soundness' and 'legal compliance'. Details of the revised proposed submission publication is set out in Section 7 of this statement.

Section 4: Issues and Options Consultation (21 June – 9 August 2010) Under Regulation 25 of the 2008 Regulations

The Issues and Options document was made available for public consultation between 21 June and 9 August 2010. The Council consulted the community and other stakeholders using the methods detailed in Table 1 below. There were a total of 484 representations made (Table 2).

Table 1: Issues and Options 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 SCAAP Issues and Options consultation document was published for consultation. The database contains 700 consultees representing Specific, General and Other Consultees.
	100 hard copies of the document were printed and made available on request.
	Letters and hard copies of the SCAAP 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 SCAAP 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 SCAAP 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-line consultation system and left at deposit points/exhibitions.
	Information about consultation and Links to Borough Council's Web Page placed on SAVS and Renaissance Southend's Web sites on 14 th July 2010 – this is to actively target more hard to reach groups.
Publication of Newsletters and/or Leaflets as appropriate	1,000 consultation leaflets were printed.
	Poster and Leaflets deposited at all Doctors Surgeries on 19 th July 2010 in order to potentially target some of the harder to reach groups.
Press Release + newspaper notice	Press Release to local papers issued printed on Friday 2 nd July 2010 and Friday 16 th July 2010.
	Advert about public consultation and information about drop in exhibition event in Town Centre (see below) placed in local

Method	Action Taken
	press on Wednesday 14 th July 2010, Thursday 15 th July and Friday 16 th July 2010. Also advert placed in free weekly paper 14 th July 2010 [Evening Echo Essex Enquirer and Southend Standard].
Area Forums/Workshops/exhibitions	Drop in exhibition Victoria Plaza and The Royals Shopping Centres on 17 th and 18 th July 2010 to target Residents and Visitors to the Town Centre.
	Permanent Exhibition and Leaflets in Central Library from 19 th July to 9 th August 2010 to target Residents and Visitors to the Town Centre.
	Informed the regular breakfast meeting of Planning and Developers Forum held on 24 th June 2010 about the SCAAP consultation to target the development industry.
Community Groups	Letter sent on 21 st June 2010 to all on LDF database to inform that the SCAAP Issues and Options consultation document is published for consultation – includes comprehensive coverage of resident / tenants / community associations and societies across the Borough.
	Information about consultation and links to Borough Council's Web Page placed on SAVS and Renaissance Southend's websites on 14 th July 2010.
Councillors	Local Development Framework Working Party briefed about consultation on the SCAAP 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.

Table 2: Summary of Consultation responses made during the Issues and Options consultation stage

	Total no. of Respondents	Objectors	Total No. of Representations	Support	Object	General Comments
SCAAP Issues and Options	27	9 (33%)	484	153 (32%)	36 (7%)	295 (61%)

Section 5: First Proposed-Submission Document (5 September – 17 October 2011) Under Regulation 27 of the 2008 Regulations

The SCAAP Submission Document was first published on 5 September 2011. The Council consulted the community and other stakeholders through the actions set out in Table 3 below.

Table 3: Consultation Methods (First Proposed Submission SCAAP Publication)

Method	Action Taken
Direct Consultation with Specific, General and Other Consultees including hardcopies/electronic copies of the consultation document where appropriate	Letter and email sent on 5 th September 2011 to all contacts on the LDF database to inform them that the Southend Central Area Action Plan (SCAAP) Proposed Submission consultation document was published for consultation. The database contains 700 consultees representing Specific, General and Other Consultees.
	100 hard copies of the document were printed and made available on request.
	Letters and hard copies of the Southend Central Area Action Plan (SCAAP) consultation document were sent to all of the Southend-on-Sea Borough Councillors on 5 th September 2011
Inspection copies were made available at all of the public libraries in the Borough and at the Civic Centre	Copies of the Southend Central Area Action Plan (SCAAP) consultation document with Representation Form and supporting documents were placed at all libraries and Council Offices on 5 th September 2011.
Publish on the Southend-on-Sea Borough Council website	The Southend Central Area Action Plan (SCAAP) consultation document, Public Notice and supporting documents was published on the Southend-on-Sea Borough Council website and via a JDi on-line consultation facility, with ability to download the document, on 5 th September 2011. Information was provided on how to obtain hard copies and/or view at deposit points.
Press Release + newspaper notice	Public Notice placed in weekly paper 5 th September 2011 and 9 th September 2011 [Evening Echo and Southend Standard].
Feedback form to assess effectiveness of engagement activity	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.
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Summary of Consultation responses made during the first Proposed Submission stage

In total, 13 organisations and individuals made 126 representations on the draft SCAAP (Table 4). Of the 126 representations, 12 considered the document or elements of it 'unsound', 56 considered the document or parts of it 'sound'. There were also 58 general comments that did not state if the document was either 'unsound' or 'sound'.

Table 4 – Numerical breakdown of the first Proposed Submission SCAAP consultation responses

Southend Central Area Action Plan DPD (SCAAP)	Number Sound	Number Unsound	Total Responses
Section 1 – Introduction	0	1	10
Section 2 – Strategic & Local Planning Context	0	0	1
Section 3 – Characteristics & Key Issues	5	1	13
Section 4 – Vision Objectives & Strategy	2	0	5
Section 5 – Development Strategy for Key Uses	0	0	2
Section 6 – Provision of facilities for culture, leisure, tourism and entertainment	3	0	4
Section 7 – The Historic Environment	3	0	6
Section 8 – Transport & Access Strategy	1	1	9
Section 9 – Infrastructure Provision & Flood Risk	0	0	0
Section 10 – Context	4	1	9
Section 11 – Implementation	0	0	2
Policy DS1: New & Enhanced Shopping Facilities	0	0	0
Policy DS2: Shopping Frontages & Use of Floor above shops	1	0	1
Policy DS3: Retail Markets	0	0	0
Policy DS4: Employment development within the central area	1	0	1
Policy DS5: Education and higher and further education	0	0	0
Policy DS6: Provision of facilities for culture, leisure, tourism and entertainment	3	0	3
Policy DS7: Social and community infrastructure	0	0	0
Policy DS8: Housing	1	1	2
Policy PR1: Open Space Provision and the Environment	2	0	3
Policy PR2: Public Realm Enhancements	3	0	3
Policy PR3: Visually Active Frontages	1	0	1
Policy PR4: Protection of Visually Important Views	1	0	1
Policy PR5: Landmark Building	1	0	1

Policy HE1: The Clifftown Quarter	1	0	1
Policy HE2: The Central Seafront Area	0	0	0
Policy HE3: Prittlewell Gateway	0	0	0
Policy HE4: The High Street	0	0	0
Policy HE5: Frontages of Townscape Merit in the Central Area	1	0	1
Policy HE6: Conversion of Heritage Assets in the Central Area	0	0	0
Policy HE7: Areas of Archaeological Potential in the Central Area	0	0	0
Policy TA1: Town Centre and Central Area Highway Network	0	0	1
Policy TA1a: 'The Victoria' Phases 2, 3 and 4 Traffic and Public Realm Scheme	0	0	0
Policy TA1b: 'City Beach' Phase 2 - Traffic and Public Realm Scheme	2	0	2
Policy TA2: Public Transport	1	0	2
Policy TA3: Walking and Cycling	0	0	1
Policy TA4: Town Centre Parking Management	0	0	0
Policy TA5: Other Measures to Improve Accessibility	0	0	0
Policy IF1: Central Area Infrastructure	0	1	1
Policy IF2: S106 Planning Obligations and Developer Contributions	0	0	0
Policy IF3: Flood Risk Management	1	1	2
Policy DP1: The High Street Development Principles	0	0	0
Policy DP2: Queensway and London Road / Broadway Development Principles	1	0	1
Policy DP3: Elmer Square Development Principles	1	0	1
Policy DP4: Queensway and Southchurch Avenue Development Principles	3	0	4
Policy DP5: Warrior Square Development Principles	0	0	0
Policy DP6: Clifftown Development Principles	1	0	1
Policy DP7: Tylers Avenue Development Principles	1	0	2
Policy CS1: Landmark Buildings and Key Spaces	0	0	0
Policy CS2: Central Seafront Strategy - Key Principles	2	0	2
Policy CS3: Flood Risk	1	1	2
Policy CS4: Nature Conservation and Biodiversity	1	1	2
Policy CS5: The Waterfront	1	0	2
Policy CS6: Central Seafront Development Principles	0	0	1
Policy CS7: Western Esplanade, The Cliffs and Shrubbery	0	1	2
Policy CS8: Eastern Esplanade and City Beach Gateway	1	0	2
Policy DP9: Victoria Gateway Neighbourhood Development Principles	1	0	1
Proposal Site Policy PS2a: Sainsbury's and adjacent Buildings, London Road Proposal	0	1	1
Proposal Site Policy PS3a: Elmer Square Proposal Site	0	0	0

Proposal Site Policy PS4a: Queensway House and adjacent Buildings	0	0	0
Proposal Site Policy PS5a: Warrior Square Car Park Proposal Site	0	0	0
Proposal Site Policy PS5b: Whitegate Road	0	0	0
Proposal Site Policy PS6a: Clarence Road Car Park	0	0	0
Proposal Site Policy PS6b: Alexandra Street Car Park	0	0	0
Proposal Site Policy PS7a: Tylers Avenue	0	0	0
Proposal Site Policy PS7b: Pitman's Close	0	0	0
Proposal Site Policy CS6a: Southend Pier	0	0	1
Proposal Site Policy CS6b: Seaway Car Park and Marine Parade	3	0	5
Proposal Site Policy CS7a: Cultural Centre and new Southend Museum	0	0	1
Proposal Site Policy CS8a: Woodgrange Drive (Kursaal) Estate	0	0	2
Proposal Site Policy PS9a: The Victoria Office Area Site	0	0	0
Proposal Site Policy PS9b: Former Essex and Suffolk Water Board Site	0	0	0
Proposal Site Policy PS9c: Roots Hall Football Ground and Environs	1	0	1
Proposal Site Policy PS10a: Former B&Q Site	0	1	2
Proposal Site Policy PS10b: Sutton Road	0	0	0
Proposal Site Policy PS10c: Coleman Street	0	0	0
Proposal Map	0	0	2
Appendix 1 - Glossary of Terms	0	0	0
Appendix 2 - Schedule of new/improved public space, public realm, landscape etc	0	0	0
Appendix 3 - Schedule of housing capacity within the scaap	0	0	0
Appendix 4 - Schedule of existing landmark buildings	0	0	0
Appendix 5 - Background documents & studies	0	0	0
Total	56	12	126

Section 6: Preferred Approach Document (18 December 2015 – 15 February 2016) Under Regulation 18 of the 2012 Regulations

The SCAAP Preferred Approach Document was made available for public consultation in December 2015. The Council consulted the community and other stakeholders through the actions set out in Table 5 below.

Table 5: Consultation Methods (Preferred Approach SCAAP)

Method	Action Taken
Direct Consultation with Specific, General and Other Consultees including hardcopies/electronic copies of the consultation document where appropriate	Letter sent on 18 th December 2015 to all contacts on the LDF database to inform them that the SCAAP Preferred Approach consultation document was published for consultation. The database contains 700 consultees representing Specific, General and Other Consultees.
	Hard copies of the document were printed and made available on request.
	Letters and hard copies of the SCAAP Preferred Approach consultation document were sent to all of the Southend-on-Sea Borough Councillors on 18 th , 21 st December and 15 th 20 th January 2016.
	Letters were sent to all residents living within or adjacent to the Opportunity Sites set out within the SCAAP Preferred Approach version on 13 th January 2016.
	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 on 6 th January and 1 st February 2016. Hard Copies were supplied on request.
	An email was sent to the Southend Tourism Partnership informing them of the consultation and public workshops on 14 th January 2016.
	An email was sent to the BID partnership informing them of the consultation and public workshops on 13 th and 18 th January 2016.
	An email newsletter was sent to Southend Planning and Developers Forum contacts, informing them of the consultation and workshops on 18 th December 2015.
Inspection copies were made available at all of the public libraries in the Borough and at the Civic Centre	Copies of the SCAAP Preferred Approach consultation document with posters and leaflets were placed at all libraries and Council Offices on 18 th December 2015.
Publish on the Southend-on-Sea Borough Council website	The SCAAP Preferred Approach 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 18 th December 2015. Information was provided on how to obtain hard copies and/or view at deposit points.

Method	Action Taken
	Leaflets produced providing advice on the on-line consultation system and left at deposit points/exhibitions.
Publication of Newsletters and/or Leaflets as appropriate	21 st December 2015 consultation leaflets were printed advertising the public consultation workshops (see below).
	Poster and Leaflets deposited at all Doctors Surgeries on 21 st December 2015 in order to potentially target some of the harder to reach groups.
	Consultation information included within the Southend Business Partnership Newsletter, 11 th January 2016, and published on the Business on Sea website.
Press Release + newspaper notice	Press Release to local papers issued 18 December 2015 and 14 January 2016. Supported by Twitter and Facebook activity.
	Advert about public consultation and information about public workshop event in Town Centre (see below) in local press on Friday 15 th and 22 nd January 2016 [Yellow Advertiser].
Banners	Banners placed in the Civic Centre and at The Forum (public library in the Town Centre) on 18 th December 2015.
Area Forums/ Workshops/ Presentations	Public consultation workshop in Park Inn Palace Hotel on 20 th and 21 st January 2016 to target Residents, Business and Elected Councillors.
	Informed the BID Committee on 14 th January 2016 about the SCAAP Preferred Approach document.
Community Groups	Letter sent on 18 th December 2015 to all on LDF database to inform that the SCAAP Preferred Approach consultation document is published for consultation – includes comprehensive coverage of resident / tenants / community associations and societies across the Borough.
Councillors	Local Development Framework Working Party briefed about consultation on the SCAAP Preferred Approach consultation document on 15 th September 2015.
	An email was sent to all of Southend-on-Sea Borough Council's Councillors informing them of Consultation, Drop-in Sessions and Workshops on 18 th , 21 st December 2015, with follow-up emails sent on 15 th and 20 th January 2016. Hard Copies were supplied on request.
	Councillor Drop-in sessions 20 th and 21 st January 2016.
Duty to Cooperate	Letter sent on 25 th January 2016 by email to neighbouring authorities and authorities within Thames Gateway South Essex advising them of the consultation and inviting discussion and comment on the SCAAP.
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-

Method	Action Taken
	Consultation service in order to make commenting on documents easier and straightforward.

Summary of Consultation responses made during the first Preferred Approach stage

In total 33 organisations and individuals made 543 representations on the Southend Central Area Action Plan Preferred Approach. However, one such submission represented the views of over fifty businesses located within the central seafront area. Of the 543 duly made representations, 44 were considered as 'objections' to the plan and 157 supported the plan or parts of it. There were also 342 general comments. There were no 'not duly made' representations received.

Table 6 – Numerical breakdown of Preferred Approach consultation responses

Southend Central Area Action Plan DPD	Support	Object	Comment	Total Responses
Section 1 - Introduction				
Question 1: SA	0	0	1	1
Question 2: Policies Map	1	1	2	4
Section 2 - Visions and Objections				
Question 3: Vision	4	1	5	10
Question 4: Strategic Objectives	16	0	4	20
Section 3 - Central Area Strategy				
Question 5: Central Area Strategy	6	0	3	9
Section 4 - Criteria Based Policies				
Question 6: Policy DS1 Retail	10	3	25	38
Question 7: Policy Options DS1a, DS1b, DS1c	3	1	4	8
Question 8: Employment Section	6	0	1	7
Question 9: Housing Allocation of residential sites with planning permission	1	0	0	1
Question 10: Housing Section	8	0	7	15
Question 11: Culture, Leisure, Tourism & Recreation Section	3	2	4	9
Question 12: Historic Environment Section	7	1	6	14
Question 13: Open and Green Space section	5	0	3	8
Question 14: Policy DS2: Key Views	6	0	2	8
Question 15: Policy DS3: Landmarks and Landmark Buildings	2	2	3	7
Question 16: Policy DS4: Floodrisk, SuDS	2	0	5	7
Question 17: Policy DS5: Transport, Access, Public Realm	6	13	46	65
Question 18: Infrastructure Section	4	0	9	13
Section 5 - Policy Areas and Site Allocations				
Question 19: Site Allocation Indicative Capacity Table	0	1	0	1
Question 20: Policy PA1 High Street	9	1	24	34
Question 21: Policy PA2 London Road	4	4	23	31

Question 22: Policy PA3 Elmer	3	0	7	10
Question 23: Policy PA4 Queensway	3	0	11	14
Question 24: Policy PA5 Warrior Sq	1	0	13	14
Question 25: Policy PA6 Clifftown	6	2	16	24
Question 26: Policy PA7 Tylers	2	0	16	18
Question 27: Policy CS1 Central Seafront	22	7	45	74
Question 28: Policy CS2 Nature Conservation & Biodiversity	1	0	3	4
Question 29: Policy CS3 Waterfront	2	0	3	5
Question 30: Policy PA8 Victoria Gateway	3	2	18	23
Question 31: Policy PA9 Sutton Gateway	3	1	4	8
Section 6 - Delivery of the SCAAP				
Question 32: Phasing of Development Table	1	1	1	3
Question 33: Useful to include indicative figures for potential development in this section	1	0	0	1
Question 34: Useful to set out a series of projects and tasks for the Plan – linked to funding	1	0	0	1
Question 35: Overall approach for the Implementation Plan	1	0	1	2
Question 36: Monitoring Framework	1	0	0	1
Question 37: General Comments	3	1	27	31
Total	157	44	342	543

A number of useful comments were also made via the consultation workshops held to present and discuss the SCAAP policies and proposals. These comments and responses are not repeated in this report but are available to view in Appendix 4 of the Regulation 19 Consultation Statement (Nov 2016) available on the Council's website. http://www.southend.gov.uk/download/downloads/id/4548/scaap_revised_proposed_sub_mission_consultation_statement.pdf

Section 7: Revised Proposed-Submission Document (3 November 2016 – 16 December 2016) Under Regulation 19 of the 2012 Regulations

The Southend Central Area Action Plan (SCAAP) Revised Proposed Submission Version was published so that representations could be made in relation to soundness and legal compliance between 3rd November 2016 and 16th December 2016.

The Submission Version consultation was carried out in line with the Council's adopted Statement of Community Involvement (2013) and relevant planning regulations. During the 6 week consultation the plan was publicised in the local press, the council's website www.southend.gov.uk/scaap and was available to view at the Council offices and all local libraries. Consultation response forms were also available. Appendix 4 set out the list of specific and general consultees contacted and Appendix 5 sets out a copy of the consultation material used for the Revised Proposed Submission SCAAP.

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

Table 6: Consultation Methods (Revised Proposed Submission SCAAP Publication)

Method	Action Taken
Direct Consultation with Specific, General and Other Consultees including hardcopies/electronic copies of the consultation document where appropriate	Notification sent on 3 rd November 2016 to all contacts on the LDF database to inform them that the SCAAP Revised Proposed Submission consultation document was published for consultation. The database contains 700 consultees representing Specific, General and Other Consultees.
	Hard copies of the document were printed and made available on request.
	An email was sent to all Southend-on-Sea Borough Councillors informing them of the consultation on 3 rd November 2016. Hard copies were supplied upon request.
	Letters were sent to all residents living within or adjacent to the Opportunity Sites set out within the SCAAP Preferred Approach version on 4 th November 2016.
	An email was sent to all of Southend-on-Sea Borough Council's Corporate Directors informing them of Consultation on 17 th November 2016.
	An email was sent to the BID partnership informing them of the consultation on 22 nd November 2016.
Inspection copies were made available at all of the public libraries in the Borough and at the Civic Centre	Copies of the SCAAP Revised Proposed Submission consultation document with posters and leaflets were placed at all libraries and Council Offices on 2 nd November 2016.
Publish on the Southend-on-Sea Borough Council website	The SCAAP Revised Proposed Submission consultation document was published on the Southend-on-Sea Borough Council website with a JDi on line consultation facility and ability to download

Method	Action Taken
	document on 3 rd November 2016. Information was provided on how to obtain hard copies and/or view at deposit points.
	Leaflets produced providing advice on the on-line consultation system and left at deposit points.
Publication of Newsletters and/or Leaflets as appropriate	Leaflets deposited to all Doctors Surgeries 7 th November 2016 in order to potentially target some of the harder to reach groups.
Social Media	Consultation process promoted via Twitter @PlanSouthend.
Press Release + newspaper notice	Press Release to local papers issued 4 th November 2016.
	Public Notice published in the Southend Echo on 8 th and 9 th November 2016, and in the Southend Standard on 11 th November 2016.
Banners	Banners placed at The Forum (public library in the Town Centre) and at the Civic Centre on 16 th and 23 rd November 2016.
Area Forums/ Workshops/ Presentations	SBC Officers had a stand at the Open Access Southend event held at Victoria Shopping Centre on 15 th November 2016, where the general public had opportunity to view and discuss the SCAAP Revised Proposed Submission document. This was promoted on social media, via Twitter.
Community Groups	Letter sent on 3 rd November 2016 to all on LDF database to inform that the SCAAP Revised Proposed Submission consultation document is published for consultation – includes comprehensive coverage of resident / tenants / community associations and societies across the Borough.
Councillors	Local Development Framework Working Party briefed about the SCAAP Revised Proposed document on 6 th September 2016.
	An email was sent to all of Southend-on-Sea Borough Council's Councillors on 3 rd November 2016. Hard Copies were supplied on request.
Duty to Cooperate	Letter sent on 28 th October 2016 by email to neighbouring authorities and authorities within South Essex advising them of the forthcoming consultation and inviting discussion and comment on the SCAAP.
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 representations made during the revised proposed submission stage

In total 111 organisations and individuals made 410 representations on the Southend Central Area Action Plan Submission Version. Of the 410 duly made representations, 255

were considered as 'objections' to the plan and 58 supported the plan or parts of it. There were also 97 general comments. There were no 'not duly made' representations received.

Table 7 – Numerical breakdown of the Revised Proposed Submission SCAAP representations

Southend Central Area Action Plan DPD	Support	Object	Comment	Total Responses
Part A The Plan and its Contents				
Section 1 - Introduction	0	0	0	0
1.1 Strategic Planning Context	0	18	4	22
1.2 Local Plan Preparation	1	3	3	7
1.3 The Purpose of This Document	0	0	0	0
1.4 Relationship Between Policies	0	1	0	1
1.5 Supporting Documents	1	0	0	1
Section 2 - Vision and Objectives	8	1	1	10
Part B Development Strategy				
Section 3 – Central Area Strategy	0	0	0	0
3.1 Central Area Strategy	1	1	3	5
Section 4 – Criteria Based Polices	0	0	0	0
4.1 Introduction	0	0	0	0
4.2 Retail	0	2	2	4
Policy DS1 Policy DS1 A Prosperous Retail Centre	1	1	3	5
4.3 Employment	0	1	0	1
4.4 Housing	2	2	3	7
4.5 Tourism, Culture, Leisure & Recreational Facilities	1	2	0	3
4.6 Historic Environment	0	4	1	5
4.7 Open & Green Spaces	2	1	0	3
4.8 Key Views	0	0	0	0
4.9 Landmarks and Landmark Buildings	0	2	0	2
Policy DS2: Key Views	0	0	0	0
Policy DS3: Landmarks and Landmark Buildings	0	0	0	0
4.10 Flood Risk Management & Sustainable Drainage	4	1	0	5
Policy DS4: Flood Risk Management and Sustainable Drainage	2	1	0	3
4.11 Transport, Access & Public Realm	2	21	15	38
Policy DS5: Transport, Access, Public Realm	4	127	15	146
4.12 Infrastructure Provision	2	0	1	3
Part C Policy Areas and Opportunity Sites				
Section 5 Policy Areas & Opportunity Sites	0	0	0	0
5.1 Introduction	0	32	0	32

5.2 High Street Policy Area	0	0	1	1
Policy PA1 High Street	3	1	4	8
5.3 London Road Policy Area	1	0	1	2
Policy PA2 London Road	1	1	1	3
5.4 Elmer Square Policy Area	0	0	1	1
Policy PA3 Elmer Square	0	0	0	0
Opportunity Site PA3.1 Elmer Square Phase 2	0	0	0	0
5.5 Queensway Policy Area	0	0	0	0
Policy PA4 Queensway	0	0	2	2
Opportunity Site PA4.1 'Better Queensway' Project	0	0	0	0
5.6 Warrior Square Policy Area	0	0	0	0
Policy PA5 Warrior Square	0	0	0	0
5.7 Clifftown Policy Area	0	0	0	0
Policy PA6 Clifftown	2	0	1	3
5.8 Tylers Policy Area	0	1	0	1
Policy PA7 Tylers	1	4	3	8
Opportunity Site PA7.1 Tylers Avenue	0	0	1	1
5.9 Central Seafront Policy Area	1	3	3	7
Policy CS1 Central Seafront	2	10	13	25
Opportunity Site CS1.1 Southend Pier	0	0	0	0
Opportunity Site CS1.2 Seaways	2	3	2	7
Opportunity Site CS1.3 Marine Plaza	1	0	1	2
Opportunity Site CS1.4 New Southend Museum	0	0	0	0
Policy CS2 Nature Conservation & Biodiversity	4	1	0	5
Policy CS3 The Waterfront	1	1	0	2
5.10 Victoria Gateway Neighbourhood Policy Area	1	0	2	3
Policy PA8 Victoria Gateway	1	1	1	3
Opportunity Site PA8.1 Victoria Avenue	0	0	0	0
Opportunity Site PA8.2 Baxter Avenue	0	2	1	3
5.11 Sutton Gateway Neighbourhood Policy Area	0	0	1	1
Policy PA9 Sutton Gateway	0	0	1	1
Opportunity Site PA9.1 Sutton Road	0	0	0	0
Opportunity Site PA9.2 Guildford Road	1	3	0	4
Part D Implementation and Monitoring Framework				
Section 6 – Delivery of the SCAAP	0	0	0	0
6.1 Introduction	0	0	0	0
6.2 Delivery	0	0	0	0
6.3 Implementation	0	1	0	1
Maps	2	1	3	6

Tables	1	0	1	2
Proposals Map	2	1	0	3
Appendices	0	0	2	2
Total	58	255	97	410

Key Issues Identified during Revised Proposed Submission Publication

The following information provides a list of some of the issues raised by the representations on the submission version of the Plan and each of its policy provisions as part of the consultation process. This list is not intended to be exhaustive.

Appendix 1 of this report provides a summary of each representation made. Full comments made on the Revised Proposed Submission Document can be viewed here <http://southend.jdi-consult.net/localplan/readdoc.php?docid=24>

Table 8: Key Issues Identified From Representations Received on the Revised Proposed Submission (3rd November 2016 to 16th December 2016)

Plan Provisions	Key Issues Identified
General Approach	
Vision, Strategic Objectives and Strategy	Well supported
Approach to employment development	Generally well supported
Residential development in central area	Generally well supported
Approach to culture, leisure, tourism, historic environment and open space	Generally well supported, subject to there being no detrimental impact to car parking access and capacity, particularly south of the railway line Concern regarding lack of emphasis in Plan on importance of tourism to Southend and the importance of the areas historic past
Policy DS1: Maintaining a Prosperous Retail Centre	Support for maintaining High Street as a prosperous sub-regional centre Recognition that High Street needs to adapt to changing retail patterns and be more flexible in its approach and diversity to encourage restaurants, cafes and similar uses
Policy DS2: Key Views	Policy provisions generally welcomed
Policy DS3: Landmarks and Landmark Buildings	Policy provisions generally welcomed
Policy DS4: Flood Risk Management and Sustainable Drainage	Policy provisions generally welcomed Need to ensure consistency with national policy
Policy DS5: Transport Access and Public Realm	Provisions for sustainable transport to provide a choice of travel options welcomed Need to maintain car parking capacity at a level that supports the vitality and viability of

	<p>centre. Parking already inadequate to meet needs</p> <p>Problems of accessibility to centre and limited car parking provision preventing further investment in tourism facilities</p> <p>Need for additional car parking provision in central seafront tourist areas to meet peak demand</p> <p>Consideration should be given to the introduction of parking zones</p> <p>Plan does not distinguish between leisure/retail parking needs and tourism parking needs – most people with families visiting the tourism areas travel by car</p> <p>No net loss of car parking provision in the south of the Plan area does not make provision for growth in the tourism economy as sought in the Plan</p> <p>Consider parking surveys to be flawed – incorrect information used/survey dates not representative of peak usage</p> <p>Congestion/poor accessibility resulting in shoppers/visitors not returning to town</p> <p>Should be like for like car parking provision on Opportunity Sites which are currently used for car parking with additional provision for development proposed on site</p> <p>Needs to be improved signage and VMS for car park facilities</p>
Policy PA1: High Street	Policy provisions generally supported
	Question re-designation of southern end of High Street (western side) from Prime to Secondary Frontage
Policy PA2: London Road	Pedestrianisation generally welcomed but concerns regarding accessibility
Policy PA3: Elmer Square	Policy provisions welcomed
Policy PA4: Queensway	Policy provisions generally welcomed
Policy PA5: Warrior Square	Policy provisions generally welcomed. Pedestrianisation supported
Policy PA6: Clifftown	General support for policy provisions
	Concerns raised regarding traffic movement in area

Policy PA7: Tylers	Essential car parking is retained and enhanced at this key car parking facility for town centre
Policy CS1: Central Seafront	General support for policy principles
	Concerns relating to inadequacy of car parking in area to support tourism facilities and potential growth
	Plan fails to recognise the importance of the car to the tourism economy – the choice of transport for families visiting the town
	Need for improved signage and connectivity to High Street and surrounding areas
	Need to ensure Seaway Opportunity Site provides for replacement and additional car parking facilities and a quality gateway to the Seafront
	Plan does not adequately recognise the importance of 'day visitors' to the tourism economy
	Need to ensure that new lighting is arranged so as to avoid direct illumination of the foreshore and excessive glare to avoid potential impact on designated areas.
Question the need for a cinema development on the Seaways Opportunity Site	
Policy CS2: Nature Conservation and Biodiversity	Policy provisions generally supported
	Need to ensure consistency with national policy.
Policy CS3: The Waterfront	Policy provisions generally supported
Policy PA8: Victoria Gateway	Regeneration of area welcomed
	Redevelopment of Roots Hall Football Ground should be included as an Opportunity Site
	Support for Baxter Avenue Opportunity Site and phased delivery within the plan period.
	Baxter Avenue site should not be included as an Opportunity Site
Policy PA9: Sutton Road	General support for regeneration of area
	Guildford Road Opportunity Site supported in principle, however concern relating to lack of flexibility in policy provisions.

Further clarification was sought regarding the representations made from Natural England, the NHS and on behalf of the BID. Details of this are presented in Section 8: Duty to Cooperate and Section 9: Points of Clarification. Discussion with Natural England has resulted in a change being made to their representation, and objection to the plan being withdrawn.

A schedule of suggested amendments has subsequently been proposed taking into account the representations received. The schedule is available on the Councils website and for convenience in Appendix 3.

Section 8: Duty to Cooperate

No objections have been made on the SCAAP in respect to the Duty-to-Cooperate.

Under Section 33A (1) of the Planning and Compulsory Purchase Act 2004 (as introduced through Section 110 of the Localism Act), Local Planning Authorities, such as Southend, and other prescribed bodies have a duty to cooperate on strategic matters during the plan making process to ensure the effectiveness of the plan. Cooperation should take place on issues that require strategic planning across local boundaries, should be proportionate, and with those bodies as set out in Part 2 of the Town & Country Planning (Local Planning) (England) Regulations 2012.

Although a proportion of the SCAAP preparation pre-dated the formal requirements of the Duty to Cooperate, Southend Borough Council has had a strong level of cooperation and engagement with other authorities on planning matters (particularly the South Essex authorities: Castle Point, Basildon, Rochford, Thurrock and Essex County Council), and public bodies (including the Environment Agency, Natural England and English Heritage), and has participated in a number of joint studies (including the Strategic Housing Market Assessment, Vehicle Parking Standards, and Strategic Flood Risk Assessment).

This cross-boundary and collaborative working is reflected within the SCAAP, which builds upon the spatial strategy established by Southend's adopted Core Strategy DPD (which is itself the product of a high level of cross-boundary, cooperative working). Feedback received during the four consultation and publication stages has been considered and amendments made where appropriate, with every effort having been taken to reach an agreed outcome on those issues raised as part of the engagement/ consultation process, where possible to do so. Southend Borough Council therefore considers that the Duty to Cooperate has been fulfilled in relation to the preparation of the SCAAP and that there are no cross boundary issues arising from the document. The Council has published a separate Statement of Compliance that contains more information concerning the Duty to Cooperate for the submission SCAAP and is available on the Council's website.

The Council contends that its Core Strategy, which sets the strategic planning framework for the Borough, adopted in 2007, was found sound by the Inspector, being in general conformity with the Regional Spatial Strategy (now revoked), which was at that time the mechanism for dealing with cross-boundary, strategic issues prior to the introduction of Section 33A to the Planning and Compulsory Purchase Act (2004) as amended. The SCAAP contains policies that deliver the strategic priorities of the Core Strategy and is therefore the product of a high level of cross-boundary, cooperative working.

In relation Natural England's representation [refs. 2869-2871, 2874, 2876-7, 2879-80] made during the SCAAP's revised proposed submission consultation (2016), the Council has produced a response setting out further details relating to the plans production,

addressing representations received, suggesting minor amendments or highlighting where it is satisfied that the position taken in the SCAAP is appropriate. It affirms that the SCAAP is a positive plan that will, in combination with the adopted Core Strategy, protect and enhance the integrity of nature conservation sites in accordance with the requirements of Natural England. This conclusion has been validated by Natural England who state that: '*Natural England supports all of the minor modifications that are proposed, and we withdraw our previous Objections to Policies.*' A full copy of the letter submitted by Natural England on 10th February 2017 in respect of this addendum may be seen in Appendix 2.

In relation to NHS Southend CCG's representation [ref. 2515] made during the SCAAP's revised proposed submission consultation (2016), the Council has produced a response (see Appendix 2). It affirms that the SCAAP is a positive plan that will bring forward the delivery of the remaining proportion of planned regeneration and growth in the Central Area in order to meet Core Strategy targets to 2021. Reference is drawn in the Council's response to the Southend Infrastructure Delivery Plan (IDP), which identifies infrastructure requirements for health, based on supporting evidence from NHS Property Services, arising from planning growth within Southend. The conclusion has been validated by NHS Southend CCG (Appendix 2)

SECTION 9: Points of Clarification

Mr Thompson and Mr Alan Bacon submitted a number of representations (2883 - 2887) as 'members of the Southend BID' and on 'behalf of members of the Southend BID'. In respect to representation 2883, the Chair of the BID, Dawn Jeakings, has outlined that two of the suggested changes referred to in the representation, as set out below, are not the sentiment of the majority of the BID Board. Please see Appendix 2 for full correspondence.

- A strategy to increase parking stock in the central area by 25% over the next 4 years.
- A freeze on sustainable transport routes such as bus lanes, cycle routes and pedestrian priority routes due to the importance of the car to the economy of the high street and seafront.

As a point of clarification in relation to rep. 2513 from Cllr Martin Terry (Southend Borough Council), the Council made its Appointments for 2016/17, following May 2016 Local Elections, on 19 May 2016. Cllr Martin Terry was portfolio holder of Public Protection, Waste and Transport until this date.

**Appendix 1: Representations made on the Revised Proposed
Submission SCAAP (Nov – Dec 2016) – Detailed Summary**

SCAAP – Representations for Proposed Submission – December 2016

Respondent	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission) / <i>Respondents Suggested Changes to Plan (Italics)</i>	Test of Soundness / EIP
Amanda Parrott (Basildon Council)	1	2585	Comment	The proposals set out in the Southend Central Area Action Plan Revised Submission have been reviewed, and are not considered to have an adverse impact on Basildon Borough, its residents or proposals for the regeneration of Basildon Town Centre. Basildon Borough Council does not therefore seek to raise an objection to the Southend Central Area Action Plan	
Simon Mitchell (OFCOM)	1	2664	Comment	No Comment	
Mr Simon Patterson (Chinnerys)	1	2679	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>	Test of Soundness: Legally compliant - no
Mr Martin Maynard (Maynard Milton Insurance Services LLP)	1	2684	Object	<p>5. The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>	Test of Soundness: Legally compliant - No

Mrs Lisa Raymond (East Anglia Pubs Co)	1	2709	Object	<p>5. The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>	<p>Test of Soundness: Legally Compliant - No</p> <p>EIP: Written</p>
Mr Steve Solly (Sancto Party Store)	1	2722	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>	<p>Test of Soundness: Legally compliant - no</p> <p>EIP: Written</p>
Mr Neil Raven (Ravens of Southend)	1	2727	Object	<p>5. The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>	<p>Test of Soundness: Legally compliant - no</p> <p>EIP: Written</p>

Mr Richard Prewer Las Vegas Grill	1	2736	Object	<p>5. The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>	<p>Test of Soundness: Legally compliant - no</p> <p>EIP: Written</p>
Mr David Prewter (Clarkes Restaurant)	1	2749	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>	<p>Test of Soundness: Legally compliant - no</p> <p>EIP: Written</p>
Mr Ron Collier (Neptune Fish Restaurant)	1	2758	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>	<p>Test of Soundness: Legally compliant - no</p>

Mr Michael Tall (Papillon)	1	2767	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>	Test of Soundness: Legally compliant - No
Mr Chris Petris (Roses Restaurant)	1	2772	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>	Test of Soundness: Legally compliant - No
Mr Justin Carmichael (Southend Rock & Gifts)	1	2777	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>	Test of Soundness: Legally compliant - No

Mr David Rayment (Beaches Cafe Bar Bistro)	1	2782	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>	Test of Soundness: Legally compliant - No
Ms Anna Grech (Sunset Club & Bar)	1	2804	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>	Test of Soundness: Legally Compliant - No
Ms Anne Marie Jeffrey (The Hope Hotel)	1	2805	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>	Test of Soundness: Legally Compliant - No

Mr Paul Thompson (Seafront Traders Association)	1	2810	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p> <p><i>The consultation process should be done again in a way that complies with the Councils Statement of Community Involvement. The 6 week consultation period in which representations can be made prior to the Government Inspectors hearing should be done again in a way that allows everyone to submit a representation in a simple manner.</i></p>	<p>Test of Soundness: Legally compliant - no</p> <p>EIP: Appearance</p>
Mr Paul Thompson (Pebbles One Ltd)	1	2815	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>	<p>Test of Soundness: Legally Compliant - No</p> <p>EIP: Appearance</p>
Ms Frances Auger	1	2819	Object	I want to make a comment and an objection regarding the new plans for Southend Central.	
Castle Point Borough Council (Mr Steve Rogers)	1	2830	Comment	Castle Point Borough Council does not wish to make any representations at this time.	
National Grid (Mr Robert Deanwood)	1	2831	Comment	We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.	

RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	1 General Consultation Process	2867	Object	<p>Consultation Process</p> <p>Southend Borough Council issued a letter to businesses dated 13 January 2016. This letter invited businesses to have their say on the SCAAP. It stated that there were two public workshops planned on 21st January at the Laurel & Hardy Room, Park Inn Palace, one in the morning and one in the evening. Although dated 13th January, these letters were only received by seafront businesses two days before the deadline (i.e. on 19th January). Many businesses were not able to attend the event due to the short notice. Only three businesses turned up and one trader went along and was told that he had missed it. In addition, the workshop appeared to be primarily about residential issues, not business issues.</p> <p>The letter to Adventure Island is attached for information.</p> <p>The Statement of Community Involvement (SCI, 2013) states that the Council will consult local businesses (third bullet point, 'Who we will consult', Page 2). Under 'How we will consult', it states the following:</p> <ul style="list-style-type: none"> · "We will contact appropriate organisations and individuals directly by post or electronic means" (second bullet); · "We may publicise consultations by methods such as...community events, public exhibitions, workshops..." (fifth bullet). <p>We consider that seafront businesses are major stakeholders and should have been properly consulted in accordance with the SCI. The Council failed to properly consult the business community in line with the SCI, by holding an event but not adequately informing businesses of the event in advance.</p> <p><i>No specific change required.</i></p>	<p>Test of Soundness: Legally Compliant: No Sound: Yes</p> <p>EIP: Appearance</p>
Mr Ron Woodley (BERA)	7	2577	Comment	<p>It would be useful to have an indication of likely timescales of the forthcoming aspects of the plan process. Specifically the new Local Plan will set out new long term growth targets which will include a review of SCAAP proposals but there is no indication of timescales. We have no idea at this stage of when SCAAP is expected to be adopted and therefore how long it may be valid.</p>	
Mr Ron Woodley (BERA)	7	2578	Comment	<p>The introduction makes reference (1.2 para 7) to a joint assessment of needs for the housing market but, and this was asked at the consultation draft stage, no indication as to who the joint assessment will be with.</p>	
Rochford District Council (Natalie Heyward)	7	2594	Support	<p>A review of the draft Southend Central Area Action Plan prior to 2021, as appropriate, after adoption of a new Local Plan would be welcomed.</p>	
Mr Ian Ross (NHS Southend CCG)	15	2515	Comment	<p>Any planned changes need to be discussed with both NHS Southend CCG and NHS England especially when it relates to new estate and the delivery of primary and community care. There are a number of initiatives planned and being implemented which should be considered before the council finalises any development plans as they will potentially have a major impact on services and how patients access those services.</p>	

Ms Louise McDermott	15	2557	Object	<p>I object to sustainability being used as a buzz word when the plan itself does not make enough effort to deal with the current issues of traffic gridlock and over saturation of the seafront along with building numerous flats with no regard for the additional infrastructure required</p> <p><i>Sustainable needs to be implemented in a meaningful way. Incentivise people to avoid driving. Where housing developments are planned provide green space, additional facilities and show how the infrastructure is good enough to support the additional residents. All this strategy does is pay lip service to the idea of sustainability.</i></p>	<p>Test of Soundness: The document is unsound because it is not: i. Positively prepared</p>
RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	Context and Issues Item e 'Tourism, Culture, Leisure and Recreation'	2832	Object	<p>Our representations are on behalf of The Stockvale Group, which is the owner and operator of: Adventure Island; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex. We do not repeat this in our representations to other paragraphs and policies.</p> <p>We support the opportunities to maximise Southend's potential as a visitor destination and resort, and enhancing the evening economy, encouraging overnight and longer stays, and by creating a positive experience for visitors. It is essential that policies in this document support this. However, this section should recognise the proportion of visitors who visit Southend on day trips. It is still primarily a day trip destination, given its accessibility to London and Essex towns, and unless this is recognised explicitly here it is likely that policies will not respond adequately to this issue. Indeed, this is the case, as set out in our representations on other paragraphs and policies. It is essential that the day visitor tourism economy is placed right at the heart of the plan's policies for the seafront, or (as can be seen in policies currently drafted) they will simply be causing and then managing decline, not planning positively for growth.</p> <p><i>"...However, there is opportunity to further maximise Southend's potential as a visitor destination and resort, particularly in terms of the evening economy and through encouraging overnight and longer stays, by building on the resort's success as a day visitor destination and by creating a positive experience of the central area for visitors."</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared</p> <p>EIP: Appearance</p>

<p>RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group</p>	<p>Context and Issues Item g 'Transport, Access and Public Realm</p>	<p>2833</p>	<p>Object</p>	<p>Comments on first paragraph: It is essential that the 'Transport, Access and Public Realm' section recognises the need for car access to support Southend's tourism economy. The seafront attractions are serving a much wider catchment area than the town centre, and catering much more for families; therefore the private car is a much more important component for travel. The strategy needs to recognise the need to attract car-borne visitors and park them close to the seafront. There needs to be high quality, sustainable ways of getting visitors to the various attractions. Simply "acknowledging the role the car plays in this balance" is not enough when creating policies to support an industry that is largely reliant on the private car. In our other representations we refer to surveys that demonstrate the reliance of this industry on the private car, and the fact that this can be sustainable when car occupancy levels are considered. There needs to be a clear statement that in the Central Seafront Area, policies will aim to support the day visitor economy, and a key element of this is providing sufficient car parking spaces to enable this economy to thrive and prosper.</p> <p>The second paragraph discusses the Central Area car parks and goes on to state: "It will be important to ensure that a level and quality of provision is provided that supports the vitality and viability of Southend Central Area." This statement needs to be far stronger, and should be looking for the protection of existing spaces that serve the seafront, the achievement of additional spaces to enable growth in tourism businesses, to support the significant new development proposed and the improvement of the quality of car parks and the routes from the car parks to the attractions. This is because, unlike the Town Centre, the seafront area is less easy to access by public transport because of the origins of visitors (a large proportion from outside Southend) and the fact that these trips are family trips which are much more difficult to serve by public transport. A survey of visitors to Adventure Island undertaken by The Stockvale Group in 2016 using Survey Monkey showed that out of 1,532 respondents only 137 (9%) of visitors originated from Southend and 1,295 of the 1,532 respondents (84.7%) travelled by car. The survey also showed that 30% of visitors had four passengers in the car and 29% had three passengers, demonstrating how difficult it is to serve this type of family visitor by public transport.</p> <p>The third paragraph recognises that "there is a clear imbalance in the Southend Central Area parking network at periods of peak demand, with car parking to the south of the central area experiencing over capacity issues, while car parking to the north has available spare capacity." This is a key issue and needs to be addressed and needs to be followed through in other policies. The 85% figure used in this paragraph is misleading as it relates to the entire SCAAP area. The seafront has significant capacity issues at peak times which are causing serious problems for operators and preventing growth.</p> <p><i>First para: "... whilst acknowledging the role the car plays in this balance. In the Central Seafront Area sufficient provision will be made to ensure that all day visitors can park at a reasonable distance from the seafront, including at peak periods, to support the ongoing success and growth of this thriving tourism area."</i></p> <p><i>Second para: "It will be important to ensure that a level and quality of provision is provided that supports the vitality and viability of Southend Central Area. In the Central Seafront Area the quality and quantity of this provision will need to be improved to support the growth of this important component of Southend's economy."</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared</p> <p>EIP: Appearance</p>
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Cllr Brian Ayling (Southend Borough Council)	21	2511	Object	<p>The Scaap document does not include the Tourism and Parking policy (not yet available) and it is nonsense to have a plan without considering its effect on a forthcoming policy.</p> <p><i>The Scaap plan will be modified when a Tourism and Parking policy is agreed and this policy should provide parking for visitors by car / bus in proportion to any increase in visitors to the town.</i></p>	<p>Test of Soundness: The document is unsound because it is not:</p> <ul style="list-style-type: none"> i. Positively prepared ii. Justified iv. Consistent with national policy <p>EIP: Appearance</p>
Natural England (Mr Steve Roe)	HRA 25 - 26	2881	Support	<p>We note that the Habitat Regulations Assessment -Screening Report (draft) dated June 2016 is still described as a Scoping Report. It is in fact a Screening Report - as previously advised on 26 January 2016 (our ref 174743) and 19 August 2016 (our ref: 191786). We note that the data presented in Table 1 - Conservation Objectives and Designated Features of European Sites on the Condition of the SSSIs has now been updated to accurately reflect the current condition of these sites. We also welcome the inclusion of the Southend-on-Sea Shoreline Strategy Plan following our advice of 26 January 2016.</p> <p>Several of the Policies may result in additional development and/or intensification close to the European sites (particularly Benfleet and Southend Marshes SPA and Ramsar site). Notwithstanding this, Natural England is generally supportive of the HRA 'Scoping Report' and concurs with its conclusions that "the SCAAP, in conjunction with the Southend on Sea Core Strategy and related documents, will not have a significant effect on European sites".</p> <p>NOTE The Thames Estuary 2100 Project table showing the Recommended Preferred Options for PMU Action Zones 8 & 6 contains duplicated information (pp 43-45 of the pdf).</p>	
Mr Martin Barrell (Environment Agency)	29	2602	Support	We support the inclusion of objectives 9 and 10	<p>Test of Soundness: Legally Compliant – Yes Sound - Yes</p>
Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd	29	2638	Support	A number of strategic objectives are set out within the SCAAP which include: Improving and transforming the "economic vitality, viability and diversity of Southend's area by encouraging establishment of a wider range of homes, business and shops whilst providing new opportunities for learning, recreation, leisure and tourism". It also seeks to improve accessibility to the area, ensuring street, public and green spaces are well-connected, well-designed and safe, which is welcomed.	<p>Test of Soundness: Legally Compliant: Yes Sound: Yes</p>

<p>Mr Paul Thompson (Pebbles One Ltd, Spar, Subway, Baskin Robbins & Maple House)</p>	<p>2.1 (29)</p>	<p>2807</p>	<p>Object</p>	<p>Page 5 of the CPS recognises the increased future demand for parking predicted in the Southend Local Transport Plan 3 by 2021, stating: "The Southend Local Transport Plan 3 (L TP3): Strategy Document outlines key considerations related to Central Area parking provision. It notes that Central Area car parking demand is forecast to grow by 25% by 2021." Although this context is set out very early in the CPS, no further account appears to be taken of it in the analysis. Thus, the predicted increased future demand for parking of 25% is not accounted for within the strategy. Paragraph 2.1 goes on to say: "The Southend Local Transport Plan 3 (L TP3): Strategy Document outlines key considerations related to Central Area parking provision. It notes that Central Area car parking demand is forecast to grow by 25% by 2021." Although this context is set out very early in the CPS, no further account appears to be taken of it in the analysis. Thus, the predicted increased future demand for parking of 25% is not accounted for within the strategy. Paragraph 2.1 goes on to say: The document notes that Southend Central Area has a high level of car parking, which can encourage people to drive to the Central Area rather than using other more sustainable modes." For some land uses, this can be the case, however, for tourist attractions, high levels of car parking are necessary. The tourist industry relies upon the busiest days of the year to subsidise other periods of the year when they are not busy. The car parking demand for these busy periods therefore must be met to maximise their customer attraction. If this is not met, then it jeopardises their viability throughout the remainder of the year, which has a significant knock-on effect in terms of jobs and the local economy. Therefore, there will be some days that are not busy where there appears to be high levels of car parking availability, however, in reality, these spaces are necessary. In this regard, paragraph 2.1 recognises this by stating: "The L TP highlights a seasonal shortfall of parking capacity in certain car parks in summer and in December." The CPS therefore recognises at a very early stage that there is a seasonal shortfall of parking capacity in some car parks and that there is a predicted 25% increase in future demand for parking. Despite this, the CPS makes no further reference to this. Table 3.2 page 16 of survey report shows weather conditions on the survey days. These are incorrect and differ to the weather recorded at the time by traders: 13 August 2015 Rain & Thunderstorms 15 August 2015 Cloudy, Brightening up late afternoon 23 March 2016 Cloudy, Av temp 7c (90% seafront closed) 25 March 2016 Partly Cloudy, Av temp 11c 26 March 2016 Cloud & Rain, Av temp 1 Oc (storm Katie weekend) 30 May 2016 Mostly Cloudy, Av temp 14c No parking surveys done on a warm sunny day - ie in good weather Thus surveys do not show how parking capacity in central area performs in good weather conditions, which obviously are the peak times. This report greatly influences the transport/parking section of SCAAP and thus it is flawed. Page 8 Table 2.2 and page 9 table 2.4 shows the off street and on street car parking used in the report. However significant amounts of car parking spaces have not been included and some have not been identified. Table 2.3 page 8 identifies some car parks not included but gives no explanation as to why. The</p>	<p>Test of Soundness: Sound – No 4(2) Justified EIP: Appearance</p>
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				<p>Marine Plaza car park is a major car park on the seafront with 200 spaces that has not been identified? (planning permission granted 26th Oct 2000 ref 00/00765FUL)</p> <p>Not including this car park is considered to underestimate the total car parking stock for tourists and visitors within the Southend Central Area and also (by not counting cars parked here) underestimate the total car parking demand created by tourists and visitors within the Southend Central Area. Similarly this has the effect of over stating the percentage figure on any day for spare capacity.</p>	
RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	28. Vision (p12)	2834	Support	<p>We support this Vision as it recognises that day visitors are an integral component of Southend's economy now and will need to be in the future. It is essential that policies elsewhere in the Plan recognise this.</p> <p><i>No changes</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: Yes</p> <p>EIP: Appearance</p>

GL Hearn Ltd part of Capita Real Estate (David Maxwell)	29 Proposed Vision	2629	Support	<p>Genesis Housing Association (GHA) is a major landowner within the Southend Central Area. GHA supports the Vision for Southend Central Area set out within the SCAAP.</p> <p>GHA is particularly supportive of the Vision seeking to create a prosperous and thriving regional centre, being vibrant, safe and hospitable and an attractive, diverse place where people will want to live, as well as a place to work and visit.</p> <p>GHA intends to deliver major regeneration at SCAAP Opportunity Site PA8.2 (Baxter Avenue), within the Victoria Gateway, which will contribute notably towards the SCAAP aim to transform the perception and image of Southend.</p>	<p>Test of Soundness: Legally Compliant: Yes Sound: Yes</p> <p>EIP: Appearance</p>
GL Hearn Ltd part of Capita Real Estate (David Maxwell)	29 Strategic Objectives	2630	Support	<p>Genesis Housing Association (GHA) supports the Strategic Objectives 1-11 set out within the SCAAP, and GHA agrees that the SCAAP Proposed Vision will be achieved by meeting Strategic Objectives 1-11.</p> <p>GHA has a development vision to regenerate the SCAAP Opportunity Site PA8.2 (Baxter Avenue). Delivery of new homes and regeneration of the Baxter Avenue site will contribute to and adhere to each of the objectives as applicable, with particular relevance to the following Strategic Objectives:</p> <p>1.Redevlopment of the Baxter Avenue site will contribute towards establishment of a wider range of homes, likely to include a mixture of affordable, market, shared ownership and new starter homes, as well as re-provision of sheltered accommodation;</p> <p>2.The Baxter Avenue development will provide a high quality design delivering notable public realm improvements that respond positively towards and enhance the Victoria Gateway public realm;</p> <p>3.The Baxter Avenue development will increase the number and diversity of people living within the Southend Central Area through delivery of at least 250 new homes in the SCAAP period. The new homes provided at Baxter Avenue will be modern, efficient and appealing to a wide range of people, including families with children;</p> <p>7.Redevlopment of the Baxter Avenue site will provide notable improvements to accessibility in the area to ensure that local streets, public and green spaces are well-connected. The Baxter Avenue development will also provide a design and streetscape that encourages and improves opportunities for walking and cycling, with excellence connections to Southend Victoria railway, bus services and the town centre.</p>	<p>Test of Soundness: Legally Compliant: Yes Sound: Yes</p> <p>EIP: Appearance</p>
Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd	29 Strategic Objectives	2639	Comment	<p>As per our previous representations submitted in relation to the draft SCAAP Preferred Approach Version 2015 in February 2016, we suggest that a further strategic objective be included that makes it clear that the SCAAP seeks to maintain and protect existing shops and town centre uses in the Southend Central area.</p>	
Natural England (Mr Steve Roe)	Para 29 Strategic Objectives	2878	Support	<p>Point 10 Natural England supports the Objective 10 "to enhance the quality of, and access to... natural environment and open spaces" as a means to relieve pressure on designated sites and to enhance local biodiversity and nature conservation through connection to the green grid.</p>	

RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	29. Strategic Objectives 5	2835	Support	<p>The Strategic Objectives are generally supported. Paragraph 5 looks to attract greater visitor numbers to Southend. There will need to be clear, justified and effective policies to deliver this objective. The rest of the Plan does not, unfortunately, follow this through.</p> <p>Paragraph 8 is supported. This objective supports the vitality of CSA, addressing peak demand and capacity, good access to seafront and well located car parks. Need to ensure policies are effective at achieving this elsewhere in the document.</p> <p><i>None</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: Yes</p> <p>EIP: Appearance</p>
RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	29. Strategic Objectives 8	2836	Support	<p>The Strategic Objectives are generally supported. Paragraph 5 looks to attract greater visitor numbers to Southend. There will need to be clear, justified and effective policies to deliver this objective. The rest of the Plan does not, unfortunately, follow this through.</p> <p>Paragraph 8 is supported. This objective supports the vitality of CSA, addressing peak demand and capacity, good access to seafront and well located car parks. Need to ensure policies are effective at achieving this elsewhere in the document.</p> <p><i>None</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: Yes</p> <p>EIP: Appearance</p>
Milton Conservation Society (Mr Andy Atkinson)	30	2477	Comment	<p>There is an absence of strategic recognition of the importance of the local historic environment and settlement in terms of its ability to influence future development.</p>	EIP: Written
Belfairs Gardens Residents Association & Southend District Pensioners Campaign (Barbara Armitage)	30	2653	Comment	<p>The plan is prepared solely on planning and environmental grounds and the Department responsible has no dialogue with departments concerned with people. There is therefore no recognition of an ageing population, that people will work into older age but have health issues of that age and no mention or concept of dealing with disability in all ages whatsoever.</p>	EIP: Written

RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	30	2837	Object	<p>This is a very residential-based approach, which does not reflect the proposed Vision and Strategic Objectives in the previous chapter.</p> <p>This is not effective in that it is not delivering on the objectives set out in Chapter 2. Indeed, this appears to be ignoring a number of the objectives and focusing on one specific area. Tourism is a large component of Southend's economy, and a key reason why the resort is well known regionally and nationally. Tourism jobs account for 12.3% of all employment in the Borough (according to the Council's Local Economic Assessment [LEA], December 2013). It is one of the few seaside resorts in the UK of this scale that has such a large reliance on day visitors (95.8%, LEA 2013) and where the visitor numbers are not supported by significant hotel or self-catering accommodation in our around the Town. For example, resorts like Great Yarmouth and Skegness are supported by thousands of caravan parks surrounding the resorts. Blackpool and Scarborough are supported by large numbers of hotels/B&Bs. Southend has historically never been primarily a short break/holiday destination; it has been a location for day trips from the surrounding urban areas and London. The Southend-on-Sea Local Economic Assessment (Southend Borough Council, December 2013) confirms (Section 5.4) that 95.8% of visitors to the town are day visitors. Whilst it is commendable that the Council is attempting to increase overnight stays and support the provision of accommodation, it is a very dangerous strategy to 'side-line' the day trip market, which this Paragraph, and subsequent paragraphs and policies do. This is not in line with the Vision and Objectives and needs to be amended. Significant other changes are needed elsewhere in the Plan if the Vision and Objectives are to be realised. This is not in line with national policy. In particular Paragraph 17 of the NPPF, which states that planning should:</p> <p>"...proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities."</p> <p><i>"30 The Central Area Strategy seeks to develop a 'City by the Sea' – a change in the function and transformation in the quality of the Town Centre and Seafront and renewal of Southend Central Area with additional residential development creating a new critical mass to support growth and inward investment and additional tourism development focused on the Central Seafront, supported by an increase in car parking capacity serving the Seafront area."</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective 4(4) Consistent with National Policy</p> <p>EIP: Appearance</p>
Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd	All 30	2645	Support	<p>Valad Europe is supportive of the draft policies set out in the SCAAP Document subject to the proposed changes being made. However, the SCAAP needs to have a greater emphasis on protecting the town centre from out-of-centre retailing. Consideration should also be given to directing new large retail developments onto existing town centre car parks with replacement car parking re-provided in the form of undercroft or multi-storey parking which would assist in relieving pressure on existing parking facilities, whilst bolstering the town centre, thus enhancing its vitality and viability. We feel that this option has not been fully explored and is an opportunity missed.</p>	<p>Test of Soundness: Legally Compliant: Yes Sound: Yes</p>

Southend Business Partnership (Murray Foster)	3.1 (30)	2595	Comment	We are broadly supportive of the Strategy, Criteria based Policies and proposed Opportunity Sites subject to there being no detrimental impact to parking access and capacity particularly south of the Southend to Fenchurch St railway line	
P Tomassi & Sons Ltd (Antony Tomassi)	37	2539	Comment	We agree upon this definition of the established linear High Street. However, as we will later point out on paragraph 50, the southern part of the High Street, opposite The Royals main entrance, is a crucial part of this well established linear High Street as defined in this section, and thus should be considered primary shopping frontage.	EIP: Appearance
RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	48	2838	Object	<p>Paragraph 48 makes reference to the central seafront area being a “destination in its own right, comprising a range of leisure uses...” This should make reference to the fact that the seafront comprises primarily tourism, not leisure uses. Tourism uses primarily serve visitors to a town and leisure uses primarily serve residents (although leisure uses can provide facilities for tourists and vice versa). These are distinct and separate land uses and are listed separately in the NPPF (see ‘Main town centre uses’ in the Glossary). Because they are aiming at different markets they have differing needs. Tourism uses are generally providing for visitors from outside a town. In the case of Southend this is a predominantly family market. Given that these visitors are travelling from outside the town and family groups often include children, it is a very difficult market to serve by public transport. The results of Stockvale’s own survey of visitors to Adventure Island (see RPS Transport Technical Note submitted alongside these representations) show that 85% of visitors travel to Southend by car. A survey by Radio Essex in December 2016 found that 79% of visitors to Southend would prefer to use seafront car parks, even if it takes them longer to find a space, which demonstrates the resistance amongst this type of visitor to using methods of travel other than the private car. Traditionally seaside towns have accepted this and provided car parking for visitors from outside the town. This was recognised, for example, in the Blackpool Core Strategy, adopted in January 2016. Following representations from seafront attractions, the Plan was amended by the Council to recognise the importance of ensuring that car parks support the resort’s tourism economy, and then subsequently by the Inspector (Malcolm Rivett) in his report dated November 2015. The Inspector recognised the need for a clear statement on retaining parking provision for tourist parking in the policy on transport and parking, not in the supporting text. He also acknowledged that the supporting text should include a statement recognising that car parks need to accommodate peak weekend/bank holiday parking. His conclusion on this point was:</p> <p>“91. Policy CS22 is a positively prepared policy recognising the importance of the attractiveness of key gateways to the resort in attracting visitors to Blackpool. However, for the sake of clarity, and thus effectiveness, modifications MM26 and MM27 are necessary to include the parking provision element of supporting text paragraph 7.39 in the policy itself and to refer to the importance of peak visitor day parking requirements in the supporting text.”</p> <p>It appears that Southend Borough Council does not recognise this, and this lack of understanding about how the resort functions has resulted in policies in the SCAAP that will not support tourism. Instead, these policies will actually undermine the tourist economy of the town.</p> <p>This is not positively prepared as it is ignoring a key sector on the seafront. It is also not compliant with Paragraph 17 of the NPPF. Policies are not justified by the evidence base as they ignore a large proportion of the local economy, which has made representations previously. The policies are not effective because they do not provide for this significant element of the economy.</p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective 4(4) Consistent with National Policy</p> <p>EIP: Appearance</p>

				<p><i>"The central seafront area represents an important visitor destination in its own right, comprising a range of tourism and leisure uses, which together with the town centre supports a wider multifunctional Central Area within Southend that offers a unique and diverse visitor/ shopper experience."</i></p>	
P Tomassi & Sons Ltd (Antony Tomassi)	50	2542	Object	<p>The south section of the High Street opposite the main entrance to the Royals has been designated secondary frontage, despite being on the main linear high street (as per paragraph 37) and serving as a vital link between seafront and the town. We think that this is not only a contradiction of the above paragraph 50 (as this area is indeed on the main high street) but are concerned that this omission will detract from quality retail stores being developed and maintained in this large and important area of the high street.</p> <p><i>To include the entire linear high street in the primary shopping frontage, including the southern area of the high street opposite the main entrance to The Royals.</i></p>	<p>Test of Soundness: The document is unsound because it is not: ii. Justified</p> <p>EIP: Appearance</p>

Mr Ron Woodley (BERA)	Para 52	2582	Comment	One way of encouraging a temporary uplift to empty units is to provide an example by dealing with the council's own property, and although it is not on the primary shopping frontage it is in a prime location. We are talking about the unit at the foot of the pier lift which has been empty since it was built. Perhaps the local college could be encouraged to join with businesses to provide visual displays.	
Mr JC Gibb	DS1	2516	Comment	Para 7 Street Markets - The current street market at the top of the High Street needs to be removed. This is extremely detrimental to attracting high quality retailers to the High Street. Currently access to shops and views of windows is severely obstructed. From a professional point of view I could not recommend taking up a unit under these circumstances and I believe that the market is contributing to decline. If the market is to be moved the new location MUST NOT blight another area. I do NOT oppose a market BUT it must be sited where it does not lead to negative results. SUMMARY Remove street market from High Street avoid blight elsewhere	
Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd	DS1	2649	Object	Our client Valad Europe largely agrees to the proposed approach to maintaining a prosperous retail centre and note that Part 1 has been updated to include the provisions of the National Planning Policy Framework (NPPF) as requested in our previous representations. We note that Part 3 now includes provision to allow no more than 40% of the town centre primary shopping frontage being used for non-retail purposes and the clarification provided on how the shopping frontage will be measured. More A3 uses will increase footfall and linked trips whilst also supporting the night time economy adding to the vitality and viability of the town centre and this is welcomed. We note that exceptions to this requirement will be considered if it can be demonstrated to the satisfaction of the Council that the A1 use is no longer viable through an effective two year marketing exercise where the vacant property has been offered for sale or letting in the open market at a realistic price and no reasonable offers have been refused. This seems very onerous and we suggest that the marketing exercise requirement be for 6 to 12 months to ensure that units do not lie vacant for two years otherwise this could have a detrimental impact on the High Street, particularly when the Council are trying to ensure its vitality and viability.	Test of Soundness: Legally Compliant: Yes Sound: Yes
Mr Ron Woodley (BERA)	Policy DS1	2581	Comment	The reality is that the High Street no longer provides any unique shopping experiences. The lack of investment shows that there is little sign the retailers have any interest in boosting Southend. Already most disposable income of Southend residents for non-food shopping finds its way to the regional centres including Chelmsford because the quality of merchandise on offer in our high street is so poor.	
Mr Ron Woodley (BERA)	Policy DS1	2583	Comment	Are you able to define in a planning context how a particular café/restaurant would contribute to the vitality of the town centre .Because Southend at present probably has as many restaurants/cafes/fast food outlets as anywhere in the country but the overwhelming majority are of poor quality. The prospect of more of the same potentially making up 40% of the High Street is an appalling prospect not a unique and diverse visitor/shopper experience you are seeking.	
Rochford District Council (Natalie Heyward)	Policy DS1	2591	Support	Southend town centre offers one of the largest retail experiences in proximity to Rochford District, and on the whole has a different retail offer to the main towns of Rayleigh, Hockley and Rochford. The Council generally supports the draft proposals to enhance the main retail core within the primary shopping area. .	

RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	58	2839	Object	<p>This paragraph recognises that tourism is still a significant component of Southend's economy ("While tourism remains a central pillar of Southend's employment base..."). What the Plan does not acknowledge, however, is the fragility of this type of economy and the need to develop clear and positive policies to protect and grow this component. A survey of Adventure Island visitors undertaken by The Stockvale Group in 2016 showed that of 1,481 responses to the question, 54% of visitors, had visited Southend more than five times in the past 12 months. This shows that Southend operates very much like other traditional seaside resorts that rely significantly on repeat visits from people who make regular visits to the resort. This type of visitor can go elsewhere and if the Council does not protect this important component of the economy, there could be serious consequences for the visitor attractions on the seafront. The attached cutting (see Supporting Information below) from the November 2016 edition of theme park industry magazine 'Park World' shows the fragility of this type of tourism business. This page has two separate articles reporting on difficulties at two seaside amusement parks. The first is Pleasure Island at Cleethorpes, which closed down permanently in October 2016 due to dwindling visitor numbers and Dreamland in Margate, one of the UK's largest and longest established seaside amusement parks which has gone into administration and is threatened with closure.</p> <p>Businesses like Adventure Island need to be able to attract every single person that wishes to attend, including very importantly an ability to accommodate everybody who would like to visit in peak periods. We deal with this issue in more detail in our objections to parking-related policies, but for the purposes of this paragraph, it is sufficient to simply state that the peak summer days subsidise these operations throughout the rest of the year. An inability to capture all visitors during these very short periods mean less investment, fewer staff, and shorter operating periods for the rest of the year. This is certainly the case with Adventure Island, and this will have a local effect, given the source of most of the staff at Adventure Island is local and also the local supply chain (noting the company uses local trades and suppliers as a matter of policy). Over time visitors are likely to go elsewhere if they repeatedly cannot find a parking space.</p> <p>It is important, therefore, to ensure that there is a more positive statement in the Plan dealing with this point that doesn't only recognise the need for growth in these new industries, but also in the tourism industry.</p> <p><i>"While tourism remains a central pillar of Southend's employment base, the creative and cultural sectors, aviation and medical technologies are all growing and offer further potential for growth in the future. The Council also considers that tourism has the potential for growth, and policies will facilitate that. The Town Centre is a sustainable location for significant employment growth. This growth is concentrated in service sectors that require flexible and good quality offices, such as those for finance and business services as well as knowledge based creative industries."</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared</p> <p>EIP: Appearance</p>
Rochford District Council (Natalie Heyward)	67	2592	Comment	<p>The Council notes that the draft Southend Central Area Action Plan continues to be based on the Core Strategy, as this is the current local development plan for the Borough. In light of the identification of a much higher objectively assessed need for housing – although it is acknowledged that this is not the housing target, and needs to be tested through the plan-making process in line with national policy and guidance – the Council recommends that the draft Southend Central Area Action Plan should seek to exceed Core Strategy targets, wherever possible</p>	

Rochford District Council (Natalie Heyward)	67	2593	Support	It is recognised that bringing forward the draft Southend Central Area Action Plan will be instrumental in delivering dwellings in the short term, during the preparation of the new Southend Local Plan.	
Mr Ron Woodley (BERA)	68	2579	Comment	There seems to be a preoccupation with footfall to the extent that this supposed increase in footfall is the sole argument for providing more housing in the plan area. But the validity of this point is dubious. Residential areas are devoid of on street activity in the evening. The justification for more housing in the SCAAP area needs to be more robustly made. If greater footfall is required then leisure activities and housing are required, not solely housing.	
Powerhaus Consultancy on behalf of Southend United Football Club	71	2617	Object	The most recently identified objectively assessed housing need for Southend grossly exceeds the plan target at 950--1135 dwellings per annum for the period of 2014--2037 (South Essex Strategic Housing Market Assessment, May 2016). Furthermore, the Council has recently highlighted its difficulty in meeting its objectively assessed housing need through the Local Plan process, in a letter to the Examiner of the Caste Point New Local Plan (dated 18th November 2016), with particular reference to the constraints of the Borough in finding suitable land for development. The Roots Hall site is not only suitable for development, as previously highlighted in the SCAAP (December 2015) and pre-application discussions with the Council, but would be available within the next 5 years, and would therefore deliver much needed housing towards the Council's objectively assessed needs.	
Amanda Parrott (Basildon Council)	72	2586	Comment	Additional housing provision welcomed.	
Miss Ruth Wharfe	72	2613	Support	Support provision of more housing particularly a good mix of affordable housing including consideration for the homeless	Test of Soundness: Legally Compliant – Yes Sound - Yes
Ms Louise McDermott	73	2555	Object	The development of so many properties may meet one target but what about the effects on the infrastructure? No thought seems to have been given to the extra provision that will be required for services such as doctors, green space, car parking. This mentality is incredibly short sighted and does not bode well for cohesive communities. <i>Where housing is implemented there must be the associated services available that are not saturated, parking for the new residents, extra green space so that people do not go stir crazy and feel the need to drive to the seafront, which is already over saturated with visitors. It is not sustainable.</i>	Test of Soundness: The document is unsound because it is not: i. Positively prepared

RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	77	2840	Support	<p>We support the recognition that there should be “further enhancement” of tourism facilities in Southend Central Area. These facilities need to include car parking for visitors, the enhancement of these car parks, additional parking capacity and improvements of links between the car parks and seafront area. We also support the recognition that the Council will aim to “build on” the town’s role as a major tourism destination.</p> <p>No Change</p>	<p>Test of Soundness: Legally Compliant: Yes Sound: Yes</p> <p>EIP: Appearance</p>
Southend & District Pensioners Campaign (Mr Robert Howes)	80	2482	Object	<p>Not going to be a Regional Capital of culture or tourism. Town is ideal for day-trippers. We cannot expect large numbers of visitors to stay overnight. We are surprised the tourism is not a bigger part of this document, given it's importance to the central area. Any planning inspector would be amazed we believe. This is embarrassing to our residents we feel. We should be bold and imaginative in developing our Pier's potential, with new trains/ monorail and something at the head to excite visitors. The Priory could attract many people if the Saxon remains were housed nearby.</p> <p><i>This Action Plan does not say enough about tourism in our view, as there are major challenges involved. The high street needs more interesting and less down-market shops, restaurants and maybe a busy hotel and toilet facilities. A concert hall would be welcome, and we do have to find a way to develop our world famous pier. The Plan is incomplete.</i></p>	<p>Test of Soundness: Document is not Sound Soundness Test(s): i. Positively prepared ii. Justified</p> <p>EIP: Written</p>
Ms Louise McDermott	81	2554	Object	<p>Although tourism is important for Southend there are residents here who are affected by it. In order for the area to thrive with happy communities there should be a healthy and balanced mix however it appears that the tourist pound is valued above all else</p> <p><i>There is more to Southend than the Central Seafront - the plan should look at other areas instead of turning this area into a tacky and over saturated nightmare. The plan mentions sustainability but it is not so.</i></p>	<p>Test of Soundness: The document is unsound because it is not: i. Positively prepared</p>

Milton Conservation Society (Mr Andy Atkinson)	84	2478	Object	<p>The term 'celebrate heritage' is abstract and meaningless and heritage assets are not only important for the 'tourist economy' and 'identity-making'. DM5 is only written in terms of 'conserving and enhancing' historic assets and the requirements for development proposals. These are the most basic requirements derived from the NPPF and the Planning (Listed Building and Conservation Area Act) 1990 and not descriptive of Southend-on-Sea.</p> <p><i>The historic settlement of Southend's town centre and the importance of the route from Prittlewell, the remaining historic buildings should be strategically highlighted and protected as reference points for future development that respects the history of the town. Named building/sites outside the SCAAP area should be listed as elsewhere in policy.</i></p>	<p>Test of Soundness: Document is not Legal Document is not Sound Soundness Test(s): i. Positively prepared ii. Justified</p> <p>EIP: Written</p>
Belfairs Gardens Residents Association & Southend District Pensioners Campaign (Barbara Armitage)	84	2661	Comment	<p>Prittlewell Conservation area is certainly important because there is little of it now so we do not understand why the Council wanted to allow demolition of cottages in East Street and we hope that the Council is facilitating the restoration of these.</p>	<p>EIP: Written</p>
Milton Conservation Society (Mr Andy Atkinson)	87	2479	Object	<p>This is just a basic line of text stating that conservation areas exist and that they must be 'conserved and enhanced', a minimal threshold based upon the Planning (Listed Building and Conservation Areas) Act 1990 and not Southend-on-Sea.</p> <p><i>Conservation areas should not only be protected but should influence the urban design at their borders and in the zones between closely sited conservation areas, as present within the SCAAP area.</i></p>	<p>Test of Soundness: Document is not Legal Document is not Sound Soundness Test(s): i. Positively prepared ii. Justified</p> <p>EIP: Written</p>

Milton Conservation Society (Mr Andy Atkinson)	88	2480	Object	<p>The same comments as made for conservation areas apply.</p> <p><i>The plan should reference these buildings and the particular importance they have for the future of the town, not least the pier.</i></p>	<p>Test of Soundness: Document is not Legal Document is not Sound Soundness Test(s): i. Positively prepared ii. Justified</p> <p>EIP: Written</p>
Milton Conservation Society (Mr Andy Atkinson)	89	2481	Object	<p>Material consideration' with planning application affecting Frontages of Townscape Merit and other non-designated heritage assets is a minimal threshold, again only based upon the NPPF.</p> <p><i>Beyond 'material consideration' with planning applications these assets should be described as important to the urban history of Southend and where retained should be used as important reference points for adjacent urban design.</i></p>	<p>Test of Soundness: Document is not Legal Document is not Sound Soundness Test(s): i. Positively prepared ii. Justified</p> <p>EIP: Written</p>
Tracy Abbott	97	2565	Support	<p>The green spaces we have are great and am also pleased to hear that improvements are being made to the area.</p>	
Mr Martin Barrell (Environment Agency)	97	2608	Support	<p>We support the linking of green spaces. A linked network of green spaces and habitats creates a more robust framework for biodiversity.</p>	<p>Test of Soundness: Legally Compliant – Yes Sound - Yes</p>

Natural England (Mr Steve Roe)	Para 94 - 98	2879	Object	<p>There is likely to be increased recreational and development pressures on designated international, European and nationally designated sites. While Natural England welcomes the inclusion of various measures of urban greening described in Policies: DS5, PA1, PA3, PA4, PA5, PA6, CS1, PA8, PA9, the Plan should include a strategic approach for networks of biodiversity and for green infrastructure. The SCAAP Consultation Draft Proposed Submission (2011) contained Policy PR1: Open Space Provision and the environment: a policy supported by Natural England. It contained a number of thematic-links: reducing recreational pressure on Benfleet and Southend Marshes SPA / Ramsar / SSSI and climate change mitigation within a framework of linking open spaces in the green grid. Every effort should be made to minimise the severance of green infrastructure. Therefore although we welcome the intention expressed in paragraph 96 to remedy the deficit of green spaces within the Town Centre within the relevant Policy Areas and Opportunity Sites, it is not clear that the approach described at paragraph 95 is consistent with the NPPF paragraphs 114 and 117. It is also not clear whether a robust and up-to-date assessment of the needs for open space, and opportunities for new provision has been undertaken, in accordance with paragraph 73 of the NPPF. Natural England has an Accessible Natural Greenspace Standard and has produced an analysis of the adequacy of open space provision for Essex, with details for each district.</p> <p><i>1. Natural England recommends the links between Policies DS5 and CS1 are strengthened to demonstrate clearly a strategic approach. One recommendation would be to overlay the 'green grid' map of Thames Gateway South Essex Green Grid Strategy on to the Policy Map, and also include a wider-level map (as was included on p62 of the SCAAP Consultation Draft Proposed Submission (2011)) to help demonstrate strategic approach.</i></p> <p><i>2. We would advise that a check is undertaken as to what assessment of open space needs has been undertaken either as part of the SCAAP or in any connected strategic plan. We would recommend the inclusion of the analysis of the adequacy of open space provision for Essex in the evidence base.</i></p> <p><i>3. We would also advise that the SCAAP DPD makes the distinction between natural greenspace and general open space provision, as well as distinguishing between formal and informal open space.</i></p>	
Anthony Belyavin	102	2537	Object	<p>Your failure to ensure the 'gateway' approach to Southend at Prittlewell corner, is attractive, shows how ineffective all this is. Buildings on the right, immediately after Prittlewell Park Corner, heading South up Victoria Avenue needs to be addressed.</p> <p><i>These buildings should be refurbished and relet as original, and not allowed to decay as a monument to some laughable redevelopment of roots hall.</i></p>	<p>Test of Soundness: The document is unsound because it is not: iii. Effective</p> <p>EIP: Appearance</p>
Mr Carson Peter	102	2547	Object	<p>Adventure Island should not be considered a landmark. Its just a business on the seafront and not a landmark.</p> <p><i>Remove Adventure Island from the category of Landmark</i></p>	<p>EIP: Written</p>

Mr Martin Barrell (Environment Agency)	111	2611	Support	We support the reference to the SMP and the future flood management requirements. This section would be further strengthened by also including reference to the Thames Estuary 2100 (TG2100) Plan policies for this area. The Plans recommended flood risk management policy for Leigh Old Town and SOS is "to take further action to keep up with climate and land use change so that flood risk does not increase".	Test of Soundness: Legally Compliant – Yes Sound - Yes
Mr Martin Barrell (Environment Agency)	116	2606	Support	We support this paragraph which highlights the need for an early consideration of the FRA. We would also highlight that we would charge for detailed pre-application advice. This paragraph could direct developers to the 'Model Checklist' for Site Specific Flood Risk Assessment' in the flood risk and coastal change section of the Planning Practice Guidance in the first instance . <i>See Representation</i>	Test of Soundness: Legally Compliant – Yes Sound - Yes
Mr Martin Barrell (Environment Agency)	118	2605	Support	We support the reference to SuDS information and guidance. However, the references should be updated. The 'Non Technical Standards for Sustainable Drainage were published by DEFRA March 2015. The CIRIA SuDS Manual was updated in 2015. SuDS designs should also include sufficient treatment steps to ensure that water quality is protected, the SuDS manual details this. <i>See Representation</i>	Test of Soundness: Legally Compliant – Yes Sound - Yes
Ms Louise McDermott	120	2556	Object	Green fields wherever possible? Where are the green fields in this area? There are none. We have seen the shambles of the developed shared space seafront and the flooding the occurs there when it rains heavily. The newly proposed accommodation will put even more strain on this area and increase the risk of flooding unless a concrete plan is put in place to prevent it. The development should not be allowed until the drainage is guaranteed to be failsafe. <i>"Where possible" is not acceptable in these circumstance. Unless the drainage is failsafe then development should not occur. It is not sustainable.</i>	Test of Soundness: The document is unsound because it is not: i. Positively prepared
Mr Martin Barrell (Environment Agency)	121	2604	Support	We fully support this requirement for early consideration of SuDS. This should assist in delivering the best possible schemes, to benefit flood risk reduction, biodiversity and amenity.	Test of Soundness: Legally Compliant – Yes Sound - Yes
Mr Martin Barrell (Environment Agency)	DS4	2603	Support	We support the inclusion of this policy, in particular the comprehensive flood risk requirements in part 1 of the policy.	Test of Soundness: Legally Compliant – Yes Sound - Yes
Natural England (Mr Steve Roe)	Policy DS4	2875	Support	Natural England welcomes this policy requiring Flood Risk Assessments and the widespread adoption of SuDS techniques.	

Natural England (Mr Steve Roe)	Policy DS4	2876	Object	We note that climate change appears in Policy DS4 as well as in other places throughout the document; the main focus of attention relates to Flood Risk management. Whilst we recognise the intentions of paragraph 97 with regard mitigation of climate change by tree planting, we would advise that the SCAAP include a separate Policy on climate change, to cover both mitigation and adaptation, in accordance with paragraphs 94 and 156 of the NPPF. This Policy could focus on measures to assist biodiversity to adapt, and include green infrastructure measures to assist people to adapt (principally to extreme high temperature events, extreme high/low rainfall events, and for coastal areas, sea level rise and extreme storm surge events). For example, using tree planting to moderate heat island effects and SuDS to address flooding. For more information, see PPG on Climate Change.	
Mr Daryl Peagram	123	2474	Object	The SCAAP won't work as it has ignored parking considerations until after the initial consultation on the content of the plan, and even then has only given inadequate consideration, meaning the plan was not properly consulted on and so is neither compliance nor sound. It does not seek to meet requirements, it is based otherwise than on evidence and is undeliverable. The second consultation is only on the legality meaning residents have no chance to help the council remedy the defect other than by asking the inspector to refuse the SCAAP <i>The SCAAP must include a parking plan addressing the admitted conflicts between its intended growth and reduced car parks to the extent that it is rendered reasonable enough to be lawful.</i>	Test of Soundness: Document is not Legal Document is not Sound EIP: Written
Gleneagles Guest House (Penny Lowen)	123	2493	Comment	I think we need to be bold and change travel behaviour to encourage use of trains etc, Need VMS on A127 at Basildon for example to say use stations as car parks when others are full .Also need to integrate bus and train and consider trams light rail . I do not want to see a town full of car parks empty for 75% of the year	EIP: n/a
Ian Goodchild	123	2568	Comment	Roads heavily congested. To assist with blockages how about considering another link from Sutton rd/ industrial site/Journeymans ways and north of the sports ground in to an improved Warner's bridge close/improved bridge crossing at least this would relieve and offer alternate road way also if the proposed football stadium ever materialised foot access from the airport station.	
Southend Business Partnership (Murray Foster)	123	2596	Comment	Southend Borough Council's Business Survey 2016 clearly showed that businesses rated "Parking" as their biggest concern.	
Southend & District Pensioners Campaign (Mr Robert Howes)	124	2485	Object	The plan talks of inclusive access for walking. It fails to mention safe access. As pensioners we feel that important routes around Victoria rail station and on the "Golden Mile" are not safe "Shared-Space" areas for the elderly, frail or disabled pedestrian. Or for the very young. Badly conceived in inappropriate sites, we think. <i>The Council need to either scrap these Shared Space areas, or provide proper level crossings and kerbs. For the blind and partially sighted, we need audio controls at the crossings. Shared Space areas can and do work across Europe in suitable locations. We feel generally that this plan majors on physical structures like buildings, and needs to take account of the needs of people more.</i>	Test of Soundness: Document is not Sound Soundness Test(s): i. Positively prepared iii. Effective EIP: Written

Mrs Carolyn Hutcheon	124	2545	Comment	Encouraging more cycle access to the high street is very welcome. Reduce short car journeys into the town centre by providing an alternative by means of secure cycle parking and a welcoming spirit to cyclists will help reduce unnecessary traffic and congestion into the town. Secure cycle parking is a huge issue, and by secure not just a metal stand that requires a lock but somewhere you know you can leave and lock your bike, even if a small charge was applicable. Additional safe cycle paths/shared space required into the town centre and/or allocated along the high street.	
RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	124	2841	Object	<p>This paragraph refers to Map 4: SCAAP Car Parking, Access and Public Realm, which apparently depicts the existing car parking network. This appears to exclude the Marine Plaza/Dizzyland site which, although privately owned, forms an important part of the seafront car parking supply. Planning permission has been granted for the redevelopment of this site (with very little on-site parking to accommodate the traffic generated), but we understand that this has not come forward due to viability reasons. It may be necessary for a further planning application to be submitted for this site and if the SCAAP has been adopted with the amendments requested by The Stockvale Group it may be possible to secure improved car parking provision as part of any amended scheme.</p> <p>This would also ensure that the loss of existing car parking was properly considered in accordance with proposed Policy DS5 (2).</p> <p><i>Map 5 to be amended so that the Marine Plaza/Dizzyland site is included in the category 'Off Street Payment Parking'.</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(2) Justified</p> <p>EIP: Appearance.</p>
Mr Carson Peter	125	2548	Object	<p>Visual attractiveness of buildings is "the fashion of the moment". I believe what appears to be a current visually blank building should remain as it is as it represents what was considered fashionable in its time. Any alterations to a building façade should certainly not include decorative lighting as this adds to the energy consumption of the nation causing additional greenhouse gas emissions and additional light pollution.</p> <p><i>Leave visually blank building facades as existing.</i></p>	EIP: Written
Mr Ed Lee	128	2499	Object	<p>The rate of car ownership should be considered by density of dwellings as well as percentage of population. Traffic is terrible and very likely to get worse. Public transport will not improve unless supported practically.</p> <p><i>There should be a park and ride scheme starting close to the west borough border with connections to the Airport, Central Southend and the seafront.</i></p>	<p>Test of Soundness: The document is unsound because it is not: i. Positively prepared</p> <p>EIP: Written</p>
Mr JC Gibb	128	2517	Comment	The use of cycle lanes will never deal with more than a small minority of users. These should not be allowed to inhibit car movement within the town which at times is snarled up. Use of these lanes where they exist should be compulsory. There are often more cyclists blocking up the road or footway than in the cycle lane!!	

Anthony Belyavin	128	2538	Object	This is madness, arterial routes into central Southend, are already close to paralysis at normal commuting times, and SHOULD NOT have cycle lanes or others, added.	Test of Soundness: The document is unsound because it is not: iii. Effective EIP: Appearance
Belfairs Gardens Residents Association & Southend District Pensioners Campaign (Barbara Armitage)	128	2657	Comment	The statement that there is a low level of car ownership in the town centre , possibly because of multi occupation, is losing credibility as more flats are coming all over the town and the exceptionally high cost of many would indicate that car ownership will go up rapidly.	EIP: Written

RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	128	2842	Object	<p>Paragraph 128 refers to the "low rate of car ownership in Southend Central Area" and that this provides opportunities for other measures to facilitate the use of sustainable transport modes, such as cycle lanes and bus priority measures, together with linked improvements to the public realm.</p> <p>We would like to make two points in relation to this paragraph.</p> <p>Firstly, although residents of Southend Central Area have a low rate of car ownership, tourists visiting Southend Central Area, particularly the seafront, do not. The survey of visitors to Adventure Island undertaken by The Stockvale Group demonstrated that 85% of visitors to Adventure Island use the car. This is due to the high level of car occupancy for the largely family visitors (the same survey showed that 60% of family visitors had three or more passengers in their cars). It is difficult and expensive for this type of family user to access public transport. Of course, with such a high proportion of seats being used it is actually a sustainable method of travel in our view, with only 3% being single occupancy vehicles. It is therefore essential that policies in this Plan reflect this reliance on the private car, and the fact that for this type of visitor the use of a private car is not necessarily unsustainable. This is confirmed in the RPS Technical Note.</p> <p>Secondly, if the improvements mentioned in this paragraph are put in place it is essential that care is taken that the supply of car parking spaces is not reduced in the Southend Central Area to such an extent that it causes displacement into car parks serving the seafront. The impact of changes to parking across the entire Central Area needs to be considered strategically. On the seafront itself there should be no loss of car parking spaces and, indeed, we strongly suggest that the SCAAP needs to positively plan for an increase in spaces to support the growth of businesses on the seafront, as set out in the Vision and Strategic Objectives (page 12).</p> <p><i>"With a low rate of car ownership in Southend Central Area there is a need and opportunities along access routes to allow other measures to be implemented that facilitate the use of sustainable transport modes, such as cycle lanes and bus priority measures, which will be implemented through the Local Transport Plan and associated strategies, together with linked improvements to the quality of the public realm. Any such measures must demonstrate that there would be no loss of car parking space south of the railway line and that any loss north of the railway line does not result in displacement of cars into car parks that serve the seafront area resulting in a loss of important spaces that support the town's tourism businesses."</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(3) Effective</p> <p>EIP: Appearance</p>
RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	129	2843	Support	<p>We support the improvement of signage and way-finding within and around Southend Central Area. This needs to include signage for drivers seeking car parking spaces from the main routes into Southend that are used by tourists who may not know which car parks are most appropriate for their purposes. It also needs to include improved way-finding within the Central Area, particularly those routes that link the main car parks to the seafront area as these routes are most likely to be used by visitors who do not already know the routes around the town.</p> <p><i>No specific change, but please ensure that the comments above are noted.</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: Yes</p> <p>EIP: Appearance</p>
Southend Business Partnership (Murray Foster)	130	2597	Comment	<p>Southend Business Partnership's response to the Thames Estuary Growth Commission 2050- Call for Ideas highlighted the need for "New underground parking provision within the town centre"</p>	

Southend Business Partnership (Murray Foster)	130	2598	Comment	Opportunity South Essex's (formerly South Essex Growth Partnership) new Growth Strategy indicates that there will be significant job creation and housing growth across South Essex including Southend. This will inevitably result in more people visiting Southend as a tourism and leisure destination; provided our offers remain fit for purpose, with the need for having the capacity in place both parking and infrastructure access to welcome them. This means our parking provision and access to it needs to be improved from now on as otherwise our tourism and leisure destination attractiveness will be compromised and future investment could be jeopardised. We need to continue to be able to retain and enhance the existing core tourism seafront offer which attracts thousands of people to the town whilst widening the range of our offers to attract new visitors to the town.	
Southend Business Partnership (Murray Foster)	130	2599	Comment	The supplementary document "Car Parking Study for the Central Area of Southend" does go somewhat towards proposing mitigating measures however measures indicated "in the medium term "2-5 years" (page 2 of recommendations) do in our view need to be fast tracked and implemented within a 2-3 year period	
Mr Paul Thompson (Pebbles One Ltd, Spar, Subway, Baskin Robbins & Maple House)	130	2806	Object	<p>page 41</p> <p>I object to the use of the Car Parking Study (CPS) commissioned by Southend Council and undertaken by Steer Davies Gleave as part of the evidence base for the SCAAP. The study has been used to form the Parking Management Techniques adopted within the SCAAP. I believe the Study is flawed for reasons set out below and will result in an inefficient transport network in and around the SCAAP area, with a severe shortage of parking capacity to the south resulting in heavy congestion at busy periods.</p> <p>The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street and on bad weather days thus the parking situation & demand to the south of the railway line has been misrepresented. The southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. Therefore the report is flawed and thus the related policies within the SCAAP are flawed.</p> <p><i>The CPS should be done again based on more up to date surveys. New surveys were not done in July or August 2016. The parking surveys should be done in August 2017, containing data for ALL publicly available car parks and on days where the weather is sunny and hot.</i></p>	<p>Test of Soundness: Sound – No 4(2) Justified</p> <p>EIP: Appearance</p>

RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	130	2844	Object	<p>The Stockvale Group strongly objects to the use of the Car Parking Study that was commissioned by Southend Borough Council and undertaken by Steer Davies Gleave as part of the evidence base of the SCAAP. There are numerous issues with this study, both in terms of its scope, methodology, surveys carried out and the extent to which it takes into account the specific needs of the seafront tourism businesses. Stockvale has commissioned transport planning consultants at RPS to review this from a technical perspective and the RPS Technical Note is attached to these representations (see below) and should be read alongside them.</p> <p>The key conclusions are set out in our representations to Policy DS5.</p> <p><i>We consider that the issues raised by the Car Parking Study are so severe, and have such a serious impact on the policies that follow, that it is difficult to rectify through any amendment to the wording of this paragraph as the Study needs to be updated to take into account the needs of the seafront businesses. However, if the amendments that we request in our representations on other policies and paragraphs are taken into account we consider that the Plan can proceed to adoption without this Study being updated.</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(3) Effective</p> <p>EIP: Appearance</p>
Mr Ed Lee	131	2500	Object	<p>Car users visit less often in part due to the disproportionately high parking fees. Even for those living in the borough it is cheaper to travel outside the area for shopping. This undermines the High Street and creates a self justifying situation where the causes and symptoms are mixed.</p> <p><i>Recognise that car transport is a significant factor in local business. You might not want it to be but that is to not accept the reality.</i></p>	<p>Test of Soundness: The document is unsound because it is not: i. Positively prepared ii. Justified</p> <p>EIP: Written</p>

<p>RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group</p>	<p>131</p>	<p>2845</p>	<p>Object</p>	<p>Please see our comments on Paragraph 130, as they apply equally to this paragraph and summarise our concerns about the significant flaws in the Study.</p> <p>In relation to the points made in this paragraph, we make the following comments: Paragraph 131 states that the Study "reviews current and future car parking provision in Southend Central Area". In our view, the Study does not correctly identify all capacity in the Central Area. It states that the Study "sets out the performance of the existing parking network". The Study has not recorded correctly the performance of the car parks that serve the seafront area on peak days when the weather is good. These are the days (which can be relatively few) when the tourism businesses need to be able to capture every visitor. These days essentially subsidise the operation of the attractions and other supporting businesses throughout the year. If visitors are lost due to lack of car parking then these businesses are less able to remain open at quieter times of year when tourism businesses traditionally lose money. This can also mean an inability to keep on staff, which makes the business (and ultimately Southend seafront) more of a seasonal operation. This will have a damaging effect on the economy of the town and its overall prosperity, when a sizeable proportion of the town's economy is supported by its tourism role. This model applies to pretty much all mainly outdoor tourism businesses. The author of these representations (Nick Laister of RPS) is a specialist planning consultant who has worked on projects in most of the UK's main seaside towns, including Blackpool, Southport, Rhyl, Weston-super-Mare, Exmouth, Southsea, Hayling Island, Isle of Wight, Eastbourne, Hastings, Margate, Lowestoft, Great Yarmouth, Skegness and Scarborough. These issues have emerged at a number of those resorts. It is an issue that is almost unique to the outdoor tourism industry but without an understanding of the need to accommodate the main peaks there can be significant harmful outcomes from ill-conceived policies. Until the Study is amended to reflect these critical periods for the operators of seafront attractions it is not a suitable basis on which to build the policies that will impact upon the way the seafront operates. This paragraph also mentions "the potential impact of development proposals on the network". We do not consider that this has been adequately assessed, for the reasons set out in the RPS Technical Note. This paragraph goes on to state: "It also assesses the economic importance of parking in Southend Central Area based on a recent survey of shoppers. As a result it provides a good indication of modes of travel and associated spend within Southend Central Area. It reveals that all visitors, including those who travelled by car, bus, train, cycle or walk, contribute to the local economy by spending in Southend Central Area." It is not clear why a similar survey was not undertaken of tourists visiting the town as these are equally important to the town's economy and have very different requirements (and, of course, their use focuses on different parts of the Central Area). The statement: "As a result it provides a good indication of modes of travel and associated spend within Southend Central Area" simply cannot be justified as this only gives part of the picture. It does not give a picture of the needs of the seafront businesses, nor does it try to understand how visitors to Southend might have different requirements, patterns of movement, mode of travel, time of travel and priorities compared to shoppers. This is a key reason why this section of the SCAAP is likely to be so damaging to the important seafront businesses..</p> <p>As stated in relation to our representations on other policies and paragraphs, Stockvale carried out its own survey of visitors to Adventure Island, which more accurately reflects the requirements of visitors to the seafront area. This is summarised in the RPS Technical Note, which is submitted with these representations. It shows that there is a much greater reliance on car travel, a very high occupancy of</p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(2) Justified</p> <p>EIP: Appearance</p>
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			<p>vehicles and a high sensitivity to the availability of spaces and the difficulty in finding those spaces. This Paragraph needs to be amended to reflect the needs of tourists visiting Southend.</p> <p><i>"The Study reviews current and future car parking provision in Southend Central Area. It sets out the performance of the existing parking network, and the potential impact of development proposals on the network, based on surveys that were focused on the town centre. It also assesses the economic importance of parking in Southend Central Area based on a recent survey of shoppers. As a result it provides a good indication of modes of travel and associated spend within Southend Central Area. It reveals that all visitors, including those who travelled by car, bus, train, cycle or walk, contribute to the local economy by spending in Southend Central Area. It also shows that generally car users spend more but visit less often than other mode users. Additional surveys have also been undertaken to better understand the needs of visitors to the seafront area. This shows that car travel is the dominant mode of travel (85% of visitors), with very high car occupancy levels (84% of cars having three or more occupants, and 56% having four or more occupants), and that these visitors have a very high sensitivity to availability of spaces and the ease of finding spaces."</i></p>	
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<p>Mr Steve Kearney (SK Architects) on behalf of Stockvale</p>	<p>132</p>	<p>2552</p>	<p>Object</p>	<p>SKArchitects provide architectural and planning consultancy to the Stockvale Group the main seafront business together with a number of other seafront and town centre businesses.</p> <p>CS1/DS5</p> <p>It is apparent from the manner in which the SCAAP has been compiled that there is a lack of understanding of the demographics of visitors to Southend on Sea and indeed the social economics of the wider catchment area of South Essex and East London.</p> <p>Clearly Southend is a strong day visitor attraction which mainly caters for families from South Essex and East London. The majority of these visitors travel to the town by car and experience great difficulty in travelling into the town and indeed finding a parking space within proximity to the Central Seafront.</p> <p>It is also clear that whilst tourism is a key strength the fragility of the tourist economy is dependent upon easy vehicular access into the town and parking arrangements once in the Central Seafront area. We believe that the Local Authority through the SCAAP have dramatically under represented the value of the tourist economy to the SCAAP area.</p> <p>The SCAAP fails completely to have regard for the necessity of the Seafront businesses to operate to maximum capacity on the sunny days. Without maximizing the income on such days, there is a challenge to the very sustainability of the Seafront as an attraction and the associated Seafront businesses.</p> <p>Whilst the Council would like to see the tourist economy increase and include longer stay visits, this to some extent negates the success of the day visits and the importance of those day visits to the local economy.</p> <p>The Local Authority's encouragement of staycation as opposed to day visits will potentially be to the detriment of the existing seaside offer. This is likely to see a decline of the family orientated day visits that Stockvale in the main have promoted and extensively invested in. Through the continued reinvestment by the Stockvale Group and other Seafront businesses Southend as a seaside town has seen significant regeneration and is now a safe, clean, high quality family destination of choice.</p> <p>The SCAAP is primarily based on the residential intensification of the central area with development opportunities identified on existing public car parks. Through the SCAAP the Council want to see and encourage alternative modes of transport within the Central Area. This should be an aspiration for the new residents in the Town Centre and not day visitors. However in reality there will be a parking demand as a result of the proposed residential re-use and regeneration of the Central Area and this will be at further detriment to the already strained public car parking provision and in particular the southern part of the SCAAP area.</p> <p>Whilst the Council have indicated no net loss, this is not an aspiration for growth! Indeed it has been made very clear to the Council through various consultations that their position of no net loss will see no further growth or investment from the seafront businesses. The seafront economy is already declining due to the constrained access and parking arrangements and the SCAAP does not encourage or indicate any improvement.</p> <p>It is also apparent that the Council's approach towards consultation, has seen a total lack of any acceptance or awareness of the importance of the tourist economy to the Central Area and indeed the difference between tourism and leisure. The Seafront businesses have gone to lengths to explain this difference to the Council through their consultation responses to-date which have been completely discarded. This has currently removed any confidence in those businesses to further invest and will, as suggested see a decline in the Seafront and tourist economy of Southend unless the Local Authority dramatically review the proposed SCAAP.</p>	<p>Test of Soundness: The document is unsound because it is not: i. Positively prepared ii. Justified iii. Effective</p> <p>EIP: Written</p>
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			<p>As part of the car parking study in the local transport plan 3 the Central Area parking demand is forecast to grow by 25% by 2021. The car park study undertaken by Steer Davies Gleave as part of the SCAAP takes no account of this projected growth and the Councils position in no net loss against their own local transport plan indicates a clear flaw in the SCAAP analysis of Public Car Parking Provision.</p> <p>Summary</p> <p>Through the SCAAP Southend on Sea Borough Council have failed to recognise the difference between tourism and leisure and indeed the importance of access and easy parking in close proximity to the Central Seafront for the tourist economy day visitor customer base.</p> <p>The Council have identified a number of the surface car parks for redevelopment with a principle of no net loss of car parking spaces, however, this has been made clear through consultation that this a standstill position which will not encourage any further re-investment and growth in the tourist economy.</p> <p>Southend is in a unique position in terms of the success of its tourist economy and Central Seafront. This relies heavily on its catchment area of South Essex and East London and the unique social economics and demographics of its geography and its proximity to London.</p> <p>The Seafront economy is absolutely reliant on day visits. The day visits market is being and will further be discouraged by the sheer frustration of visitors' inability to easily access the town and to find convenient car parking facilities in close proximity to the Seafront.</p> <p>If the Council do not engage in the concerns that have been raised by the Seafront businesses it is inevitable that the renewal and regeneration that has occurred over the last two decades will start to recede and the Seafront will decline like many other seaside around Britain.</p> <p><i>We believe that the SCAAP has not been positively prepared and is flawed in relation to the Council's understanding of the tourist economy and the difference between tourism and leisure. As a result there is lack of engagement with needs of Seafront businesses. The SCAAP needs to be comprehensively reconsidered in relation to the importance of easily accessible and convenient parking for the Seafront. This in particular needs to factor the number of very busy days when the sun is shining as opposed to a global approach of parking provision within the wider Central Area. Through the SCAAP parking provision needs to focus on periods of peak demand to reduce and improve upon the existing over capacity issues.</i></p> <p><i>As has been clear with other plan making processes in seaside towns the importance of being able to cater for these peak days has been acknowledged. This is what seafront businesses in other seaside towns and the tourist economy rely upon to ensure their future sustainability.</i></p> <ul style="list-style-type: none"> <i>We believe that the document is unsound as it has not been positively prepared. The SCAAP has not engaged appropriately with the key economic driver of tourism within the Central Area. There has been a complete lack of understanding of tourism and the differences between tourism and leisure.</i> <i>The SCAAP has not been justified in relation to its previous consultation responses and the Council's complete dismissal of the concerns that have been raised by the primary economy.</i> <i>The SCAAP is not effective as it will not deliver growth within the tourist economy and completely neglects the importance of the tourist economy to the Central Area. Clearly the primary economy of tourism has a secondary impact on the High Street retail and associated offer.</i> 	
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Belfairs Gardens Residents Association & Southend District Pensioners Campaign (Barbara Armitage)	132	2658	Comment	<p>There is also a statement that there is an excess of parking available. This has been in these plans for years. In my opinion they take account of all the sea front parking which few would park at and walk uphill from to shop in Hamlet Court Road or the town centre. Also the Cliffs Pavilion car park is not used much when a show is not taking place. This is not near shops and any restaurants on the sea front are a substantial walk away. Also underground car parking by the university is only at certain times and including any parking by private shopping areas is quite wrong.</p>	EIP: Written
RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	132	2846	Object	<p>Paragraph 132 again uses the Parking Study as its basis and this causes a number of errors or inappropriate conclusions. For example, it states that "The Study found that the Southend Central Area parking network rarely exceeds 85% occupancy." This masks the problems faced in the seafront areas where there is currently a significant under capacity of parking spaces. Although this paragraph does acknowledge an imbalance, the Study fails to capture the extent of the issue as the survey dates used were not appropriate for understanding how tourism businesses operate and how their visitors get to them (for example, inappropriate dates, surveys undertaken in poor weather).</p> <p>This is covered in more detail in the RPS Technical Note. But looking at the dates used compared to the peak days recorded at The Stockvale Group's Adventure Island theme park and Sea Life Adventure attractions, it can be seen that the dates selected were far from representative of a peak day in the school holidays. The level of visitors to Southend seafront is primarily a result of the weather, and the consultants did not select appropriate days to understand the existing level of pressure on car parks that serve the seafront, and therefore how sensitive the seafront businesses will be to change in this capacity.</p> <p>As can be seen in our separate comments on policies that are partly based on this study, this has had the effect of generating policies that do not support the seafront tourism businesses. Indeed, these policies will have the effect of reducing visitor numbers and therefore investment into Southend seafront.</p> <p><i>It is difficult to specify amendments to this paragraph as additional background work needs to be undertaken to understand the issue. This can only be done in the summer, so would need to be undertaken in August 2017 on sunny days.</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(2) Justified</p> <p>EIP: Appearance</p>

<p>RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group</p>	<p>133</p>	<p>2847</p>	<p>Object</p>	<p>Paragraph 133 appears to acknowledge that more work needs to be done. Unfortunately, if the SCAAP is adopted before this work is done, and these policies brought into use, it will be difficult to avoid some very serious, long-lasting and damaging consequences for the businesses operating on the seafront. Paragraph 29 of the NPPF acknowledges that different policies for sustainable travel are appropriate for different areas:</p> <p>“Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives...The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.”</p> <p>In the case of Southend, visitors to the seafront attractions have different needs to residents using town centre facilities and a greater reliance on the private car (see our representations on paragraph 128). It is essential that the SCAAP differentiates in this way and takes these needs into account. This paragraph states that additional parking expected to be provided by development in Southend Central Area “is likely to accommodate future demand for parking generated in the plan period up to 2021”. This, however, does not reflect the reality that there is likely to be a reduction in car parking spaces in the seafront area caused by the proposed SCAAP policies. This is caused by· the likely loss of car parking spaces (for example, Marine Plaza/Dizyland, Seaways and reduction of parking in the town centre);</p> <ul style="list-style-type: none"> · displacement of cars parked elsewhere in the Southend Central Area, where parking spaces will be reduced (noting that the Council’s Car Parking Study underestimates the demand for parking and incorrectly identifies capacity – see RPS Technical Note); and · demand created by the new developments proposed in the SCAAP/Core Strategy. <p>The SCAAP should be proposing increasing the spaces to allow for business growth, not reducing the number of spaces.</p> <p>As stated above, the paragraph does acknowledge shortcomings and states that further work will be needed. The enclosed RPS Technical Note, which reviewed the Council’s Parking Study, shows the extent to which this document is flawed as a basis for a planning policy document. The effects of implementing the SCAAP in its current form, informed as it is by the results of a flawed Parking Study that does not grasp the nature and importance of tourist-related visitors and businesses, will be to harm the businesses on the seafront. The ‘further work’ referred to in this paragraph must be undertaken before the SCAAP is adopted. The Stockvale Group, and many of the other businesses on the seafront, would be happy to work with the Council, and share its existing survey data, to establish a more robust evidence base on which to build the policies of this Plan.</p> <p><i>This paragraph acknowledges “further work will be needed , in the light of the Study, to ensure that parking supply is carefully balanced between the car parks and development sites north and south of the Central Area.” This work must be undertaken before adopting this Plan to ensure that the policies are informed by this work. It must include properly planned surveys in the peak summer period and develop a realistic and robust evidence base on which to consider policies. It is not, therefore, possible to provide alternative wording at the present time without this work being undertaken. However, the following amendment to the paragraph would be a fall-back option:</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective 4(4) Consistent with National Policy</p> <p>EIP: Appearance</p>
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Mr Ed Lee	134	2501	Object	<p>The 10 minutes walk criteria does not recognise that there is a significant height difference between the central area and the seafront. For anyone of limited mobility it is not a practical walk. With the average age increasing this is likely to be an increasing percentage of visitors. This constitutes disability discrimination.</p> <p><i>Recognise that the claimed 10 minute walk criteria is inappropriate.</i></p>	<p>Test of Soundness: The document is unsound because it is not:</p> <ul style="list-style-type: none"> i. Positively prepared ii. Justified iii. Effective iv. Consistent with national policy <p>EIP: Written</p>
Mrs Ros Sanders	134	2506	Object	<p>Parking on the seafront has become more difficult every year. I do not believe that encouraging tourists to use car parks 10 minutes walk away from the seafront will achieve anything other than encourage motorists to arrive earlier and park in residential areas on, and adjoining the seafront and Southchurch Park.</p> <p><i>-Identify yellow lines that can be removed to create more spaces -add floors to additional car parks - reject all new building applications that do not include 1.5 accessible parking spaces per dwelling in the seafront area.</i></p>	
Mr JC Gibb	134	2518	Comment	<p>The use of cycle lanes will never deal with more than a small minority of users. These should not be allowed to inhibit car movement within the town which at times is snarled up. Use of these lanes where they exist should be compulsory. There are often more cyclists blocking up the road or footway than in the cycle lane!!</p>	
Mr Ron Woodley (BERA)	134	2575	Comment	<p>The Council should be encouraging more use of the car parks in the eastern and western parts of town. A free of charge land train during the peak summer periods has to be considered, with the car parking ticket being used as the free ticket to ride.</p>	

<p>RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group</p>	<p>134</p>	<p>2848</p>	<p>Object</p>	<p>Paragraph states that “collectively the car parks located in Southend Central Area have the potential to serve both the Town Centre and Central Seafront, facilitating linked trips and increasing the potential for associated shared spend”. This is not correct. As appears to be acknowledged in the second part of this paragraph, the town centre car parks are not all well located to accommodate visitors to Southend who are visiting for the seafront area. These visitors would not find it attractive to park in car parks in the town centre, particularly those north of the railway line. There will undoubtedly be an opportunity for linked trips, but the most important factor for those operating businesses is to ensure that the visitors are able to get to Southend and park conveniently for the seafront. Once these people are parked, then they will be able to use both the seafront and town centre, especially if routes between the two are improved.</p> <p>We know that convenience of car parking spaces is a major factor in the attractiveness of Southend as a tourist destination. The survey of Adventure Island visitors undertaken by The Stockvale Group (set out in the accompanying RPS Technical Note) shows that this is a very important issue for visitors.</p> <p>When asked how important parking and the journey to Southend is in making a decision to come back again (on a scale of 1 to 10, where 10 is the highest importance), 10 was the category most commonly provided by the 1,484 respondents, with 33% of respondents giving 10, and 65.03% scoring this issue 8, 9 or 10. This cannot be underestimated. As stated in our representations to paragraph 58, return visits forms the basis of businesses such as Adventure Island, and they operate in a very competitive environment. If visitors cannot get access to convenient car parks they may choose not to return to Southend. The tourism economy of the town relies on these day visitors, and a reduction in availability or attractiveness of parking will potentially reduce visitor numbers, shorten season, reduce employment levels and ultimately will reduce the attractiveness of Southend seafront. It is essential that the Plan recognises why tourism-related traffic has to be considered differently to traffic associated with journeys to work, school and other regularly used destinations.</p> <p><i>“134 It is considered, that there is some potential for the car parks located in Southend Central Area to have the potential to serve both the Town Centre and Central Seafront, facilitating linked trips and increasing the potential for associated shared spend. Nevertheless, many of the car parks in the Town Centre do not adequately serve the seafront. It is also recognised that those car parks which are approximately 10 minutes' walk from the shoreline (south Central Area, i.e. those generally located south of the central railway line) are better positioned to provide more direct and convenient access to the Central Seafront area, which is the focus of the tourism and leisure resort.”</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective 4(4) Consistent with National Policy</p> <p>EIP: Appearance</p>
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P Tomassi & Sons Ltd (Antony Tomassi)	135	2543	Object	<p>We are concerned by the assertion that there will be 'no *net* loss of public car parking to the south of the Central Area'. Given the plans to build 200+ spaces at Southend Museum, this could allow for spaces to be lost in the southern part of the town centre, which this plan acknowledges as the busiest parking area. Parking spaces on the seafront and parking spaces in the southern town centre do not have an interchangeable use, and any loss of parking in the southern part of the town centre could result in the High Street being less competitive versus other town centres/out of town locations. Furthermore, museum parking should be primarily for those visiting the museum, and it is unlikely that people will park on the seafront and then walk up to the town centre & carry shopping back etc.</p> <p>SUMMARY Car parking at the seafront and car parking in the southern town centre are not interchangeable in use, thus we should not look to maintain *net* numbers here by building a new car park at Southend museum, potentially allowing town centre car parks to be re-developed.</p> <p><i>Current car parking in the southern town centre needs to be maintained, and any additional parking e.g. the museum, should be developed incrementally to this, rather than to maintain a net number of spaces.</i></p>	<p>Test of Soundness: The document is unsound because it is not: ii. Justified iii. Effective</p> <p>EIP: Appearance</p>
Belfairs Gardens Residents Association & Southend District Pensioners Campaign (Barbara Armitage)	135	2659	Comment	<p>Building on central car parks is a retrograde step. P42 It might provide additional facilities but these could be offset by the public going elsewhere. We support the Traders that town car parking is essential.(plus disabled places as above). The car park by the Southend Association of Voluntary Services and the old municipal offices are examples. Around that area are lots of businesses such as solicitors, accountants, care providers etc. whose customers go there for short periods of time and then go on to other places. The idea of an out of town car park and bus or walk could lead those to lose business and just move out.</p>	<p>EIP: Written</p>

<p>RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group</p>	<p>135</p>	<p>2849</p>	<p>Object</p>	<p>This paragraph states that there are 2,550 publicly available spaces to the south of the central area. As stated in the RPS Technical Note, this is actually closer to 4,000. It goes on to state that there will be “no net loss of public car parking to the south of the Central Area.”</p> <p>Firstly, The Stockvale Group objects to this statement because it is a negative approach, not a positive one to meet the needs of businesses. The Stockvale Group have been planning for growth in visitor numbers, supported by significant investments in their attractions Adventure Island and Sea Life Adventure, as well as their numerous restaurants, cafes and kiosks on the seafront. It states in paragraph 28 that the Council’s vision is to promote economic growth. Specifically, in Paragraph 29 it states that a Strategic Objective is to attract “greater visitor numbers”, which is a direct reference to the town as a resort. Paragraph 30 also reiterates that the Council is aiming to support growth. Similarly, in Paragraph 81, the Council states: “The tourism and hotel sector is expected to grow in Southend over the next 20 years”.</p> <p>A policy of no net loss of public car parking spaces south of the Central Area will not support growth. As Stockvale’s surveys have shown (see the RPS Technical Note), the seafront tourism sector is reliant on visitors from outside the town who largely travel by car, with high car occupancies (families). This Paragraph should be making a clear statement that the intention of the Council is to increase the number of car parking spaces that provide convenient access to the seafront area. If this statement is not included, then this plan cannot be considered to be positively prepared as it is not meeting the needs of the seafront area. Equally seriously, it is not clear whether this approach will even be effective in protecting against net loss of spaces as the Plan is not clear enough about how this is calculated. In order to make investment decisions. The Stockvale Group and other seafront traders need the certainty that visitors will be able to access their attractions and other facilities that support tourists visiting Southend. A number of points need to be clarified:</p> <ol style="list-style-type: none"> 1. It is not clear to Stockvale how the net loss will be calculated. As can be seen from the RPS Technical Note, the Council does not appear to have included all available spaces in and around Southend seafront in the capacity, nor accounted for all the demand. Given that, at peak times the seafront car parks are full, this is likely to result in an over-estimation of the percentage of available spaces in Southend north of the railway line. 2. It is not clear whether the Council has taken into account the trips generated by substantial new development proposed, for example, at the Seaways car park site. If this has not been taken into account, then there will be an immediate net loss on spaces due to displacement caused by traffic parking for the new developments. The RPS Technical Note suggests that this has not been correctly factored in. 3. It is not clear what level of importance will be attached to the most accessible spaces, or whether spaces nearer the town centre (some of which are up a steep slope from the main seafront area) will be considered as part of this ‘net’ figure. 4. Similarly it is not clear if the Council has considered spaces that have poor links to the seafront as part of this ‘net’ figure. <p>We support the Council’s attempt to secure additional car parking spaces as part of the new Southend Museum development (approximately 220 spaces). However, this development is in the very early stages, is not yet funded and cannot be relied upon. For the purposes of this policy, and in the timescales available to this plan, we do not consider much regard should be taken to this in assessing the availability of car parking</p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective</p> <p>EIP: Appearance</p>
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			<p>spaces now and in the future.</p> <p>In short we do not have the confidence that this policy is going to be effective. Indeed, it is likely on the basis of the work undertaken by RPS that this policy will be ineffective and actually counterproductive by resulting in a net loss of spaces available to visiting tourists. We are not confident that the Council is planning positively to accommodate growth, nor that its policies will be effective in ensuring no net loss.</p> <p><i>This paragraph, which supports Policy DS5 and will be read in conjunction with it, needs to clarify how it will ensure no net loss of spaces. It needs to be clear exactly which spaces are part of the capacity against which the net loss will be calculated, it needs to make it clear that additional spaces will be required over and above existing supply and it needs to be clear which are the prime seafront car parks, with good links to the seafront attractions, that will be protected and enhanced.</i></p> <p><i>More importantly, there needs to be a clear statement that the Council intends to plan positively and develop policies that implement its own Vision and Strategic Objectives. This statement should be as follows: "The Council will seek to increase the number of car parking spaces available south of the railway line. Any developments in this area should ensure that provision is made to accommodate their own needs and that this is over and above the supply existing in 2016. Taking into account new developments, and the poor accessibility to car parks in the town centre due to topography, there will be no net loss of car parking spaces that serve the seafront area when measured against the 2016 car parking supply of 4,000 [this figure to be agreed between Southend Council, The Stockvale Group and seafront traders, who have a good knowledge of car parking availability in this part of the Central Area]."</i></p> <p><i>This will enable Policy DS5 to be effective when the Council is determining planning applications.</i></p> <p><i>We also consider that there should be a clear statement that the 220 spaces proposed at the New Southend Museum shall not be considered part of the current or future supply until the development has commenced.</i></p>	
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Southend & District Pensioners Campaign (Mr Robert Howes)	136	2484	Object	<p>Car parking deserves to have more emphasis in this action plan. The situation now is difficult and produces major congestion. Some local residents struggle to park near the centre of Southend. Disabled people often have no easy access to buses, and some cannot access a bus anyway. Our seafront businesses are already upset over the lack of car park provision near the coast, and most new trippers will arrive here by car. Already people are parking illegally on grass banks in Kursaal Ward in the summer. Essex Police have other priorities. This plan appears to be incomplete.</p> <p><i>Please think carefully about retaining the space needed for additional car parking spaces in the central Southend and seafront areas, as it will be key to the success of the whole plan in our view. This is a change needed. Also, consider the need for multi-storey parking, or underground provision.</i></p> <p><i>We believe this project is a great opportunity to transform our town centre which could be successful if a parking and tourism strategy with tactics were incorporated into this document. As it stands, this plan looks incomplete.</i></p>	<p>Test of Soundness: Document is not Sound Soundness Test(s): i. Positively prepared ii. Justified</p> <p>EIP: Written</p>
Mr Carson Peter	136	2550	Support	I agree	EIP: Written
Ms Louise McDermott	136	2553	Comment	The parking situation in Southend on warm/sunny days is horrendous, many days being total gridlock down the seafront. This is not sustainable for the town and contributes to environmental pollution which has health effects. The move should be away from parking in the congested areas - encourage people to park and ride, use the numerous train stations, etc, on peak days.	
Southend Business Partnership (Murray Foster)	136	2600	Comment	We do identify with increasing parking supply for peak periods through a weekend and public holiday Park & Ride (train) but additionally broadening it to potentially to include Benfleet and Pitsea stations in addition to Leigh on Sea. However in the immediate term we would ask the Council to actively monitor the capacity and accessibility of parking, particularly at known busy times (Bank Holidays/summer weekends), and committing to taking earlier action if there is seen to be a worsening situation.	
RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	136	2850	Object	<p>The first bullet point covers the same ground as paragraph 135. Please see our representations to paragraph 135. However, we wish to make the following additional points:</p> <p>The first bullet point also includes the statements: "maintain overall capacity at a level that supports the vitality and viability of the SCAAP area, and enables the delivery of relevant Opportunity Sites". It is not clear whether this means that the levels of car parking will be increased to accommodate development at opportunity sites. If not, this could have a serious effect on the viability of seafront businesses that serve tourists travelling from outside the town. It is also important to note that the seafront area includes opportunity sites and therefore it is essential that any developments do not result in the loss of easily accessible spaces, as well as provide for their own parking needs.</p> <p><i>The paragraph needs to be clarified.</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective</p> <p>EIP: Appearance</p>

Mr Michael Thwaites	CS1/Ds5	2534	Object	<p>There is no recognition throughout the plan that Southend as a seaside resort attracts visitors from London, across the county of Essex and from the region. The profile of visitors is extensively families and their preferred mode of transport to access the seafront is by car.</p> <p>The SCAAP does not positively recognise that the economy of the town is very much built on day visitors and majors on longer stay visitors which in its self is commendable but not at the expense of the day visitors. We do not have the propensity of accommodation etc like many other seaside towns and because of this and proximity out day visitors have been the backbone of the local economy. If Southend Council aspires to build on the already thriving economy, its is a high risk strategy simply to ignore our very important day trippers. The plan also completely neglects the fact that the peak days (when the sun shines) is essential to each and every businesses survival for the rest of the year. It is a fact that our geographical location and difficulty in accessing the seafront is also completely lost in this document. It we want the town to thrive and prosper there needs to be an increase in parking and the SCAAP reliance on no net loss is totally unacceptable.</p> <p>SUMMARY The SCAAP fails to recognise the importance of day visitors and the use of the car, sufficiently accessible, convenient quality parking to the seafront to cater for primarily family visitors and importance of peak days to businesses. It also has glaring omissions in terms of a parking strategy and tourist strategy which are fundamental I to the unique character of Southend and its huge potential to grow, expand and encourage businesses to invest.</p> <p><i>I do not feel the SCAAP is sound or positively prepared because of the clearly flawed data it relies on and a total lack of understanding of the tourist economy and the needs of businesses. It needs to be re written and contain clear objectives to increase accessibility to convenient parking(and more not just 'no net loss') near to the seafront to support day visitors/families. It also needs to acknowledge the importance of peak days to local businesses.</i></p>	<p>Test of Soundness: The document is unsound because it is not: i. Positively prepared ii. Justified iii. Effective</p> <p>EIP: Written</p>
Ms Stephanie DiChiara	DS5	2507	Object	<p>While your document is difficult to understand - I think you underestimate the importance of parking near the shoreline. Apart from Adventure Island, and the beach there is little that sets Southend apart from other towns. With two small children, if parking becomes difficult we will cease to visit Southend. Trains from London are convenient, but with 2 children and beach gear they aren't a feasible transport. We will go to Margate or Brighton instead.</p> <p><i>Ensure there is sufficient, convenient and affordable long stay parking close to the shore. Lots could be improved (paved, lined) and the ones not directly on the shoreline built up / multi-storey if you are trying to free up land. But walking down from the central shopping area is not an attractive option.</i></p>	<p>Test of Soundness: The document is unsound because it is not: iii. Effective</p>

CPF Leisure Ltd (Liam Finch)	DS5	2536	Object	<p>As a managing director that deals with several business based on Southend seafront. I know first hand how bad the parking situation and traffic circulation is during the summer months. I fully believe the policy will not be effective on the basis of a few points.</p> <ol style="list-style-type: none"> 1) You cannot rely on family's with young children to use public transport to visit the attractions we have on our seafront. It just won't work. Parents especially with young children need to carry plenty of belongings with them and you cannot expect to drag heavy bags onto the train and then walk down Southend high street with the bags to get to the seafront. 2. The town desperately needs more parking. To take part of the seaway parking site away for development would be a catastrophic move for the businesses I deal with. Therefore having a negative effect on me and my business. Implementing this would further frustrate tourists who are already struggling to find car parking spaces during the summer months. If their day at the seaside starts with parking problems I would highly doubt they would come back to visit Southend and therefore eliminating repeat business for my customers and myself. 3. Delivering to my customers on the seafront is already a logistical nightmare. My delivery drivers can never find loading bays close to the business they are delivering to so they have to result in manually carrying the box's to there destination. This results in the job taking much longer then it should. As a consequence of this I have had plenty of parking tickets issued to my drivers as they have been in the loading bay for more then 30 mins. This is all a result of the bad traffic circulation in the town. To implement further restrictions on loading bays stated in DS5 would have a negative effect on my business. I delivery to various seaside towns in the Uk and my home town is by far the most difficult. <p>I fully believe this policy will not be effective</p>	<p>Test of Soundness: The document is unsound because it is not: i. Positively prepared</p> <p>EIP: Written</p>
Anthony Belyavin	DS5	2541	Object	<p>This Policy fails to listen to local Town Centre Small Businesses, and can only exacerbate the decline of Southend High Street.</p> <p><i>Consult fully in more detail with Small business owners within the Town Centre and retail centres. Councillors must listen and Understand how important Car Parking is to consumers being attracted to Southend retail Town and retail centres.</i></p>	<p>Test of Soundness: The document is unsound because it is not: iii. Effective</p> <p>EIP: Appearance</p>
Mrs Collette Kemp	DS5	2546	Support	<p>Southend really needs to improve the facilities for pedestrians and cyclists so I and my family are in full support of these proposals. It should be very expensive to park as it is in places such as Cambridge to discourage people from using their car or the town will come to a complete standstill. I would like to see an improvement in air quality, more greenery and less noise. We currently avoid coming into central Southend or bringing visitors there as it is just embarrassing.</p>	

<p>Essex Chambers of Commerce (David Burch)</p>	<p>DS5</p>	<p>2549</p>	<p>Object</p>	<p>Essex Chambers of Commerce are the main business organisation in the county and have several hundred members based in and around Southend.</p> <p>We generally support Southend Borough Council's aspirations for the development of the town and welcome their desire to broaden the economic base of Southend through the development of Southend Airport, the Airport Business Park, and to improve the town centre, including Victoria Avenue. However, we have concerns that an important, and long standing, sector of Southend's economy is likely to be penalised by one key policy proposal, namely the tourism industry and predominantly the seafront traders, and on this basis we would question whether the plan can genuinely be regarded as sound. The policy in question is DS5 – Transport, Access and Public Realm.</p> <p>We note that the Car Parking Study for the Central Area of Southend (CPS) produced by Steer Davies Gleave, Reference 22958601 November 2016, for the Borough Council identified that there is a clear imbalance in the Southend Central Area parking network at periods of peak demand with car parking to the south of the central area experiencing overcapacity issues, while car parking to the north has available spare capacity. Overall the Study shows that parking areas to the south of Southend Central Area were busiest and exceeded 85% occupancy on one in every ten days between May 2015 and April 2016. (Southend Central Area Action Plan DPD (SCAAP) Revised Proposed Submission – November 2016)</p> <p>Looking to the future paragraph 2.1 of the CPS states that the "The Southend Local Transport Plan 3 (LTP3): Strategy Document outlines key considerations related to Central Area parking provision. It notes that Central Area parking demand is forecast to grow by 25% by 2021" However despite the early recognition of this forecast in the CPS no further account of this projected growth appears to be taken of it in the overall analysis and the predicted increase in future demand for parking is not accounted for within the strategy.</p> <p>Paragraph 2.1 of the CPS also states that "The document notes that Southend Central Area has a high level of car parking, which can encourage people to drive to the Central Area rather than using other more sustainable modes"</p> <p>We believe that for some business operations using "more sustainable modes" is a viable option but would question whether that applies to the tourism and leisure sectors. For them high levels of car parking provision are necessary if not essential. They rely on generating sufficient income in the busiest periods of the year to subsidise those periods when they are not so busy. As such the car parking demand for these busy periods must be met to maximise their customer attraction and if it isn't then it jeopardises their viability for the rest of the year.</p> <p>On this basis we feel that the car parking measures set out in the SCAAP do not meet the future demands of a key sector of the Southend economy, despite the fact that there is a recognition of a growth in parking demand in the future. Such an omission potentially puts at risk the long term viability of this sector. Given that the SCAAP is supposed to be taking a holistic view of the future of the central area we feel this is not reflected in its' parking policy and on this basis is not a sound document for the future development of the</p>	<p>Test of Soundness: The document is unsound because it is not: ii. Justified iii. Effective</p> <p>EIP: Appearance</p>
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town.

Finally we would like to highlight the modifications recommended to the Blackpool Local Plan by the planning inspector who considered it. They were of the view that "Any change in parking provision as a result of major redevelopment must not undermine the resort's ability to accommodate visitor trips" With several existing car parks in Southend identified as potential redevelopment sites, especially the major site at Seaways, we would like to see the same policy applied to the SCAAP.

<p>RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group</p>	<p>DS5</p>	<p>2551</p>	<p>Object</p>	<p>We are very concerned about this Policy. It is partly based on the Car Parking Study (CPS), undertaken by Steer Davis Gleave, Reference 22958604, dated November 2016. The Stockvale Group commissioned a review of the CPS by RPS Transport. This review is summarised in the RPS Technical Note submitted with these representations.</p> <p>This review highlights a significant number of errors and omissions within the report which in our view demonstrate that this is not a robust evidence base on which to build policies on transport and access. In summary, these points include: No recognition of the fact that the Local Transport Plan 3 (LTP3) forecasts a 25% increase in parking demand by 2021, which is ignored throughout the document. LTP3 also recognises a shortfall in seafront car parking in the summer.</p> <p>The report underestimates both parking supply and demand. The report severely underestimates tourism demand in the seafront area due to a number of omissions/errors. The RPS Transport Technical Note states that it has “no confidence” in the results for this area (Paragraph 66/67).</p> <p>The methodology used actually has the effect of suppressing peak demand and spreading it throughout the day (Paragraph 71) and makes no attempt to assess the true demand (Paragraph 75).</p> <p>Visitors to the seafront area choose not to use capacity elsewhere in the Central Area when it is available, but this is not recognised in the CPS (Paragraph 91).</p> <p>The busiest days for the seafront are not assessed (Paragraph 98).</p> <p>Key car parks are excluded from the calculations of the impacts of the Opportunity Sites. This seriously underestimates the number of spaces lost to development and overestimates parking availability.</p> <p>RPS concludes that the Opportunity Sites will result in a net loss of parking spaces, so will not cater for their own impact, let alone provide an increase in spaces to allow for the growth of Southend’s seafront attractions. Indeed, the Opportunity Sites result in a loss of car parking space in the areas where there is already significant pressure and a predicted significant increase by 2021.</p> <p>In addition, the visitor surveys were mainly undertaken in the Town Centre area, yet the report identifies the main car parking pressure as being the seafront, and there is little attempt to disaggregate the results. The recommendations mainly assist the Town Centre area, not the seafront.</p> <p>We cannot rely on the CPS and we therefore do not consider policies that are clearly based upon the conclusions and recommendations of the CPS as being sound.</p> <p>Our representations to Paragraphs 123 to 136 summarise a large amount of our concerns and should be read in conjunction with our representations on this policy.</p> <p><i>2b should be changed as follows:</i> <i>“Ensure that there is no net loss in car parking to the south of in the Southend Central Area. The Council will seek a 25% increase in net publicly available car parking capacity in Central Area South, by requiring additional car parking capacity as part of proposals to redevelop Opportunity Sites in the Central Area South. Every planning application shall demonstrate how car parking capacity in the Central Area South shall be increased, taking into account the trips generated by any new development proposed for the sites.”</i> <i>We are unable to provide changes to 2c, as the evidence base on which this policy is based is not sufficiently robust. We recommend that the car park survey work is undertaken again, responding to the points made in the RPS Technical Note, and this should then form a sound basis for developing suitable policies for transport and access.</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective</p> <p>EIP: Appearance</p>
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Mr Tony Nathan	DS5	2587	Object	Appalled by the proposals. Encourage visitors and make Southend a 12 month attraction. To achieve this it is obvious we need ease of car and coach parking with reasonable parking charges.	
Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd	DS5	2634	Comment	Draft Policy DS5 continues to state that the Council will encourage businesses to provide appropriate service and delivery arrangements and minimise their environmental impact; working with the freight industry and logistics to implement more efficient use of vehicles in terms of guidance, zoning and delivery timetables and that this can be set out in freight management plan. As per our previous representations, the requirement for a freight management plan should not be set out in Policy but dealt with by a case-by-case basis and, as necessary.	Test of Soundness: Legally Compliant: Yes Sound: Yes
Cllr Walker (SBC)	DS5	2650	Comment	What is needed is a full review of parking in the town. Not just a review of paid-for parking as was carried out.	
Belfairs Gardens Residents Association & Southend District Pensioners Campaign (Barbara Armitage)	DS5	2654	Comment	The document repeats the assumptions that people will use public transport or cycle. Transport has been an issue in the town for decades. East West is possible except no buses to the sea front at all, but North South has always been poor. The bus companies control the public transport on road and routes come and go as the recent withdrawal of No. 5 bus along Leigh Road shows.	EIP: Written
Belfairs Gardens Residents Association & Southend District Pensioners Campaign (Barbara Armitage)	DS5	2655	Comment	The numbers cycling are low and doing so into pensionable age is questionable. Therefore cars remain the main means of transport both for personal shopping and important appointments with opticians, dentists and other practitioners either personally driven or assisted by friends and family. Blue badge spaces are not mentioned and again maintaining a worthwhile lifestyle for a disabled person is often dependent upon a blue badge. 'Making reasonable provision' is required under the disability legislation and the diminution of any blue badge spaces should be resisted.	EIP: Written
Mr Jason Finley (Legenddeli Ltd)	DS5	2666	Object	We need more sustainable parking – not less – its becoming a difficulty to travel and park in the town centre and I believe further cuts to parking would only damage the town further and independent businesses.	Test of Soundness: Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective 4(4) Consistent with National Policy EIP: Written

Mr Jason Finley (Legenddeli Ltd)	DS5	2667	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mr Jason Finley (Legenddeli Ltd)	DS5	2668	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mr Jason Finley (Legenddeli Ltd)	DS5	2670	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
Mrs Jackie Carmichael (SRG)	DS5	2671	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p>

Mrs Jackie Carmichael (SRG)	DS5	2672	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	Test of Soundness: Sound: No 4(2) Justified
Mrs Jackie Carmichael (SRG)	DS5	2674	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	Test of Soundness: Sound: No 4(4) Consistent with National Policy
Mr Simon Patterson (Chinnerys)	DS5	2675	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	Test of Soundness: Legally Compliant – No 4(1) Positively Prepared

Mr Simon Patterson (Chinnerys)	DS5	2676	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	Test of Soundness: Sound: No 4(2) Justified
Mr Simon Patterson (Chinnerys)	DS5	2678	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	Test of Soundness: Sound: No 4(4) Consistent with National Policy
Mr Martin Maynard (Maynard Milton Insurance Services LLP)	DS5	2680	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	Test of Soundness: Sound: No 4(1) Positively Prepared

Mr Martin Maynard (Maynard Milton Insurance Services LLP)	DS5	2681	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	Test of Soundness: Sound: No 4(2) Justified
Mr Martin Maynard (Maynard Milton Insurance Services LLP)	DS5	2683	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	Test of Soundness: Sound: No 4(4) Consistent with National Policy
Mrs Maria Siciliani (Rossi Ice Cream)	DS5	2685	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	Test of Soundness: Sound: No 4(1) Positively Prepared EIP: Written

Mrs Maria Siciliani (Rossi Ice Cream)	DS5	2686	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mrs Maria Siciliani (Rossi Ice Cream)	DS5	2688	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
Mrs Ann Bush (Annies Bistro)	DS5	2689	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p> <p>EIP: Written</p>

Mrs Ann Bush (Annie's Bistro)	DS5	2690	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mrs Ann Bush (Annie's Bistro)	DS5	2692	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
Mrs Amy Snelling (Stuarts)	DS5	2693	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p> <p>EIP: Written</p>

Mrs Amy Snelling (Stuarts)	DS5	2694	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mrs Amy Snelling (Stuarts)	DS5	2696	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
Mr Robert Stevens (Clarence House Jewellers)	DS5	2697	Object	<p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p> <p>EIP: Written</p>

Mr Robert Stevens (Clarence House Jewellers)	DS5	2698	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mr Robert Stevens (Clarence House Jewellers)	DS5	2700	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
Mr Robert Stevens (The PawnBroker)	DS5	2701	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p> <p>EIP: Written</p>

Mr Robert Stevens (The PawnBroker)	DS5	2702	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mr Robert Stevens (The PawnBroker)	DS5	2704	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
Mr Micheal Kouspetris (Bizarre)	DS5	2705	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p> <p>EIP: Written</p>

Mr Micheal Kouspetris (Bizarre)	DS5	2706	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mr Micheal Kouspetris (Bizarre)	DS5	2708	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
Mrs Lisa Raymond (East Anglia Pubs Co)	DS5	2710	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p> <p>EIP: Written</p>

Mrs Lisa Raymond (East Anglia Pubs Co)	DS5	2711	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mrs Lisa Raymond (East Anglia Pubs Co)	DS5	2713	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
Mr Christopher Papouis (H2o Barber Shop)	DS5	2714	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p> <p>EIP: Written</p>

Mr Christopher Papouis (H2o Barber Shop)	DS5	2715	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mr Christopher Papouis (H2o Barber Shop)	DS5	2717	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
Mr Steve Solly (Sancto Party Store)	DS5	2718	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p> <p>EIP: Written</p>

Mr Steve Solly (Sancto Party Store)	DS5	2719	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mr Steve Solly (Sancto Party Store)	DS5	2721	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
Mr Neil Raven (Ravens of Southend)	DS5	2723	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p> <p>EIP: Written</p>

Mr Neil Raven (Ravens of Southend)	DS5	2724	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mr Neil Raven (Ravens of Southend)	DS5	2726	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
Mr Perry Reynolds (Laurelle London Ltd)	DS5	2728	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p> <p>EIP: Written</p>

Mr Perry Reynolds (Laurelle London Ltd)	DS5	2729	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mr Perry Reynolds (Laurelle London Ltd)	DS5	2731	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
Mr Richard Prewer Las Vegas Grill	DS5	2732	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p> <p>EIP: Written</p>

Mr Richard Prewer Las Vegas Grill	DS5	2733	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mr Richard Prewer Las Vegas Grill	DS5	2735	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
Mrs Gloria Humphreys (Copacabana Leisure)	DS5	2737	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p> <p>EIP: Written</p>

Mrs Gloria Humphreys (Copacabana Leisure)	DS5	2738	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mrs Gloria Humphreys (Copacabana Leisure)	DS5	2740	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
Miss Jodie Humphreys (Rio Leisure Ltd)	DS5	2741	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p>

Miss Jodie Humpreys (Rio Leisure Ltd)	DS5	2742	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p>
Miss Jodie Humpreys (Rio Leisure Ltd)	DS5	2744	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p>
Mr David Prewter (Clarkes Restaurant)	DS5	2745	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p> <p>EIP: Written</p>

Mr David Prewter (Clarkes Restaurant)	DS5	2746	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mr David Prewter (Clarkes Restaurant)	DS5	2748	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
Mr John Remblance (Star Amusements)	DS5	2750	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p> <p>EIP: Written</p>

Mr John Remblance (Star Amusements)	DS5	2751	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Written</p>
Mr John Remblance (Star Amusements)	DS5	2753	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
Mr Ron Collier (Neptune Fish Restaurant)	DS5	2754	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p>

Mr Ron Collier (Neptune Fish Restaurant)	DS5	2755	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	Test of Soundness: Sound: No 4(2) Justified
Mr Ron Collier (Neptune Fish Restaurant)	DS5	2757	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	Test of Soundness: Sound: No 4(4) Consistent with National Policy
Ms Emma Brown (Seabeds Ltd)	DS5	2759	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	Test of Soundness: Sound: No 4(1) Positively Prepared

Ms Emma Brown (Seabeds Ltd)	DS5	2760	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	Test of Soundness: Sound: No 4(2) Justified
Ms Emma Brown (Seabeds Ltd)	DS5	2762	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable.</p>	Test of Soundness: Sound: No 4(4) Consistent with National Policy
Mr Michael Tall (Papillon)	DS5	2763	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	Test of Soundness: Sound: No 4(1) Positively Prepared
Mr Michael Tall (Papillon)	DS5	2764	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	Test of Soundness: Sound: No 4(2) Justified

Mr Michael Tall (Papillon)	DS5	2766	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	Test of Soundness: Sound: No 4(4) Consistent with National Policy
Mr Chris Petris (Roses Restaurant)	DS5	2768	Object	<p>UNSOUND Positively Prepared The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	Test of Soundness: Sound: No 4(1) Positively Prepared
Mr Chris Petris (Roses Restaurant)	DS5	2769	Object	<p>Justified I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	Test of Soundness: Sound: No 4(2) Justified

Mr Chris Petris (Roses Restaurant)	DS5	2771	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	Test of Soundness: Sound: No 4(4) Consistent with National Policy
Mr Justin Carmichael (Southend Rock & Gifts)	DS5	2773	Object	<p>UNSOUND Positively Prepared The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	Test of Soundness: Sound: No 4(1) Positively Prepared
Mr Justin Carmichael (Southend Rock & Gifts)	DS5	2774	Object	<p>Justified I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	Test of Soundness: Sound: No 4(2) Justified

Mr Justin Carmichael (Southend Rock & Gifts)	DS5	2776	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	Test of Soundness: Sound: No 4(4) Consistent with National Policy
Mr David Rayment (Beaches Cafe Bar Bistro)	DS5	2778	Object	<p>UNSOUND Positively Prepared The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	Test of Soundness: Sound: No 4(1) Positively Prepared
Mr David Rayment (Beaches Cafe Bar Bistro)	DS5	2779	Object	<p>Justified I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	Test of Soundness: Sound: No 4(2) Justified

Mr David Rayment (Beaches Cafe Bar Bistro)	DS5	2781	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	Test of Soundness: Sound: No 4(4) Consistent with National Policy
Mr Chris Elvin (Falcon Pub)	DS5	2783	Object	<p>UNSOUND Positively Prepared The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	Test of Soundness: Sound: No 4(1) Positively Prepared
Mr Chris Elvin (Falcon Pub)	DS5	2784	Object	<p>Justified I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	Test of Soundness: Sound: No 4(2) Justified

Mr Chris Elvin (Falcon Pub)	DS5	2786	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	Test of Soundness: Sound: No 4(4) Consistent with National Policy
Mr Carl Vanner (Harry Levy)	DS5	2787	Object	<p>UNSOUND Positively Prepared The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	Test of Soundness: Sound: No 4(1) Positively Prepared
Mr Carl Vanner (Harry Levy)	DS5	2788	Object	<p>Justified I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	Test of Soundness: Sound: No 4(2) Justified

Mr Carl Vanner (Harry Levy)	DS5	2790	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	Test of Soundness: Sound: No 4(4) Consistent with National Policy
Mr Roger Eary	DS5	2791	Object	<p>UNSOUND Positively Prepared The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	Test of Soundness: Sound: No 4(1) Positively Prepared
Mr Roger Eary	DS5	2792	Object	<p>Justified I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	Test of Soundness: Sound: No 4(2) Justified

Mr Roger Eary	DS5	2794	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	Test of Soundness: Sound: No 4(4) Consistent with National Policy
Mr Simon Stephens	DS5	2795	Object	<p>UNSOUND Positively Prepared The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	Test of Soundness: Sound: No 4(1) Positively Prepared
Mr Simon Stephens	DS5	2796	Object	<p>Justified I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	Test of Soundness: Sound: No 4(2) Justified

Mr Simon Stephens	DS5	2798	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	Test of Soundness: Sound: No 4(4) Consistent with National Policy
Mr Alan Cropley	DS5	2800	Object	<p>UN SOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>	Test of Soundness: Sound: No 4(1) Positively Prepared
Mr Alan Cropley	DS5	2801	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>	Test of Soundness: Sound: No 4(2) Justified

Mr Alan Cropley	DS5	2803	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p>
Mr Paul Thompson (Pebbles One Ltd, Spar, Subway, Baskin Robbins & Maple House)	DS5	2808	Object	<p>NOT POSITIVELY PREPARED It is essential that the Transport Access and Public realm section recognises the need for tourists to be able to access the town and seafront by car. A survey carried out by Stockvale and the Seafront Traders Association has identified that 85% of tourists (out of 1500 surveyed) come by car. The implementation of the points listed under CS1.c, f and g will be at the cost of the car. Bus lanes etc will increase journey times into the SCAAP area by car and result in more congestion. This will deter tourists from visiting Southend and result in cars turning around and going elsewhere as the roads are so congested. The policies under section 2 are not sufficient to deal with the current or future demand for car spaces, particularly to the south. The CPS and Local Transport Plan3 highlight the council's estimated 25% increase in demand for parking spaces in the SCAAP area in the next 4 years. The SCAAP and the measures above do nothing to address this extra demand that will arise. On busy days, warm sunny days, there is a massive shortage of parking spaces and congestion results as cars are continually circulating looking for spaces. Visitors vow not to return as it can take hours to enter the town and get parked. Traffic jams back up along the A 127 and many cars turn around and go elsewhere. This means on warm sunny days the seafront has reached it's maximum capacity as no more visitors can get here by car. As a result investment by businesses will stop. Visitors often cancel bookings as they can't get into the town. Visitors opt to visit other resorts and use out of town shopping centres such as Lakeside and Bluewater. The policies do not meet the development needs of businesses on the seafront and the infrastructure will be insufficient to meet future growth in demand. The CPS recognises that there are already problems in the south on peak days but does nothing to deal with this.</p> <p><i>The SCAAP needs to contain a policy that increases parking capacity by 25% in the southern central area. It should stipulate that any new development on existing car parks contains sufficient parking capacity to cope with the existing spaces and to meet the additional demand from the new developments new use. Roads and accessibility by car should take priority over bus and cycle lanes and pedestrian routes.</i></p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared 4(4) Consistent with National Policy</p> <p>EIP: Appearance</p>

<p>Mr Paul Thompson (Pebbles One Ltd, Spar, Subway, Baskin Robbins & Maple House)</p>	<p>DS5</p>	<p>2809</p>	<p>Object</p>	<p>CONSISTENT WITH NATIONAL POLICY The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and different opportunities to maximise sustainable transport solutions will vary. The sustainable transport policies identified in the SCAAP will make journey by car to the central area much longer and much harder to navigate and thus will cause economic harm to the local economy. Residents lives will also suffer due to increased congestion and pollution.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy EIP: Appearance</p>
<p>Mr Paul Thompson (Seafront Traders Association)</p>	<p>DS5</p>	<p>2811</p>	<p>Object</p>	<p>I am making this representation on behalf of the Seafront Traders Association in my role as Chair of the association. The Association represents approximately 30 seafront businesses which are all located on the seafront within the Southend Central Area. I have been a trader on the seafront for over 15 years and own 4 businesses located on Marine Parade. I have been the Chair of this association for the past 3 years and a member for 15 years. I am also a director of the Southend BID. Parking and the road network infrastructure in central Southend has been an issue that has caused much debate within the association for many years. The association meets on a regular basis and the SCAAP document and consultation process has been widely discussed at meetings for the last few years. The view of the businesses in the association is a unanimous one and has been represented in this form. feel it is important for the association to be represented at the oral examination as the body represents a significant percentage of the businesses that are located in the main tourist part of Southend and the scaap area (The Golden Mile as it has been named historically). I have spent considerable time over the last few years working with businesses and the council on various committees with issues related to parking, congestion and infrastructure. I have spent time at the civic centre with the council's VMS team and have a good understanding of how this works. I have even walked round and counted every parking space in the SCAAP area to the south of the railway line and can thus safely state that my figures for the parking capacity in this area are far more accurate and significantly different to those published. I have also spent considerable time this summer walking around the car parks on busy weekends witnessing how the network performs and where problems exist. Sharing this first hand knowledge at the oral examination would be useful I think from the inspector's point of view. We have significant evidence with regard to the accuracy of the council's vms system, and have strong concerns re the Car Parking Study commissioned by SBC. The oral examination is the best forum to discuss this information as it is difficult to scribe. <i>The importance of the dpd is vital to the viability of businesses in the scaap area. We feel the document needs to be re written including a policy that will increase parking capacity in the Southern part of the scaap area by a minimum of 25% in the next 3 years. The statement of 'no net loss' is vague with no exact definition, and it is insufficient to allow the growth of tourism to occur. In fact we believe it will have the effect to hamper growth. It should stipulate that any new development on existing car parks should contain replacement car parking equal to the existing stock, and in addition sufficient capacity to serve the new development's use. Due to the central area's reliance on tourism the road network should give priority to the car, and any sustainable transport routes should not take priority or occupy existing road space used by cars.</i></p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective 4(4) Consistent with National Policy EIP: Appearance</p>

				<p><i>The CPS should be done again based on more up to date surveys. No surveys were done in the summer 2016 in July or August during 2 months of virtually unbroken sunshine. New parking surveys should be done on warm sunny days in July & August 2017. These surveys should focus on the total car parking network, including all publically available spaces. This will enable data taken at peak times to be assessed.</i></p>	
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Mr Paul Thompson (Seafront Traders Association)	DS5	2812	Object	<p>NOT POSITIVELY PREPARED</p> <p>It is essential that the Transport Access and Public realm section recognises the need for tourists to be able to access the town and seafront by car. A survey carried out by Stockvale and the Seafront Traders Association has identified that 85% of tourists (out of 1500 surveyed) come by car.</p> <p>Southend has built up its reputation over the last 100 years as a resort popular for family day trips, with many visitors coming from the Thames gateway area, London, Essex and Kent. For families, the easiest, convenient and most cost effective mode of transport to visit Southend is the car. Sustainable modes of transport are often too impractical for family visits to Southend seaside. As car ownership has increased considerably over the last 20 years the importance of the car to the local tourist economy is vital. The scaap and the CPS fail to recognise this and its importance to the viability of the tourist industry in Southend. The implementation of the points listed above under no.1 will be at the cost of the car. Bus & cycle lanes etc will increase journey times into the SCAAP area by car and result in more congestion. This will deter tourists from visiting Southend and result in cars turning around and going elsewhere as the roads are so congested.</p> <p>The policies under section 2 are not sufficient to deal with the current or future demand for car spaces, particularly to the south.</p> <p>The CPS and Local Transport Plan3 highlight the council's estimated 25% increase in demand for parking spaces in the SCAAP area in the next 4 years. The SCAAP and the measures above do nothing to address the capacity shortages this extra demand will create.</p> <p>On busy days, warm sunny days, there is already a massive shortage of parking spaces and congestion results as cars are continually circulating looking for spaces. Visitors vow not to return as it can take hours to enter the town and get parked. Traffic jams back up along the A 127 and many cars turn around and go elsewhere.</p> <p>This means on warm sunny days the seafront has reached it's maximum capacity as no more visitors can get here and parked by car. As a result investment by businesses will stop. Visitors often cancel bookings as they can't get into the town. Visitors opt to visit other resorts and use out of town shopping centres such as Lakeside and Bluewater.</p> <p>The policies do not meet the development needs of businesses on the seafront and the infrastructure will be insufficient to meet future growth in demand. The CPS recognises that there are already existing problems in the south on peak days but does nothing to deal with this.</p>	<p>Test of Soundness: Sound: No 4(1) Positively Prepared</p> <p>EIP: Appearance</p>
Mr Paul Thompson (Seafront Traders Association)	DS5	2813	Object	<p>CONSISTENT WITH NATIONAL POLICY</p> <p>The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and different opportunities to maximise sustainable transport solutions will vary.</p> <p>The sustainable transport policies identified in the SCAAP will make journey by car to the central area much longer and much harder to navigate and thus will cause economic harm to the local economy. Residents lives will also suffer due to increased congestion and pollution.</p>	<p>Test of Soundness: Sound: No 4(4) Consistent with National Policy</p> <p>EIP: Appearance</p>

<p>Mr Paul Thompson (Seafront Traders Association)</p>	<p>DS5</p>	<p>2814</p>	<p>Object</p>	<p>JUSTIFIED</p> <p>Paragraph 130 page 41</p> <p>The Traders Association objects to the use of the Car Parking Study (CPS) commissioned by Southend Council and undertaken by Steer Davies Gleave as part of the evidence base for the SCAAP. The study has been used to form the Parking Management Techniques adopted within the SCAAP. We believe the Study is flawed for reasons set out below and will result in an inefficient transport network in and around the SCAAP area, with a severe shortage of parking capacity to the south resulting in heavy congestion at busy periods.</p> <p>The Association has worked in conjunction with Stockvale Ltd and RPS planning in assessing the accuracy and reliability of the CPS. RPS have evaluated the CPS and their report has been submitted as part of Stockvale Ltd's representation. The Traders association fully support the findings of this report. The parking report and surveys have underestimated the parking capacity, particularly in the central area to the south of railway, and thus have underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street and on bad weather days thus the parking situation & demand to the south of the railway line has been misrepresented.</p> <p>The southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. Therefore the report is flawed and thus the related policies within the SCAAP are flawed.</p> <p>Page 5 paragraph 2.1 of the CPS identifies the increased future estimated growth in demand for parking within the scaap area in the Southend Local Transport Plan 3 by 2021, stating: "The Southend L TP3 Strategy Document outlines key considerations related to Central Area parking provision. It notes that Central Area car parking demand is forecast to grow by 25% by 2021. 11 Although this is stated early in the CPS, no further policies have been suggested to increase the parking capacity to meet this forecast demand. Thus, the predicted increased future demand for parking of 25% is not accounted for within the strategy.</p> <p>Paragraph 2.1 goes on to say: "The document notes that Southend Central Area has a high level of car parking, which can encourage people to drive to the Central Area rather than using other more sustainable modes. For tourist attractions, high levels of car parking are necessary. The tourist industry in Southend relies upon the busiest days of the year to subsidise other periods of the year when they are not busy. The car parking demand for these busy periods therefore must be met to maximise their customer attraction. If this is not met, then it jeopardises the viability of the businesses throughout the remainder of the year, which has a significant knock-on effect in terms of jobs and the local economy. There are many days where there is spare capacity in the parking network however these spaces are vital as they fill up rapidly on busiest days. Figures from the council's car park department show the annual revenue per space in the Seafront car parks is higher than elsewhere in the town. paragraph 2.1 recognises this by stating: "The L TP highlights a seasonal shortfall of parking capacity in certain car parks in summer and in December."</p> <p>Table 3.2 page 16 of survey report shows weather conditions on the survey days. These are incorrect and differ to the weather recorded at the time by traders: 13 August 2015 Rain & Thunderstorms</p>	<p>Test of Soundness: Sound: No 4(2) Justified</p> <p>EIP: Appearance</p>
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Mr Aaron Dorn	DS5	2817	Object	I wanted to find out about apparent (ridiculous) proposal to build on more car parks in the town, but you've made it too complicated for laypersons directly affected by it.	
Ms Katherine Gibbinson	DS5	2818	Object	I have heard about the plans to make Southend a car free zone. I feel that this would be inappropriate for the town for a number of reasons. I have 3 disabled children and the only way I can enjoy the seafront is if I travel by car. This is true for many people with disabilities and being car free could be considered discriminatory towards them. I think you would find that in reality the majority of visitors to the town travel by car. I think that the study showing only 25 percent may have been conducted outside of the train station.	
Mr A Millman (Goldwyns)	DS5	2820	Object	There is already a lack of car parking available in the town and the plans to develop sites which are currently car parks appear nonsensical.	

Mr A Millman (Goldwyns)	DS5	2823	Object	I understand that there will be bicycle/bus lanes, which will simply further add to the already congested state of the roads in the Borough.
Mrs Vivien Fletcher	DS5	2824	Comment	Concerned about the reduction of car parking spaces at Tyler's Ave, Seaway and Marine Plaza. Parking in the town is already poor and absolutely object to the removal of any more parking places. This summer I have had many problems finding both parking spaces and finding working meters. It is as if the Council want to deter visitors and make things as difficult as possible.
Mrs Gillian Beeching	DS5	2827	Object	<p>On most occasions we have visited Southend, especially in the summer, we have found traffic into the town slow and the parking around the seafront awful – sometimes taking at least 45 minutes to find a space and almost getting in a fight on one occasion. Every time we visit it is the thing that mars my anticipation of arriving, travelling that far with 2 young children and not knowing how long we will be driving round to find a space.</p> <p>Due to this I have researched travelling to Southend by public transport, but this would take me even longer than the journey time and cost a lot more, plus would mean having to walk further from the station or getting another bus with 2 kids, so driving is still our best option.</p> <p>I'm concerned that the SCAAP seems to be reducing the amount of parking available for getting easily to the Seafront.</p> <p>Ensure that there is no net loss in car parking to the south of the Southend Central Area;" and if the plan goes ahead let me know where I should park!</p>

Mr Paul Thompson (Southend Bid)	DS5	2883	Object	<p>Transport and Access into the Town is a key theme and in order to deliver the aspired number of new dwellings and new jobs in the Central Area, the BID wish to see this appropriately addressed through the SCAAP documentation. At present the BID does not believe that the Transport, Access and Parking issues have been given enough consideration. Nor has the ability of the existing infrastructure to cope with the increased pressure on it that will be created from the aspirational growth. During busy periods business believes that the parking and infrastructure network is insufficient to deal with existing demand, let alone cope with the predicted growth.</p> <p>The Council's Local Transport Plan 3 estimates the growth in demand for car parking in the central area over the next 4 years will be 25%. No policy is in place within the scaap to deal with this estimated shortage in capacity.</p> <p>The BID notes that the omission of an effective parking strategy, stating the need to increase parking stock over the next 4 years, neglects the needs of existing business and the development needs of the area as well as the existing and future infrastructure requirements.</p> <p>The BID would like to emphasise its concern that the above, combined with the desired sustainable transport measures proposed in DS5, will lead to a major shortage of parking capacity during peak periods and heavy congestion throughout the area.</p> <p>The Seafront businesses rely on easy access to car parking and convenient access to the seafront so the large number of families visiting by car can access the tourist attractions on the seafront easily. The retail businesses located in and around the high street rely on a large supply of easy to access car parking spaces to encourage trips into the high street. The BID believe the omission of planned infrastructure improvements and increases in the parking stock will create parking chaos and congestion and drive the customers of its businesses elsewhere. Tourists will simply choose another resort destination and increasing numbers of shoppers will choose out of town shopping centres and retail parks such as Lakeside and the Mayflower retail Park at Basildon.</p> <p><i>Not Positively Prepared.</i></p> <ul style="list-style-type: none"> •A strategy to increase parking stock in the central area by 25% over the next 4 years •Necessary infrastructure improvements to be made to sustain the planned growth of residential units and jobs in the area •A freeze on sustainable transport routes such as bus lanes, cycle routes and pedestrian priority routes due to the importance of the car to the economy of the high st. and seafront •A CPS that is based on accurate car parking data, covering the entire parking stock of publicly available spaces and using surveys that have been done in peak periods, ie warm sunny conditions in the summer holidays. •The report produced by SK architects for the BID should be given higher priority and used to influence the economic and transport sections of the dpd. 	<p>Test of Soundness: Legally Compliant: Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective 4(4) Consistent with National Policy</p> <p>EIP: Appearance</p>
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Mr Paul Thompson (Southend Bid)	DS5	2884	Object	<p>Members of the BID have raised considerable concerns as to the validity of the evidence in the form of the Car Parking Study produced by Steer Davies Gleave for SBC. The CPS helped formed the transport and access policy DS5.</p> <p>The parking report and surveys have underestimated the parking capacity, particularly in the central area to the south of railway, and thus have underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street and on bad weather days thus the parking situation & demand to the south of the railway line has been misrepresented. The southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies heavily on data from the VMS system which is inaccurate and unreliable. Therefore the report cannot be relied upon and thus the related policy within the SCAAP, DS5 is flawed.</p> <p>The policy as it stands will result in an inefficient transport network in and around the SCAAP area, with a severe shortage of parking capacity to the south resulting in heavy congestion at busy periods, clogging up the road network across the whole of Southend.</p> <p>The CPS makes reference to car parking studies carried out on 6 dates over 2015 and 2016. SBC consulted the BID board of directors in February 2016 as to when the BID thought the surveys should be carried out to best give an indication of how the parking network performs in busy periods. The recommendations from the BID were that the council should not conduct any surveys at Easter and should concentrate surveys on hot sunny weekends during July and August. Following on from this advice SBC conducted surveys at Easter and one in May but none in July or August 2016!</p> <p>The dates the surveys were done on experienced poor weather conditions, and thus the high street and seafront were not busy. Thus the surveys do not show how the network copes at peak busy times, ie when the sun is out and it is warm. Table 3.2 page 16 of survey report shows weather conditions on the survey days. The weather conditions were not published in any earlier version of the dpd. The BID contests the weather conditions published by SDG in the CPS. Weather conditions on these dates were not as described in the CPS, but were far worse.</p> <p><i>Justified</i></p> <ul style="list-style-type: none"> •A CPS that is based on accurate car parking data, covering the entire parking stock of publicly available spaces and using surveys that have been done in peak periods, ie warm sunny conditions in the summer holidays. 	<p>Test of Soundness: Legally Compliant: Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective 4(4) Consistent with National Policy</p> <p>EIP: Appearance</p>
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Mr Paul Thompson (Southend Bid)	DS5	2885	Object	Most of the opportunity sites in the scaap are large car parks owned by SBC. Due to the scale and complexity of developments that would likely replace the car parks the BID does not see the sites as deliverable in the next 4 years.	Test of Soundness: Legally Compliant: Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective 4(4) Consistent with National Policy EIP: Appearance
Mr Paul Thompson (Southend Bid)	DS5	2886	Object	Great emphasis has been placed in the NPPF on the 'golden thread' of sustainable development. The scaap should deliver a strategy that leads to the growth of a strong economy within the area, and the economic role is one of the key principles of sustainable development. "an economic role -contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure" A major concern held by the businesses in the BID is that policy DS5 will make access to the central area by car difficult and frustrating, driving it's customer base elsewhere. This will have a severe negative impact on economic growth and will threaten the viability of retail and tourism within the central area. This policy thus is inconsistent with the NPPF.	Test of Soundness: Legally Compliant: Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective 4(4) Consistent with National Policy EIP: Appearance
RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	DS5 Point 1a	2852	Support	We support 1a, the provision of strategic junction improvements, which is important to improve vehicle circulation and to accommodate growth.	EIP: Appearance

RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	DS5 Point 1b	2853	Support	We also support 1b, which is to better manage the demand on the road network. However, the RPS Transport Technical Note demonstrates that visitors to the seafront do not like to utilise car parks elsewhere in the Central Area, even when there is spare capacity. Traffic management measures are only, therefore, part of the solution, and there needs to be a focus on convenient supply for the seafront area, noting that evidence in the Stockvale visitor survey (reported in the RPS Note) shows that car occupancy is very high amongst visitors to Adventure Island as they are predominantly families, so at these occupancy levels this is actually a sustainable use of the road network.	EIP: Appearance
RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	DS5 Point 1g	2854	Support	We strongly support 1g, as there needs to be a marked improvement in the quality of pedestrian routes from the main parking areas and Town Centre to the seafront areas.	EIP: Appearance
RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	DS5 Point 2a	2855	Object	We object to 2a, as this only proposes to "maintain parking capacity".	Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective EIP: Appearance.

<p>RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group</p>	<p>DS5 Points 2b</p>	<p>2856</p>	<p>Object</p>	<p>We strongly object to the wording of 2b, which states that the Council will “Ensure that there is no net loss in car parking to the south of the Southend Central Area”. We set out in some detail our concerns about this statement in our representations to Paragraph 135, and these representations should be read as representations to Part 2b of Policy DS5. The proposals to redevelop three of the Council’s main seafront car parks (Tylers Avenue, Seaways and Marine Plaza) have resulted in great uncertainty for Stockvale, which is impacting upon its investment plans for Adventure Island (Southend’s most visited commercial attraction and the UK’s most successful seaside fun park) and the Sea-Life Adventure aquarium attraction. Business needs confidence to invest; the SCAAP as currently drafted, and most worryingly Policies DS5 and CS1, have almost entirely removed confidence and this is now holding back investment and growth. It has already resulted in the cancellation of significant projects at Adventure Island. A Policy that results in such a lack of certainty and confidence is inherently unsound and not effective.</p> <p>The RPS Technical Note shows that there is already significant pressure on car parks in the Central South Area that serve the seafront. The SCAAP recognises the need to support the growth of businesses on the seafront, as set out in the Vision and Strategic Objectives (page 12). It states in Paragraph 28 that the Council’s vision is to promote economic growth. Specifically, in Paragraph 29 it states that a Strategic Objective is to attract “greater visitor numbers”, which is a direct reference to the town as a resort. Paragraph 30 also reiterates that the Council is aiming to support growth, as does Paragraph 81. LTP3 also advises planning for a 25% increase in car parking demand in the central area (see RPS Technical Note). The businesses along Southend seafront had been planning for growth, including The Stockvale Group at their attractions Adventure Island and Sea Life Adventure, as well as investment in their various sea front catering establishments. Yet this policy is only looking for no net loss in car parking capacity, and when coupled with Policy CS1 (which allows for the redevelopment of the three most important car parks serving the seafront), it has left businesses with a level of uncertainty that is not conducive to investment as there can be no confidence that these policies will support growth. Quite the contrary, these proposed policies as drafted are the single biggest cause of business uncertainty amongst seafront operators. In addition to not being effective, by having the opposite effect to that intended in the early sections of the SCAAP, this approach is also not justified, especially when our work has shown that “no net loss” is likely to mean a significant loss of parking in the seafront area.</p> <p><i>2b should be changed as follows:</i> <i>“Ensure that there is no net loss in car parking to the south of in the Southend Central Area. The Council will seek a 25% increase in net publicly available car parking capacity in Central Area South, by requiring additional car parking capacity as part of proposals to redevelop Opportunity Sites in the Central Area South. Every planning application shall demonstrate how car parking capacity in the Central Area South shall be increased, taking into account the trips generated by any new development proposed for the sites.”</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective</p> <p>EIP: Appearance</p>
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RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	DS5 Point 2c	2857	Object	<p>We also object to 2c, as it proposes acting on the outcomes of the Parking Study. As set out in the RPS Technical Note, this study cannot be relied upon as it does not correctly respond to the parking situation in the seafront area, and because of this the conclusions and recommendations are seriously flawed. This Plan cannot be sound if it is relying on this Study. This is a fundamental issue with this and other policies in the SCAAP and the seafront traders are very concerned that the Plan might be adopted on the basis of this flawed work. We ask that this is carefully reviewed prior to the adoption of this part of the Plan.</p> <p><i>We are unable to provide changes to 2c, as the evidence base on which this policy is based is not sufficiently robust. We recommend that the car park survey work is undertaken again, responding to the points made in the RPS Technical Note, and this should then form a sound basis for developing suitable policies for transport and access.</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective</p> <p>EIP: Appearance</p>
RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	DS5 Point 2f	2858	Comment	<p>Whilst the approach set out in 2f is welcomed (relieving pressure on the more well-used car parks), this is only likely to have a marginal impact, for the reasons set out in the RPS Technical Note. In addition, the supporting text does not adequately explain how this can be done</p>	<p>EIP: Appearance</p>
Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd	DS5.1.m	2635	Comment	<p>Part 1 (M) of Draft Policy DS5 states that the Council will encourage visually active frontages to the installation of public art, green walls, well detailed signage and appropriately placed window and entrance ways to enliven blank frontages. It should be recognised that this is not always possible due to the internal requirements of certain retailers and the need to include for example, fire escapes.</p>	
Carter Jonas LLP (Matthew Hare) on behalf Turnstone Southend Ltd	DS5.2.a	2624	Object	<p>When interpreted objectively and having regard to the wording of Policy DS5.2.a as a whole suggests that parking capacity within the Southend Central Area must be able to fully accommodate all those seeking to park in the central area at any given time.</p> <p>Accordingly, the promotion of a policy wording that seeks to ensure that there is parking provision to accommodate all demand for private vehicular trips is contrary to principles of sustainability and national planning policy (Paragraph 29 and 30) requirements for the local transport systems to be 'balanced in favour of sustainable transport modes'. It is well evidenced that the general propensity to use sustainable forms of transport increases when private car parking is not abundantly available.</p> <p><i>It is suggested that the word 'accommodate' is replaced by the word 'attract' and that visitor trips are more broadly defined to include all modes of transport. If worded in this manner then criterion 2a of policy DS5 would not undermine national planning policy objectives for sustainable modes of transport.</i></p> <p><i>Suggested amendment DS5.2.a: 'Maintain parking capacity* within Southend Central Area at a level that supports vitality and viability and does not undermine the Central Area's ability to <u>attract</u> visitor trips <u>across all modes of transport</u>, whilst enabling the delivery of relevant opportunity sites'</i></p>	<p>Test of Soundness: Legally Compliant: No Sound : Yes 4(4) Consistent with National Policy</p> <p>EIP: Written</p>

<p>Carter Jonas LLP (Matthew Hare) on behalf Turnstone Southend Ltd</p>	<p>DS5.2.b</p>	<p>2625</p>	<p>Object</p>	<p>The Southend Central Area parking capacity rarely exceeds 85% occupancy. Capacity issues only occur at the seafront car parks during peak periods (bank holidays and summer holiday periods). During these peak periods seafront parking is at capacity during the day, but capacity was available in the northern car parks.</p> <p>A key point is that all the car parks do not provide a clear distinction between long-stay and short-stay with the pricing regime broadly consistent across all the car parks. As a result there is no financial incentive for long or short stay parking demand to be directed to particular locations. As a result, most people will park in a location closest to their destination, resulting in short and long stay parking demands putting combined pressure on the car parks located closest to the seafront and town centre. Typically long-stay parkers are happy to accept longer walking distances to their destination if lower long-stay charges are available.</p> <p>Having regard to the findings and recommendations of the Parking Study therefore it not strictly the case that car parking provision in south of the Southend Central Area needs to be maintained at current levels in order to support the vitality and viability of the SCAAP. Rather it is the case that, with a dedicated parking strategy to distinguish between long and short term car parking in the area the vitality and viability of the SCAAP could be maintained even if there were to be a slight reduction in the car parking in the south of the Southend Central Area.</p> <p><i>Do not consider that criterion 2b is necessary and should be removed from the policy.</i></p> <p><i>If the Council is not minded to remove criterion 2b then it is suggested that it should be explicitly tied to a base level of existing car parking provision within the southern SCAAP area for reasons of clarity that are self-evident. The Parking Study provides an up to date assessment of parking provision within the SCAAP area and provides a breakdown for the southern SCAAP area. Criterion 2d of the policy DS5 should therefore make reference to the results of the Parking Study as a benchmark and be expressed in less definitive terms with the addition of wording to the effect of 'unless it can be demonstrated that the Central Area's ability to attract visitor trips overall will not be materially harmed' and that reference is made to the parking study in the policy text.</i></p> <p><i>Suggested amendment Policy DS5.2.b: 'Ensure that there is no net loss in car parking** to the south of the Southend Central Area, unless it can be demonstrated that the Central Area's ability to attract visitor trips overall will not be materially harmed</i></p> <p><i>** For the purposes of this policy parking capacity in the south of the Southend Central Area will be benchmarked against the existing provision in this area identified in the Car Parking Study for the Central Area of Southend dated November 2016 and carried out by Steer Davies Gleave'</i></p>	<p>Test of Soundness: Legally Compliant: No Sound : Yes 4(4) Consistent with National Policy</p> <p>EIP: Written</p>
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Mr Richard Carpenter	Policy DS5	2504	Object	<p>Have not read report, just received an email from adventure island asking customers to respond to proposal to cut car parking from seafront. If this is the case I do think out of town visitors will be put off from coming to visit the seafront</p> <p><i>keep parking along seafront</i></p>	<p>Test of Soundness: The document is unsound because it is not: iv. Consistent with national policy</p> <p>EIP: Written</p>
Mr Mark Williams (Choice Insurance Agency Ltd)	Policy DS5	2510	Object	<p>We struggle to park in the town as it is, less parking will drive away businesses and visitors to the town.</p> <p><i>I do not believe that this policy will be effective but will instead drive visitors and businesses from the area. Car parking is the lifeblood of the town and should be expanded, not limited.</i></p>	<p>Test of Soundness: The document is unsound because it is not: i. Positively prepared ii. Justified iii. Effective</p> <p>EIP: Written</p>
Mr James Anderson (Bandai Namco Amusement Europe Ltd)	Policy DS5	2512	Object	<p>I object to this policy (DS5) and believe it will not be effective and in fact will be detrimental to the development of the town. Southend thrives on tourism and is a leading tourist destination in the UK. If anything the council should be looking at ways to nourish the business to help it thrive not to limit the business and therefore the local economy.</p>	<p>Test of Soundness: The document is unsound because it is not: iii. Effective</p> <p>EIP: Written</p>
Mr JC Gibb	Policy DS5	2519	Comment	<p>An increase in parking provision is required. If the town is to compete it needs to reduce parking charges and provide more space.</p>	
Mr JC Gibb	Policy DS5	2520	Comment	<p>The roads are already clogged up and any further moves to favour cyclists and pedestrians would be detrimental. The Shared space on the seafront is confusing and unsafe. Whilst a restriction in peak times may be appropriate for the 90%+ of the time when the area is quiet the free flow of traffic at 30mph should be restored to reduce congestion and pollution not only on the sea front but in the rest of the town. Consideration should be given to allowing free flow of traffic in pedestrianized areas at night to make them less undesirable.</p>	
Mr JC Gibb	Policy DS5	2521	Comment	<p>Car parking in the central area should be increased to deal with the planned increased activity. Pricing should be lowered to encourage use</p>	

City Electrical Factors (Mr Steven Bennett)	Policy DS5	2531	Object	<p>As a resident and representative of a local branch of a national company, My feelings are that this will NOT be effective. The town desperately needs more parking, not less and if when visitors/residents arrive they could get parked swiftly, it would stop the town becoming gridlocked and reduce pollution as the cars would quickly be off the road.</p> <p><i>Prepare, Propose solution for increased parking areas, to facilitate the growing popularity of the town, this will reduce traffic on roads, pollution and overall function of the traffic flow within Southend On Sea.</i></p>	<p>Test of Soundness: The document is unsound because it is not:</p> <ul style="list-style-type: none"> i. Positively prepared ii. Justified iv. Consistent with national policy
Mr Ron Woodley (BERA)	Policy DS5	2570	Comment	Parking zone charges for individual car parks should be made, depending whether they are north or south of the railway line.	
Mr Ron Woodley (BERA)	Policy DS5	2576	Comment	No matter how many car parking places are provided, there will, at some point during the year, be a potential for lack of capacity. What we cannot do, is have empty parking spaces for the majority of the year, which will have no financial benefit to the town at all. The plans should also consider maximising the use of public transport, with serious consideration especially given in encouraging people to use the Southend-bound trains. One thing is for certain, the Council should never contemplate putting a decked car park on the beach side of the sea front, as this would restrict sea views and create a narrowing effect on the promenade between any proposed decked car park and the beach.	
Mr Ron Woodley (BERA)	Policy DS5	2580	Comment	The policy on accessibility appears to be skewed towards satisfying the demands of the residents of the Central area whereas additionally accessibility improvements must satisfy those wishing to access the area from outside. You appear to ignore the fact that a significant factor in determining car park usage overall and in particular the town centre and between individual car parks is the cost of parking, eg zoning.	
Mr Glen Cameron (Capital Services Facilities Ltd)	Policy DS5	2601	Object	I wish to register my disapproval of the proposed changes to the car parks in Southend	
Mr Ron Woodley (BERA)	Policy DS5 and Policy PA7	2571	Comment	To try and alleviate problems in relation to the re-development of Queensway, Seaway car park, Marine Plaza and the town centre, proposals should be considered to multi-storey Tylers Avenue car park as a first stage, before developing the car parks in Clarence and Alexandra Street and Warrior Square.	
Mrs Lise Hodgson	Policy DS5 Transport, Access and Public Realm	2473	Object	<p>Point 2b. It is not enough to ensure there remains the same number of car parking spaces. There should be more spaces in this area. The Council cannot just expect people to park further in town and walk down to the seafront. If that happens they will stay away. If they were willing to walk they would not sit for ages in queues waiting to get into the Royal car park and Seaway.</p> <p><i>Proper arrangements for coaches should be made close to the sea front. The Council are in danger of losing day trippers in their endeavour to get people to stay overnight.</i></p>	EIP: Written
Peter Grubb (Uncle Toms Cabin)	Policy DS5.2	2627	Comment	Regarding infrastructure, it is a given that the town has serious problems at peak times on the roads - forcing people to walk will not work without a comprehensive Park & Ride scheme	

Tracy Abbott	142	2563	Support	Support the need for educational facilities in the town.	
Mr David Batley	145	2490	Support	I fully approve of bus priority. Introducing bus lanes is the best way to improve frequency and reliability, and reduce the cost of fares. I also support pro-cycling measures. Removing through-traffic from residential roads can create an excellent cycle route and improve the environment for residents.	
Mr David Batley	145	2491	Comment	The council can be robust when discussing bus priority schemes with bus operators. As an estimate for the lower bound of bus company savings, a 5 minute saving during rush hour (2 hours per day in each direction) for 9 buses per hour along London Road would save a company GBP 17,000 per year on staff wages alone. (Plus capital costs and other employee costs),	
Mr Jason Finley (Legenddeli Ltd)	152	2669	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective EIP: Written
Mrs Jackie Carmichael (SRG)	152	2673	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective
Mr Simon Patterson (Chinnerys)	152	2677	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective
Mr Martin Maynard (Maynard Milton Insurance Services LLP)	152	2682	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective
Mrs Maria Siciliani (Rossi Ice Cream)	152	2687	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective EIP: Written

Mrs Ann Bush (Annies Bistro)	152	2691	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective EIP: Written
Mrs Amy Snelling (Stuarts)	152	2695	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective EIP: Written
Mr Robert Stevens (Clarence House Jewellers)	152	2699	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective EIP: Written
Mr Robert Stevens (The PawnBroker)	152	2703	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective EIP: Written
Mr Micheal Kouspetris (Bizarre)	152	2707	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective EIP: Written
Mrs Lisa Raymond (East Anglia Pubs Co)	152	2712	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective EIP: Written

Mr Christopher Papouis (H2o Barber Shop)	152	2716	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective EIP: Written
Mr Steve Solly (Sancto Party Store)	152	2720	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective EIP: Written
Mr Neil Raven (Ravens of Southend)	152	2725	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective EIP: Written
Mr Perry Reynolds (Laurelle London Ltd)	152	2730	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective EIP: Written
Mr Richard Prewer Las Vegas Grill	152	2734	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective EIP: Written
Mrs Gloria Humphreys (Copacabana Leisure)	152	2739	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective EIP: Written

Miss Jodie Humpreys (Rio Leisure Ltd)	152	2743	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective
Mr David Prewter (Clarkes Restaurant)	152	2747	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective EIP: Written
Mr John Remblance (Star Amusements)	152	2752	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective EIP: Written
Mr Ron Collier (Neptune Fish Restaurant)	152	2756	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective
Ms Emma Brown (Seabeds Ltd)	152	2761	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective
Mr Michael Tall (Papillon)	152	2765	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective
Mr Chris Petris (Roses Restaurant)	152	2770	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective
Mr Justin Carmichael (Southend Rock & Gifts)	152	2775	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective
Mr David Rayment (Beaches Cafe Bar Bistro)	152	2780	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective

Mr Chris Elvin (Falcon Pub)	152	2785	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective
Mr Carl Vanner (Harry Levy)	152	2789	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective
Mr Roger Eary	152	2793	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective
Mr Simon Stephens	152	2797	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective
Mr Alan Cropley	152	2802	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.	Test of Soundness: Sound: No 4(3) Effective
RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	155	2859	Object	This Paragraph states that: "The policies are not explicit on the precise quantum of development..." Whilst we do not object to this in principle, there is not an adequate policy framework on which to judge the impact of different scales of development. This partly as a result of the inadequate and partly erroneous evidence base that is being used, particularly the Parking Study. To be effective, we need to ensure that the effects of development on the operation of the important sea front tourism area is understood. Until this is resolved, we will maintain a holding objection to this point. <i>We do not require any amended text at this stage. We need to understand how the Council is going to resolve serious issues with its evidence base, which will enable us to better understand the potential impact of development of the Opportunity Sites</i>	Test of Soundness: Legally Compliant: Yes Sound: No 4(2) Justified EIP: Appearance
Mr JC Gibb	158	2522	Comment	Street Market provision should not be allowed to adversely affect shops as the current one clearly does	
Mr JC Gibb	Policy PA1	2523	Comment	Tree planting is essential - noted that the last High Street Makeover appears to have left the road tree free! Further pedestrianisation will lead to a loss of parking, access and a sense of isolation at night	
Mrs Gillian Crossley	PA1	2615	Comment	Better access to the seafront. The lift to be repaired quicker. More access to toilets in the town and seafront.	

RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	PA1	2860	Object	It is essential that car parking in this area is protected to avoid displacement onto sensitive seafront car parks (see the Council's Parking Study and the RPS Technical Note). <i>Addition of an additional point under Part 2 of the Policy: "g. Protection of overall car parking levels within the High Street Policy Area to avoid displacement onto sensitive seafront parking areas."</i>	Test of Soundness: Legally Compliant: Yes Sound: No 4(3) Effective EIP: Appearance
Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd	PA1.2.d	2640	Support	We note that Part 2D of this policy states that proposals that would assist with delivery of the provision of an active frontage on the southern façade of The Royals Shopping Centre will be supported in principle which is welcomed.	Test of Soundness: Legally Compliant: Yes Sound: Yes
Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd	PA1.2.e	2641	Comment	Part E also states that the introduction of additional A3 cafes and restaurants will be supported in principle, subject to the provisions of Policy DS1: A Prosperous Retail Centre. It is important to include the provision of certain non-A1 uses in the town centre to ensure the vitality and viability of the town centre and also to support the town centres night time economy.	
Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd	PA1.4.d	2642	Comment	Part 4D of Draft Policy PA1 seeks to further connect the town centre to the central seafront policy area through improved signage which will help to link the seafront with the Town Centre and High Street, thus benefiting the Town Centre as a whole and, as such, is welcomed by Valad Europe.	
Miss Laura Cowell	Policy PA1: High Street Policy Area Development Principles	2489	Support	There needs to be consideration given to improving the condition of the building facades above the retail units in the High Street, there is a great opportunity to drastically improve the appearance of the High Street if money was spent on improving these buildings, some of these should be added to the Landmark Buildings - i.e. the building on the corner of Warrior Square and the High Street, above Dorothy Perkins currently. This is in an awful state but we should be proud of buildings like this that we have.	
Miss Laura Cowell	Policy PA1: High Street Policy Area Development Principles	2558	Support	The pedestrianisation of Warrior Square including up to the High Street is long overdue and would help draw people into this area from the High Street. The area outside Maitland House feels like a back street, choked up with cars and Warrior Square is blocked from view if you are in the High Street.	
Miss Laura Cowell	161	2486	Support	The market would be suitably placed here too, drawing people off the main 'drag' and encouraging them to use Queen's Road etc. The market in its current location causes the High St to feel pretty claustrophobic at times. The area in front of the Odeon cinema feels like a huge waste of space too	

Ms Celia Newton	161	2497	Comment	I am concerned that it is proposed that this area be pedestrianised. I don't think full pedestrianised works. Yes, in Covent Garden where there are plenty of tourists and attractions, however, Southend is never going to be very busy at night. I believe the full High Street should be open to taxis and public transport again. Traffic makes you feel safe. To pedestrianise the London Road area would restrict traffic and continue to make visitors feel unsafe after the restaurants close.	
Mr JC Gibb	Policy PA2	2524	Comment	I am concerned about a loss of parking from further pedestrianisation.	
Miss Laura Cowell	Policy PA2	2559	Support	The proposals for London Road are long overdue, there is such a opportunity to pedestrianise the area currently used for a taxi rank in order to create outside seating for the many restaurants in summer time and a proper location for the market.	
Belfairs Gardens Residents Association & Southend District Pensioners Campaign (Barbara Armitage)	PA2.2.a	2656	Object	Pedestrianisation of further parts of the town such as London Road P.58 near the Odeon will make it difficult for older and disabled people to take advantage of the excellent transmissions of opera and ballet and the Thursday afternoon tea and films much enjoyed.	EIP: Written
Gleneagles Guest House (Penny Lowen)	163	2495	Comment	Can we be bold here and use the forum as one side of the grid of a town square and have admin buildings above shops and restaurants on other sides and open the square onto the high street	EIP: n/a
Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd	PA4	2644	Comment	Part 1 of this Policy states that the Council will promote residential and supporting uses that deliver the aims for the policy area. However, in Part 3, it states that it would be suitable primarily for residential development, supported by social and community uses and retail provision. There appears to be an error in the summary table as it specifies under 'timescales for delivery' proposed uses. This table needs to be updated and amended.	
Mr JC Gibb	Policy PA4	2525	Comment	I am concerned that traffic flow on Queensway which in peak times can be diabolical is not worsened. Any changes to Queensway need to ensure smooth traffic flow.	
P Tomassi & Sons Ltd (Antony Tomassi)	PA6	2544	Comment	Regarding point 3a, more information is required here as to what the impact of this would be on traffic flow around the town centre and what the specifics of this plan would be. Where would this traffic be sent instead?	EIP: Appearance
Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd	PA6.1	2636	Support	The proposal to promote independent small scale retail, boutiques, café's, restaurants, bars and small studio styled workshops to create an area with a strong cultural identity together with residential uses above is welcomed. This will also help reinforce the vitality and viability of the High Street through linked trips.	Test of Soundness: Legally Compliant: Yes Sound: Yes
Indigo Planning (Helen Greenhalgh) on behalf of Valad	PA6.2	2637	Support	Part 2 seeks to redevelop Central House for new larger retail units with frontage on the High Street and Clifton Road and office and residential above which is also supported for the reasons set out above.	Test of Soundness: Legally Compliant: Yes

Europe Ltd					Sound: Yes
RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	Tylers Policy Area Aims	2861	Object	<p>Page 69 – Tylers Policy Area Aims The aims state that “car parking will be addressed”. There needs to be significantly more clarity here as this is an important car park serving the South Central Area, where the most car park pressure has been identified in the Council’s Car Park Study and the RPS Technical Note. Simply stating “addressed” is not a positively prepared statement and the outcome could be serious harm to the seafront tourism area, which would mean the policy was not effective.</p> <p><i>There needs to be a clear statement that this is an important car park for the seafront and town centre: “Car parking will be addressed within this integrated approach to development, which combines with other objectives for the policy area, and contributes to the vitality and viability of the town centre. Any development proposals for this important car park will need to demonstrate how they can achieve a 25% increase in publicly available car parking spaces.”</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(3) Effective</p> <p>EIP: Appearance</p>
Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd	PA7	2643	Support	Draft Policy PA7 seeks to provide enhanced connectivity to the Central, Seafront and High Street policy areas which is welcomed because by enhancing the link, this will help to increase footfall, linked trips which, in turn, will help boost the vitality and viability of the town centre, and on this basis, Valad Europe support this policy.	<p>Test of Soundness: Legally Compliant: Yes Sound: Yes</p>
Mr A Millman (Goldwyns)	PA7	2821	Object	There is already a lack of car parking available in the town and the plans to develop sites which are currently car parks appear nonsensical.	
Mrs Vivien Fletcher	PA7	2825	Comment	Concerned about the reduction of car parking spaces at Tyler's Ave, Seaway and Marine Plaza. Parking in the town is already poor and absolutely object to the removal of any more parking places. This summer I have had many problems finding both parking spaces and finding working meters. It is as if the Council want to deter visitors and make things as difficult as possible.	
Mrs Gillian Beeching	PA7	2828	Object	<p>On most occasions we have visited Southend, especially in the summer, we have found traffic into the town slow and the parking around the seafront awful – sometimes taking at least 45 minutes to find a space and almost getting in a fight on one occasion. Every time we visit it is the thing that mars my anticipation of arriving, travelling that far with 2 young children and not knowing how long we will be driving round to find a space.</p> <p>Due to this I have researched travelling to Southend by public transport, but this would take me even longer than the journey time and cost a lot more, plus would mean having to walk further from the station or getting another bus with 2 kids, so driving is still our best option.</p> <p>I’m concerned that the SCAAP seems to be reducing the amount of parking available for getting easily to the Seafront.</p> <p>Ensure that there is no net loss in car parking to the south of the Southend Central Area;” and if the plan goes ahead let me know where I should park!</p>	

RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	PA7	2862	Object	<p>We strongly object to this policy. The Council's Car Parking Study (CPS), undertaken by Steer Davis Gleave, Reference 22958604, dated November 2016 and the RPS Technical Note, which is submitted with in support of these representations, show that the car parks south of the railway line are the ones that are most under pressure, with 97% occupancy recorded on a day that was far from the busiest of the year. This site is an important part of that capacity, and also needs to play a role in increasing capacity to support the growth of the seafront tourism sector proposed by the SCAAP and to deal with the capacity issues identified in the two car parking documents.</p> <p>We are surprised that the policy only mentions addressing a need for replacement car parking provision by "identifying how any displaced parking needs are to be met on the site or in this part of the town centre". This makes no allowance for the growth in the tourism industry that the SCAAP states that it is seeking, which will generate additional demand for parking (noting that there is a greater reliance on the private car by tourists – see RPS Technical Note). It also does not reflect the statement in Local Transport Plan 3 that there is likely to be a 25% growth in car parking demand by 2021. There needs to be a clear statement that any development proposals which remove areas of surface car parking should contribute to the replacement of that car parking, with an increase of around 25%. If this policy does not aim to deal with capacity issues identified in the CPS and the RPS Technical Note, as well as providing for the growth in tourism that the SCAAP is seeking to achieve (see our representations on other paragraphs and policies covering growth), then this will not have been positively prepared. In addition, a policy that cannot accommodate and facilitate this growth will not be effective in meeting the objectives of the SCAAP set out on Page 12. The statement about finding an alternative site in "this part" of the town centre needs to be clear that the site must be south of the railway line; otherwise the seafront area, where it has been identified that there is the greatest pressure, will suffer from a reduction in parking capacity, with serious consequences for the businesses on the seafront.</p> <p><i>"ii. Any development of the Opportunity Site should address a need for replacement car parking provision in line with Policy DS5: Transport, Access and Public Realm, identifying how any displaced parking needs, and an allowance for an increase in capacity of 25%, are to be met on the site or in this part of the town centre on another site south of the railway line and accessible to the seafront attractions and explore the potential for relocating the travel centre on the northern extent of the site where applicable to provide for enhanced passenger transport facilities and improved pedestrian connectivity to the town centre and central railway station;"</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(3) Effective</p> <p>EIP: Appearance</p>
Mrs Pauline Angell	Policy PA7	2509	Object	<p>The Tylers Ave carpark is very popular. The fact that it is there encourages shoppers to Southend High St. It is used by shoppers, workers in the office buildings in Tylers Ave and Court users. The elderly need car parks near to the shops which Tylers Ave is. The Council shouldn't be trying to drive the less mobile out of Southend. More residential properties should not be built in the middle of the town. This will cause more congestion because of lack of parking. Artisan workshops could be set up in the old BHS store.</p> <p><i>Drop the idea for building on Tylers Ave carpark which is so popular and leave it as it is. The carpark being there, so near to the shops is the reason many, including elderly people that are not that mobile, visit Southend shopping centre.</i></p>	<p>Test of Soundness: The document is unsound because it is not: ii. Justified</p> <p>EIP: Written</p>
Mr JC Gibb	Policy PA7	2526	Comment	<p>Having spent a great deal on money on the existing Travel Centre any proposition to repeat this seems wasteful.</p>	

Mr Ron Woodley (BERA)	Policy PA7	2572	Comment	The aim should be to relocate the bus station from its current position, to that of the rebuilt Tylers Avenue car park, to encourage greater use of the bus service.	
Mr Steven Lawrence	Policy PA7 OS (PA7.1) Tylers Avenue	2560	Comment	I think the development of Seaway & Tylers car parks is a mistake. These are critical car parking areas for day visitors and local residents. We are local residents and have young children. using public transport is a totally impractical option. We will just avoid Southend entirely if there is nowhere to park. We'll end up going to Chelmsford or Lakeside shopping instead.	EIP: Written
Mr Philip Donovan (Choice Discount Stores)	187	2496	Object	I disagree with further development in Southend because the parking facilities are already inadequate for the needs of the town. <i>More parking availability</i>	EIP: Written
Mr JC Gibb	191	2527	Comment	Adventure Island is one of the most successful businesses in the town in terms of attracting visitors and employment. It seems perverse to single it out for criticism.	
Mr Stephen Kennedy	195	2492	Object	Does Southend need a second cinema <i>No need for any development in this area</i>	Test of Soundness: Document is not Legal Document is not Sound Soundness Test(s): ii. Justified EIP: Written

RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	195	2864	Object	<p>This paragraph identifies Seaways as: "...a major opportunity for mixed-use development, contributing to the leisure and cultural offer of Southend Central Area through the provision of uses such as restaurants and cinema as well as possibly a hotel or residential, car parking, public open and green spaces, improved access and connectively through the creation of 'Spanish Steps' linking this opportunity site to the promenade of Marine Parade." We are concerned about this paragraph for a number of reasons. This is the single most important car park for the seafront, and supports numerous growing businesses on Southend seafront. In short, the seafront tourism businesses rely on this car park. It is worrying to see it referred to as a "major opportunity for mixed-use development", as we are concerned about its ability to continue in this role. If this car park is lost, there will be significant implications for the seafront businesses, including the major attractions operated by The Stockvale Group (Adventure Island and Sea Life Adventure, as well as its several restaurants and other catering outlets on the seafront).</p> <p>We are also worried by the statement that this development will contribute "to the leisure and cultural offer" of Southend Central Area, as we consider that this car park primarily serves the town's tourism offer. As we have stated in our representations on other paragraphs and policies, there is a difference between tourism and leisure. Although there is crossover, tourism serves primarily visitors to an area and leisure mainly provides for residents. There needs to be a clear statement in the Plan that this site serves the town's tourism industry, and any loss of that role to other developments (such as leisure and residential) will be a major concern to us. We don't dispute that a cinema would provide a facility for visitors to the town, but this would not be its primary role. Most visitors to Southend come from towns with cinemas; they do not visit Southend of this reason. It is essential that this point is understood by the Council because the loss of an important tourism resource to a development that is primarily serving local residents is going to be a sizeable blow to the town's tourism economy. There is no mention in the supporting text of protecting and expanding the site's tourism role, and in particular increasing and enhancing the parking provision on the site to accommodate the growth in the town's tourism offer that the SCAAP proposes.</p> <p><i>"195 Seaways presents a major opportunity to enhance the Town's tourism infrastructure, contributing to this important part of the local economy. for mixed use development, contributing to the leisure and cultural offer of Southend Central Area through the provision of uses such as restaurants and cinema as well as possibly a hotel or residential, The Council will be seeking an-increase in car parking, provision of public open and green spaces, improved access and connectively through the creation of 'Spanish Steps' linking this opportunity site to the promenade of Marine Parade. Some limited development will be acceptable if it results in an enhancement of the site, an increase in car parking spaces and supports the Town's seafront tourism offer."</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective</p> <p>EIP: Appearance</p>
Mr JC Gibb	196	2528	Comment	Given the need for car parking and the number of empty units in the town this area should be preserved for its current use. More restaurants etc. will reduce the viability of the existing ones.	
Gleneagles Guest House (Penny Lowen)	197	2494	Support	The Clifftown area is a jewel in the crown for Southend yet is unseen by millions of visitors and remarkably local citizens who do not know of its existence . The museum offers the opportunity to showcase the clifftown area	EIP: n/a
Mr JC Gibb	197	2529	Comment	Preservation of the cliffs as public open space is preferable to creating new buildings within them. It is somewhat ironic that the area was acquired by compulsory purchase to preserve it just after the war.	

Mr Tony Nathan	CS1	2588	Comment	It should be remembered that Southend seafront is an asset that should be maintained as a key attraction. The High Street is struggling (Mainly by restricting parking and high parking charges). Come to think of it that might be the reason the suspicious claim that only 25% of visitors to Southend come by car – they are frightened off and have probably gone to Bluewater or Lakeside.	
Mr Martin Barrell (Environment Agency)	CS1	2610	Support	We support part (e) of this policy promoting an integrated approach to flood risk management.	Test of Soundness: Legally Compliant – Yes Sound - Yes
Mrs Gillian Crossley	CS1	2614	Comment	Better access to the seafront . The lift to be repaired quicker. More access to toilets in the town and seafront.	
Mr James Blackender	CS1	2816	Object	It is difficult on a normal day to park in Southend sea front area. If the council decide to reduce the parking in this area for whatever reason they will definitely reduce the amount of visitors. It will not stop me or my very large family going to the sea front but sadly it won't be Southend that we will visit. Please do not turn Southend back to a second class seafront.	
Mr A Millman (Goldwyns)	CS1	2822	Object	There is already a lack of car parking available in the town and the plans to develop sites which are currently car parks appear nonsensical.	
Mrs Vivien Fletcher	CS1	2826	Comment	Concerned about the reduction of car parking spaces at Tyler's Ave, Seaway and Marine Plaza. Parking in the town is already poor and absolutely object to the removal of any more parking places. This summer I have had many problems finding both parking spaces and finding working meters. It is as if the Council want to deter visitors and make things as difficult as possible.	
Mrs Gillian Beeching	CS1	2829	Object	On most occasions we have visited Southend, especially in the summer, we have found traffic into the town slow and the parking around the seafront awful – sometimes taking at least 45 minutes to find a space and almost getting in a fight on one occasion. Every time we visit it is the thing that mars my anticipation of arriving, travelling that far with 2 young children and not knowing how long we will be driving round to find a space. Due to this I have researched travelling to Southend by public transport, but this would take me even longer than the journey time and cost a lot more, plus would mean having to walk further from the station or getting another bus with 2 kids, so driving is still our best option. I'm concerned that the SCAAP seems to be reducing the amount of parking available for getting easily to the Seafront. Ensure that there is no net loss in car parking to the south of the Southend Central Area;" and if the plan goes ahead let me know where I should park!	

<p>RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group</p>	<p>Cs1</p>	<p>2865</p>	<p>Object</p>	<p>This Policy needs to recognise the serious concerns that seafront traders have in relation to the impact of policies as currently drafted in the SCAAP. There is an opportunity here to clearly state the Council's intention to protect and increase seafront parking and support tourism development on the seafront. As stated in our representations on Policy DS5, the proposals set out in this Policy, when read alongside the content of Policy DS5, gives seafront traders serious cause for concern. Business needs confidence to invest. This policy threatens to remove the most important car parks serving the seafront (Seaways and Marine Plaza), with no firm proposal to retain the spaces that are existing, let alone provide for the developments themselves and the growth in seafront tourism that the SCAAP is looking for (see our representations on Paragraph 135 and Policy DS5 for a summary of the Council's objectives in the SCAAP for achieving growth in tourism and the local economy). This uncertainty is already resulting in investment plans being shelved and staffing levels being reviewed at the Stockvale attractions in Southend (Adventure Island and Sea Life Adventure). A policy that creates such high levels of uncertainty, and which has almost the opposite result intended when read alongside the statements in the SCAAP about facilitating growth, simply cannot be effective. It is therefore unsound. It is difficult to understand how the Council's Car Parking Study (CPS), undertaken by Steer Davis Gleave, identifies the seafront area as being under pressure and unable to cope with existing demand (note that the RPS Technical Review of this document identified significant errors and other flaws in the document that mean it underestimates this problem), and yet Policy CS1 proposes to redevelop two of the largest seafront car parks and allow the sites to be permanently lost. This is an extremely worrying situation for seafront traders, who were relying on the SCAAP to protect and enhance these sites, especially when one of the key objectives of the SCAAP is to grow the seafront tourism economy, and increase the number of visitors to the town.</p> <p>We strongly object to the wording of part 4ii (Opportunity Site (CS1.2): Seaways) for the reasons set out in our objection to Paragraph 195. This site is a key part of the infrastructure of the seafront tourism area and we believe that the Council has misunderstood the difference between tourism and leisure, which serve different people and have very different characteristics. We need to ensure that development of leisure and residential uses, which primarily serve local people, does not undermine the tourism offer of the seafront. Operators on the seafront are looking to grow the Southend offer, and attract more visitors to the town, and this is one of the main objectives of the SCAAP (see our objections to earlier sections of the Plan). The loss of a huge part of the seafront infrastructure will have a devastating effect on this part of the Town. Southend's seafront is its most famous asset, and is still the main reason why tourists visit the town. There must be adequate provision for them to park and access the seafront conveniently and safely. This site should play a continuing role with this. We are very concerned with the proposals to allow a significant amount of development in this area, which will undoubtedly displace car parking and add additional parking demand. This is partly covered in the RPS Technical Note that is submitted with these representations.</p> <p>We consider that this is not planning positively for the very growth in the tourism offer that the early sections of the SCAAP propose to facilitate. Indeed, this policy is doing the exact opposite and will have an undesirable effect on the seafront. It is therefore not an example of planning positively and it will not be effective in that it will have an impact that will undermine the objectives of the Plan.</p> <p>We strongly object to Part 4iii (Opportunity Site (CS1.3): Marine Plaza). This is an important seafront car park with a capacity for around 200 cars. In the Council's Car Parking Study (CPS), undertaken by Steer Davis Gleave, and the RPS Technical Note submitted with these representations, it is clear that the</p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective</p> <p>EIP: Appearance</p>
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				<p><i>f. a palette of good quality materials to reflect the vibrancy and colour of the seaside;</i></p> <p><i>g. relocation of a coach-drop off point within the site. The relocation of coach parking bays may be provided either on or off-site or a combination of both, provided off-site provision is well connected to the Seaway site and the main seafront attractions and would not significantly adversely impact the local transport network</i></p>	
Mr Paul Thompson (Southend Bid)	CS1	2887	Object	<p>Tourism contributes significantly to the economy of Southend and particularly the central area. The businesses located in this sector feel that the scaap document has very little meaningful substance in terms or a strategic approach to tourism. The document fails to understand the drivers behind tourism and the attractions, facilities and infrastructure that is needed to grow tourism within the scaap area. The dpd in effect neglects the day visitor to the area for a desire to attract longer stay visitors. It is important to try to encourage visitors to stay for longer but this should not be at the expense of the vast amount of day visitors which form the bulk of the industry's customer base.</p> <p><i>The dpd should be re written to included a well thought out policy that will enable the tourist industry to grow over the next 4 years</i></p>	EIP: Appearance

Mrs Brenda Philips	CS1	2590	Comment	Central Southend already has a high population density which will increase once the Office blocks are 'morphed' into flats. We feel that little consideration has so far been given to the need for infrastructure.	
Havens (Mr Nigel Havens)	Policy Cs1	2498	Comment	The success of the Seafront development is dependent on the provision and planning for Car Parking. Increase visitors means increase Car parking. Signage for the towns facilities should be consistently featured on A13 and A127. Not just for directional but promoting what we have for the visitor to see.	
Cllr Martin Terry (Southend Borough Council)	Policy CS1	2514	Object	The Council has failed to deliver promised direct linkage of Spanish Steps to seafront which is essential if this scheme is to work. <i>Do what is promised and deliver linkage.</i>	Test of Soundness: The document is unsound because it is not: i. Positively prepared EIP: Appearance
Mr JC Gibb	Policy CS1	2530	Comment	There should be no extension of the "Shared Space" concept and the current provision should be removed and replaced by a more conventional approach. The current scheme is confusing and impedes traffic flow in off peak times. Again the singling out of the Sea Life Centre appears inappropriate. It is an attraction provided at no cost to the town which adds to what the town offers. I hope the policy refers only to the disused part of the Crazy Golf site.	
Mr JC Gibb	Policy CS1	2561	Object	The singling out of the Sea Life Centre appears inappropriate. It is an attraction provided at no cost to the town which adds to what the town offers. I hope the policy refers only to the disused part of the Crazy Golf site.	
Ian Goodchild	Policy CS1	2566	Comment	Should look at the possibility of creating from the old swimming pool from a reclaimed sea area say 200 yards out eastwards towards the pier a raised area for parking and other seasonal events with a sand beach area at the eastern end out of the outgoing tidal flow this would preserve the sand and safety of swimmers creating a small bay ,decrease the flood tides which each year invade the carriage way,	
Mr Ron Woodley (BERA)	Policy Cs1	2569	Comment	The more car parking spaces there are along Southend seafront, the more chance there is of substantial traffic flow problems throughout the town in high seasonal periods, including the seafront	
Mr Ron Woodley (BERA)	Policy Cs1	2573	Comment	The compulsory purchase of the old gas works site to enable car parking to take place while the Seaway car park and the town centre were being developed should be considered.	
Belfairs Gardens Residents Association & Southend District Pensioners Campaign (Barbara Armitage)	Policy CS1	2660	Comment	We support the sea front style p72 but why put a tower of flats by the Kursaal or flats above the Esplanade pub(former) . This should just be leisure not housing. We support the key views but we have already lost some by enormous flat development in Leigh and on the sea front. The Council never seems to enforce this and developers rely on appeals.	EIP: Written

RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	CS1 Section 5.9 Central Seafront Policy Area Aims	2863	Object	<p>We are surprised that, given the serious issues raised in the Car Parking Study (CPS), undertaken by Steer Davis Gleave (which are more accurately summarised in the RPS Technical Note attached to these representations), there is no mention of car parking in the Aims. The resolution of a longstanding and worsening problem, that is having a serious impact on seafront traders, is something that should be identified up front.</p> <p><i>"Additional car parking capacity will be secured with high quality links to the seafront attractions. This will be achieved either through the development of new sites, improvements to existing sites or via the redevelopment of an existing site.</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(3) Effective</p> <p>EIP: Appearance</p>
Natural England (Mr Steve Roe)	Policy CS1 Point 1 f	2869	Object	<p>However within Policy CS1 there are the following matters which we raise as unsound:</p> <p>1. We note that the Policy states "restricting development south of the sea wall" which we view does not provide sufficient protection for the international, European and national designated sites in accordance with paragraph 118 of the NPPF.</p> <p><i>1. We would advise this be amended to the wording originally used in the Draft Southend Central Area Action Plan 2011 (DSCAAP 2011) that "Development south of the seawall will not normally be permitted" where any proposal has potential to adversely affect a European site or cause significant harm to a Site of Special Scientific Interest (SSSI).</i></p>	
Natural England (Mr Steve Roe)	Policy CS1 Point 1. i. ii)	2868	Support	<p>Natural England support the statement in point 1.i.i.ii "safeguard, and where appropriate, enhance the biodiversity of the foreshore and respect the European designations". We welcome the recognition of the environmental importance of the foreshore as reflected in point 1.a. "an assessment of the scale, character, location and impact of the proposal on existing facilities and environmental designations, including protected green space". We also support point 3c. regarding the "integration of the open spaces of the seafront and foreshore with the 'green grid' to create a series of linked, functional green spaces" in order to relieve recreational pressure on designated sites.</p>	
Natural England (Mr Steve Roe)	Policy CS1 Point 3d	2870	Comment	<p>Point 3.d. describes use of creative lighting and we refer you to our previous advice relating to Policy CS6 (2011) that new lighting should be arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore. This is to avoid potential impact on designated areas and the species they contain, in accordance with paragraph 118 of the NPPF. In addition, light pollution can have negative impacts on local amenity and nature conservation (especially bats and invertebrates).</p> <p><i>There are a number of places within the SCAAP that lighting and creative lighting are described, we have no preference for where the words "new lighting should be arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore" might be included.</i></p>	

Natural England (Mr Steve Roe)	Policy CS1 Point 4i	2871	Object	<p>Point 4i. Opportunity Site (CS1.1): Southend Pier. As the pier crosses the Benfleet and Southend Marshes designated site, we would have concerns that future proposals to alter the structure (such as undertaking work to deck timbers), or widening the pier (as recently considered in order to facilitate a transport system) would have the potential to impact on the designated site.</p> <p>NOTE: Point 4i. Opportunity Site (CS1.1): Southend Pier. We would advise that the Plan incorporate measures to reduce potential impacts on the important high-tide roost of wintering turnstone Arenaria interpres at the northeast corner of the pier-head. For example a recent new building close to this slipway was carefully designed to minimise overshadowing the slipway and was given a 'turnstone-friendly' rough-surfaced curved roof.</p> <p><i>We would advise that the following words be added to the Point 4i: "...angling; creative lighting; and sensitively sited renewable technologies, where appropriate and where there can be a net gain in biodiversity". There is a link here to our recommendations in point 1 of Question 6 in Policy CS2: Nature Conservation and Biodiversity (see below)</i></p>	
Ian Goodchild	Policy CS1 – OS CS1.4	2567	Comment	Like to see band stage at roof level on the museum and some parking at that level	
Mr Ron Woodley (BERA)	Policy Cs1 OS CS1.4	2574	Comment	Should be expediting the plans to build the 200 space car park for the new museum as a first stage of that development, replacing the unofficial car park on the Marine Plaza site, opposite the Kursaal	
Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd	CS1.2. Seaways	2648	Support	<p>Valad Europe support the proposed allocation of Proposed Opportunities Site (CS1.2: Seaways) on the basis that it proposes a mix of uses that will help to bolster the town centre economy and encourage linked trips. The delivery of this site and the proposed uses is an important part of ensuring the vitality and viability of the SCAAP area and is supported. However, the Council must actively resist developments that would undermine this policy and what it seeks to achieve for the town centre. As noted in our previous representations, the Council should consider whether the inclusion of retail at this site would further benefit the town centre, with the success of the development and the subsequent beneficial spinoff effects being largely down to how well the site links with the town centre.</p>	<p>Test of Soundness: Legally Compliant: Yes Sound: Yes</p>
Carter Jonas LLP (Matthew Hare) on behalf Turnstone Southend Ltd	Opportunity Site CS1.2 Seaways	2882	Support	We broadly support the proposed policy approach for CS1.2.	EIP: Written
Mrs Lise Hodgson	OS CS1.2: Seaways	2472	Object	<p>A cinema that close to the beach is a waste of valuable public land. Nobody books a hotel because there is a cinema nearby and those that do go to the cinema don't spend money in the town while they are there.</p> <p><i>A hotel might be reasonable, although why the Royal in the High Street has not long ago been refurbished as a modern hotel is strange if there is a need. However, restaurants, cafes etc. and more parking would improve the area</i></p>	EIP: Written

Cllr Martin Terry (Southend Borough Council)	Policy CS1.2	2513	Object	<p>Ref CS1.2 The redevelopment of Seaway car park is based upon very unsound figures that will leave central Southend in gridlock which is not sustainable development.</p> <p><i>Do not develop this car park unless real and genuine alternative additional capacity is identified and delivered. The current figures are inaccurate and are flawed as I pointed out when I was Portfolio Holder, The corrections were not made to my satisfaction.</i></p>	<p>Test of Soundness: The document is unsound because it is not: i. Positively prepared</p> <p>EIP: Appearance</p>
Peter Grubb (Uncle Toms Cabin)	Policy CS1.2	2626	Comment	<p>The basic flaw in the proposal is that it robs the town of a Parking asset no matter what the skillfully crafted reports state about alternatives.</p> <p>Council data suggests (the carpark) is a poor revenue generator for the town --this is misguided -- many local & national businesses benefit from the revenue stream generated by those using the facility.</p> <p><i>The parachuted in Windfall development proposal could easily go ahead if the developer was told to provide on site replacement parking by way of underground car parking.</i></p>	
Mr Brian Cook	Policy CS1: OS (CS1.2) Seaways	2502	Object	<p>Southend has gradually been strangled to people outside the central area by the narrowing of access roads and restrictions to parking</p> <p><i>The proposal to develop the Seaway car-park is misjudged unless part of the development were to be a multi storey car park of similar capacity. I personally used to shop in Southend on Sea centre weekly but know only visit about once a year as I can drive to Chelmsford, Lakeside or even Bluewater quicker than Southend.</i></p>	<p>Test of Soundness: The document is unsound because it is not: i. Positively prepared</p> <p>EIP: Written</p>
Mr Steven Lawrence	Policy CS1: OS (CS1.2) Seaways	2503	Comment	<p>I think the development of Seaway & Tylers car parks is a mistake. These are critical car parking areas for day visitors and local residents. We are local residents and have young children. using public transport is a totally impractical option. We will just avoid Southend entirely if there is nowhere to park. We'll end up going to Chelmsford or Lakeside shopping instead.</p>	EIP: Written
Belfairs Gardens Residents Association & Southend District Pensioners Campaign (Barbara Armitage)	CS1.3	2663	Comment	<p>Shared Space. This has been an ongoing problem with accidents near Southend Victoria Station and on the sea front. We do not want any more shared spaces. On the seafront there is nowhere for taxis to drop off (no buses of course). Kerbs help to keep pedestrians safe and also, vitally to direct rainwater to drains. There is flooding there as the owner of Happidrome will agree. Southend Victoria needs a crossing. There are so many near misses and elderly and disabled people are afraid to use as I am myself.</p>	EIP: Written

Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd	CS1.3.b	2647	Support	Part 3 (B) of draft Policy CS1 states that the Council will promote the creation of a well-designed Piazza area at the southern end of the High Street between The Royals, the Palace and Pier Hill and encourage new and existing uses to provide active frontages to face into this space. The proposal to provide a defined Piazza area is welcomed, however, it must be recognised that there are a number of land ownerships in place and, as such, a certain degree of flexibility will have to be employed in order to ensure that this can be delivered.	Test of Soundness: Legally Compliant: Yes Sound: Yes
Mr Martin Barrell (Environment Agency)	CS2	2609	Support	We support part (e) of this policy in particular which again is promoting a joined up approach to green space provision across the area.	Test of Soundness: Legally Compliant – Yes Sound - Yes
Miss Ruth Wharfe	CS2	2612	Support	Support approach to conserving nature and biodiversity – would welcome opportunity for more wildlife habitats in central seafront area.	Test of Soundness: Legally Compliant – Yes Sound - Yes
Natural England (Mr Steve Roe)	Policy CS2	2874	Object	<p>It is our view that Policy CS2 as presented however is not consistent with National Policy:</p> <ol style="list-style-type: none"> 1. It does not clearly set out criteria to firstly avoid, then mitigate and, as a last resort compensate for adverse impacts on biodiversity. The Southend on Sea Development Management Document (July 2015) also does not refer to the avoidance-mitigation-compensation hierarchy (see paragraph 118 of the NPPF). 2. It does not make a clear distinction between the protected sites hierarchy of international, national and local sites. A clear distinction should be made between the protected sites hierarchy of international, national and local sites in order to ensure consistency with paragraph 113 of the NPPF. There are descriptions of 'designated sites', 'international and European designated sites'. Nationally designated sites are not described at all. <p><i>We would advise that the Policy include criteria to firstly avoid, then mitigate and, as a last resort compensate for adverse impacts on biodiversity, in accordance with paragraph 118 of the NPPF. We would advise the addition of a form of words such as "Development should aim to ensure that there is a net gain of biodiversity by protecting existing biodiversity and geodiversity assets and by:</i></p> <ol style="list-style-type: none"> a. Refusing development proposals where significant harm to an asset cannot be avoided, mitigated or, b. as a last resort, compensated. <p><i>The weight accorded to an asset will reflect its status in the hierarchy of biodiversity and geodiversity designations."</i></p> <ol style="list-style-type: none"> 2. We would advise that the SCAAP is critically compared to the Southend on Sea Core Strategy (2007) with regards the hierarchy of designated sites and (within the context that the Core Strategy may not be NPPF-compliant) included. 	
Natural England (Mr Steve Roe)	Policy CS2 Point 1a	2872	Support	Natural England welcomes the inclusion of our previous advice from 26 January 2016 within point 1.a. of the Policy to "ensure that all development proposals within the Central Seafront Area are accompanied by a Habitats Regulations Assessment and associated documentation to ensure there will be no adverse effect on the European and International foreshore designations (SPA and Ramsar) either alone or in combination with other plans or projects".	

Natural England (Mr Steve Roe)	Policy Cs2 Point 1e	2873	Support	We also welcome the aspiration in point 1.e. of the Policy to link open space within a Southend 'green grid' (see CS1) and we support point 1.f to satisfy the need to make visitors and residents aware of the significance of the SSSIs through interpretation at a high-quality visitor facility.	
Mr Martin Barrell (Environment Agency)	CS3	2607	Support	We support part 2 of this policy, which seeks to protect biodiversity and flood risk interests.	Test of Soundness: Legally Compliant – Yes Sound - Yes
Natural England (Mr Steve Roe)	Policy CS3	2877	Object	<p>Natural England draws your attention to our advice on 17 October 2011: "any new or enhanced marine facilities as referred to in point 1.b may potentially need to be restricted to seasonal usage if [there will be no unacceptable impact upon navigation, biodiversity, flood risk or the special character and designations]". The seasonal restriction relates to avoidance of potential impacts on the interest features of Benfleet and Southend Marshes Special Protection Area / Ramsar in accordance with paragraph 118 of the NPPF.</p> <p><i>We would recommend amending wording of this policy from "2. Proposals for waterfront development within the Central Seafront Area and improved facilities will need to demonstrate that there will be no unacceptable impact upon navigation, biodiversity, flood risk or the special character and designations of the area" to "2. Proposals for waterfront development within the Central Seafront Area and improved facilities will need to demonstrate that there will be no unacceptable impact upon navigation, the conservation objectives or features of Benfleet and Southend Marshes Special Protection Area, Ramsar and SSSI, flood risk or the special character of the area.</i></p>	
Tracy Abbott	210	2562	Comment	Need to improve and maintain the Baxter Avenue area.	
Tracy Abbott	210	2564	Comment	Area needs to be accessible and marketed effectively. Increasing housing should be matched by increases in parking.	
GL Hearn Ltd part of Capita Real Estate (David Maxwell)	209 - 5.10 Aims	2632	Support	<p>Genesis Housing Association (GHA) supports section 5.10 which confirms the aims of regenerating Victoria Avenue and its surroundings. GHA recognises and supports the improvement of connections and accessibility within the Victoria Gateway area, to include the Baxter Avenue and Victoria Avenue Opportunity Sites. GHA has already entered into pre-application discussions with Planning and Design officers from Southend on Sea Borough Council to consider the potential measures to be applied within a redevelopment of the Baxter Avenue site to achieve a high standard of urban design, to include urban greening techniques, as well as measures to encourage walking and cycling, notably to allow easy access to the town centre, employment area and public transport interchanges.</p> <p>GHA supports and intends to deliver regeneration of the Opportunity Site PA8.2 (Baxter Avenue) to provide a high quality, mixed tenure residential development including social housing, additional sheltered and affordable housing, and market housing.</p>	<p>Test of Soundness: Legally Compliant: Yes Sound: Yes</p> <p>EIP: Appearance</p>

GL Hearn Ltd part of Capita Real Estate (David Maxwell)	PA8	2631	Support	<p>Genesis Housing Association (GHA) supports Policy PA8: Victoria Gateway Neighbourhood Policy Area. GHA supports, specifically, section (4) of Policy PA8 relating to Opportunity Site PA8.2 (Baxter Avenue). GHA has identified the Baxter Avenue site as contributing towards the GHA strategic objective to provide 1,000 new homes a year for the next 10 years. GHA owns site PA8.2 and has set out a development vision for redevelopment of the Baxter Avenue site for at least 500 dwellings. GHA together with GL Hearn (part of Capita) has worked closely and successfully with officers from Southend on Sea Borough Council's planning and housing departments throughout 2016. GHA has provide an 'Urban Design Appraisal & Concept Masterplan', dated May 2016.</p> <p>Genesis Housing Association is now working with architects to prepare a scheme for public and stakeholder consultation and then for submission as a planning application.</p> <p>GHA, together with GL Hearn (part of Capita) has carried out an initial assessment of the phased redevelopment of the Baxter Avenue site. In conclusion, GHA would progress phased demolition, decant of residents and phased construction of the new development to provide 250 dwellings prior to 2021. Subsequent phases of development, to be implemented after 2021 would be able to deliver at least 374 additional new homes i.e. the site has capacity to achieve at least 624 dwellings.</p> <p>GHA supports the very specific wording at section (4) (ii) of Policy PA8.2, which states that: "Within Opportunity Site (PA8.2): Baxter Avenue the Council will promote the regeneration of the site for high quality mixed tenure residential development, including sheltered and additional affordable housing. Any scheme should incorporate amenity open space, urban greening and sustainability measure as well as providing pedestrian access and linkages between Victoria, Baxter and Boston Avenues".</p> <p><i>It is submitted that further clarification could be made through the addition of wording to section (4) (ii) to make clear that Opportunity Site PA8.2 is expected to deliver at least 500 dwellings, 250 of which will be in the SCAAP period. This should also be provided with a degree of flexibility in delivery time-frames to allow for unforeseen changes in economic circumstances.</i></p> <p><i>In addition, this minimum number should be stated to allow for a degree of flexibility to allow for changes in economic conditions.</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: Yes</p> <p>EIP: Appearance</p>
Belfairs Gardens Residents Association & Southend District Pensioners Campaign (Barbara Armitage)	PA8.3	2662	Comment	<p>Shared Space. This has been an ongoing problem with accidents near Southend Victoria Station and on the sea front. We do not want any more shared spaces. On the seafront there is nowhere for taxis to drop off (no buses of course) . Kerbs help to keep pedestrians safe and also, vitally to direct rainwater to drains. There is flooding there as the owner of Happidrome will agree. Southend Victoria needs a crossing. There are so many near misses and elderly and disabled people are afraid to use as I am myself.</p>	EIP: Written

Powerhaus Consultancy on behalf of Southend United Football Club	Policy PA8	2616	Object	<p>Our principle objection to the SCAAP is the removal of and the lack of an allocation of the Roots Hall Football Stadium and adjacent land. Roots Hall was designated in the December 2015 document for mixed-use development for convenience retail and approximately 290 homes, for development post 2021 (ref: OS13). The SCAAP (November 2016), however now omits the site from any formal allocation.</p> <p>The availability of the Roots Hall site for development is subject to the relocation of the Southend United Football Club stadium. It is of particular surprise to the Club that the site allocation has been removed, despite the advanced stage of pre-application discussions for the relocation of the football stadium to Fossetts Farm and consequential redevelopment of the Roots Hall site.</p> <p><i>The site allocation for the Roots Hall Stadium site should be re--instated in the SCAAP, to include a mixed--use development for convenience/ retail and residential uses, with an indicative capacity of 675 homes It has the potential to be delivering homes by 2018/19 linked to the delivery of a new stadium at Fossetts Farm.</i></p>	
Mrs Brenda Philips	PA8.2	2589	Comment	We are surprised and shocked that the SCAAP as it stands, incorporates the demolition of perfectly good dwellings in Baxter Avenue.	
Mrs Sylvia Myers	PA8.2. Baxter Avenue	2651	Object	<p>I believe that the proposal to regenerate the Baxter Avenue site (site reference PA8.2) is unsound. Catherine Lodge, which is within the Baxter Avenue "opportunity area" is a supported housing unit for residents over the age of 65. It was only built in 1984 and was renovated in 2006. The building is perfectly adequate and its owner, Genesis Housing Association, stated at a meeting on November 21 st 2016 that, absent the SCAAP, it had no plans to refurbish Catherine Lodge as there were many other properties within its portfolio that were more in need of refurbishment. As the other properties owned by Genesis in the Baxter Avenue area (Charlotte Mews, The Clusters etc} are of similar age and appear to be in a similar condition I would imagine that it has no plans to refurbish/regenerate these buildings either.</p> <p>Therefore, I believe that there is no economic justification in knocking down perfectly acceptable housing and, indeed, that it is financially unsound particularly as there are many areas of much older housing in the Southend area that are in far greater need of regeneration. I am 92 years old and moved into Catherine Lodge in the belief that it would see me through the remainder of my life and that I would never have to move again. On that basis, I spent £4,000 on fitted furniture that will be of no use elsewhere. I believe that it is grossly unfair that I should spend the rest of my life living amidst a building site worrying about when I will have to move and what I will have to move into.</p> <p><i>I believe that the Baxter Avenue area should be removed from the SCAAP in order to best utilise the financial resources of Southend Borough Council. This will make the plan more sound as it will ensure that the council's limited funds are used in the regeneration of older, more dilapidated areas within the borough.</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: Yes</p> <p>EIP: Appearance</p>
Mr Brian Demmen	PA8.2. Baxter Avenue	2652	Object	<p>I am writing to you concerning the above matter, having been a resident of Charlotte Mews for the last three years, and very happy with my accommodation.</p> <p>The thought of having a move thrust upon me at my time of life is extremely daunting. Following the tenants meeting this afternoon with Mr Peter Arey, representative of Genesis Housing, time frames and schedules were indicated and, as this is the very beginning of the proposed activity, it is understandable that little specific information is currently available. However, as mentioned, the mere fact that this proposal is under consideration, myself and my fellow residents are uneasy, having this matter hanging over our heads.</p>	EIP: Written

Pegasus Planning Group Ltd (Jonathon Rainey) On behalf of The Co-operative Group	220	2620	Comment	The underutilisation of the site is not just limited to these upper floors but should also include the unused area of car parking at the rear of the site. consider that a comprehensive redevelopment of the site, including the car park area can result in scheme which delivers high quality, sustainable development.	EIP: Appearance
Mr Paul Lowe	Policy PA9: Sutton Gateway Neighbourhood Policy Area Development Principles. PA3.i.a	2475	Comment	<p>Policy PA9 Sutton Gateway(3.i.a) should be updated to have regard to all residential buildings bordering the development.</p> <p><i>Re: Policy PA9 Sutton Gateway (3.i.a): 'The Council will require the building design, form and massing to:</i> <i>a. have regard to residential buildings on the opposite side of Sutton Road...'</i></p> <p><i>This should be updated to:</i> <i>'a. have regard to all residential buildings bordering the development...'</i></p> <p><i>It is not just residents on the opposite side of Sutton Road that are potentially affected. In fact, properties to the rear of the Opportunity Site are clearly affected most by any development to the western side of Sutton Road.</i></p>	
Pegasus Planning Group Ltd (Jonathon Rainey) On behalf of The Co-operative Group	PA9.2	2619	Support	Support in principle the proposed allocation of 53-57 Sutton Road for mix use development. The Co-Operative Group are committed to pursuing the redevelopment of this site and consider that this is achievable within the SCAAP timeframe by 2021. As the Council is aware pre-application discussions were held in February 2015 and since then the site has been openly marketed	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(2) Justified 4(3) Effective</p> <p>EIP: Appearance</p>
Pegasus Planning Group Ltd (Jonathon Rainey) On behalf of The Co-operative Group	PA9.2	2621	Object	<p>Whilst we acknowledge that the site is located within an area of secondary shopping frontage (Policy DM131: Secondary Shopping Frontage), this should not necessitate the retention of like for like floorspace. The Co-operative Group would like flexibility in terms of size of any replacement retail floorspace (i.e. provided opportunity to increase or decrease which is currently present).</p> <p><i>Consider that the draft policy should be amended as follows: the Council will support the redevelopment of this site to achieve a replacement convenience store (with a minimum GIA of 450sqm)</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(2) Justified 4(3) Effective</p> <p>EIP: Appearance</p>

Pegasus Planning Group Ltd (Jonathon Rainey) On behalf of The Co-operative Group	PA9.2	2622	Object	<p>Concerned that the wording of paragraph 220 and Policy PA9(ii) will necessitate the retention of the existing façade. The site is not located within a defined Conservation Area and the building itself is not listed either nationally or locally.</p> <p>Consider that the policy should be worded more flexibly and there should not be the protection where the need to do so is not justified and the protection may result in an inferior scheme being achieved.</p> <p><i>Suggested amendment: 'The façade of the current building fronting onto Sutton Road should preferably be retained subject to viability and architectural/engineering constraints'</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(2) Justified 4(3) Effective</p> <p>EIP: Appearance</p>
Pegasus Planning Group Ltd (Jonathon Rainey) On behalf of The Co-operative Group	PA9.2	2623	Object	<p>We consider that the wording relating to 'amenity open space, urban greening and sustainability measures' is vague, generalised and imprecise. There is no justification within the supporting text or the policy itself to justify measures which place a greater onus on sites within the SCAAP and requirements which would not be the case on development sites elsewhere outside the SCAAP. Any application for development would need to be determined in accordance with other policies within the Development Plan.</p> <p><i>We therefore suggest that this sentence should be deleted so as to ensure that the policy can reasonably be considered to be effective in this regard.</i></p> <p><i>Suggested amendment: 'The scheme should also incorporate amenity open space, urban greening and sustainability measures.'</i></p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(2) Justified 4(3) Effective</p> <p>EIP: Appearance</p>

RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group	228 Page 94 - Implementation & Monitoring	2866	Object	<p>In its monitoring indicators and targets for DS5, this proposes: “DS5.1 Providing a level of publically available car parking provision to support the vitality and viability of the central area – no net loss of permanent publically available car parking south of the central railway line.” There needs to be more detail here to provide comfort to seafront traders that existing supply will be retained and enhanced. The following is not clear:</p> <ol style="list-style-type: none"> 1. Which car parks form part of the baseline against which to measure this? The RPS Technical Note shows that the existing capacity in the Council’s Car Parking Study (CPS), undertaken by Steer Davis Gleave, is inaccurate and needs to be reviewed, as it severely underestimates supply in the seafront area by excluding a number of car parks. 2. How will this take into account additional demand in seafront car parks caused by the displacement from car parks elsewhere in the Southend Central Area where there has been a reduction in capacity (as there is no policy protecting capacity here)? 3. How will this take into account the trips generated by new development, both on existing car park sites and elsewhere in the Southend Central Area? 4. How will this monitor the success of the main SCAAP objectives, which is to secure growth? Simply maintaining no net loss could have the effect of reducing investment and visitors to the Central Seafront Area. There needs to be a mechanism to measure how parking capacity in the Central Seafront Area is being increased, and whether these spaces are sufficient. <p>“DS5.1 Providing a level of publically available car parking provision to support the vitality and viability of the central area – no net loss of permanent publically available car parking south of the central railway line, taking into account vehicles displaced from other car parks where capacity is lost, traffic generated by new development on car parks and elsewhere in the Central Seafront Area. Also monitor the extent to which an increase in the number of parking spaces south of the central railway line is being achieved.”</p>	<p>Test of Soundness: Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective</p> <p>EIP: Appearance</p>
Mr Ron Woodley (BERA)	Map 3	2584	Comment	<p>It is difficult to see why the western side of the High street south of Alexandra Road has been downgraded to a secondary shopping frontage when a) the eastern side is primary and b) it is immediately at the meeting between the high street and the sea front. It seems to offer no less potential than the eastern side and is important in setting the scene for visitors from the sea side activities into the town. It should remain primary shopping frontage.</p>	
Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd	Map 3	2646	Support	<p>We note that part of The Royals Shopping Centre is shown as being located in the primary shopping frontage with the Church Road and Alexander Road frontages lying in secondary shopping frontage. For clarity, the upper level should be shown as secondary shopping frontage similar to the Victoria Shopping Centre.</p>	<p>Test of Soundness: Legally Compliant: Yes Sound: Yes</p>
James Gibbs	Map 4	2505	Comment	<p>This Policy on car parking will not be effective and will only cause issues. the roads are already congested and ear marking current parking for development will only create further congestion. in reality double the parking we currently have is what is required. by increasing the parking and not taking away then it would take cars of the road quicker on busy days and clear the roads a lot quicker. I feel this is derogatory to local businesses and future visitors as all that will happen is it will put people of.</p>	

Anthony Belyavin	Map 4	2540	Object	<p>This plan is ill conceived, and fails to take into account the views and experience of local businesses.</p> <p><i>Undertake serious discussions with town centre local business owners, to understand how car parking is the lifeblood of getting customers to them.</i></p>	<p>Test of Soundness: The document is unsound because it is not: iii. Effective</p> <p>EIP: Appearance</p>
Mr Philip Barnard	Map 5	2483	Comment	<p>Parking I note one of the paid parking areas on Victoria Avenue is to build on as a hotel. It has been full each day I've gone past on the bus to the hospital. Where are these people going to park. Why is there generally no provision for parking in any of your plans?</p>	
GL Hearn Ltd part of Capita Real Estate (David Maxwell)	Map 6	2628	Support	<p>Map 6: SCAAP Policy Areas and Opportunity Sites. Genesis Housing Association (GHA) supports the identification of Opportunity Site PA8.2 (Baxter Avenue) falling with the Victoria Gateway Neighbourhood as indicated by Map 6 of the SCAAP.</p>	<p>Test of Soundness: Legally Compliant: Yes Sound: Yes</p> <p>EIP: Appearance</p>
Pegasus Planning Group Ltd (Jonathon Rainey) On behalf of The Co-operative Group	Table 1 (73)	2618	Comment	<p>We would note that the total units identified within Table 1 for the whole of the SCAAP falls short of the Core Strategy total by approximately 300 dwellings. There is no explanation as to how the Council intends to deliver these additional units.</p>	<p>EIP: Appearance</p>

GL Hearn Ltd part of Capita Real Estate (David Maxwell)	Table 5	2633	Support	<p>Genesis Housing Association (GHA) supports the identification of Opportunity Site PA8.2 (Baxter Avenue) within Table 5: Opportunity Sites of the SCAAP.</p> <p>Opportunity Site PA8.2 (Baxter Avenue) is within the full ownership of GHA. The site is currently used as a low density mixed tenure housing located at the southern point of the Victoria Gateway Neighbourhood Area containing; The Clusters; Catherine Lodge; Charlotte Mews; Alexandra Court; Elizabeth Tower. It is submitted that redevelopment of this site will accord with the aims, objectives and principles of the Estate Regeneration National Strategy, DCLG, November 2016. GHA recognise that the proposed regeneration of the Baxter Avenue site will transform the neighbourhood and people's lives through delivery of a high quality, well designed residential development with improved public space. The proposed redevelopment of Baxter Avenue will also connect with the wider redevelopment initiatives in the Victoria Gateway area, and Central Southend throughout and beyond the SCAAP period.</p> <p>GHA has worked productively and positively throughout 2016 with Southend on Sea Borough Council Housing and Planning departments to consider and confirm the development vision that GHA has for redevelopment of the Baxter Avenue site. Positive discussions with the Borough Council's Housing and Planning departments remain ongoing. At the time of the submission of these representations the most recent development vision for the Baxter Avenue site is set out within the document titled 'Urban Design Appraisal & Concept Masterplan', dated May 2016 prepared by Capita on behalf of GHA. The vision provides for redevelopment of the Baxter Avenue site to provide at least 500 dwellings, of which half would be delivered within the SCAAP period. GHA is now working with architects to progress the scheme in greater detail to be progressed to resident and public consultation, further pre-application and stakeholder consultation, and a planning application.</p> <p>GHA therefore supports the identification of Opportunity Site PA8.2 (Baxter Avenue) within Table 5, as well as the indicative residential capacity and phasing indicated by Table 5.</p> <p>GHA does however recommend that Table 5 should be amended to indicate that the indicative residential capacity figures should be noted within the SCAAP as anticipated minimum residential capacities.</p>	EIP: Appearance
Natural England (Mr Steve Roe)	Policies Map	2880	Object	<p>Nature Improvement Areas (NIA) are fundamental to the step-change needed to establish a coherent and resilient ecological network. Policies should ensure that any development affecting the Greater Thames Marshes NIA should be compatible with their purpose and make a positive contribution to NIA enhancement (using CIL/S106 agreements/conditions as appropriate).</p> <p><i>Natural England advise that the Greater Thames Marshes NIA is included in the Plan Policy Map.</i></p>	
Miss Laura Cowell	Proposals Map	2487	Support	<p>With regard to new or improved pedestrian links between PA.1 and PA.2, it is not clear how the new developments currently in construction in Vic Ave play into any development brief for this area. Will there be a lack of cohesion or continuity for the different sites. How can you propose new/improved open spaces in Vic Ave when all the sites are already being developed by different developers in mismatched styles and with not much evidence of green spaces?</p>	
Miss Laura Cowell	Proposals Map	2488	Support	<p>The pedestrianisation of Warrior Square including up to the High Street is long overdue and would help draw people into this area from the High Street. The area outside Maitland House feels like a back street, choked up with cars and Warrior Square is blocked from view if you are in the High Street.</p>	

Mr JC Gibb	Appendix 5	2532	Comment	<p>Appendix 5 I note that the council is encouraging a borough wide travel card.</p> <p>I also note that the system for bus season tickets is so inflexible as to be comical. You can only by a daily, weekly, four weekly or annual card. On the railway you can by any length of season at the price of the stage to which it applies e.g. 6 weeks and a day at the monthly rate.</p> <p>You can also purchase your season at train stations. Why can this not be done for buses. At the moment you cannot buy a season to correspond with a school term. You have to buy your ticket on the bus or at the travel centre. The latter is inconvenient and the former clearly delays everybody on the bus. Not to mention the logistics of paying £56 on a bus for a four week ticket! At present we spend a fortune on bus lanes etc. but we cannot get a simple season into the twentieth century let alone the twenty first!</p> <p>I am not sure who would even consider cycling from Southend Central to the travel centre. Can you take the bicycle on the bus?</p> <p>If you are traveling by train Westfield is accessible from both Southend's main lines. What has Southend to offer in the way of shopping that Westfield does not? We have to compete by providing a better or equal offer and the only way we are likely to achieve that is by making more cheap parking available. I like traveling by train but with the best will in the world it is not compatible with carrying lots of shopping.</p>	
Mr JC Gibb	Appendix 8	2533	Comment	<p>Appendix 8 Sadly I feel that this policy needs a little more bite. The fact that a property is being "Marketed" does not necessarily mean that there is any active effort going into letting it. This may be the case if the agent concerned or his clients stand to make far more money from a redevelopment. Some property on the other hand will clearly be unlettable however long it is marketed for and that may be obvious in a far shorter period.</p>	

Appendix 2: Further Engagement and Points of Clarification

SBC response to Natural England on Southend Central Area Action Plan (SCAAP) revised proposed submission document (2016)

1. Context

1.1 The Southend Central Area Action Plan (SCAAP) is supported by the adopted Southend Core Strategy DPD (2007) and Development Management DPD (2015). The Council has also adopted its CIL Charging Schedule (2015) and Joint Area Action Plan for London Southend Airport and its Environs (2014), as well as a number of Supplementary Planning Documents, and the Joint Waste Local Plan is at an advanced stage.

1.2 The SCAAP is at an advanced stage and is considered to be an important catalyst and driver for investment and for the delivery of the remaining proportion of regeneration and growth in the Southend Central Area to meet Core Strategy targets up to 2021. The SCAAP also provides additional policy criteria to guide and manage development proposals within Southend Central Area, complementing those policy criteria established by the NPPF, Core Strategy and DMD. The SCAAP will be subject to an early review as part of the preparation of the new Southend Local Plan as set out below.

1.3 A new Southend Local Plan is at an early stage of production with Sustainability Appraisal scoping opinion and a first round of consultation due later this year. A number of evidence base studies are being produced to support the preparation of the Local Plan, including: Economic Development Needs Assessment, Strategic Housing Market Assessment, Strategic Retail Assessment, Strategic Flood Risk Assessment and funding to undertake a joint Open Space and Playing Pitches Study has been agreed. This evidence base is primarily being undertaken at a strategic level, working cooperatively with neighbouring authorities in South Essex.

1.4 The Local Plan will contain an overall vision for the Borough of Southend and put in place a new strategy for delivering growth and regeneration that meets the needs of local people. The new Southend Local Plan will include a review the Core Strategy, JAAP¹, DMD, SCAAP, remaining Saved Borough Local Plan Policies, and will comprise the following elements:

- Spatial Strategy;
- Assessment of Objectively Assessed Needs and Growth Targets;
- Site Allocations and Designations;
- Development Management Policies;
- Area-wide policy, including for Shoeburyness² and the Central Area;
- Policies Map.

¹ Review of the JAAP may necessitate the need for a separate stand-alone DPD, to accompany the Local Plan. This owing to the need for continued joint working on the JAAP in partnership with Rochford District Council.

² Detailed planning policy was previously being brought forward via a Shoebury Area Action Plan. This will now be incorporated into the new Southend Local Plan.

2. Southend Central Area Action Plan – Natural England Representations

2.1 Natural England provided representations to the SCAAP at the following stages: Issues and Options (2010), Proposed Submission (2011), Preferred Approach (2015) and Revised Proposed Submission (2016). When considering representations made by Natural England during the last iteration of the plan, the Preferred Approach (2015), the matters raised related to the consideration from Natural England that a Habitats Regulations Assessment and associated documentation should accompany all development proposals within the Central Seafront Area. This matter was considered by Southend Borough Council and was included within Policy CS2.1.a (SCAAP Revised Proposed Submission Document, November 2016).

Table 1: Natural England Representation to SCAAP Preferred Approach (2015) with Council response

Reps	Question	Comment		
	Question 28 Policy CS2		<p><i>Wording of Policy not considered accurate and it is suggested that Policy CS2.1, is amended to read as follows:</i></p> <p><i>"1. Ensure that all development proposals within the Central Seafront Area are accompanied by a Habitats Regulations Assessment and associated documentation to ensure there will be no adverse effect on the European and International foreshore designations (SPA and Ramsar) either alone or in combination with other plans or projects;"</i></p> <p>The Habitats Directive requires competent authorities to decide whether or not a plan or project can proceed having undertaken the following "appropriate assessment requirements" to:</p> <ol style="list-style-type: none"> 1. Determine whether a plan or project may have a significant effect on a European site, either alone or in combination; 2. If required (ie when there is a likely significant effect), undertake an appropriate assessment of the plan or project; 3. Decide whether there may be an adverse effect on the integrity of the European site in light of the 	<p>Noted. Amend the wording of Policy CS2 point 1 to read: <i>'Ensure that all development proposals within the Central Seafront Area are accompanied by a Habitats Regulations Assessment and associated documentation to ensure there will be no adverse effect on the European and International foreshore designations (SPA and Ramsar) either alone or in combination with other plans or projects.'</i></p>

		<p>appropriate assessment.</p> <p>This whole process is generally referred to as Habitats Regulations Assessment (HRA).</p> <p>The responsibility for carrying out a HRA rests squarely upon the decision-making competent authority; except insofar as it may be appropriate for the competent authority to adopt the reasoning or conclusions of another competent authority as to whether a plan or project is likely to have a significant effect on a European site, or will adversely affect the integrity of a European site. The Regulations transposing the Habitats Directive also provide that a competent authority is not required to assess any implications of a plan or project that would be more appropriately assessed by another competent authority. Planning applications are often accompanied by a document which is described as being a HRA; however such a document produced by or on behalf of an applicant does not have any legal weight and is therefore sometimes referred to as a 'shadow HRA'.</p> <p>As the competent authority, it remains Southend-on-Sea Borough Council's responsibility to produce the definitive HRA; either by adopting an applicant's 'shadow HRA', or by carrying out its own HRA. Where a competent authority chooses to carry out its own HRA, it will normally require the applicant to provide the necessary background information to support the assessment process.</p>	
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2.2 During the consultation on the SCAAP Revised Proposed Submission Document (2016) however, a number of additional matters were raised by Natural England to the Plan, which had not been raised previously. A number of these matters were considered to be substantive, drawing reference to both the Core Strategy DPD and Development Management Document, which have been adopted by the Council previously.

2.3 Having considered the representation received from Natural England, the Council considers that a number of the matters can be addressed by means of a minor modification to the plan, which will be submitted alongside the Plan for consideration by the Inspector in a separate schedule of modifications. There are instances however, where the Council considers that a proposed modification to the plan would not be reasonable at this late stage of preparation. The Council’s response to the Natural England representation (2016) is set out below.

2.4 Following a telephone conversation with Natural England, it was determined that the Council would set out their response to the original representation from Natural England received to the SCAAP Revised Proposed Submission consultation (2016). Natural England would then consider the response, and provide an updated representation (withdrawing the original representation and removing substantive objections).

2.5 Table 2 sets out the representation received from Natural England and the Council’s response to this. For clarity, we have separated elements of the representation out into separate issues /matters and highlighted where these are considered to be support/comment/object (highlighting indicates a change from the support/comment/object description used in the original rep.):

Table 2: Natural England representation to SCAAP Revised Proposed Submission version (2016) with Council response

Respondent	Natural England (Mr Steve Roe)				
Full Submission	<p>Thank you for your consultation on the above which was received by Natural England on 03 November 2016. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p><i>Context</i></p> <p>We responded on 11 July 2011 on the Draft Southend Central Area Action Plan and associated HRA Screening Report (our ref 27040) and supplied comments online to the Central Area Action Plan – Proposed Submission on 17 October 2011 (our ref 33069). We also responded on 26 January 2016 on the Preferred Approach Option 2015 (our ref 176229). While you have provided a Representation Form, we are providing comments below in the same format as that form in order to expedite this response:</p>				
	Policy CS1 Point 1. i. ii)	Support	Natural England support the statement in point 1.i.i.ii “safeguard, and where appropriate, enhance the biodiversity of the foreshore and respect the European designations”. We welcome the recognition of the environmental importance of the foreshore as reflected in point 1.a. “an assessment of the scale, character, location and impact of the proposal on existing		Noted.

			facilities and environmental designations, including protected green space". We also support point 3c c. regarding the "integration of the open spaces of the seafront and foreshore with the 'green grid' to create a series of linked, functional green spaces" in order to relieve recreational pressure on designated sites.		
	Policy CS1 Point 1 f	Object	<p>However within Policy CS1 there are the following matters which we raise as unsound:</p> <p>1. We note that the Policy states "restricting development south of the sea wall" which we view does not provide sufficient protection for the international, European and national designated sites in accordance with paragraph 118 of the NPPF.</p>	<p>Sound: No</p> <p>4(4) Consistent with National Policy</p> <p>1. We would advise this be amended to the wording originally used in the Draft Southend Central Area Action Plan 2011 (DSCAAP 2011) that "Development south of the seawall will not normally be permitted" where any proposal has potential to adversely affect a European site or cause significant harm to a Site of Special Scientific Interest (SSSI).</p>	<p>Agree. Amend Policy CS1.1.f to read: <i>'f.seek to maintain not normally permit foreshore views by restricting development south of the sea wall- where a proposal has the potential to adversely affect a European site or cause significant harm to a Site of Special Scientific Interest (SSSI), or adversely impact on foreshore views. Any proposed use will also have to be water compatible as defined in the Planning Practice Guidance;'</i></p>
	Policy CS1 Point 3d	Comment	<p>Point 3.d. describes use of creative lighting and we refer you to our previous advice relating to Policy CS6 (2011) that new lighting should be arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore. This is to avoid potential impact on designated areas and the species they contain, in accordance with paragraph 118 of the NPPF. In addition, light pollution can have negative impacts on local amenity and nature conservation (especially bats and invertebrates).</p>	<p>There are a number of places within the SCAAP that lighting and creative lighting are described, we have no preference for where the words "new lighting should be arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore" might be included.</p>	<p>Agree. Add to Policy CS1 3d the following: 'use creative lighting and public art to strengthen identity and connectivity. <u>New lighting should be arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore.'</u></p>
	Policy CS1 Point 4i	Object	<p>Point 4i. Opportunity Site (CS1.1): Southend Pier. As the pier crosses the Benfleet and</p>	<p>We would advise that the following words be added to the Point 4i:</p>	<p>The Council considers that there is not a need for modifications to be</p>

			<p>Southend Marshes designated site, we would have concerns that future proposals to alter the structure (such as undertaking work to deck timbers), or widening the pier (as recently considered in order to facilitate a transport system) would have the potential to impact on the designated site. NOTE: Point 4i. Opportunity Site (CS1.1): Southend Pier. We would advise that the Plan incorporate measures to reduce potential impacts on the important high-tide roost of wintering turnstone <i>Arenaria interpres</i> at the northeast corner of the pier-head. For example a recent new building close to this slipway was carefully designed to minimise overshadowing the slipway and was given a ‘turnstone-friendly’ rough-surfaced curved roof.</p>	<p>“...angling; creative lighting; and sensitively sited renewable technologies, where appropriate and where there can be a net gain in biodiversity”. There is a link here to our recommendations in point 1 of Question 6 in Policy CS2: Nature Conservation and Biodiversity (see below)</p>	<p>made to the policy wording relating to Opportunity Site CS1.1 Southend Pier. It is considered that there are other relevant policy criteria that seek to safeguard and, where appropriate, enhance biodiversity, including Policy CS1.1.i.ii. Policy KP2 of the Core Strategy also provides safeguards international sites for nature conservation and seeks enhancement to the ecological and amenity value of the natural environment. A policy linkages box is provided at the end of Policy CS1 which draws clear links to other relevant policies.</p>
	Policy CS2 Point 1a	Support	<p>Natural England welcomes the inclusion of our previous advice from 26 January 2016 within point 1.a. of the Policy to “ensure that all development proposals within the Central Seafront Area are accompanied by a Habitats Regulations Assessment and associated documentation to ensure there will be no adverse effect on the European and International foreshore designations (SPA and Ramsar) either alone or in combination with other plans or projects”.</p>		Noted.
	Policy Cs2 Point 1e	Support	<p>We also welcome the aspiration in point 1.e. of the Policy to link open space within a Southend ‘green grid’ (see CS1) and we support point 1.f to satisfy the need to make visitors and residents aware of the significance of the SSSIs through interpretation at a high-quality visitor</p>		Noted.

			facility.		
	Policy CS2	Object	<p>It is our view that Policy CS2 as presented however is not consistent with National Policy:</p> <ol style="list-style-type: none"> 1. It does not clearly set out criteria to firstly avoid, then mitigate and, as a last resort compensate for adverse impacts on biodiversity. The Southend on Sea Development Management Document (July 2015) also does not refer to the avoidance-mitigation-compensation hierarchy (see paragraph 118 of the NPPF). 2. It does not make a clear distinction between the protected sites hierarchy of international, national and local sites. A clear distinction should be made between the protected sites hierarchy of international, national and local sites in order to ensure consistency with paragraph 113 of the NPPF. There are descriptions of 'designated sites', 'international and European designated sites'. Nationally designated sites are not described at all. 	<p>Sound: No 4(4) Consistent with National Policy</p> <p>We would advise that the Policy include criteria to firstly avoid, then mitigate and, as a last resort compensate for adverse impacts on biodiversity, in accordance with paragraph 118 of the NPPF. We would advise the addition of a form of words such as "Development should aim to ensure that there is a net gain of biodiversity by protecting existing biodiversity and geodiversity assets and by:</p> <ol style="list-style-type: none"> a. Refusing development proposals where significant harm to an asset cannot be avoided, mitigated or, b. as a last resort, compensated. <p>The weight accorded to an asset will reflect its status in the hierarchy of biodiversity and geodiversity designations."</p> <p>2. We would advise that the SCAAP is critically compared to the Southend on Sea Core Strategy (2007) with regards the hierarchy of designated sites and (within the context that the Core Strategy may not be NPPF-compliant) included.</p>	<p>1. It is considered that an additional policy criterion to CS2 as proposed, relating to development proposals aiming to ensure a net gain in biodiversity, would not provide certainty to developers or decision makers during the planning process.</p> <p>Policy CS1.1.i.ii provides an appropriate criterion, seeking to ensure development within the central seafront area safeguard and, where appropriate, enhance, the biodiversity of the foreshore. Policy KP2 of the Core Strategy also provides safeguards for environmental designation for nature conservation and seeks enhancement to the ecological and amenity value of the environment from development proposals across the Borough.</p> <p>Policy DM6 of the Development Management Document also seeks to limit any adverse impacts and where possible enhance the biodiversity interests of the nature reserves and coastal and marine environment.</p> <p>It is however considered that the following wording should be added to policy CS2.1.b: 'Not permit development proposals that will <u>result in significant harm to</u> have an adverse impact, either</p>

~~directly or indirectly, on~~ the foreshore designations that cannot be avoided, adequately mitigated, or as a last resort compensated for.'

2. As discussed, and noted above, this is a substantive point made at this late stage in the plan preparation process that has not been raised previously by Natural England and furthermore relates to the adopted Core Strategy. The Council is progressing with the production of its Local Plan, which will include a review of the Core Strategy DPD. The SCAAP is at an advanced stage and is considered to be an important catalyst and driver for investment and for the delivery of the remaining proportion of regeneration and growth in Southend Central Area to meet Core Strategy targets up to 2021. The SCAAP also provides additional policy criteria to guide and manage development proposals within Southend Central Area, complementing those established by the NPPF, Core Strategy and DMD. All Southend Development Plan Documents, listed above, will be subject to an early review as part of the Local Plan production. However, in relation to the point raised with regard to the hierarchy it considered that a minor modification to the

supporting text is proposed:

199. The foreshore is designated for International, ~~and~~ European, National and Local sites for nature conservation. Particularly relevant to the Central Seafront Policy Area are Benfleet and Southend Marshes (SPA, SSSI, ~~and~~ Ramsar site and Local Nature Reserve)....

200 ...All future activity and development will need to ensure that they do not adversely affect the interests of the nature conservation designations on the foreshore, giving appropriate weight to their importance as an international, European, national or locally designated sites.

Additional paragraph after 205: Developments which adversely affect a site of national importance (SSSI) will not normally be permitted. In cases where an adverse effect on the special interest of the SSSI is considered to be likely, but the benefits of the development are shown to clearly outweigh both the impacts on the special features of the site and any broader impact on the wider network of SSSIs, an exception may be made. Consultation will be required with Natural England to ensure reasonable steps are taken to

					<p>further the conservation and enhancement of the special interest features of the SSSI.</p> <p>Locally designated sites (local nature reserves and local wildlife sites), are non-statutory but have an important role to play in meeting overall biodiversity targets and contributing to the public enjoyment of nature conservation.</p>
	Policy DS4	Support	Natural England welcomes this policy requiring Flood Risk Assessments and the widespread adoption of SuDS techniques.		Noted.
	Policy DS4	Object	<p>Para 97</p> <p>We note that climate change appears in Policy DS4 as well as in other places throughout the document; the main focus of attention relates to Flood Risk management. Whilst we recognise the intentions of paragraph 97 with regard mitigation of climate change by tree planting, we would advise that the SCAAP include a separate Policy on climate change, to cover both mitigation and adaptation, in accordance with paragraphs 94 and 156 of the NPPF. This Policy could focus on measures to assist biodiversity to adapt, and include green infrastructure measures to assist people to adapt (principally to extreme high temperature events, extreme high/low rainfall events, and for coastal areas, sea level rise and extreme storm surge events). For example, using tree planting to moderate heat island effects and SuDS to address flooding. For more</p>	<p>Sound: Yes</p> <p>4(4) Consistent with National Policy</p>	<p>This is a substantive point that has not been raised in previous representations from Natural England on the SCAAP.</p> <p>The Council does not consider that an additional policy relating to climate change is necessary as this is addressed by the Development Management Document (Policy DM2 – Low Carbon Development and Efficient Use of Resources), Policy DM6 – The Seafront) and the Core Strategy (Policy KP2, KP3 and CP4).</p>

			information, see PPG on Climate Change .		
	Policy CS3	Object	Natural England draws your attention to our advice on 17 October 2011: “any new or enhanced marine facilities as referred to in point 1.b may potentially need to be restricted to seasonal usage if [there will be no unacceptable impact upon navigation, biodiversity, flood risk or the special character and designations]”. The seasonal restriction relates to avoidance of potential impacts on the interest features of Benfleet and Southend Marshes Special Protection Area / Ramsar in accordance with paragraph 118 of the NPPF.	<p>Sound: No 4(4) Consistent with National Policy</p> <p>We would recommend amending wording of this policy from “2. Proposals for waterfront development within the Central Seafront Area and improved facilities will need to demonstrate that there will be no unacceptable impact upon navigation, biodiversity, flood risk or the special character and designations of the area” to “2. Proposals for waterfront development within the Central Seafront Area and improved facilities will need to demonstrate that there will be no unacceptable impact upon navigation, the conservation objectives or features of Benfleet and Southend Marshes Special Protection Area, Ramsar and SSSI, flood risk or the special character of the area.</p>	Agree. In Policy CS3 point 2 delete the word ‘biodiversity’ and replace with the following: <i>‘Proposals for waterfront development within the Central Seafront Area and improved facilities will need to demonstrate that there will be no unacceptable impact upon navigation, biodiversity the conservation objectives or features of Benfleet and Southend Marshes Special Protection Area, Ramsar and SSSI, flood risk or the special character and designations of the area.’</i>
	Para 29 Strategic	Support	Point 10 Natural England supports the Objective 10	Sound: No	Noted.

	Objectives		“to enhance the quality of, and access to... natural environment and open spaces” as a means to relieve pressure on designated sites and to enhance local biodiversity and nature conservation through connection to the green grid.	None	
	Para 94 - 98	Object	<p>There is likely to be increased recreational and development pressures on designated international, European and nationally designated sites. While Natural England welcomes the inclusion of various measures of urban greening described in Policies: DS5, PA1, PA3, PA4, PA5, PA6, CS1, PA8, PA9, the Plan should include a strategic approach for networks of biodiversity and for green infrastructure. The SCAAP Consultation Draft Proposed Submission (2011) contained Policy PR1: Open Space Provision and the environment: a policy supported by Natural England. It contained a number of thematic-links: reducing recreational pressure on Benfleet and Southend Marshes SPA / Ramsar / SSSI and climate change mitigation within a framework of linking open spaces in the green grid. Every effort should be made to minimise the severance of green infrastructure. Therefore although we welcome the intention expressed in paragraph 96 to remedy the deficit of green spaces within the Town Centre within the relevant Policy Areas and Opportunity Sites, it is not clear that the approach described at paragraph 95 is consistent with the NPPF paragraphs 114 and 117. It is also not clear whether a robust and up-to-date assessment of the</p>	<p>Sound: No</p> <ol style="list-style-type: none"> 1. Natural England recommends the links between Policies DS5 and CS1 are strengthened to demonstrate clearly a strategic approach. One recommendation would be to overlay the ‘green grid’ map of Thames Gateway South Essex Green Grid Strategy on to the Policy Map, and also include a wider-level map (as was included on p62 of the SCAAP Consultation Draft Proposed Submission (2011)) to help demonstrate strategic approach. 2. We would advise that a check is undertaken as to what assessment of open space needs has been undertaken either as part of the SCAAP or in any connected strategic plan. We would recommend the inclusion of the analysis of the adequacy of open space provision for Essex in the evidence base. 3. We would also advise that the SCAAP DPD makes the distinction between natural greenspace and general open space provision, as well as distinguishing between formal and informal open 	<p>This was not raised in previous representations from Natural England, including in the response to the SCAAP Preferred Approach Document (2015).</p> <ol style="list-style-type: none"> 1. It is not considered that inclusion of the green grid map or its overlay on the policies map would be appropriate for the SCAAP at this late stage in the plan production. The green grid map includes limited detail for Southend Central Area, providing more of a strategic overview and Borough wide detail, and this will be taken forward through the new Southend Local Plan. Furthermore, the SCAAP Policies Map outlines Protected Green Space and New/ Improved Open Space, which broadly reflects the green grid, as well as providing more detail on protected and areas proposed for new open space in the Central Area. 2. As discussed, and highlighted above, through the production of its new Local Plan, the Council will be reviewing planning policy documents (including the SCAAP)

			needs for open space, and opportunities for new provision has been undertaken, in accordance with paragraph 73 of the NPPF. Natural England has an Accessible Natural Greenspace Standard and has produced an analysis of the adequacy of open space provision for Essex, with details for each district.	space.	and the associated evidence base. Early discussions are being held with South Essex authorities in regard to the production of a joint evidence base study relating to open space and playing pitches. The Council has also recently published its Parks and Green Space Strategy 2015-2020 which provides a measure of the quality and quantity of those facilities currently available, identifies areas of deficiency and opportunity, and sets out a template for the future of green space within the Borough. It is considered that there is adequate consideration in the SCAAP of this matter. 3. It is not considered that further distinction is required within the SCAAP between formal and informal open space and this is a matter that can be considered during the preparation of the New Local Plan.
	Policies Map	Object	Nature Improvement Areas (NIA) are fundamental to the step-change needed to establish a coherent and resilient ecological network. Policies should ensure that any development affecting the Greater Thames Marshes NIA should be compatible with their purpose and make a positive contribution to NIA enhancement (using CIL/S106 agreements/conditions as appropriate). For information on NIAs see	Sound: No Natural England advise that the Greater Thames Marshes NIA is included in the Plan Policy Map.	This point has not been raised previously in consultation responses from Natural England on the SCAAP. On balance, it is considered that the SCAAP Policies Map includes detail of a wide range of relevant designations, and that inclusion of the NIA on the policies map is not necessary at this late stage.

			here.		
	HRA 25 - 26	Support	<p>We note that the Habitat Regulations Assessment -Screening Report (draft) dated June 2016 is still described as a Scoping Report. It is in fact a Screening Report - as previously advised on 26 January 2016 (our ref 174743) and 19 August 2016 (our ref: 191786). We note that the data presented in Table 1 - Conservation Objectives and Designated Features of European Sites on the Condition of the SSSIs has now been updated to accurately reflect the current condition of these sites. We also welcome the inclusion of the Southend-on-Sea Shoreline Strategy Plan following our advice of 26 January 2016.</p> <p>Several of the Policies may result in additional development and/or intensification close to the European sites (particularly Benfleet and Southend Marshes SPA and Ramsar site).</p> <p>Notwithstanding this, Natural England is generally supportive of the HRA 'Scoping Report' and concurs with its conclusions that "the SCAAP, in conjunction with the Southend on Sea Core Strategy and related documents, will not have a significant effect on European sites".</p> <p>NOTE The Thames Estuary 2100 Project table showing the Recommended Preferred Options for PMU Action Zones 8 & 6 contains duplicated information (pp 43-45 of the pdf).</p>		Noted

Date: 10 February 2017
Our ref: 207921
Your ref:



Amy Roberts, Senior Planner, Strategic Planning

████████████████████
BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Amy,

Revisions to Southend Central Area Action Plan

Thank you for your email regarding Natural England’s consultation response of 14 December 2016 (our ref 200678). We found this email and specifically the attachment titled *SBC response to Natural England on Southend Central Area Action Plan (SCAAP) revised proposed submission document (2016)* (hereafter “SBC response to NE”) helpful in describing the present situation and context of the Southend Central Area Action Plan (SCAAP), together with current thinking and developments regarding assessment of greenspace provision in the borough.

We note that the new Local Plan (with a review of the Core Strategy DPD, Sustainability Appraisal scoping opinion and a first round of consultation) is at an early stage of preparation. We recognise that the Core Strategy was adopted in December 2007 – prior to the National Planning Policy Framework (NPPF) - and that it will be reviewed as part of the new Local Plan. In our previous consultation response we are not advocating substantive amendments to either the already adopted Core Strategy DPD and Development Management Document, rather we are providing advice to ensure that the SCAAP is compliant with the NPPF. We have already discussed that a number of our comments were made as ‘Object’ (on the basis that the only two available options were Support or Object) and these can now be proposed as ‘Comment’.

Natural England supports all of the minor modifications that are proposed, and we withdraw our previous Objections to Policies. This letter revises our position specifically on Objections and replaces our previous representation on these matters only. Our other comments and support for policy wording still remains.

Minor modifications

We support all of the suggested wording as minor modifications as given in the document titled *Southend Central Area Action Plan Schedule of Suggested Amendments to be considered during examination of the Southend Central Area Action Plan (DRAFT – including responses relating to Natural England rep only) (Proposed as factual updates or in response to Representations)*, dated February 2017.

Detail on withdrawal of Objection and summary of Natural England’s position

1. To which part of the document does this representation relate?	Policy CS1: Central Seafront Policy Area Development Principles.
2. Do you?	Support
Summary of our position	
Natural England supports the inclusion of the new wording and in Policies CS1.1.f and CS1.3.d and	

we **withdraw our Objection** to the Policy CS1 on basis of soundness.

We agree with your assessment that Policy CS1.1.i.ii together with Policies (e.g. Policy KP2 of the Core Strategy) should satisfy our concerns that *“future proposals to alter the structure (such as undertaking work to deck timbers), or widening the pier (as recently considered in order to facilitate a transport system) would have the potential to impact on the designated site”* and we withdraw our previous suggested additional wording for Opportunity Site CS1.1 Southend Pier.

1.To which part of the document does this representation relate?	Policy CS2: Nature Conservation and Biodiversity
2. Do you?	Comment
Summary of our position	
We support the additions and amendments at paragraphs 199, 200 and those to follow paragraph 205 regarding the significance of the nationally designated sites (SSSIs), and the addition of the avoidance, mitigation and compensation hierarchy into Policy CS2.1.b and the additional wording in Policy CS3.2.	
We note that you have decided not to include our recommended wording <i>“The weight accorded to an asset will reflect its status in the hierarchy of biodiversity and geodiversity designations”</i> and wording related to net biodiversity gain. These are recommended in compliance with NPPF paragraph 132, and in paragraphs 9 and 109 respectively.	
Having reviewed the Core Strategy (2007) with regards the hierarchy of designated sites, we recognise that the Core Strategy was adopted before the NPPF and cannot be amended.	
We withdraw our Objection to the Policy CS2 on basis of soundness.	

1.To which part of the document does this representation relate?	Policy DS4: Flood Risk Management and Sustainable Drainage. Paragraph 97
2. Do you?	Comment
Summary of our position	
We note your comments regarding climate change. We recommend that the new Local Plan preparations review references to climate change mitigation and adaptation, and draw your attention to our previous advice that the <i>“Policy could focus on measures to assist biodiversity to adapt, and green infrastructure measures to assist people to adapt (principally to extreme high temperature events, extreme high/low rainfall events, and for coastal areas, sea level rise and extreme storm surge events).”</i>	
We withdraw our Objection to the Policy DS4.	

1.To which part of the document does this representation relate?	Policy CS3: The Waterfront.
2. Do you?	Support
3. Do you consider the document is: 3(2) Sound?	Yes
Summary of our position	
We support the additions and amendments at paragraphs 199, 200 and to follow paragraph 205 regarding the significance of the nationally designated sites (SSSIs) and the addition of the avoidance, mitigation and compensation hierarchy into Policy CS2.1.b and the additional wording in Policy CS3.2.	
We withdraw our Objection to the Policy CS3 on basis of soundness.	

1.To which part of the document does this representation relate?	Paragraphs 94 – 98 (Open and Green Spaces)
2. Do you?	Comment

Summary of our position

We note that the Council has produced a *Parks and Green Space Strategy 2015-20*. This Strategy includes reference to our [Accessible Natural Greenspace Standard](#) (ANGSt). We welcome the inclusion of ANGSt principles. We note from this Strategy that a standard of one hectare of public open space per 1000 people is set, although “*approximately one third of the borough doesn’t meet the standard due to dense population*”.

We understand from the *SBC response to NE* that “*Early discussions are being held with South Essex authorities in regard to the production of a joint evidence base study relating to open space*”. We advise that this evidence base study for the new Local Plan, future assessment and consequent provision makes the distinction between natural greenspace provision and general open space.

Therefore considering the stage of SCAAP production, and the proxy of the Policies Map to the green grid map and the recent Strategy we **withdraw our Objection** to paragraphs 94 - 98.

NOTE: We draw your attention to a suspected typo on p25 in the *Parks and Green Space Strategy* regarding area where 0.02ha and 0.2ha are both described.

1.To which part of the document does this representation relate?	Policies Map
2. Do you?	Comment

Summary of our position

We would advise that the Council explore the opportunities that the new Local Plan can provide in support of the objectives of the [Greater Thames Marshes Nature Improvement Area](#); We note that this NIA has produced [suggested wording for Local Plans](#).

We **withdraw our Objection** to Policy Map.

We welcome further information on the time-scale for new Local Plan this when available. For any queries relating to the specific advice in this letter only please contact me on [REDACTED] For any new consultations, or to provide further information on this consultation please send your correspondences to [REDACTED]

Yours faithfully

Steve Roe
Lead Adviser – Land Use Planning
West Anglia Area Team

SBC response to NHS Southend CCG on Southend Central Area Action Plan (SCAAP) revised proposed submission document (2016)

1. Context

- 1.1 The SCAAP is at an advanced stage and is considered to be an important catalyst and driver for investment and for the delivery of the remaining proportion of regeneration and growth in the Southend Central Area to meet the adopted Core Strategy targets up to 2021. The SCAAP also provides additional policy criteria to guide and manage development proposals within Southend Central Area, complementing those policy criteria established by the National Planning Policy Framework (NPPF), Core Strategy and Development Management Document.
- 1.2 The SCAAP is supported by the Development Management DPD (2015) and CIL Charging Schedule (2015). Southend Infrastructure Delivery Plan (IDP) is another supporting document for the SCAAP and Core Strategy and covers the remaining plan period to 2021. The IDP sets out the infrastructure required in the Borough. The IDP identifies infrastructure requirements for Health, based on supporting evidence provided by NHS Property Services (Essex), arising from planned growth within Southend, identifying additional (developer funded) healthcare provision, principally focussed on GP related medical services and supporting community health services.
- 1.3 The SCAAP (2016) draws reference to the IDP in Section 4.12, highlighting the identified need for new and enhanced GP floorspace provision in the Central Area. This is taken forward in the Queensway (PA4), Warrior Square (PA5) and Victoria Gateway Neighbourhood (PA8) Policy Areas, which promote the provision of community infrastructure, including health facilities. The policies are not overly prescriptive in terms of the type or size of facilities, more so providing an indication of the areas in which there may be potential for relevant facilities to be brought forward. This does not preclude development of health facilities elsewhere in the Southend Central Area, and any development proposal would be considered on its merits.
- 1.4 The SCAAP will be subject to an early review as part of the preparation of the new Southend Local Plan as set out below. A new Southend Local Plan is at an early stage of production with Sustainability Appraisal scoping opinion and a first round of consultation due later this year. The Local Plan will establish new definitive housing and employment growth targets and supporting infrastructure for the next 15 to 20 years. A number of evidence base studies are being produced to support the preparation of the Local Plan, including: Economic Development Needs Assessment, Strategic Housing Market Assessment, Strategic Retail Assessment, and Strategic Flood Risk Assessment. This evidence base is primarily being undertaken at a strategic level, working cooperatively with neighbouring authorities in South Essex.

2. Southend Central Area Action Plan – NHS Representations

2.1 This section provides a review of the representations made by the NHS to the various consultation stages of the Southend Central Area Action Plan (SCAAP). There have been four stages of consultation on the SCAAP, each is addressed in turn below:

2.2 **SCAAP Issues and Options (2010)** – no representation made by NHS.

2.3 **SCAAP Proposed Submission (2011)** – no representation made by NHS.

2.4 **SCAAP Preferred Approach (2015)** – no representation made by NHS.

2.5 **SCAAP Revised Proposed Submission (2016)** - representation made by NHS Southend CCG. This representation is set out in Table1 below together with the response from Southend Borough Council.

Table 1: NHS Representation to SCAAP Revised Proposed Submission (2016) with Council response

Respondent	Mr Ian Ross (NHS Southend CCG)
Full Submission	<p>It is not clear if the inclusion of new health facilities is on the basis of discussions with NHS England or the NHS Southend CCG, or indeed based on health need analysis.</p> <p>Any new infrastructure will need to form part of commissioning plans and go through appropriate governance process. All proposals for new primary care facilities are subject to NHS England prioritisation and approval process.</p> <p>Through its operational plans and general practice forward view plan and the STP (Sustainability & Transformation Plan), NHS Southend CCG has set out its vision for local health service in the future.</p> <p>These changes need to be factored into any potential development plans Southend Borough Council has especially when it relates to new estate and the delivery of primary and community care. There are a number of initiatives planned and being implemented which should be considered before the council finalises any development plans as they will potentially have a major impact on services and how patients access those services, some of which will include;</p> <ul style="list-style-type: none"> • Our integrated health and social services including the new complex care coordination service, which will improve the care of people with frailty in the community and at home. • The development of our four localities in Southend, with the long term vision being an integrated approach to the delivery of health and social

				<p>care needs of the population. This includes more services being delivered in the community and the development of primary care at scale, where populations of 40,000 to 60,000 residents can be served.</p> <ul style="list-style-type: none"> • It should also be noted that Southend is part of the 'Mid and South Essex Success Regime' footprint; this project will have an impact on how health services are delivered in the future and will include the three acute hospitals in this footprint working closely in partnership. • In addition, there are also a number of Public Health considerations including the impact the high number of fast food restaurants can have on the general health of the population where over 23% of adults are already classified as obese. 	
					Council Response
Rep	15	2515	Comment	<p>It is not clear if the inclusion of new health facilities is on the basis of discussions with NHS England or the NHS Southend CCG, or indeed based on health need analysis.</p> <p>Any new infrastructure will need to form part of commissioning plans and go through appropriate governance process. All proposals for new primary care facilities are subject to NHS England prioritisation and approval process.</p> <p>Through its operational plans and general practice forward view plan and the STP (Sustainability & Transformation Plan), NHS Southend CCG has set out its vision for local health service in the future.</p> <p>These changes need to be factored into any potential development plans Southend Borough Council has especially when it relates to new estate and the delivery of primary and community care. There are a number of initiatives planned and being implemented which should be</p>	<p>The SCAAP seeks to bring forward the delivery of the remaining proportion of planned regeneration and growth in the Central Area in order to meet the established Core Strategy targets to 2021. The Southend Infrastructure Delivery Plan (IDP) sets out the infrastructure required in the Borough. The IDP is a supporting document for the Southend Core Strategy and covers the remaining plan period to 2021.</p> <p>The IDP identifies infrastructure requirements for Health, based on supporting evidence provided by NHS Property Services (Essex), arising from planned growth within Southend, identifying additional (developer funded) healthcare provision, principally focussed</p>

			<p>considered before the council finalises any development plans as they will potentially have a major impact on services and how patients access those services, some of which will include;</p> <ul style="list-style-type: none"> • Our integrated health and social services including the new complex care coordination service, which will improve the care of people with frailty in the community and at home. • The development of our four localities in Southend, with the long term vision being an integrated approach to the delivery of health and social care needs of the population. This includes more services being delivered in the community and the development of primary care at scale, where populations of 40,000 to 60,000 residents can be served. • It should also be noted that Southend is part of the 'Mid and South Essex Success Regime' footprint; this project will have an impact on how health services are delivered in the future and will include the three acute hospitals in this footprint working closely in partnership. 		<p>on GP related medical services and supporting community health services.</p> <p>The SCAAP draws reference to the IDP in Section 4.12, highlighting the identified need for new and enhanced GP floorspace provision in the Central Area. This is taken forward in the Queensway (PA4), Warrior Square (PA5) and Victoria Gateway Neighbourhood (PA8) Policy Areas, which promote the provision of community infrastructure, including health facilities.</p> <p>It is therefore not considered that further work is necessary at this stage in the production of the SCAAP. The new Southend Local Plan will contain an overall vision for the Borough of Southend and put in place a new strategy for delivering growth and regeneration that meets the needs of local people, including a consideration of the needs of infrastructure provision, including health</p>
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				<ul style="list-style-type: none">• In addition, there are also a number of Public Health considerations including the impact the high number of fast food restaurants can have on the general health of the population where over 23% of adults are already classified as obese.		facilities.
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Correspondence from NHS Southend CCG

From: [REDACTED]
Sent: 09 March 2017 12:38
To: Amy Roberts
Subject: Southend representation

Hi Amy

Just to confirm that Southend CCG is happy with the response from the council regarding its SCAAP representation, following consultation with our primary care committee members. We look forward to working with the council in developing local plans in the future.

Kind regards
Sadie

Sadie Parker
Associate Director of Primary Care and Engagement
Primary Care and Engagement Team

[REDACTED]



Working together for a healthy Southend



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From: Dawn Jeakings [REDACTED]
Sent: 07 March 2017 11:47
To: Mark Sheppard
Cc: [REDACTED]
Subject: BID - SCAAP Response

Mark

As discussed I would like to point out that the first and third points from the paragraph below are not the sentiment from the majority of the BID Board.

Changes to the Plan

The scaap should be written again to include;

- A strategy to increase parking stock in the central area by 25% over the next 4 years
- Necessary infrastructure improvements to be made to sustain the planned growth of residential units and jobs in the area
- A freeze on sustainable transport routes such as bus lanes, cycle routes and pedestrian priority routes due to the importance of the car to the economy of the high st. and seafront
- A CPS that is based on accurate car parking data, covering the entire parking stock of publicly available spaces and using surveys that have been done in peak periods, ie warm sunny conditions in the summer holidays.
- The report produced by SK architects for the BID should be given higher priority and used to influence the economic and transport sections of the dpd.

Regards

Dawn Jeakings Dip SCM

Centre Manager



The Royals Shopping Centre
High Street
Southend-on-Sea
Essex
SS1 1DG

[REDACTED]
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Appendix 3: Schedule of Suggested Amendments to the SCAAP to be considered at Examination

The table below sets out the schedule of post-publication suggested amendments to the SCAAP Revised Proposed Submission document:

Ref	Page	Paragraph / Policy	Suggested Amendment	Justification	In response to (reference)
SA1	7	7	<p>Amend paragraph as follows, add footnote and update numbering of all subsequent footnotes: It is also acknowledged that further work has been jointly undertaken to establish an objectively assessed need⁴, in terms of jobs and housing, for Southend and surrounding housing market area. This will be a key evidence document in the preparation of the Southend Local Plan, which will set out new long term growth targets replacing those of the adopted Southend Core Strategy, including a review of unimplemented development sites within the SCAAP.</p> <p>4 Strategic Housing Market Assessment covering Basildon, Castle Point, Rochford, Southend-on-Sea and Thurrock authorities.</p>	To clarify with which local authority partners the jointly undertaken study of objectively assessed need has been undertaken with.	Mr Ron Woodley (BERA) Rep No. 2578
SA2	8	Context and Issues for the Southend Central Area (e)	<p>Amend (e) as follows: e. Tourism, Culture, Leisure and Recreation - Southend has a vibrant offer in terms of leisure, tourism and cultural facilities, enhanced in recent years by a number of successful new developments in the town centre and central seafront area. However, there is opportunity to further maximise Southend's potential as a visitor destination and resort, particularly in terms of the evening economy and through encouraging overnight and longer stays by building on the resort's success as a day visitor destination, and by creating a positive experience of the central area for visitors.</p>	To clarify and emphasise the important role of day visitors to the local economy.	RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group Rep. No. 2832 Mr Michael Thwaites Rep. No.2534
SA3	14	32	<p>Amend paragraph as follows: The SCAAP establishes Policy Areas which, to varying extents, take on a new mixed-use sustainable character. Development within these Policy Areas will be appropriate to their context, either seeking to strengthen the existing competitive advantage of current uses, encourage a greater mix of uses or defining new roles, whilst protecting and enhancing its heritage assets, contributing to the regeneration of the identified opportunity sites as well as Southend Central Area as a whole.</p>	To recognise the importance of the local historic environment in terms of its ability to influence future development.	Milton Conservation Society (Mr Andy Atkinson) Rep No. 2477
SA4	17	43	<p>Amend paragraph as follows: The retail sector is crucial to the health of the local economy in terms of its attraction to visitors, business and investment. The changing nature of the 'High Street, facing competition from internet</p>	To emphasise the need to upgrade retail	Mr Ron Woodley (BERA) Rep No. 2581

Ref	Page	Paragraph / Policy	Suggested Amendment	Justification	In response to (reference)
			shopping, out-of-town retail parks and neighbouring centres, has impacted the level of trading in the Town Centre, and the quality of provision . There is consequently there is a need to upgrade , enhance and broaden its offer and function to possibly further include other complimentary uses. The effective promotion and marketing of the town centre to potential new investors will be crucial to this process .	provision and to highlight the importance of promotion and marketing in this process.	
SA5	18	48	Amend paragraph as follows: It is also important to understand that Southend's town centre is perpendicular and well connected to the central seafront area. The central seafront area represents an important visitor destination in its own right, comprising a range of tourism and leisure uses, which together with the town centre supports a wider multifunctional Central Area within Southend that offers a unique and diverse visitor/ shopper experience.	To emphasise the role of tourism in the central seafront area.	RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group Rep. No. 2838
SA6	21	Policy DS1.2	Amend Policy DS1.2 as follows: New retail development should be well integrated and closely linked with the Town Centre Primary Shopping Area, as defined on the Policies Map, in terms of proximity, continuity of function and ease of access. The Council will promote the town centre in seeking to upgrade and diversify its offer .	To highlight the importance of promotion and marketing.	Mr Ron Woodley (BERA) Rep No. 2581
SA7	23	58	Amend 3 rd sentence of paragraph as follows: While tourism remains a central pillar of Southend's employment base and has potential for growth , the creative and cultural sectors, aviation and medical technologies are all growing and also offer further potential for growth in the future.	To emphasise the potential for growth in the local tourism economy	RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group Rep. No. 2839
SA8	25	72	Amend paragraph as follows: The Core Strategy requires at least 2,474 ^[9] net additional new dwellings to be provided within Southend Central Area during the period from 2001 to 2021. According to the Southend Annual Monitoring Report (AMR), between 2001 and 2016, 1,087 dwellings have been built within the Southend Central Area. An additional 1,732 net dwellings have been identified through Opportunity Sites and 1,040 of these have planning permission as of 1 April 2016. A further 434 425 dwellings have been identified by outstanding planning permissions located outside of the opportunity sites and are predicted to be delivered by 2021, see table 1 below.	Factual update to reflect AMR 2016.	Southend Borough Council – factual update to reflect AMR 2016.
SA9	26	Table 1	Amends Table 1 as follows: Table 1: The Scale of new Residential Development to be delivered by 2021	Factual update to reflect AMR 2016.	Southend Borough Council – factual update

Ref	Page	Paragraph / Policy	Suggested Amendment				Justification	In response to (reference)
			SCAAP Policy Area	Net additional dwellings identified in Opportunity Sites (of which committed)	Other committed at 1 April 2016 (net)	Total		
			PA1: High Street	n/a	171	171	to reflect AMR 2016.	
			PA2: London Road	n/a	1	1		
			PA3: Elmer Square	0	73	73		
			PA4: Queensway	380 (8)	0	380		
			PA5: Warrior Square	n/a	16	16		
			PA6: Clifftown	n/a	57 48	57 48		
			PA7: Tylers	150	4	154		
			CS1: Central Seafront	278 (278)	4	282		
			PA8: Victoria Gateway Neighbourhood	782 (662)	39	821		
			PA9: Sutton Gateway Neighbourhood	142 (92)	69	211		
			TOTAL	1,732 (1,040)	434 425	2,166 2,157		
			<i>Committed = with planning permission or prior approval</i>					
SA10	28	84	<p>Amend paragraph as follows: This Plan seeks to celebrate <u>promote</u> heritage and to conserve and enhance Southend Central Area's heritage assets in a manner appropriate to their significance, with the emphasis on high quality design in all development proposals. Heritage assets <u>contribute to the character of the town and are an important reminder of the town's history and identity. They are also</u> an important component of the tourist economy and play a crucial role in the identity-making. Development Management Document Policy DM5: Southend-on-Sea's Historic Environment sets out the local approach to the management of the historic environment within the Borough.</p>					To clarify the term 'celebrate heritage' to emphasise the importance of heritage assets for the tourist economy and identity-making.
SA11	29	87	<p>Amend paragraph as follows: There are a number of Conservation Areas within the Central Area, as depicted on the Policies Map, <u>which contribute to its character and identity.</u> These include: Prittlewell, Eastern Esplanade, The Kursaal, Clifftown, and Warrior Square. Each has its own unique character which must be conserved and enhanced, <u>and consideration given to the contribution made by its setting.</u></p>				To emphasise the role Conservation areas play in contributing to the character	Milton Conservation Society (Mr Andy Atkinson) Rep No. 2479

Ref	Page	Paragraph / Policy	Suggested Amendment	Justification	In response to (reference)
				and identity of the area.	
SA1 2	36	111	Amend first sentence of paragraph as follows: To address this, the Essex and South Suffolk Shoreline Management Plan (2010) and Thames Estuary 2100 Plan establish es an approach to hold the existing line of flood defence within the Central Area, which includes taking account of the effects of climate change.	To strengthen this section by including reference to the Thames Estuary 2100 Plan.	Mr Martin Barrell (Environment Agency) Rep. No. 2611
SA1 3	38	118	Amend paragraph as follows: SuDS should be designed in accordance with the National Standards for Sustainable Drainage Systems (December 2011) Non-statutory technical standards for sustainable drainage systems (2015) and guidance in the SuDS Manual (2007) (2015) published by Construction Industry Research and Information Association (CIRIA).	To update references.	Mr Martin Barrell (Environment Agency) Rep. No.2605
SA1 4	47 - 48	Map 4, Map 5	Update Map 4 and Map 5 to reflect key visitor car parks in Southend Central Area. Refer to Appendix A	To emphasise the key visitor car park only and to provide consistency with Policy DS5.2.b	Southend Borough Council
SA1 5	41	129	Insert after the first sentence of paragraph 129, the following: Improving signage will aid way-finding, promote ease of movement through Southend Central Area= <u> and should encourage more linked trips, highlighting linkages between the town centre and central seafront area, as well as between Southend Central Railway Station, Southend Victoria Railway Station and bus interchange, and the travel centre. They will also aid drivers in finding the most appropriate car park for their journey purpose and inform them of the availability of spaces. This will be particularly important for visitors to the town unfamiliar with the local road system. Map 5: SCAAP Public Transport shows the public transport network within Southend Central Area.</u>	To emphasise the importance of quality signage as part of traffic management improvements	RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group Rep. No. 2843
SA1 6	42	136	Amend bullet point 1 of paragraph 136 as follows, and update numbering of all subsequent footnotes: <ul style="list-style-type: none"> ensure there is no net loss in car parking to the south of the Central Area (for the purposes of Policy DS5.2.b, these are the key visitor car parks^[13] located within 10 minutes' walk of the shoreline and generally located south of the central railway line), and to maintain overall capacity at a level that supports the vitality and viability of the SCAAP area, and enables the delivery of relevant Opportunity Sites; 	To provide further clarity on the key visitor car parks to which the policy applies.	RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group Rep. No. 2849;

Ref	Page	Paragraph / Policy	Suggested Amendment	Justification	In response to (reference)										
			¹³ Key visitor car parks within 10 minutes' walk of the shoreline, as surveyed in the Car Parking Study (November 2016) and reviewed in Topic Paper 1: Parking and Access (March 2017), are comprised of: Eastern Esplanade (67 spaces), Alexandra Street (74 spaces), Fairheads (211 spaces), Seaway (478 spaces), Shorefield (125 spaces), The Royals Shopping Centre (426 spaces), Western Esplanade central (585 spaces), Western Esplanade east section (128 spaces), Clarence Road (126 spaces), Tylers (249 spaces), York Road (93 spaces).		Mr Michael Thwaites Rep. No.2534; Carter Jonas LLP (Matthew Hare) on behalf of Turnstone Southend Ltd Rep. No. 2625										
SA17	45	Policy DS5.2.b	Amend Policy DS5.2.b as follows: b. Ensure that there is no net loss in car parking** to the south of the Southend Central Area; ** Key visitor car parks within 10 minutes' walk of the shoreline, as surveyed in the Car Parking Study (November 2016) and reviewed in Topic Paper 1: Parking and Access (March 2017),, are comprised of: Eastern Esplanade (67 spaces), Alexandra Street (74 spaces), Fairheads (211 spaces), Seaway (478 spaces), Shorefield (125 spaces), The Royals Shopping Centre (426 spaces), Western Esplanade central (585 spaces), Western Esplanade east section (128 spaces), Clarence Road (126 spaces), Tylers (249 spaces), York Road (93 spaces).	To provide further clarity on the key visitor car parks to which the policy applies.	RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group Rep. No. 2849; Mr Michael Thwaites Rep. No.2534; Carter Jonas LLP (Matthew Hare) on behalf of Turnstone Southend Ltd Rep. No. 2625										
SA18	64	Policy PA4.3	<p>Amend table as follows:</p> <table border="1"> <thead> <tr> <th>Site Reference</th> <th>Site Name</th> <th>Planning Status*</th> <th>Indicative number of dwellings</th> <th>Timescale for delivery Other potential use classes</th> </tr> </thead> <tbody> <tr> <td>PA4.1</td> <td>'Better Queensway' Project</td> <td>NA</td> <td>1200**</td> <td>D1, A1, A3</td> </tr> </tbody> </table> <p><i>*Planning Status as of April 2016. NA = New Allocation</i> <i>**Half of site assumed to be delivered during SCAAP plan period (i.e. by 2021)</i></p>	Site Reference	Site Name	Planning Status*	Indicative number of dwellings	Timescale for delivery Other potential use classes	PA4.1	'Better Queensway' Project	NA	1200**	D1, A1, A3	To provide for consistency with policy provisions and appropriate definitions.	Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd Rep. No. 2644
Site Reference	Site Name	Planning Status*	Indicative number of dwellings	Timescale for delivery Other potential use classes											
PA4.1	'Better Queensway' Project	NA	1200**	D1, A1, A3											
SA19	69	183	Amend last sentence of paragraph 183 as follows: It contains a fragmented area of office blocks, Southend Travel Centre (the Town Centre public transport interchange), public surface level car parking at Tylers Avenue , and residential streets. It also contains an important surface level car park for shoppers and visitors to this part of the town.	To emphasise the importance of this site serving as a	RPS Planning & Development (Mr Nick Laister) on										

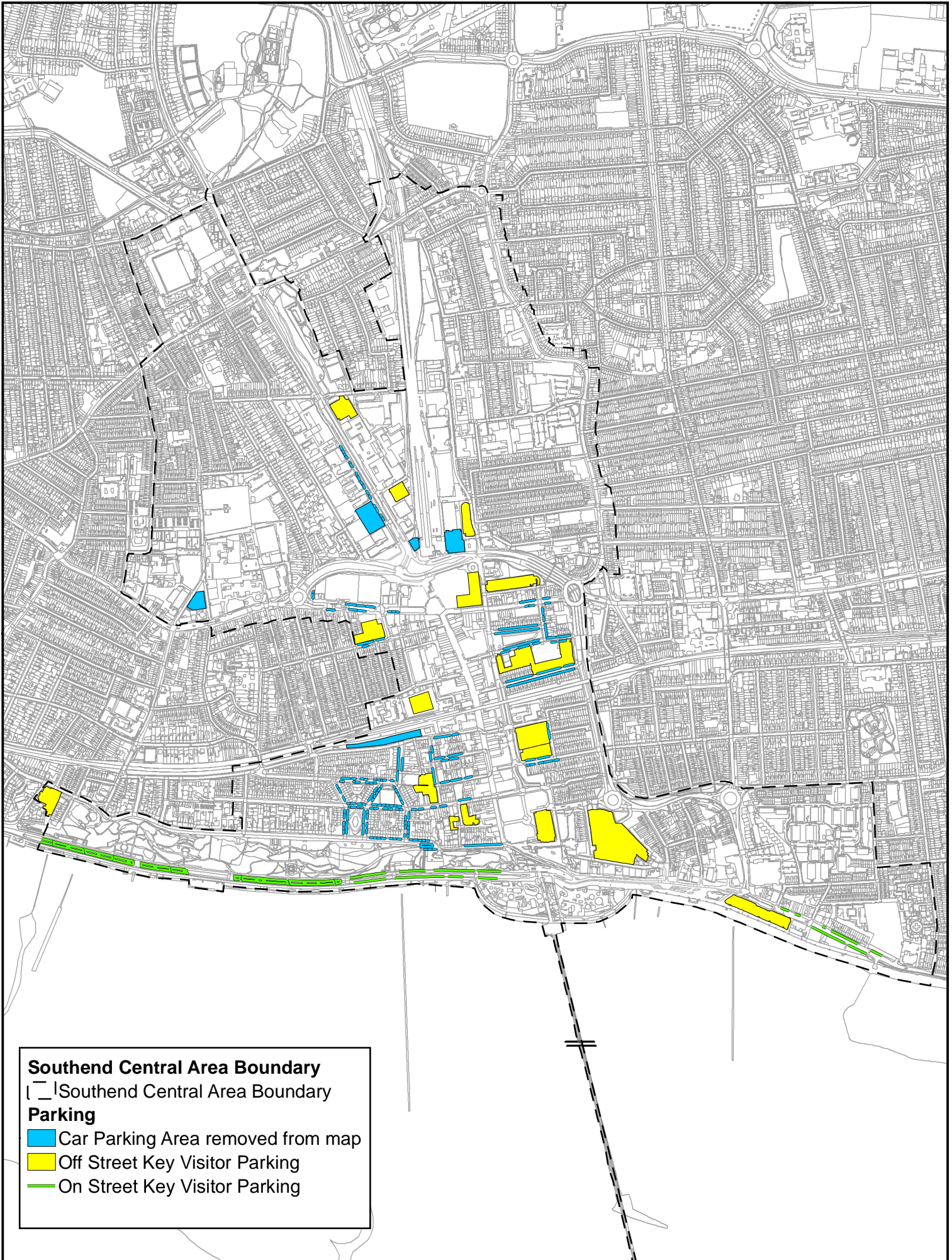
Ref	Page	Paragraph / Policy	Suggested Amendment	Justification	In response to (reference)
				car park for the South Central Area.	behalf of Stockvale Group Rep. No. 2861
SA20	72	Central Seafront Policy Area: Aims	Add to Aims at end of paragraph 3, as follows: There will be seamless transition between the Central Seafront and the town centre. New and enhanced access points will create a network of routes that lead seamlessly to the estuary and foreshore from surrounding areas. This will increase permeability and encourage better functional links between the different policy areas, increasing footfall and opportunities to contribute towards the local economy. Car parking will be addressed within this integrated approach to development, which combines with other objectives for the policy area, and contributes to the vitality and viability of the central seafront area.	To emphasise the importance of maintaining and enhancing car parking in this locality	RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group Rep. No. 2863
SA21	72	187	Amend paragraph as follows: The Central Seafront Policy Area, as defined on the Policies Map, is a thriving leisure and tourism area and with over 6 million day visitors a year, it is a significant economic asset to the town. The area's resort function will be maintained and enhanced through a co-ordinated programme of quality development and transport and environmental enhancement schemes. [create new paragraph and update numbering of subsequent paragraphs]: Although the Pier Lift, a landmark building (Policy DS3) has helped to improve access between the Central Seafront Policy Area and Town Centre, if access was more straightforward and more pronounced in other locations such as Opportunity Site CS1.2 Seaways, there may be a better exchange of visitors between the Central Seafront and Town Centre and their functions. Its regeneration and successful integration with the town centre through improved and enhanced pedestrian links amongst other things, will therefore be key to increasing footfall and improving the areas vitality and viability.	To emphasise the importance of day visitors to the local tourism economy.	Mr Michael Thwaites Rep. No.2534
SA22	73	191	Amend paragraph as follows: In respect to leisure and tourism the Central Seafront draws in residents and visitors for a range of activities including use of the beach, water sports and other seafront attractions. Adventure Island is a major tourism asset to Southend, but its physical form tends to be inward looking and isolated from its urban context. It also obscures esplanade level views and routes to the sea. If redevelopment and expansion does occur options should be explored with the owners how changes within the site could simultaneously benefit the public realm around it by creating a more permeable boundary and incorporating active frontages to increase footfall around the site edges.	To clarify that whilst permeability of the site is desirable it is not critical to the design objectives of this area.	Mr James Gibb Rep. No. 2527
SA23	73	195	Amend paragraph as follows: Seaways, currently a surface level car park , presents a major opportunity for mixed-use development, contributing to the leisure and cultural and tourism offer of Southend Central Area through the	To emphasise the role the site plays in	RPS Planning & Development (Mr Nick

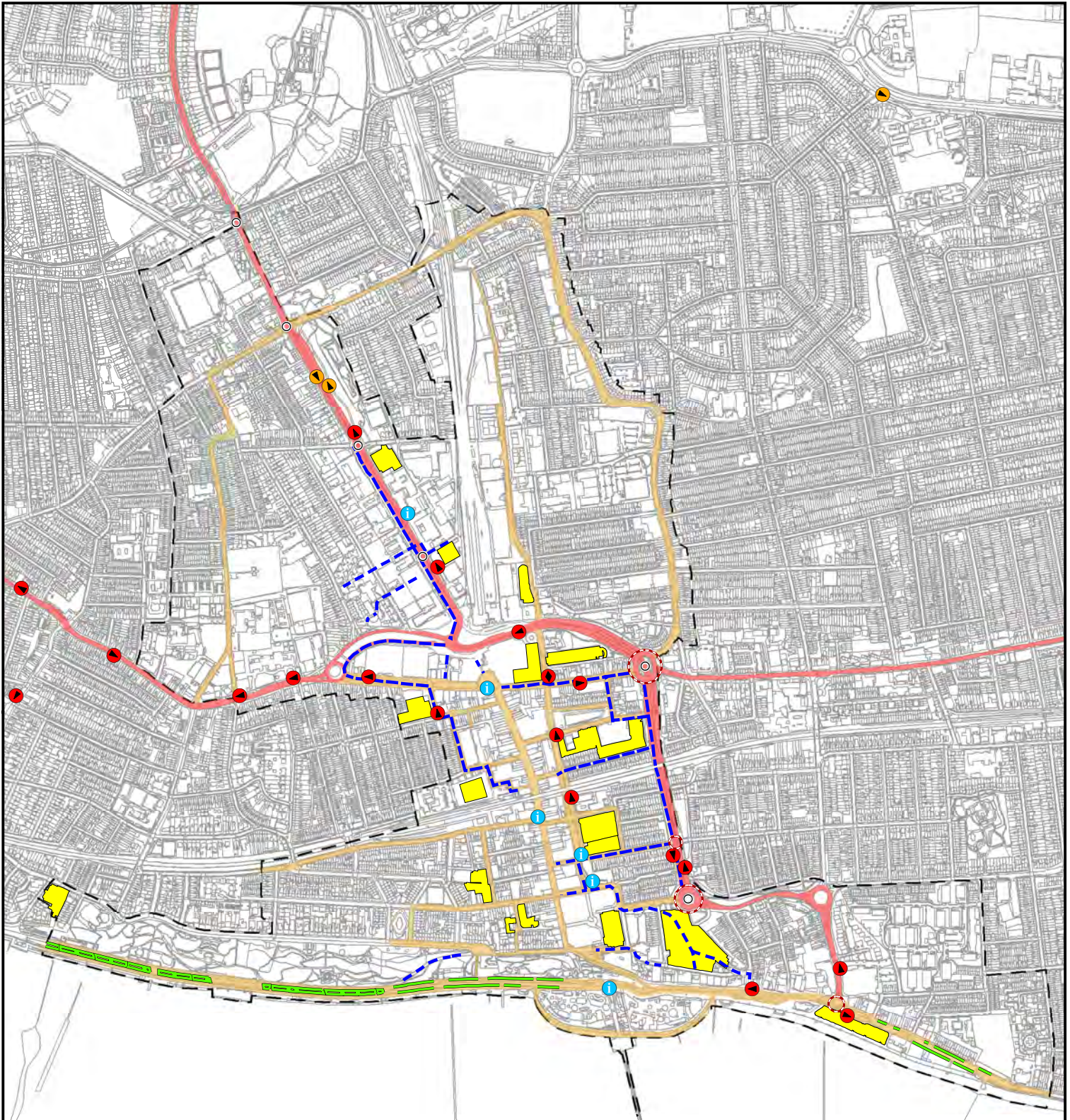
Ref	Page	Paragraph / Policy	Suggested Amendment	Justification	In response to (reference)
			<p>provision of uses such as restaurants and cinema, as well as possibly a hotel or residential, car parking, public open and green spaces, improved access and connectivity through the creation of 'Spanish Steps' linking this opportunity site to the promenade of Marine Parade, as well as possibly a hotel or residential.</p>	<p>providing opportunities for improving the tourism offer in this locality and the importance of the site in providing for car parking provision to meet the needs of the leisure and tourism functions of the area.</p>	<p>Laister) on behalf of Stockvale Group Rep. No.2864</p>
SA2 4	74	Policy CS1.1.f	<p>Amend Policy CS1.1.f as follows: f.seek to maintain foreshore views by restricting <u>not normally permit</u> development south of the sea wall <u>where a proposal has the potential to adversely affect a European site or cause significant harm to a Site of Special Scientific Interest (SSSI), or adversely impact on foreshore views</u>. Any proposed use will also have to be water compatible as defined in the Planning Practice Guidance;</p>	<p>To provide clarity in the wording to ensure sufficient protection is provided for the international, European and national designated sites in accordance with paragraph 118 of the NPPF.</p>	<p>Natural England (Mr Steve Roe) Rep. No. 2869</p>
SA2 5	75	Policy CS1.3.d	<p>Amend Policy CS1.3.d as follows: Use creative lighting and public art to strengthen identity and connectivity. <u>New lighting should be arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore</u>;</p>	<p>To emphasise that new lighting should be arranged as to avoid direct</p>	<p>Natural England (Mr Steve Roe) Rep. No. 2870</p>

Ref	Page	Paragraph / Policy	Suggested Amendment	Justification	In response to (reference)
				illumination of the foreshore or excessive glare when viewed from the foreshore. This is to avoid potential impact on designated areas and the species they contain, in accordance with paragraph 118 of the NPPF.	
SA2 6	75	Policy CS1.3.f	Amend Policy CS1.3.f as follows, and renumber subsequent criteria: f. provision of a more permeable boundary to Adventure Island to provide views in and through the site.	To clarify that whilst permeability of the site is desirable it is not critical to the design objectives of this area.	Mr James Gibb Rep. No. 2527
SA2 7	77	199	Amend paragraph as follows: The foreshore is designated for International, and European, <u>National and Local</u> sites for nature conservation. Particularly relevant to the Central Seafront Policy Area are Benfleet and Southend Marches (SPA, SSSI, and Ramsar site <u>and Local Nature Reserve</u>), which comprises the intertidal part of the Thames Estuary from Benfleet to Shoeburyness and cover the same land area within the SCAAP and wider Southend-on-Sea Borough.	To ensure consistency with NPPF	Natural England (Mr Steve Roe) Rep. No. 2874
SA2 8	77	200	Amend 3 rd sentence of paragraph as follows: All future activity and development will need to ensure that they do not adversely affect the interests of the nature conservation designations on the foreshore, <u>giving appropriate weight to their importance as an international, European, national or locally designated sites.</u>	To ensure consistency with NPPF	Natural England (Mr Steve Roe) Rep. No. 2874

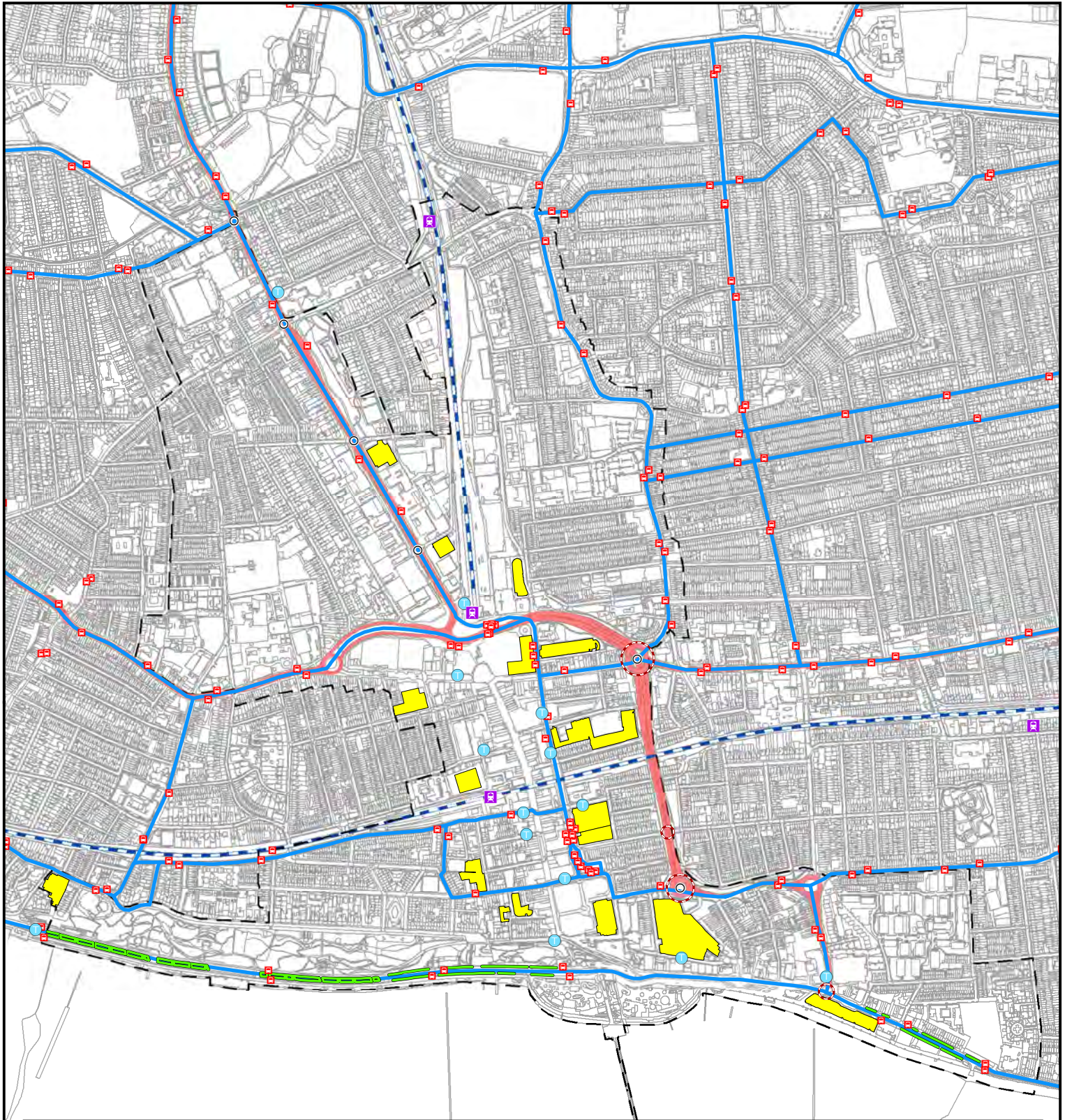
Ref	Page	Paragraph / Policy	Suggested Amendment	Justification	In response to (reference)
SA29	78	205	<p>Insert new paragraphs after paragraph 205, renumber subsequent paragraphs:</p> <p><u>Developments which adversely affect a site of national importance (SSSI) will not normally be permitted. In cases where an adverse effect on the special interest of the SSSI is considered to be likely, but the benefits of the development are shown to clearly outweigh both the impacts on the special features of the site and any broader impact on the wider network of SSSI's, an exception may be made. Consultation will be required with Natural England to ensure reasonable steps are taken to further the conservation and enhancement of the special interest features of the SSSI.</u></p> <p><u>Locally designated sites (local nature reserves and local wildlife sites), are non-statutory but have an important role to place in meeting overall biodiversity targets and contributing to the public enjoyment of nature conservation.</u></p>	To ensure consistency with NPPF	Natural England (Mr Steve Roe) Rep. No. 2874
SA30	78	Policy CS2.1.b	<p>Amend Policy CS2.1.b as follows:</p> <p>Not permit development proposals that will <u>result in significant harm to</u> have an adverse impact, either directly or indirectly, on the foreshore designations <u>that cannot be avoided, adequately mitigated, or as a last resort compensated for;</u></p>	To ensure consistency with NPPF	Natural England (Mr Steve Roe) Rep. No. 2874
SA31	80	Policy CS3.2	<p>Amend Policy CS3.2 as follows:</p> <p>2. Proposals for waterfront development within the Central Seafront Area and improved facilities will need to demonstrate that there will be no unacceptable impact upon navigation, biodiversity <u>the conservation objectives or features of Benfleet and Southend Marshes Special Protection Area, Ramsar and SSSI,</u> flood risk or the special character and designations of the area.</p>	To clarify the objectives of this part of policy.	Natural England (Mr Steve Roe) Rep. No. 2877
SA32	86	Policy PA9.3.i.a	<p>Amend policy as follows:</p> <p>a. have regard to all residential buildings on the opposite side of Sutton Road <u>bordering the Opportunity Site</u> and contribute positively to repairing the street scene and urban grain in this area;</p>	To ensure any new development has regard to all residential buildings bordering the site.	Mr Paul Lowe Rep No. 2475
SA33	86	Policy PA9.3.ii	<p>Amend policy as follows:</p> <p>ii. Within Opportunity Site (PA9.2): Guildford Road the Council will support the redevelopment of this site to achieve a replacement convenience store fronting Sutton Road that enhances the Secondary Shopping offer of this locality together with new residential accommodation. The façade of the current building fronting onto Sutton road must be retained and linked architecturally into any proposal. The scheme should also incorporate amenity open space, urban greening and sustainability measures. Site access will be via Guildford Road.</p>	To provide consistency with the determination of development sites elsewhere in accordance with the Development	Pegasus Planning Group Ltd (Jonathon Rainey) On behalf of The Co-operative Group

Ref	Page	Paragraph / Policy	Suggested Amendment	Justification	In response to (reference)																																
				Management DPD.	Rep. No. 2621 and Rep. No. 2623.																																
SA3 4	94	Implementation and Monitoring table: Policy DS5	<p>Amend third column (Monitoring Indicators and Targets) DS5.1 as follows: DS5.1 Providing a level of publically available car parking provision to support the vitality and viability of the central area: <u>- keep car parking capacity, demand and traffic management provisions under review to ensure that this capacity remains at a level to support the vitality and viability of Southend Central Area.</u> – no net loss of permanent publically available car parking* south of the central railway line. As Core Strategy Policy CP3. As Development Management Policy DM15.</p> <p><u>*Key visitor car parks within 10 minutes' walk of the shoreline, as surveyed in the Car Parking Study, are comprised of: Eastern Esplanade (67 spaces), Alexandra Street (74 spaces), Fairheads (211 spaces), Seaway (478 spaces), Shorefield (125 spaces), The Royals Shopping Centre (426 spaces), Western Esplanade central (585 spaces), Western Esplanade east section (128 spaces), Clarence Road (126 spaces), Tylers (249 spaces), York Road (93 spaces).</u></p>	To clarify and emphasise the need for effective monitoring of car parking provision to ensure that this adequately meets the needs of the Central Seafront Area.	RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group Rep. No. 2866																																
SA3 5	109	Appendix 6	<p>Amend Appendix 6 as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Core Strategy 2001 to 2021</th> <th>Completed April 2001 to March 2016 (net)</th> <th>Core Strategy (as adjusted 2016 to 2021)</th> <th>Site Allocations (net) to be delivered by 2021*</th> <th>Other commitments to be delivered by 2021</th> <th>Total New Dwellings</th> <th>Difference from Core Strategy (adjusted 2014 to 2021)</th> </tr> </thead> <tbody> <tr> <td>SCAAP</td> <td>2,474</td> <td>1,087</td> <td>1,387</td> <td>1,732</td> <td>434 425</td> <td>2,166 2,157</td> <td>+779 +770</td> </tr> <tr> <td>Local Authority Area excluding SCAAP</td> <td>4,026</td> <td>3,694</td> <td>332</td> <td>To be determined</td> <td>786 780</td> <td>786 780</td> <td>+454 +448</td> </tr> <tr> <td>All Borough (Total)</td> <td>6,500</td> <td>4,781</td> <td>1,719</td> <td>1,732</td> <td>1,220 1,205</td> <td>2,952 2,937</td> <td>+1233 +1,218</td> </tr> </tbody> </table>		Core Strategy 2001 to 2021	Completed April 2001 to March 2016 (net)	Core Strategy (as adjusted 2016 to 2021)	Site Allocations (net) to be delivered by 2021*	Other commitments to be delivered by 2021	Total New Dwellings	Difference from Core Strategy (adjusted 2014 to 2021)	SCAAP	2,474	1,087	1,387	1,732	434 425	2,166 2,157	+779 +770	Local Authority Area excluding SCAAP	4,026	3,694	332	To be determined	786 780	786 780	+454 +448	All Borough (Total)	6,500	4,781	1,719	1,732	1,220 1,205	2,952 2,937	+1233 +1,218	Factual update to reflect AMR 2016.	Southend Borough Council – factual update to reflect AMR 2016.
	Core Strategy 2001 to 2021	Completed April 2001 to March 2016 (net)	Core Strategy (as adjusted 2016 to 2021)	Site Allocations (net) to be delivered by 2021*	Other commitments to be delivered by 2021	Total New Dwellings	Difference from Core Strategy (adjusted 2014 to 2021)																														
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Southend Central Area Boundary		Information	
[-] Southend Central Area Boundary		i Information Hubs For Pedestrians	
Parking		Movement and Activity	
 Off Street Key Visitor Parking	 Key Public Realm Improvement	 Improved Pedestrian Routes	 Improved Gateway Access for Pedestrians
 On Street Key Visitor Parking	 Parking Information	 Main Route Network - Crossing and Environmental Improvements	 Proposed Strategic Junction Improvement
Variable Message Signs		 Traffic Information	



Southend Central Area Boundary

Southend Central Area Boundary

Taxi Ranks

Taxi Rank

Parking

Off Street Key Visitor Parking

On Street Key Visitor Parking

Public Transport and Access

Railway Station

Railway Line

Bus Stop

Bus Route - Road served at least 5 days a week

Improved Gateway Access for Pedestrians

Main Route Network - Crossing and Environmental Improvements

Proposed Strategic Junction Improvement

Appendix 4: Specific and general consultation bodies consulted at revised proposed submission stage

LDF 2016 - Specific Consultees (ALL)

Organisation

Aldi Foodstore Ltd	Essex Police
AMEC Environment & Infrastructure UK Ltd	Essex Police Community Safety Dept
Anglian Water Services	Essex Police, Headquarters
Arriva Southern Counties	Essex Wildlife Trust
Arriva Southern Counties Ltd	First Essex Buses Ltd
Asda Superstores	Foulness Parish Council
Barling Magna Parish Council	Friends, Families, Travellers & Travellers Community
Basildon Borough Council	Great Wakering Parish Council
British Wind Energy Association	Guide Dogs for the Blind Association
BUPA Wellesley Hospital	HM Customs & Excise
c2c Rail & National Express East Anglia	Highways Agency
CAA Safety Regulation Group	Highways Agency (Network Strategy)
Castle Point Borough Council	Highways England
CPREssex	Historic England
Dartford Borough Council	Hockley Parish Council
Defence Infrastructure Organisation	Leigh Town Council
East of England Ambulance Service	London Southend Airport
EDF Energy	MOA (Mobile Operators Association)
EDF Energy (Renewables)	National Grid
EE	Natural England
English Heritage East of England	Natural England Consultation Service
Environment Agency	NHS England, Essex Area Team
Environment Agency	Planning Potential on behalf of Aldi Stores
Environment Agency	Public Health
Essex Chambers of Commerce - South Essex Office	QineteQ
Essex Council Council	Resident Association Watch
Essex County Council	Rochford District Council
Essex County Council	Rochford Parish Council
Essex Fire & Rescue Service HQ	South East Local Enterprise Partnership

Organisation

Sport England

Southend University Hospital NHS Foundation Trust

The National Trust

National Federation of Gypsy Liaison Groups

The Society for the Protection of Ancient Buildings

The Planning Inspectorate

Thurrock Council

Three

Thurrock Unitary Council

Traveller Law Reform

Town Centre Partnership

University of Essex

UK Power Network

Vodafone and O2

LDF General Consultees

A W Squier Ltd
AC Taxis
Age Concern
Arriva Southern Counties Ltd
Association of Jewish Refugees
Barton Wilmore
Belfairs Gardens Residents Association
Braintree District Council
BRE Global
Brentwood Borough Council
British Hardware Federation
British Horse Society
Burgess Estate Residents Association (BERA)
Bus & Rail User Group
c2c Rail
Campaign to Protect Rural Essex (CPREssex)
Canewdon Parish Council
Chalkwell Ward Residents Association
Chart Plan (2004) Ltd
Chelmsford Borough Council
COBRA (Coalition of Borough Residents Associations)
Conservation Association Westcliff Seaboard
County Hotel
CPRE Southend Area
Crest Nicholson
Crime Prevention Panel (Leigh)
Crown Estate Office
Cycling Touring Club (CTC)
Darby & Joan Organisation
DIAL Southend
English Sports Council (East)
Essex & Suffolk Water
Essex Amphibian & Reptile Group
Essex Badger Protection Group
Essex Biodiversity Project
Essex Bridleways Association
Essex Racial Equality Council
Essex Wildlife Trust
Essex Wildlife Trust - Southend and Rochford Group
Estuary Housing Association
Ethnic Minority Forum
Federation of Small Businesses
Fusion Online Ltd
GreenKeeper
Hamlet Court Road Business Association
Hanson Quarry Products
Harlow District Council
Hawkehill Parish Council
Heaton Planning
Herbert Grove Residents Association
Hindu Association (Southend & District)
Hobbs Parker
Home Builders Federation (HBF)
Horse Owners and Riders (SE Essex)
Hullbridge Parish Council
Iceni Projects Ltd
Indigo Planning
IPECO
J.C Gibb Chartered Surveyors
Januarys
John Grooms Association
Kent County Council
Lambert Smith Hampton
Lancashire Digital Technology Centre
Landmark Town Planning Group
Leigh Cliff Association
Leigh Seafront Action Group
Leigh Society
Leigh Traders Association
Leigh-on-Sea Crime Prevention Panel
Lidl UK Ltd
Maldon District Council
Milton Community Partnership
Milton Conservation Society
Moat Homes
National Express East Anglia
National Federation for the Blind
National Rivers Authority Anglian Region
Network Rail (Town Planning Team)
Network Rail Property
NIBS
North Crescent & Feeches Rd Residents Association
Older Peoples Federation
Olympus KeyMed
OPA

Paglesham Parish Council
Parklife
Pebbles 1
Persimmon Homes (Essex) Ltd
Peter Harris Associates
Phase 2 Planning and Development
Planning Perspectives LLP
Planning Potential
Planware Ltd
Port of London Authority
Powergen Plc
Prospects College
Qinetiq
Ramblers Association (Southend Unitary Authority)
Rayleigh Town Council
Residents Association of Westborough (RAW)
RIBA South East Chapter
Royal Association For Deaf People (RAD)
Royal Bank of Scotland (RBS)
Royal Mail Group Property
Royal National Lifeboat Institution - Southend Branch
SAEN
Sanctuary Group
Shoebury Residents Association
Shoebury Society
Shoebury Traders Association
Smart Planning Ltd
Society for the Protection of Undercliff Gardens
SOS Domestic Abuse Projects
South East Essex Archaeological Society
South East Essex Archaeological and Historical Society
South East Essex College
South East Essex Friends of the Earth
South Essex Area Health Authority
South Essex Natural History Society
South Westcliff Community Group
Southend & District Aid Society
Southend & District Pensioners Campaign
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 Ornithological Group
Southend Primary Care Trust (PCT)
Southend Properties (Guernsey) Ltd
Southend Sports Council & Southend Wheelers Cycling Club
Southend Taxi Drivers Association
Southend Tenants and Residents Federation
Southend Town Centre Business Group
Southend University Hospital
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
SSA Planning
St. Matthew's Christian Spiritualist Church (1999) Ltd.
Stambridge Parish Council
Stephensons of Essex
Stewart Ross Associates
Stock Woolstencroft Architecture and Urbanism
Stockdale Group of Companies
Strutt and Parker
SUSTRANS Essex
Sutton Parish Council
Tarmac Southern Ltd
Tattersall Gardens Residents Group
Tendring District Council
Terence O'Rourke
Tesco Stores Ltd
Tetlow King Planning

Thames Gateway South Essex Partnership
Ltd
Thames Water Property Services
The Guinness Trust
The Planning & Development Partnership
The Planning Bureau Ltd
The Salvation Army Leigh on Sea
The Southend Pier Museum Trust Ltd
The Southend Society
The Theatres Trust
The Victoria Shopping Centre
Tolhurst House Residents Association
Trust Links
University of Essex Southend
Uttlesford District Council, Planning
Department

SCAAP – Extra Consultees

Added specifically for this document, (correspondence sent as per LDF database, Table 1: Consultation Methods).

Beaches

CGG

Chinnerys

Genting Club

Gleneagles Guest House

Happidrome

Hedgeway Development

Heygate Residents Associations

Papillion

Pebbles One

Southend Planning and Developers Forum 2015

Alan Shaw Architects
Alex Baldwin
Amar Trivedi
APS Design Associates
Architectural Design & Plan
Barratt Homes
Bernard Gooding Associates
Bob Scott
Building Design Associates CET
Architectural Design Charter
Projects
Clark Partnership
Colin Millard
Country & Metropolitan Homes
Dave Grew
David Turner Associates
DBS Property Designs Ltd
DC Planning
Design Associates
Design Works
Ergo Planning
Estuary
Fulcrum Building Designs Ltd
Graham Jolley
Heart Contracts Ltd
Invent ID
John Jackson
Knight Gratrix Architects
Landmark Planning
Lap Architects
Leigh Planning Services Ltd
Lindsey Wislocki
Marcus Bennett Associates Mark
Hipsey
McCarthy and Stone
MHS Projects
Mike Gray
Mr M Snellgrove
New World Designers
NPS Group
Paul Aldridge
Paul Henry Architects
rcmk
Richard Dean
Robert Leonard
Sam Milne
Sime Solutions
SKA Architects
Slee Architectural Services Smith
and Metson Architects Stome
Me Ltd
TC Matthew Chartered Architect
The Draughtsman
The Livemore Partnership
Tim Knight Architects

Trudys Architectural Services
Welton Bremner
Weston Homes

Businesses invited to participate in the workshops and consultation by Southend Bid

Company Registered Name	
07 Heaven Design	Martin Engleman Business Solutions
4 Seasons Complementary Health Practice	Masterpart Distribution
4Site Implementation Ltd	MaxCleavage Ltd
A & J TOWELLING PRODUCTS	Mayas Restaurant
A PASS 4 U	Mayhem Nightclub
A R Photography	Mayura Yoga Ltd
A1 Designs Fabrication & Welding	MCB Restaurants
A1 Stallard Electrical	Meades Florist
A2B LUXURY TRANSFERS	Measured Designs
ABACUS TRAINING	Media Corp
Abbeyfield Southend	Medical Innovations
Abbotts	Memory House
ABERCROMBIE LALIS	Mercedes Benz
aComms	Merenda & Company Ltd
Action Damp	merenda insurance
AdaVista	MERIDIAN ELECTRICAL EASTERN LTD
Adecco	Messiter Creative Services
Adelphi Executive Hire	Metal Culture Ltd
Admin Services	metro bank
Admiral Court	Metrow Foods LTD
ADVANCED INTEGRATED SECURITY	Michael Dempsey ICT
Advice by Telephone Ltd	Miles Design
affinity mortgages	Millennium Challenge Ltd
Affordable services LTD	Miller and Carter
AGH Event Consultants	Mindfulness
AI Security	MINI FOOTIE FOOTBALL ACADEMY
Aim for total health	Mitchell and Butlers- Site name is O'Neills
Aiming Hire Mini Buses	Mobile Mechanic
Airport Lettings Stansted Ltd	Monster Parties Limited
AIS	Moody Marketing
AJ Chambers Specialist Recruitment Ltd	MORTGAGE CONCIERGE LTD
AJR Eco LTD	MOTOR & ARMATURE REWINDS LTD
Alan Blunden Insurance Brokers	MouseTrap Innovation Ltd
ALBION COOLING SYSTEMS LTD	Move It Removals
Aldermore	Mr Window
Allied Irish Bank	MUGHAL DYNASTY
Aloe Vera Products	Mullis & Peake Ltd
Alpha3 Training	My Buggy Buddy
AMBLESIDE SOCIAL CLUB	My HR Business Partner
Amygdala Press	NANDOS
Andromeda	NAT WEST
Angela Kimberley Associates	Neil Clare Professional Driving Instructors
Angela Kimberley Associates	Nelly McNally Hair
Angela Kimberley Ltd	net paper
Anglia Battery & Filter Co	NETS GALORE
Anglia Ruskin University	New Business
ANGLO EUROPEAN CLINIC	New Business -
ANNABEL BARRY HYPNOTHERAPY	New Business - Call Centre
AnnaHeimOnline	New Business - new product to start business rucksack
ANNANDALE CLINIC LTD	New Business Start-up
Apcoa	New start-up business
APPLE DRIVING SCHOOL LTD	New Town Films Ltd
Appointmoor Estate Agents	Newman & Partners Accountants
AQMS	Newood Transmissions
AR Lee & Co	Newsquest
Arbonne International	NHS South East Essex
Arriva	Nilpat LTD
Arriva (Bus)	North Essex Finance Ltd

Arts & Crafts shop
AS Services Plumbing and Maintenance Ltd
Asda
ASHINGDON HALL CARE LTD
ashleigh stone
ASHLEY FINANCE
ATC Lasham
Atelier 73
ATHENA FLOORING & RUGS
AutoCAD
AutoEmailer
Avionicare
Avionicare Ltd
AW Squier Ltd
Ayers & Cruiks
Ayers and Cruiks
Azzurro
Balfour Beatty Regional Civil Engineering
BALI-HAI CARE HOME
BAR VIC
Barclays
Barclays Bank
Barnes & Taylor Solicitors
Barry Richardson Counselling Services
Basildon and District Local Enterprise Agency
Bath Store
BATTLESBRIDGE TILING SERVICES
BBC Essex
Beach Hut cafe
Beardwell Construction Ltd
Beauty By Stella
BELINDA JANES
belle rose florists
Belle Vue Motors
Bellinis
BGA Architects
BGA Architects
Bibby Financial Services
Big local app
Bird Luckin
BirdLuckin
bitc
BIZphit
Blades Hair Company
blatella productions
BLOOD SWEAT & INK TATTOOS
Blue47
Bluebird Care
Bluebird Care
Bobby Jos 50's Diner
Boots UK
BOSCOMBE JOINERY & MOULDINGS LTD
Brand Identity
brandyhole
Brighten LED
Brighter Green
BrilleMusic
BROADGATE PAPER CO.LTD
BROADWAY CARS
NQE
Nutrition Matters 4u
NUWAVE INTERIORS
NWES
Odeon Cinema
Older Person's Assembly
Olympus Keymed
One to One Personnel Limited
Online Business
optimum facilities management
Oracle
Organisation for Responsible Businesses
Organisation for Responsible Businesses Ltd
Osborne Plumbing
P J Stibbards Denture Clinic
P M B ELECTRICAL LTD
Pace Plc
Pageantry Postcards
Palmers Solicitors
Pandora in the Royals and Niche in Leigh Jewellers
paparazzi
Park Inn by Radisson
Park Inn Palace
Party shop 1 2 1
PASS & CO
Paul Lucas Bathroom Supplies
paulgeentertainments
Payeday Solutions Ltd
PB Polishers LTD
pds digital ltd
PEACOCK DEVELOPMENT
Pebbles Guesthouse
PEMXQ
People Need Skills
Peterboat
Pete's Tackle
Phoenix Electrical
photoreceptorcell
PHS Besafe
piccolo
Pickles & Sons Builders
Pits Dental Laboratories Chemicals
Pixel Work
Planet Leasing
PM Leisure/ Chinnerys
POLARIS TRAINING & DEVELOPMENT SYSTEMS
Pouch of Douglas
Power Roofing Ltd
Practical HR
Premier Inn
PREMIER SCREEN PRINTING
Premier Travel Ltd
PRESSING MATTERS
Presstige dry cleaners
pride & joy classic cars ltd
Primary Image
Princes Trust
Priority
Pro-Actions

Broadway Estates
Broadway Grill
brook street (uk) limited

BRS Associates Ltd
Bryman Recruitment
burnt mills tyres
Bushukan Bonsai
Business Connected
Business Doctors
Business Hub
BUSYBEADS
Butlers Fresh Fish
Butterfly Effect Coaching
Buzz Box
Buzz Box Ltd
C N Metals LTD
C W Construction Ltd
C2C Rail Ltd
cafe ciao
Cafe Kia Ltd
Cakes By Gemma
Capital Enterprise Centres Ltd
Career SOS Limited
Casa Bonita
castle point avs
Castle Point Borough Council
CBHC LLP Chartered Accountants
Cedar Hall Clinic
Chairman
Chalkley Solutions Limited
Chalkwell Auctions
CHALKWELL INSURANCE SERVICES
Champagne
Chargecrest Security
Charles Derby
Charles Electrical Ltd
Charter House Property Management
Chase High School
Chase Sport and Fitness Centre
CHC CONSTRUCTION
Cheerful Childminding
Children's Entertainer
chip and pin solutions ltd
Chloe Elizabeth Interiors
Chorus Business Advisers
Chorus Business Advisers Ltd
CI-Connect
City Electrical Factors
CJM Electrical Ltd
CLARENCE HOUSE JEWELLERS
Clarence Restaurant
Classic Carpets
Cliffords Barber Shop
Cliffs Pavillion Palace Theatre
CME Personnel Consultancy
cockle
Comfy Saddle
Community Sports Network

Professional Tiling Ltd
Profile Clothing
ProFit recruitment, accountant and finance staff recruitment specialists
Profusion
Profusion plc
Progress Building Contractors Ltd
Prospects College of Advanced Technology
Public Health
quadrant security services
Qualitas Inspection Services Ltd
Quattro Recruitment
Queens
Quick fit services
R & Y TYERS REMOVAL CONTRACTORS
R B Emerson Group
R Hartcare Ltd
Rachael Pereira
Ravens
Raybrook sheet metal work
RAYLEIGH MOWER SERVICES
RBS
Reach out therapy
Red Wine Media
REDLINE INDUSTRIAL SUPPLIES
Reed Residential
Reflections
Renalls Trading & Pawnbrokers
RENT A TOY
resinfo-tech
Retro Central
Revivo Therapy Ltd
Rickard Keen
Rikard Keen
Rimingtons Finance & Insurance Brokers
Robert Leonard Group PLC
Rochford District Council
Rochford Hundred Golf Club
Roslin Hotel
ROSSIS ICE CREAM
Rowallan Group
Royal Bank of Scotland
Royal Hotel
Roydon Academy of Performing arts
RSW Partnership
Russia Local
S K Signs & Lables LTD
S M G PAINTING & DECORATING
Sainsbury's
Salvation Army
Sams Child Minding Service
Samuels Associates
Sandbanks
Santander
Santry Davis Accountants
Saphire Computer Systems Ltd
SAVS
Sayer Complementary Health
SBS

Connect Interiors
Connexions
Conridge LTD
Consultant
Contrast LTD
Converso
Corks N Cans
Corner Shop
Costcutter
Cottis House Ltd
Countrywide
Couture Cakes by Kosta
CRB MODELS
CREST
Crossways Consultancy (Int'l) Limited
Crown College
Crown Vocational Training
CROWSTONE PREPARATORY SCHOOL
CUMBERLAND PACKAGE
Cumberland Packaging Group
CURA - Passion for Ales of the UK
CXD World
Cyberdan Ltd
Cycle Southend/Ideas In Motion
D & G MOTORS
Dallas Packaging
Darby & Joan Organisation
Davenport
DAVID PETHERBRIDGE UPHOLSTERY
De Vere Care
Dedman
Dedman Property Services
Deep Clean
Delicious PR
Devine Financial Management
DG Servicing
Diamond Property Cleaning
Digital Exploration Centre
DISCOUNT COMPUTER REPAIRS
dphotos
Dr Zaidi
Dragon Enterprise Centre
DRIVERSHIELDS (UK) LTD
Earth Zest
Easy Jet
EBS Consulting
ec2i
Echo
ECLIPTECH LTD
Eco clothing
Edes Electrical and Homewares
Editions Alecto
EGL Homecare
EIC Management Limited
ELC Property Recruitment
eLignum
Eliza Boutique
Elliot's Printing
Energy Fitness For Women
Scape Interiors
Scott & Mears
Scott & Stapleton
Seabourne Day Nursery
Secure Sitting Service
SEEDBED Centre
Seetec
SEEVIC College
Self Defence Essex
Self Employed
Service Garage MOT & Repair Centre LTD
Sexuality and Gender Identity
SGM DESIGN LTD
shapers of westcliff
Shaw Trust Employment
Shawtrust
Shore Beauty
Shout design
Siesta Therapies
Silkstream
Silver City Estates
SILVERSEA LODGE
Simply Better
Simply Words Editing Services
Simply-Better
Six Red Squares
SJPP
Slade Decorating Services
SNAKES ALIVE
snap.
SNAPS NURSERY TRADING AS SNN LTD
Social Fair
Social Media
Solicitor
somerstime
SOS Locksmiths
Sounds-D-Light
South East & Central Essex Mind
South East Essex College
South East Essex Practice Nurse Group
South Essex
South Essex College
south essex homes
South Records Limited
Southbourne Physiotherapy Limited
Southchurch Business
Southchurch Convenient Store
southend & local plumbing co
Southend Adult Community College
Southend Adult Community College (SACC)
Southend Advocacy for Older People
Southend and Chelmsford Radio
Southend Business Support
Southend Carnival Association
Southend Cliffs Pavillion
Southend Enterprise Accreditation Ltd
Southend Enterprise Society
Southend Ethnic Minority Forum
Southend Football Supporters Social Club LTD

ENGRAVING SERVICES
ENS Recruitment & Training Services
Enter Africa
Enterprising UK Ltd
Environmental Consultant
Epiphany Training Ltd
Equinox World Wide Limited
Erbil Gulhan
Essensys
Essex Asian Womens Association
Essex Bookeeping Company
Essex Chamber of Commerce
Essex Chambers of Commerce
Essex Countryside
Essex County Cricket Club
Essex County Fire & Rescue Service
Essex Enquirer
Essex Financial Planners
Essex GAS SHOWROOMS
Essex Injection Mouldings
Essex Interior designers
Essex LPC
Essex Pest Proof Limited
Essex Police
Essex Property Solutions
Essex Search & Rescue
Essex Wildlife Trust
Estate Planning Consultant
Estuary Housing Association
Eva Design
Evolution Tennis Academy.Com Ltd
Evolve telecommunications
EXCELSIOR LANGUAGE SPECIALISTS
Exemplas
Fabricake sugarcraft limited
Fair Havens Hospice
Fairfield Motors
Fairview Residential Home
Farmers Choice
Federation of Small Business
FIBRE FIX
Figure of Eight Media
Fikay Eco Fashion
First Data Corporation
First Essex Buses
First Group (Bus)
Fitness First Southend
Fitness Focus
FLORA'S CHILDCARE
Flowers by sophie wilson
fluidata
Focal Point Gallery
Foot Clinic
Foot Stop
FOREST GARDEN SERVICES
forever living
Formara Ltd
Forum of Private Business
Foundation East
Southend Hospital
Southend Hotel & Catering Association
Southend Kitesurfing
Southend Leisure and Tennis Centre
Southend LPA
Southend MUAY THAI
Southend Osteopath
Southend Radio
Southend Rugby Club
Southend TAGB
Southend Teacher Training Partnership
Southend Team Ministry
Southend TOTAL ENGINEERING & FABRICATION
Southend united com and edu trust
Southend United Community & Educational Trust
Southend United Football Club
Southend University Hospital
Southend YMCA
Spares4Appliances Ltd
spark digital marketing ltd
Spectrum
Spider
SPINK
Spinnaker Consulting Ltd
Spire Wellesley Hospital
Sponsorpack Ltd
SPRING CLEAN CLEANING SERVICES
Square Halo
St Ann's Building Supplies
st bernards high school
st james place
St Lukes HLC
stark salon
Stephensons of Essex
Steve's Self Drive
Stobart Air
Stonedene LTD
Storm Media
Strawberry Cafe
Studio Nine
Studio21
Subject Leader - Business Studies Chase High School
SummerCare
summit tiling
Sunshine Day nursery 2003 LTD
Sweetcheeks Trees
Talking Cures
Taylor and Son
TCHC
team green
Temple Blake Solutions
Tempus Facilities Management
Tent park
Tessera Group Plc
TFS Loans LTD
The Arlington
The Arlington Ballroom
The Atrium Clinic & Therapy Centre
The Best of Southend

fp guiver & sons
freshworks (WEST END) ltd
Funky Medical Accessories LTD
Fuse
G Casino
Gardener & Co LTD
General Engineering Treatments
Genting Club Westcliff
Geoff Rhodes Associates
George Turner Models
Gerard Rayment
Giblicom Ltd
Giles Wilson
Gleneagles Guesthouse
GLOBEAID LTD
GO-TRAIN LEARNDIRECT
grace corporate insurance
Grateful Heads
GreenSpur
Gregory Dean
Greybox Design
Grosvenor Casino Southend
Groundworks
Guardian
H&T Pawnbrokers Southend
Hair & Son
Hamlet Court Road Business Association
Handelsbanken
Handmade Weddings
Harbour Financial
HART WHOLESALE
Harts Consultancy Limited
Harvey Star Ltd
Hatton Jewellery
HDA - Web and Ink Design
Headway Essex
health and wellness business
Health Watch
Heart FM
heart radio
HIDDEN HEARING LTD
hightec membrane roofing
HILLS OF SHOEBOURNESS LTD
HIM
Hi-Tec Sports UK LTD
hoboken kids ltd
Holiday Inn Southend
Home Care Professionals
Home Instead
home sweet home
Homebase
Hood Group Ltd
Hottwerk IIP
House Man Water Treatment
House of the rising sun tattoo parlour
HSBC
Hunt Roche
HYGIENE N CLEAN
I LOVE BLINDS
The Blue Jelly Cafe Limited
The Boatyard
The Body Matters
The Book Inn & Book Café
The castle
THE CHARTWELL GALLERY
THE CO-OPERATIVE FOOD
The CPL Group
The Draughtsman
The Echo
THE EDUCATORS
The Enterprise Foundation
The Exchange Public House
THE FIELD LANE FOUNDATION
The Garrison Bakery
The Grove
The Hive Enterprise Centre
The Hockett
The Hollies
The Hub London
The Ice Cream Factory
The IT CO
THE LILACS RESIDENTIAL HOME
The Livemore Partnership LLP
The Meeting Place Restaurant
The Mosaic Studio
The Nova Partnership
The Oncrowd
The Papworth Trust
The Pickle Shed
THE POLASH
The Practice
The Ragged Priest
The Royals Shopping Centre
THE SIGN FACTORY
The Squeeze
The Sutton Arms
The Tead Remedy Shop
the travelling bar
The Victoria
The Visible Woman
The Vitamin Service Ltd (FSB)
The yacht club @ brandy hole
thedeanesonline
theosteelltd
therapy life centre
This Way Belton Corner
Thus Plc
TIME
TJ PHOTOGRAPHY
tmays
Tolhurst Fisher
Tom Humble Photography
Tomassi's Restaurant & Ice-Cream Shop
Totally Sound Ltd
Train to Gain
Travel Counsellors
Traveller Dave
Treaders Kynastons DIY

I Love Fancy Dress Ltd
Ian Sanders Ltd
Icarus Training
iComputeIT Community Interest Company
IDEALS GP LIMITED
Immervox Ltd
Inflite
Ingeus UK Ltd
Ingleton Wood
Inner Body
Insure and Go
Interiors By Heather
Intraining
Ipeco Holdings Ltd
Ixion
Ixion Holdings
J Birch & Son Builders LTD
J.B August
Jasmine day spa
JD Weatherspoon PLC
jeffries law
JEGS
JENNIFER'S NATURAL HEALTH & BEAUTY
Jerry Bell Hairdressing Ltd
Jewish Care
JHP Training
Jo Curtis Photography
Job Centre Plus
Jobcentre Plus
Jobentre Plus
John Keeble Photography
johnston watches of leigh
JRD GARDENING & FLORISTRY
JS Accountancy & Payroll Services
Junior Cooks
Just Fiestas.com
Just Grow
JUST THE JOB
k barbers emporium
kat securities
Kayes Textiles
KENTES LTD
Kestrel Printing
KeyWorkers Direct
KFC
Kingdom Group
Kinggs Lettings
Kingsbury Screens
KIP McGrath Southend East
Kirby and Lewis LTD
Kiss Kiss Fashion Boutique
KLW Business Evolution Ltd
KOROKOR
Kumpania Consulting
Kursaal Function Suite
KURSALL PLANT HIRE LTD
Last Post
LAWNSCIENCE
LBH Insurance

Trustlinks
TTC wetranslate Ltd
Twincliff Scaffolding Limited
ugos cafe and bar
UK Export Finance
UKERC
UKTI
Unit10 Art
University of Essex
Upfront Marketing
Uptomen
Urban Edge
urban printing and design ltd
Urban Utopia Hairdressing
utility warehouse
Utility Warehouse Discount Club
veno viro
Ventrica
Ventrica
VENTURA STUDIOS LTD
Victoria Shopping centre
Vincent McCarthy Solicitors
Visualmark
VOA
Vocational Training Services
Vurchoo Ltd
W L Copley and Son Ltd
Waitrose
WATCH YOUR CLOCK
WATSON MOBILE PLASTERING
WDC Physiotherapy and Sports Injury Clinic
We Want 2 Work
Web Stop Shop
West Cliffe Travel
West House Nursing Home
WEST WAY TRAVEL
Westcliff Boxing Academy
westcliff travel service
Wheeldon and Deacon
wheeler construction
Whitebus
Whitebus Company
Wickham Engineering
Winns Security
WINNS SECURITY SERVICES LTD
Wire fish Services
WIREFISH
Wish
Woofco
Worby Ltd
World of Braiding & Extensions Ltd
Worsley Wines LTD
WV Lemon Fencing Ltd
Wyles Tiles
Yellow Advertiser
Yoga Dharma Limited
Youth & Connexions Service
ZU

LC Cleaning
Leigh and Southend Times
Leigh Nails
LEIGH PC SERVICES
Leigh Print & Packing LTD
Leigh-on-Sea Shellfish Merchants Association
Leigh-on-Sea Town Council
LeopardCandi
Liberty Hygiene Services
Liberty I-Zone Ltd
Library Services
Liddell Solicitors
Lighter Life
Lime Scale Solved
Lions Club of Southend on Sea
LITTLE MONKEEZ
Living Aquarium
Lloyds Bank
Lloyds TSB
Local MP
Locallife
Lollipop Local
London Southend Airport
London Southend Airport Consultative Committee
Low Carbon Business Team
Lynmar Solutions Ltd
Lynn Tait Gallery
M.D Martek Services Ltd
Made@94
Maison Renouf
Mallies
Mamma Mia
Manufacturing Advisory Service
Maplewood Investment Ltd
Maplin House
Marsh Ltd
Martin Dawn plc

Appendix 5: Copy of Revised Proposed Submission SCAAP Consultation Material (Nov – Dec 2016)

Debee Skinner

From: Debee Skinner
Sent: 03 November 2016 13:25
To: Councillors Distribution List
Subject: Have your say on the Revised Proposed Submission Southend Central Area Action Plan (SCAAP)

Importance: High

Email sent on behalf of Mark Sheppard – Strategic Planning

Dear Councillors

Have your say on the Revised Proposed Submission Southend Central Area Action Plan (SCAAP)

Southend-on-Sea Borough Council has prepared a Revised Proposed Submission Southend Central Area Action Plan (SCAAP) as part of its Local Planning Framework, which it proposes to submit to the Secretary of State under Regulation 22 of the above Regulations.

The SCAAP sets out detailed policies on a wide range of issues for positively managing new development and assessing planning applications in the Southend Central Area, including for shopping, housing, transport and the natural environment. The Plan divides Southend Central Area into a number of 'Policy Areas' each with its own set of policies and proposals. It also identifies a number of individual 'Opportunity Sites' whose development would benefit the town. These policies will replace a number of Saved Policies from the 1994 Borough Local Plan.

There has been extensive discussion and consultation on the issues and principles underlying the policies in this Plan. These have helped inform and update the SCAAP document and details about this process can be found in the Regulation 19 Consultation Statement, which is published on the Council's website. If you previously commented on the Plan, you can see how your comments have been addressed in the Consultation Statement, available on the Council's website. The Revised Proposed Submission SCAAP is accompanied by a Policies Map, a Sustainability Appraisal Report and non-technical summary, a Consultation Statement and relevant supporting background documents. These documents are being published in order for representations relating to the soundness and legality of the plan to be made prior to the submission of the SCAAP to the Secretary of State for independent examination. ***This Plan includes amended policies. Representations relating to the 'soundness' and legal compliance of the Plan should be made at this stage, even if comments have been submitted on earlier iterations of the Plan. This will ensure that your issues will be submitted for consideration by the Planning Inspector appointed to carry out the examination in public.***

A guidance note for submitting representations is available on the Council's website and assistance is also available by calling 01702 215004 ext. 5408.

Representations can be made during the publication period which ends at 5.00pm on Friday 16th December 2016.

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Where to view the documents

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Email: ldf@southend.gov.uk

Post: FAO Debee Skinner
Department for Place
Southend-on-Sea Borough Council
PO Box 5557
Civic Centre
Victoria Avenue
Southend-on-Sea SS2 6ZF


Kind regards

Mark Sheppard – Senior Planner – **Southend-on-Sea Borough Council**

Creating a Better Southend

☎ 01702 215358 (Direct) | ✉ marksheppard@southend.gov.uk | 🌐 www.southend.gov.uk

Department for Place | Southend on Sea Borough Council | Floor 13 Civic Centre | Victoria Avenue | Southend on Sea | SS2 6ER

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Debee Skinner

From: LDF
Sent: 03 November 2016 13:56
To: Debee Skinner
Subject: Have your say on the Revised Proposed Submission Southend Central Area Action Plan (SCAAP)

Importance: High

Dear Consultee

Have your say on the Revised Proposed Submission Southend Central Area Action Plan (SCAAP)

Southend-on-Sea Borough Council has prepared a Revised Proposed Submission Southend Central Area Action Plan (SCAAP) as part of its Local Planning Framework, which it proposes to submit to the Secretary of State under Regulation 22 of the above Regulations.

The SCAAP sets out detailed policies on a wide range of issues for positively managing new development and assessing planning applications in the Southend Central Area, including for shopping, housing, transport and the natural environment. The Plan divides Southend Central Area into a number of 'Policy Areas' each with its own set of policies and proposals. It also identifies a number of individual 'Opportunity Sites' whose development would benefit the town. These policies will replace a number of Saved Policies from the 1994 Borough Local Plan.

There has been extensive discussion and consultation on the issues and principles underlying the policies in this Plan. These have helped inform and update the SCAAP document and details about this process can be found in the Regulation 19 Consultation Statement, which is published on the Council's website. If you previously commented on the Plan, you can see how your comments have been addressed in the Consultation Statement, available on the Council's website. The Revised Proposed Submission SCAAP is accompanied by a Policies Map, a Sustainability Appraisal Report and non-technical summary, a Consultation Statement and relevant supporting background documents. These documents are being published in order for representations relating to the soundness and legality of the plan to be made prior to the submission of the SCAAP to the Secretary of State for independent examination. ***This Plan includes amended policies. Representations relating to the 'soundness' and legal compliance of the Plan should be made at this stage, even if comments have been submitted on earlier iterations of the Plan. This will ensure that your issues will be submitted for consideration by the Planning Inspector appointed to carry out the examination in public.***

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Southend-on-Sea Borough Council
PO Box 5557
Civic Centre
Victoria Avenue
Southend-on-Sea SS2 6ZF

Kind regards

Debee Skinner | Intelligence Officer | **Southend-on-Sea Borough Council**

Creating a Better Southend

Phone: 01702 215408 | Email: debeeskinner@southend.gov.uk debeeskinner@southend.gcsx.co.uk | Website: www.southend.gov.uk
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Email to Workshop Attendees, previous respondents and Extra Consultees

Debee Skinner

From: LDF
Sent: 03 November 2016 13:41
To: Debee Skinner
Subject: Have your say on the Revised Proposed Submission Southend Central Area Action Plan (SCAAP)
Importance: High

Dear Consultee

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Post: FAO Debee Skinner
Department for Place
Southend-on-Sea Borough Council
PO Box 5557
Civic Centre
Victoria Avenue
Southend-on-Sea SS2 6ZF

Kind regards

Debee Skinner | Business Intelligence Officer | **Southend-on-Sea Borough Council**

Creating a Better Southend

Phone: 01702 215408 | Email: debeeskinner@southend.gov.uk debeeskinner@southend.gcsx.co.uk | Website: www.southend.gov.uk
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Southend-on-Sea Borough Council

Department for Place

Peter Geraghty Head of Planning and Transport

Our ref: TP/100/489/DS

Telephone:

01702 215000

Your ref:

Fax:

Date: 3 November 2016

E-mail:

council@southend.gov.uk

Contact Name: Debee Skinner

DX 2812 Southend



The Occupier - Queensway Area

Dear Occupier

Have your say on our vision for the future development of the town centre and central seafront

We are writing to invite you to have your say on our vision for the development of Southend's town centre, central seafront and neighbouring areas over the next five years.

Our vision is contained within a document called the Southend Central Area Action Plan (SCAAP) and is available online at: www.southend.gov.uk/scaap

In this document, we have set out our preferred approach to the future development of the Southend Central Area, which includes the Town Centre, Central Seafront Area and adjacent neighbourhoods of Victoria and Sutton. We are asking local residents and business share their views by **16th December 2016**.

We have divided the Southend Central Area into a number of 'Policy Areas', each with its own set of policies and proposals. We have also identified a number of individual 'Opportunity Sites', whose development would benefit the town.

The Queensway area is identified as Opportunity Site 4 (PA4.1) within the SCAAP. As you may be aware, the Council is already actively investigating the potential for the regeneration of this area as part of the 'Better Queensway' project. The SCAAP public consultation is not directly part of that project, however we would still welcome your views on the document.

The SCAAP also seeks to protect and enhance green space and other environmental features of the town and foreshore, as well as bring about more attractive public spaces and improve access and transport.

A map displaying the location of all Opportunity Sites can be found within the SCAAP document itself and as part of the Policies Map, both available here: www.southend.gov.uk/scaap

Corporate Director for Place: Andy Lewis

Civic Centre : Victoria Avenue : Southend-on-Sea : Essex SS2 6ER

Customer Service Centre: 01702 215000 : www.southend.gov.uk



Comment online

You can submit comments via our online system at this link: <http://southend.jdi-consult.net/ldf/>.

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The Council believes that the published SCAAP is a sound and legally compliant plan and we invite comment on whether you agree with this or not. If you are making a representation to the SCAAP then your comments must relate to 'soundness' and legal compliance. Guidance notes on how to make comments on the SCAAP, together with Frequently Asked Questions (FAQs), are also available on the Council website.

Other ways to have your say

Copies of the Response Form are also available online at www.southend.gov.uk/scaap and from Southend Civic Centre, or on request by calling 01702 215408.

You can also have your say in the following ways:

- Visit your local library
- Visit the Southend Civic Centre
- Respond using a Response Form:
 - via email: ldf@southend.gov.uk
 - Post: FAO Debee Skinner
Department for Place
Southend-on-Sea Borough Council
PO BOX 5557
Civic Centre
Victoria Avenue
Southend-on-Sea
Essex SS2 6ZF

Yours faithfully

Mark Sheppard Senior Planner
Strategic Planning

Corporate Director for Place: Andy Lewis

Civic Centre : Victoria Avenue : Southend-on-Sea : Essex SS2 6ER

Customer Service Centre: 01702 215000 : www.southend.gov.uk



Southend-on-Sea Borough Council

Department for Place

Director of Planning and Transport – Peter Geraghty

Our ref: ** Telephone: 01702 215000
Your ref: ** Letter: S207
Date: 04 November 2016 E-mail: council@southend.gov.uk
Contact Name: Peter Geraghty DX 2812 Southend



Recipient details and address

Dear Occupier

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A map displaying the location of all Opportunity Sites can be found within the SCAAP document itself and as part of the Policies Map, both available here: www.southend.gov.uk/scaap

Your property or premises has been identified as being within Opportunity Site PA8.2 - Baxter Avenue, and as such this public consultation may be of particular interest to you and you may wish to comment on the draft Plan.

Comment online

You can submit comments via our online system at this link: <http://southend.jdi-consult.net/ldf/>

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Essex SS2 6ZF

Yours faithfully

Mark Sheppard Senior Planner
Strategic Planning

Southend-on-Sea Borough Council

Department for Place

Head of Planning and Transport – Peter Geraghty

Our ref: TP/100/459/ds

Telephone: 01702 215408

Your ref:

Date: 2nd November 2016

E-mail: debeeskinner@southend.gov.uk

Contact Name: D Skinner

DX 2812 Southend

Dear Sir/Madam

Southend Central Area Action Plan (SCAAP) – Revised Proposed Submission

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

The documents included are

- Southend Central Area Action (SCAAP) Revised Proposed Submission Document
- Proposals Map
- Representation Form
- Regulation 19 Notice
- Guidance Notes for Proposed Submission Stage
- Statement of Representation Procedure
- Frequently Asked Questions
- Consultation Statement Document
- SCAAP Sustainability Appraisal (SA) Document

If you require further copies of any documents please email debeeskinner@southend.gov.uk.

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

Yours faithfully

Debee Skinner
Business Intelligence Officer



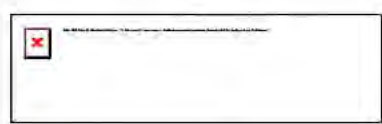
From: [Redacted]
Sent: 22 November 2016 16:22
To: [Redacted]
Subject: Have your say on the Revised Proposed Submission Southend Central Area Action Plan (SCAAP)

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Have your say on the Revised Proposed Submission Southend Central Area Action Plan.

Here at the Southend BID, we are keen to offer a unified voice for you - the businesses. Therefore, on behalf of Southend Borough Council, we invite you to express your views on the recent changes concerning the Central Area Action Plan (SCAAP), which is now available for public consultation. For further information and details, please see the letter below.



Dear Consultee

Have your say on the Revised Proposed Submission Southend Central Area Action Plan (SCAAP).

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Southend-on-Sea Borough Council
PO Box 5557 Civic Centre
Victoria Avenue
Southend-on-Sea
Essex
SS2 6ZF

✘				
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Company number: 8346559, registered in England.

Registered address: 7 Nelson Street, Southend on Sea, Essex, SS1 1EH

Public Notices



Public Notices



NOTICE OF THE PUBLICATION OF THE SOUTHEND CENTRAL AREA ACTION PLAN (REVISED PROPOSED SUBMISSION DOCUMENT)

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

Southend-on-Sea Borough Council has prepared a Revised Proposed Submission Southend Central Area Action Plan (SCAAP) as part of its Local Planning Framework, which it proposes to submit to the Secretary of State under Regulation 22 of the above Regulations.

The SCAAP Revised Proposed Submission updates the Preferred Approach version of the document (published December 2015), taking into account representations made and additional evidence.

The Southend Central Area Action Plan Revised Proposed Submission Document and accompanying documents have been published in order for representations to be made prior to the submission of the Southend Central Area Action Plan to the Secretary of State for independent examination.

The SCAAP sets out detailed policies on a wide range of issues for positively managing new development and assessing planning applications in the Southend Central Area, including for shopping, housing, transport and the natural environment. It also identifies a number of Opportunity Sites for development. These will replace a number of Saved Policies from the 1994 Borough Local Plan.

Representations can be made during the publication period which begins on 3rd November 2016 and ends at 5pm on 16th December 2016.

Only representations received during this consultation period will be considered. Late responses will not be accepted.

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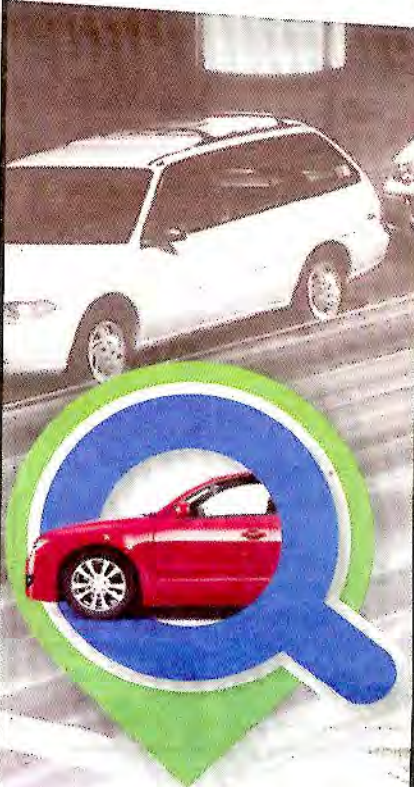
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Public Notices

Notice is hereby given that Sport Plus Company Limited is applying in respect of the May 31st 2016, 24.72 High Street, Southend 27 1HA for a variation to the premises licence under the Licensing Act 2003 to allow for this to be a variation to change the layout of the premises in accordance with the submitted plan. The main change is the addition of a response bar to the garden area in the outdoor area. The opening hours and licensable activities authorised by the premises licence are to remain unchanged. Any part of the variation application that changes the plan layout as the premises on the no effect until the works have been completed. Locations of any fire safety and other safety equipment subject to change in accordance with the requirements of the responsible authorities or following a risk assessment. Any detail shown on the plan that is not required by the licensing plan regulations is indicative only and subject to change. Representations to this application must be made in writing by 1 December 2016 to the Chief Police, Borough Council Licensing Authority at Kings Road, Southend, SS1 1AA.

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BOROUGH COUNCIL

NOTICE OF THE PUBLICATION OF THE SOUTHEAST CENTRAL AREA ACTION PLAN (REVISED PROPOSED SUBMISSION DOCUMENT)

Planning and Compulsory Purchase Act 2004 (as amended) Town and Country Planning (Local Planning) Regulations 2012, Regulation 19

Southend-on-Sea Borough Council has prepared a Revised Proposed Submission Southend Central Area Action Plan (SCAAP) as part of its Local Planning Framework, which it proposes to submit to the Secretary of State under Regulation 22 of the above Regulations.

The SCAAP Revised Proposed Submission updates the Preferred Approach version of the document (published December 2015), taking into account representations made and additional evidence.

The Southend Central Area Action Plan Revised Proposed Submission Document and accompanying documents have been published in order for representations to be made prior to the submission of the Southend Central Area Action Plan to the Secretary of State for independent examination.

The SCAAP sets out detailed policies on a wide range of issues for positively managing new development and assessing planning applications in the Southend Central Area, including for shopping, housing, transport and the natural environment. It also identifies a number of Opportunity Sites for development. These will replace a number of Saved Policies from the 1094 Borough Local Plan.

Representations can be made during the publication period which begins on 3rd November 2016 and ends at 5pm on 16th December 2016. Only representations received during this consultation period will be considered. Late responses will not be accepted.

The Revised Proposed Submission Southend Central Area Action Plan, Revised Policies Map and accompanying documents, alongside a statement setting out how representations can be made, are available for inspection from 0th November 2016 to 16th December 2016 at the following locations:

- Southend Council's website: www.southend.gov.uk/sciap
- Southend Borough Council Contact Centre, Civic Centre, Victoria Avenue, Southend on Sea between 9.00am and 5.00pm
- All Southend Libraries during normal opening hours.

Hard copies can be made available and may require a small fee. Please contact the Performance Team by telephone on 01702 215004 ext. 5408 or email idl@southend.gov.uk

Representations must relate to 'soundness' and legal compliance, and should be made using the Council's online interactive consultation system, which can be found at <http://southend.gov.uk/consult>. Alternatively, representations may be submitted using the Response Form, available on request (01702 215004 ext. 5405 or email idl@southend.gov.uk), by the following means:

email: idl@southend.gov.uk
post: FAO Debra Skinner, Department for Place, Civic Centre, Victoria Avenue, Southend-on-Sea, Essex SS2 6ZF

A guidance note for submitting representations is available on the Council's website and assistance is also available by calling 01702 215004 ext. 5408

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**Appendix 6: Summary of issues raised through consultation
on the Preferred Approach SCAAP (Dec 2015 – Feb 2016)**

Appendix 6: Summary of issues raised through consultation on the Preferred Approach SCAAP (Dec 2015 – Feb 2016)

General Approach

Vision, Strategic Objectives and Strategy well supported
Approach to employment development supported
Residential development in central area supported
Approach to culture, leisure, tourism, historic environment and open space generally well supported
Concern regarding lack of emphasis in Plan on importance of tourism to Southend and the importance of the areas historic past
Need to ensure high quality design in new developments

Policy DS1: Maintaining a Prosperous Retail Centre

Support for maintaining High Street as a prosperous sub-regional centre
Recognition that High Street needs to adapt to changing retail patterns and be more flexible in its approach and diversity to encourage restaurants, cafes and similar uses

Policy DS2: Key Views

Policy provisions well supported

Policy DS3: Landmarks and Landmark Buildings

Provisions welcomed but also concern that places emphasis on landmark buildings rather than best quality design

Policy DS4: Flood Risk Management and Sustainable Drainage

Policy provisions welcomed
Concerns raised regarding surface water disposal – policy changes proposed as a result

Policy DS5: Transport Access and Public Realm

Provisions for sustainable transport welcomed
Concern that additional residential development should make adequate provision for residents car parking
Need to maintain car parking capacity at a level that supports the vitality and viability of centre
Problems of accessibility to centre and limited car parking provision preventing further investment in tourism facilities
Need for additional car parking provision in central seafront tourist areas
Congestion/poor accessibility resulting in shoppers/visitors not returning to town
Should be like for like car parking provision on Opportunity Sites which are currently used for car parking with additional provision for development proposed on site
Concern whether 'mixed mode' transport provision is safe
Needs of vulnerable road users, cyclists and motor cyclists must be taken into full account
Road safety/connectivity improvements needed through improved road crossing facilities

Policy PA1: High Street

Policy provisions generally supported

Recognition of need to improve public realm, landscaping etc to create a quality pedestrian environment

Need to improve signage and wayfinding

Need to improve connectivity, particularly to seafront

Need to improve High Street offer

Policy PA2: London Road

Need to improve Victoria Circus

No retail frontage to Queensway

Pedestrianisation generally welcomed but concerns about mobility issues

Policy PA3: Elmer Square

Policy provisions welcomed

Policy PA4: Queensway

Policy provisions generally welcomed

Concerns regarding road safety and access

Policy PA5: Warrior Square

Need to improve connectivity and enhance urban greening

Policy PA6: Clifftown

General support for policy provisions

Concerns raised regarding traffic movement in area

Need for greater consideration to be given to future use of Empire Theatre site

Need for better connectivity to railway station

Policy PA7: Tylers

Support for the relocation of the Travel Centre

Need for better connectivity and facilities at Travel Centre

Need for improved linkages to High Street and Seafront

Policy CS1: Central Seafront

Good support for policy provisions

Concerns relating to adequacy of car parking in area to support tourism facilities and level of traffic in area

Need for improved signage and connectivity to High Street and surrounding areas

Need to ensure Seaway Opportunity Site provides a quality gateway to the seafront

Concerns regarding heights of buildings in new development

Policy CS2: Nature Conservation and Biodiversity

Policy wording not considered adequate –policy changes proposed

Policy CS3: The Waterfront

Policy provisions generally supported

Policy PA8: Victoria Gateway

Regeneration of area welcomed

Need to make adequate provision for residential parking

Consideration should be given to school and health needs

Improve connectivity to High Street

Concern regarding potential redevelopment of Roots Hall Football Ground resulting in out of town retail development to detriment of central area

Baxter Avenue site should be allocated as Opportunity Site – now proposed to be included

Policy PA9: Sutton Road

General support for regeneration of area

Guildford Road site should be allocated as Opportunity Site – now proposed to be included

Appendix 7: Response to the issues raised through consultation on the Preferred Approach SCAAP (Dec 2015 – Feb 2016)

The below provides a summary of each representation made on the Preferred Approach version of the Southend Central Area Acton Plan (SCAAP). Full submissions made during the consultation can be viewed on the Councils website.

SCAAP – Representations for SCAAP Preferred Approach

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Part A: The Plan and its Context					
Sustainability Appraisal					
Question 1: Sustainability Appraisal	Belfairs Garden Residents Association (Barbara Armitage) [511]	2330	Comment	Sustainability information not available	The SA was made available for public comment as an integral part of the SCAAP consultation process.
Policies Map					
Question 2: Policies Map	Essex Chambers of Commerce (Mr John Dallaway) [452]	1935	Support	Support the Policies map as set out	Noted.
Question 2: Policies Map	The Cooperative Group (Mr A Thompson) [473]	1974	Object	The Co-operative Group would wish to see the inclusion of land at 53-57 Sutton Road Southend within the SCAAP as an additional Opportunity Site.	The Council is considering inclusion of this site as an opportunity site. This will be assessed against information supplied by the owners of the site to demonstrate that development is deliverable by 2021.
Question 2: Policies Map	Burges Estate Residents Association [176]	1992	Comment	There is nothing in the document which justifies the Policies Map boundaries and they do seem somewhat arbitrary with the inclusion of vast swathes of residential areas which are unlikely to be the subject of significant change in the plan timescale. Large parts of areas of Victoria Gateway, Sutton Gateway and Kursaal estate are examples. On the other hand I would draw attention to the exclusion of St Marys Church from the Victoria area. The church and the adjoining properties on the corner of this important intersection are key elements in any junction improvement and should be included.	The SCAAP boundary has evolved through consultation and evidence, including the Central Area Masterplan, as well as previous versions of the SCAAP. St Marys Church is referenced in Policy DS2 – Key views, and Policy DS3 – Landmarks and Landmark Buildings, and therefore these policies will be taken into account in respect to any proposals that may impact upon it.
Question 2: Policies Map	Capitia Property Infrastructur	2030	Comment	The SCAAP preferred approach is supported. However, Capita P&I and Genesis consider that the OS11 site does not extend far enough, and that the adjacent Genesis site at Baxter Avenue should	The Council is considering inclusion of this site as an opportunity site. This will be assessed against information supplied by the

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	e On behalf of Genesis Housing [465]			<p>be incorporated within the OS11 site boundary. There are several reasons as to why, these are all explored in the supporting document. These considerations are:</p> <ul style="list-style-type: none"> • The overall shortfall in housing supply and how the development of the site can help deliver the target; • The policy compliance of the proposal; • The removal of low quality housing; • Given the area of the site, a coherent regeneration masterplan approach should be adopted in accordance with OS11; • The site is well positioned on an access vista and therefore well located for a housing led regeneration initiative. <p>The site is available, achievable and deliverable. The redevelopment of the site would allow for the residential density of the site to be optimised, whilst also providing a quality mixed use development with active frontages.</p>	owners of the site to demonstrate that development is deliverable by 2021.
Vision					
Question 3: Vision	Essex Chambers of Commerce (Mr John Dallaway) [452]	1936	Support	Support the proposed vision as set out	Noted.
Question 3: Vision	Burges Estate Residents Association [176]	1993	Comment	I have no problem with the Vision put forward for the centre, but I would question the rationale when it states that the regeneration of the centre will be led by the Uni campus. I have seen nothing in the document or elsewhere to suggest that the scale of activity, investment, etc. by the University would be such as to lead the way.	Noted, the rationale will not be included in the final version of the Plan. Growth of the university is regarded as one of the key elements which will lead to the successful regeneration of the town centre, as recognised by the Core Strategy DPD (Policy KP1).
Question 3: Vision	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2047	Support	Support the aspiration for Southend to be a City by the Sea and be a prosperous, vibrant, safe, thriving regional Centre as the cultural hub within the Thames Gateway and a great place to live, work and visit.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 3: Vision	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2048	Comment	Would argue that in relation to the Strategic Vision the Sea is what gives Southend its Unique Selling Point (USP) and this needs to be a key theme in relation to future planning policy supporting the continued growth, regeneration and reinvestment.	Noted.
Question 3: Vision	Southend Bid (Mr S Kearney) [496]	2149	Support	Support the aspiration for Southend to be a City by the Sea and be a prosperous, vibrant, safe, thriving regional Centre as the cultural hub within the Thames Gateway and a great place to live, work and visit.	Noted.
Question 3: Vision	Southend Bid (Mr S Kearney) [496]	2150	Comment	Would argue that in relation to the Strategic Vision the Sea is what gives Southend its Unique Selling Point (USP) and these need to be a key theme in relation to future planning policy supporting the continued growth, regeneration and reinvestment.	Noted.
Question 3: Vision	Southend Bid (Mr S Kearney) [496]	2238	Support	Southend BID received a 100% consultation responses having sent the Pro Forma out to 50 plus business consultees. The results of these can also be found in the tables in Appendix 4. Overwhelmingly the business consultees supported the SCAAP aspiration for Southend to be a prosperous, vibrant, safe cultural hub and City by the Sea. 94% of respondents supported that. In relation to the SCAAP's aspirational growth in homes in the Central Area 74% of the consultees supports the Councils vision. In relation to the job growth within the SCAAP area 90% of the respondents supported the Councils aspiration.	Noted
Question 3: Vision	Belfairs Garden Residents Association (Barbara Armitage) [511]	2331	Comment	The vision is too vague to make a judgement. This 2015 document only mentions people as categories. It mentions building on car parks and creating more precincts without any consideration of how people of all ages and abilities including elderly and/or disabled, (blind, deaf, restricted mobility, learning disabled) mums with children and buggies are going to access and move in this changed and regenerated town centre or how it will cater for all kinds of visitors. Where is the statement of Equality duty?	The vision is considered to be an appropriate statement of what the Borough Council wishes to achieve in the central area of the town. Details of movement and function are contained in the policy provisions of the Plan. An Equalities Impact Assessment will be carried out for the Proposed Submission version of the Plan.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 3: Vision	Southend and District Pensioners Campaign (Mr Robert Howes) [476]	2360	Object	We do not agree with the vision of Southend as a “City by the Sea”. We resent the amount of public money being spent on Bids to become a City. There is no evidence that the residents desire this status or indeed that Her Majesty would be inclined to support it. The image of the town already attracts over 6 million visitors a year, and it will always be perceived as a ‘down market seaside resort’ . What needs changing is the economy. More well paid jobs in modern hi-tech industries. This we believe is planned	The vision sets out the Council’s long term view and aspirations for the central area of the town. This is considered to be an ambitious and appropriate vision to work towards in the interests of improving the vitality and viability of the area. No changes proposed.
Question 3: Vision	Historic England (Dr Natalie Gates) [514]	2398	Comment	We would suggest that the issue of heritage is translated into the vision (paragraph 25) through this addition: “As a prosperous and thriving regional centre with a rich heritage, it will be an area...”	Noted. It is accepted that the vision does not make reference to heritage which is vitally important to the central area. <i>It is therefore proposed that the words ‘heritage and’ be added after the words ‘rich in’.</i> The vision in paragraph 25 would then read ‘Our vision for Southend Central Area, which includes the Town Centre and Central Seafront Area, is for it to be a City by the Sea. As a prosperous and thriving regional centre <u>and resort</u> , it will be an area that is vibrant, safe and hospitable, rich in <u>heritage</u> , commerce, learning and culture and an attractive, diverse place where people want to live, work and visit for both day trips, overnight and longer stays.’
Strategic Objectives					
Question 4: Strategic Objectives	Essex Chambers of Commerce (Mr John Dallaway) [452]	1937	Support	Support the Strategic Objectives as set out in the document	Noted.
Question 4: Strategic Objectives	Burges Estate Residents Association [176]	1994	Comment	Similarly I have no problem with the Strategic objectives with the exception of one fundamental addition. All efforts to promote design excellence, quality developments and use of sustainable materials will be for nothing without continuing effective maintenance and upkeep. Where the Council has the opportunity and that is especially work in the public realm, routine and timely maintenance to retain the intrinsic value of the work is essential. The designs of today are our heritage of tomorrow.	Noted.
Question 4: Strategic Objectives	Stockvale Group representing Sands & Southend Radio, Three	2054	Support	Support the improvements to the transformation on economic, vitality, viability and diversity of Southend Central Area and the encouragement of a wide range of homes, businesses and retail. It would also support the opportunity for additional learning, recreation and leisure.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]				
Question 4: Strategic Objectives	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2055	Support	Support the Councils aspiration for design excellence and good quality development proposals and significant public realm improvements to reinforce the sense of place to compliment the new and existing infrastructure and townscape of the Central Area.	Noted.
Question 4: Strategic Objectives	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2056	Support	Supports the Councils aspiration to establish Southend as low carbon City providing that it doesn't have any adverse impact in terms of access, connectivity and parking allocations within the Central Area.	Noted.
Question 4: Strategic Objectives	Stockvale Group representing Sands & Southend Radio, Three	2057	Support	Support the improvement to accessibility and the further encouragement of sustainable modes of transport.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]				
Question 4: Strategic Objectives	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2069	Support	Support the Council in their aspiration to (i) improve Competitive Performance (ii) Reduce the cost base (iii) Diversify away from retail uses (iv) grow the local economy and/or population, which is a strong theme in the preferred option principle. Recognise that the High Street should be a social place that makes creative use of public space with a vibrant evening economy.	Noted.
Question 4: Strategic Objectives	Southend Bid (Mr S Kearney) [496]	2156	Support	Support the improvements to the transformation on economic, vitality, viability and diversity of Southend Central Area and the encouragement of a wide range of homes, businesses and retail. It would also support the opportunity for additional learning, recreation and leisure.	Noted.
Question 4: Strategic Objectives	Southend Bid (Mr S Kearney) [496]	2157	Support	Support the Councils aspiration for design excellence and good quality development proposals and significant public realm improvements to reinforce the sense of place to compliment the new and existing infrastructure and townscape of the Central Area.	Noted.
Question 4: Strategic Objectives	Southend Bid (Mr S Kearney) [496]	2158	Support	Supports the Councils aspiration to establish Southend as low carbon City providing that it doesn't have any adverse impact in terms of access, connectivity and parking allocations within the Central Area.	Noted.
Question 4: Strategic Objectives	Southend Bid (Mr S Kearney) [496]	2159	Support	Support the improvement to accessibility and the further encouragement of sustainable modes of transport.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 4: Strategic Objectives	Southend Bid (Mr S Kearney) [496]	2171	Support	Support the Council in their aspiration to (i) improve Competitive Performance (ii) Reduce the cost base (iii) Diversify away from retail uses (iv) grow the local economy and/or population, which is a strong theme in the preferred option principle. Recognises that the High Street should be a social place that makes creative use of public space with a vibrant evening economy	Noted.
Question 4: Strategic Objectives	Southend Bid (Mr S Kearney) [496]	2239	Support	Southend BID received a 100% consultation responses having sent the Pro Forma out to 50 plus business consultees. The results of these can also be found in the tables in Appendix 4. Overwhelmingly the business consultees supported the SCAAP aspiration for Southend to be a prosperous, vibrant, safe cultural hub and City by the Sea. 94% of respondents supported that. In relation to the SCAAP's aspirational growth in homes in the Central Area 74% of the consultees supports the Councils vision. In relation to the job growth within the SCAAP area 90% of the respondents supported the Councils aspiration.	Noted
Question 4: Strategic Objectives	Indigo Planning on behalf of Royals Shopping Centre (Helen McManus) [498]	2471	Comment	A number of strategic objectives are set out within the SCAAP which include improving and transforming the economic vitality, viability and diversity of Southend Central Area by encouraging the establishment of a wider range of homes, businesses and shops whilst providing new opportunities for learning, recreation and leisure. We suggest that a further strategic objective be included that seeks to maintain and protect existing shops and town centre uses in the Southend Central Area.	Strategic Objective 1 seeks to improve and diversify the town centre to ensure its future economic vitality and viability. To protect existing shops and other uses per se is not considered appropriate if a flexible approach to the future development of the central area is to be achieved. No changes are proposed.
Question 4: Strategic Objectives	Bowhill Planning Partnership (Anthony Bowhill) [474]	2321	Support	Objective 1 - Currently the High Street is run-down. This is partly due to the recession (2008-2014) but more fundamentally to the restricted hinterland of The Centre which only has two main sides. This means that the shopping draw is limited as testified by the growing number of vacancies. Thus a wider range of uses in the High Street providing diversity and assisting viability and vitality is to be welcomed. I, therefore support Objective 1 with its emphasis on "a wider range of...." which would help to increase the draw of the shopping centre.	Noted.
Question 4: Strategic Objectives	Bowhill Planning Partnership (Anthony Bowhill) [474]	2322	Support	Objective 8 is welcomed by bringing more people into the centre to live who will be able to supports its vitality.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 4: Strategic Objectives	Belfairs Garden Residents Association (Barbara Armitage) [511]	2332	Comment	Too generalised for comment.	The strategic objectives set out the main direction for the Plan. The details are contained within its policy provisions.
Question 4: Strategic Objectives	Historic England (Dr Natalie Gates) [514]	2397	Support	Welcome the identification of Southend's heritage in the context and issues (paragraph15) and its inclusion as Strategic Objective 7.	Noted
Question 4: Strategic Objectives	Environment Agency (Miss Lizzie Griffiths) [334]	2419	Comment	Strategic Planning Context We are pleased that Flood Risk Management and Sustainable Drainage is included within the Context and Issues for the Southend Central Area, and in particular, that reference is made to the key challenge of addressing climate change. This section discusses the risk of tidal flooding to the Borough, although it should be noticed that there are other sources of flood risk which will need to be considered too.	Noted, additional text will be included in Issues I of 'Context and Issues for the Southend Central Area' to outline that the SCAAP area is also susceptible to surface water flooding as follows: 'Southend has been identified by the Environment Agency as susceptible to local <u>surface water</u> flooding under conditions of extreme rainfall.'
Question 4: Strategic Objectives	Southend and District Pensioners Campaign (Mr Robert Howes) [476]	2361	Support	Yes we agree	Noted.

Part B: Development Strategy

Central Area Strategy

Question 5: Central Area Strategy	Essex Chambers of Commerce (Mr John Dallaway) [452]	1938	Support	Agree with the proposed Central Area Strategy as set out	Noted.
Question 5: Central Area Strategy	Mr Michael Davies [493]	2036	Comment	An important question is- Will current and future generations thank us for the new plans in years to come? High-rise developments like these may be typical of a large city, but I'm not sure that many residents of Southend want to live in a 'City by the sea'. I think	Noted. The Plan puts in place a number of policy provisions to protect the central areas heritage assets and the character and setting of the area. Furthermore, Policy DM4 of the

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				they'd want Southend to retain some of its 'seaside town' charm. London is only an hour's train ride away; let's keep it that way, and not let London engulf the area. A vibrant, but charming town is the best thing to aim for, in my view.	Development Management Document sets out provision for managing tall and large buildings. No changes are proposed.
Question 5: Central Area Strategy	Mr Michael Davies [493]	2039	Comment	Have the Council considered a Park & Ride for Southend, to ease the long traffic queues along the A127 at busy times? It works well in Chelmsford and other towns.	Park and Ride schemes have been considered a number of times in recent years but have not been considered feasible given the limited land available and linear peninsula geography of the town. The provision of Park and Ride would only be feasible outside the SCAAP boundaries. Such options will be kept under review as part of the on-going Local Transport Plan provisions and development of the Southend Local Plan. No changes are proposed.
Question 5: Central Area Strategy	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2070	Support	Support the Council in their aspiration to (i) improve Competitive Performance (ii) Reduce the cost base (iii) Diversify away from retail uses (iv) grow the local economy and/or population, which is a strong theme in the preferred option principle. Recognise that the High Street should be a social place that makes creative use of public space with a vibrant evening economy.	Noted.
Question 5: Central Area Strategy	Southend Bid (Mr S Kearney) [496]	2172	Support	Support the Council in their aspiration to (i) improve Competitive Performance (ii) Reduce the cost base (iii) Diversify away from retail uses (iv) grow the local economy and/or population, which is a strong theme in the preferred option principle. Recognises that the High Street should be a social place that makes creative use of public space with a vibrant evening economy	Noted.
Question 5: Central Area Strategy	Southend Bid (Mr S Kearney) [496]	2240	Support	Southend BID received a 100% consultation responses having sent the Pro Forma out to 50 plus business consultees. The results of these can also be found in the tables in Appendix 4. Overwhelmingly the business consultees supported the SCAAP aspiration for Southend to be a prosperous, vibrant, safe cultural hub and City by the Sea. 94% of respondents supported that. In relation to the SCAAP's aspirational growth in homes in the Central Area 74% of the consultees supports the Councils vision. In relation to the job growth within the SCAAP area 90% of the respondents supported the Councils aspiration.	Noted

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 5: Central Area Strategy	Bowhill Planning Partnership (Anthony Bowhill) [474]	2323	Support	The Strategy is supported and every effort should be made to bring forward various identified sites particularly for new residential	Noted.
Question 5: Central Area Strategy	Belfairs Garden Residents Association (Barbara Armitage) [511]	2333	Comment	Too broad to comment	The central area strategy is a broad statement of what the Plan is trying to achieve.
Question 5: Central Area Strategy	Southend and District Pensioners Campaign (Mr Robert Howes) [476]	2362	Support	Yes we agree	Noted.

Criteria Based Policies

Maintaining a Prosperous Retail Centre – Policy DS1

Question 6; Policy DS1	Essex Chambers of Commerce (Mr John Dallaway) [452]	1939	Support	Agree with the proposed approach to maintaining a prosperous retail centre	Noted.
Question 6; Policy DS1	Mr Jason Pilley [469]	1965	Comment	I would like to make the comment that attempting to move shops out of the High Street towards outlying areas of the town would be a bad idea on many levels. For one thing it would increase people's reliance on cars, which isn't just environmentally unsound but is also an example of poor land-use planning, we ought to be making it easier for people to get to shops, not harder; we ought to be building up a strong central community, not dissipating it.	Policy DS1 makes no provision for out of centre retail. Wider retail policy for the Borough is set out within the adopted Core Strategy within the framework of which the SCAAP has been prepared. Retail development outside the SCAAP area will be considered against the adopted Core Strategy and national planning policy. These contain a town centre first approach to retail and other town centre proposals. Significant out of town retail development proposals will have to satisfy a sequential test (i.e. looking at town centre sites first) and be subject to an impact assessment.
Question 6; Policy DS1	Mr Jason Pilley [469]	1966	Comment	The character and soul and reputation of towns and cities are determined by their centre, not by their outskirts. A High Street full of pawn shops and cheapo stores and closed-down restaurants won't be doing anyone any favours	See comments in relation to Rep 1965

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 6; Policy DS1	Burges Estates Residents Association [176]	1995	Comment	Maintaining a prosperous retail centre begs the question as to how prosperity is measured. Does the retail turnover statistics for the centre show a level of prosperity that is considered adequate since the policy options seek only to maintain the current prosperity not improve or enhance it? Anecdotal evidence suggests otherwise with vast sums of disposable income from Southend residents increasingly spent at Bluewater, Lakeside, Westfield and even Chelmsford as Southend has slowly declined with many poor quality, here today gone tomorrow, shops.	Noted, it is proposed to remove the word 'maintaining' from the title of Policy DS1 and to amend this to read ' A Prosperous Retail Centre '.
Question 6; Policy DS1	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2044	Comment	Based on various research and commissioned reports there is substantive evidence to indicate that the High Street is mainly singular, and due to change in customer expectations and behaviour the type of High Street is no longer viable.	Policy PA1 provides for a flexible approach to the future development of the High Street incorporating mixed use development and public realm improvements that contribute to the vitality and viability of the centre. Furthermore, Policy DS1 allows for a greater mix of town centres uses, such as cafes and restaurants. No changes are proposed.
Question 6; Policy DS1	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2045	Comment	Support the Council's view that spatially the High Street and connections to the seafront are an inappropriate configuration for regeneration and commercial vitality.	Noted.
Question 6; Policy DS1	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2046	Support	Support idea of the Central Seafront Area achieving a compact defined prime retail core in the Town Centre with a mixture of uses and peripheral areas made over to complimentary uses and in particular support the intensification of the growth of housing in the Central Area.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 6; Policy DS1	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2059	Support	Recognise the importance of the Town Centre in viability and vitality terms and the need to enhance the existing markets where appropriate and introduce and create new markets.	Noted.
Question 6; Policy DS1	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2062	Comment	High Streets Adapting for Change (RICS) introduces the Governments recognition that our High Streets have to offer something new and different that neither the shopping centres nor the internet can match. They need to offer an experience that goes beyond retail and they need to be a destination for the socialising culture, health, well being, creativity and learning. Offices alongside shops, alongside housing, alongside eateries.	Noted. The Plan seeks to achieve this.
Question 6; Policy DS1	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2065	Comment	Changes in consumer behaviour, the growth in car ownership and its impact on accessibility of in and out of Town Centre shopping are reasonably well understood. This is particularly likely to be an issue should the Council grant the Fossetts Farm application to subsequently increase a retail offer in an out of town centre location.	Noted.
Question 6; Policy DS1	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2067	Comment	The growth of out of town shopping centre has been widely blamed for Town Centre decline and planning policies have attempted to restrict this growth, which the Stockvale Group wish to see reflected in the Council's determination of planning applications at Fossetts Farm. (The outcome of Planning Applications for extensive retail at Fossetts Farm will determine the value of the Council progressing the SCAAP process. If Fossetts Farm retail development is approved the Stockvale Group feel the SCAAPs aspirations will be undeliverable.	The Fossetts Farm proposals are located outside the SCAAP boundary. Planning permission for retail development at Fossetts Farm has been previously granted and its potential impact was taken into consideration in the preparation of the Core Strategy and SCAAP (see also Southend Retail Study). Any new proposal at Fossetts Farm will require planning permission, be subject to planning policy provisions and require a further retail impact assessment. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Sealife (Mr S Kearney) [483]				
Question 6; Policy DS1	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2071	Support	Support the Council in their aspiration to (i) improve Competitive Performance (ii) Reduce the cost base (iii) Diversify away from retail uses (iv) grow the local economy and/or population, which is a strong theme in the preferred option principle. Recognise that the High Street should be a social place that makes creative use of public space with a vibrant evening economy.	Noted.
Question 6; Policy DS1	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2073	Comment	Given that there is a shortage of housing and surplus retail property, there is no doubt that conversion to residential use should form part of the future of the Town Centre.	Noted. The Plan seeks to achieve this. In relation to ground floor conversion, this would be outside of designated shopping frontage and in accordance with national policy.
Question 6; Policy DS1	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2075	Comment	SCAAP should be seeking diversification of some of the retail uses on the ground floor as conversion to residential uses, providing attractive exit strategies for the asset managers and investors. This needs careful consideration in terms of how spatially to organise the retail uses	Policy DS1 seeks to protect retail and town centre uses on the ground floor in identified shopping areas in order to maintain the vitality and viability of the centre. No changes are proposed.
Question 6; Policy DS1	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure	2077	Comment	Many of our High Streets have been shaped by their past; however they are now trapped in their current configurations and often in poor shape to face the future. In relation to Southend on Sea, this is certainly the case. The High Street in particular has a linearity with no social space for congregation, interaction and the alternative commercial uses that would reactivate these spaces such as cafes, coffee shops, office space and importantly a high intensification of residential uses both at ground	The SCAAP recognises the need to enhance and broaden the offer in the High Street and seeks to do this by providing a more flexible approach in the determination of planning applications to encourage a mix of retail, cafe and restaurant uses. The Plan also seeks to enhance and promote new public spaces within the centre. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Island, Adventure Sealife (Mr S Kearney) [483]			level and above The SCAAP and the Stockvale Group recognise that the High Street in particular requires a restructuring on a significant scale.	
Question 6; Policy DS1	Southend Bid (Mr S Kearney) [496]	2145	Comment	Based on various research and commissioned reports there is substantive evidence to indicate that the High Street is mainly a singular and due to change in customer expectations and behaviour the type of High Street is no longer viable.	Policy PA1 provides for an approach to the future development of the High Street that incorporates mixed use development and public realm improvements that contribute to the vitality and viability of the centre. No changes are proposed.
Question 6; Policy DS1	Southend Bid (Mr S Kearney) [496]	2146	Comment	Support the Council's view that spatially the High Street and connections to the seafront are an inappropriate configuration for regeneration and commercial vitality.	Noted.
Question 6; Policy DS1	Southend Bid (Mr S Kearney) [496]	2148	Support	Support idea of the Central Seafront Area achieving a compact defined prime retail core in the Town Centre with a mixture of uses and peripheral areas made over to complimentary uses and in particular support the intensification of the growth of housing in the Central Area.	Noted.
Question 6; Policy DS1	Southend Bid (Mr S Kearney) [496]	2161	Support	Recognise the importance of the Town Centre in viability and vitality terms and the need to enhance the existing markets where appropriate and introduce and create new markets	Noted.
Question 6; Policy DS1	Southend Bid (Mr S Kearney) [496]	2164	Comment	High Streets Adapting for Change (RICS) introduces the Governments recognition that our High Streets have to offer something new and different that neither the shopping centres nor the internet can match. They need to offer an experience that goes beyond retail and they need to be a destination for the socialising culture, health, well being, creativity and learning. Offices alongside shops, alongside housing, alongside eateries.	Noted. The Plan seeks to achieve this.
Question 6; Policy DS1	Southend Bid (Mr S Kearney) [496]	2167	Comment	Changes in consumer behaviour, the growth in car ownership and its impact on accessibility of in and out of Town Centre shopping are reasonably well understood. This is particularly likely to be an issue should the Council grant the Fossetts Farm application to subsequently increase a retail offer in an out of town centre location.	Noted.
Question 6; Policy DS1	Southend Bid (Mr S Kearney) [496]	2169	Comment	The growth of out of town shopping centre has been widely blamed for Town Centre decline and planning policies have attempted to restrict this growth, which the Stockvale Group wish to see reflected in the Council's determination of planning applications at Fossetts Farm. (The outcome of Planning Applications for extensive retail at Fossetts Farm will determine the value of the Council progressing the SCAAP process. If Fossetts Farm retail development is approved the Stockvale Group feel the SCAAPs aspirations will be undeliverable).	The Fossetts Farm proposals are located outside the SCAAP boundaries. Planning permission for retail development at Fossetts Farm has been previously granted and its potential impact was taken into consideration in the preparation of the Core Strategy and SCAAP (see also Southend Retail Study). Any new proposal at Fossetts Farm will require planning permission, be subject to planning policy and require a further retail impact assessment. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 6; Policy DS1	Southend Bid (Mr S Kearney) [496]	2173	Support	Support the Council in their aspiration to (i) improve Competitive Performance (ii) Reduce the cost base (iii) Diversify away from retail uses (iv) grow the local economy and/or population, which is a strong theme in the preferred option principle. Recognises that the High Street should be a social place that makes creative use of public space with a vibrant evening economy	Noted.
Question 6; Policy DS1	Southend Bid (Mr S Kearney) [496]	2175	Comment	Given that there is a shortage of housing and surplus retail property, there is no doubt that conversion to residential use should form part of the future of the Town Centre.	Noted. The Plan seeks to achieve this. In relation to ground floor conversion, this would be outside of designated shopping frontage and in accordance with national policy.
Question 6; Policy DS1	Southend Bid (Mr S Kearney) [496]	2177	Comment	SCAAP should be seeking diversification of some of the retail uses on the ground floor as conversion to residential uses, providing attractive exit strategies for the asset managers and investors. This needs careful consideration in terms of how spatially to organise the retail use.	Policy DS1 seeks to maintain retail uses or other town centre uses that provide an active frontage and contribute to the vitality of the town centre. No changes are proposed.
Question 6; Policy DS1	Southend Bid (Mr S Kearney) [496]	2179	Comment	Many of our High Streets have been shaped by their past, however they are now trapped in their current configurations and often in poor shape to face the future. In relation to Southend on Sea, this is certainly the case. The High Street in particular has a linearity with no social space for congregation, interaction and the alternative commercial uses that would reactivate these spaces such as cafes, coffee shops, office space and importantly a high intensification of residential uses both at ground level and above. The SCAAP and the Stockvale Group recognise that the High Street in particular requires a restructuring on a significant scale.	The SCAAP recognises the need to enhance and broaden the offer in the High Street and seeks to do this by encouraging a mix of retail, cafe and restaurant uses. The Plan also seeks to enhance and promote new public spaces within the centre. No changes are proposed.
Question 6; Policy DS1	Southend Bid (Mr S Kearney) [496]	2244	Comment	Retail provision achieved 82% top score high priority.	Noted.
Question 6; Policy DS1	Southend Bid (Mr S Kearney) [496]	2261	Comment	Whilst the BID do not object or have any particular concern regarding the moving of the Southend Football Club the move is predicted on the suggested development requirement to combine a significant number of retail outlets. This is being presented as a financial necessity to allow the Club to move to new premises, however, if this is supported many if not all the High Street chains are likely to follow.	Noted.
Question 6; Policy DS1	Southend Bid (Mr S Kearney) [496]	2263	Object	In relation to the Fossetts Farm development. Proposals to have a large quantum of A1 retail provision would have a major impact on the Town Centre which is highly likely to lead to a further decline of an already struggling retail offer within the High Street and surrounding environs. Furthermore, the highway connection and infrastructure would not support the level of traffic journeys that the proposals at Roots Hall are likely to generate. The BID would ask that the Council ensure that in accordance with advice in the National Planning Policy Framework (NPPF) a sequential test is undertaken and would like to be informed of the conclusions in	The Fossetts Farm proposals are located outside the SCAAP boundaries. Planning permission for retail development at Fossetts Farm has been previously granted and its potential impact was taken into consideration in the preparation of the Core Strategy and SCAAP (see also Southend Retail Study). Any new proposal at Fossetts Farm, which includes a significant amount of retail development, will require planning permission, be subject to planning policy, satisfy a

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				relation to the impact on the vitality and viability of the Town Centre. The BID are rightly concerned that the Fossetts Farm proposals will have negative impact on the future of the High Street and the existing retail economy of the SCAAP area.	sequential test and require a retail impact assessment. No changes are proposed.
Question 6; Policy DS1	Indigo Planning on behalf of Royals Shopping Centre (Helen McManus) [498]	2300	Support	Valad (Europe) largely agree to the proposed approach to maintaining a prosperous retail centre, however , a number of amendments are suggested:	Noted.
Question 6; Policy DS1	Indigo Planning on behalf of Royals Shopping Centre (Helen McManus) [498]	2301	Object	Part 7 of Policy DS1 states that the Council will encourage the landowner/landlord of a unit with little prospect of being occupied in the primary or secondary frontage to display local art. This should be removed. If this situation arises, the Council should liaise with the landowner/landlord and ask if this could be provided. It is not appropriate to set this out in policy.	The policy wording is considered to be appropriate as it seeks to 'encourage' landlords. This would necessitate consultation with the landlord/landowner. The policy merely sets out the Council's intent in such matters. However, it is considered that this statement can be moved to the supporting text.
Question 6; Policy DS1	Indigo Planning on behalf of Royals Shopping Centre (Helen McManus) [498]	2302	Object	Policy DS1 seeks to ensure that new retail development is well integrated and closely linked with the Town Centre Primary Shopping Frontage and that proposals for retail development inside or outside the Primary Shopping Area will be determined in accordance with Core Strategy Policy CP2 (relating to Town Centre and Retail Development). The policy should be amended to state that any out of centre retail will be determined in accordance with the NPPF and Policy CP2 of the Core Strategy (in so far as it conforms with the NPPF). Policy CP2 was drafted before the publication of the NPPF and is out of date in some respects, referring to the needs test, for example.	It is accepted that the Core Strategy was adopted before the publication of the National Planning Policy Framework (NPPF). It is therefore proposed that the following words are added to the end of Policy DS1 point 2 as follows: 'and the provisions of the National Planning Policy Framework (NPPF)'.
Question 6; Policy DS1	Belfairs Garden Residents Association (Barbara Armitage) [511]	2334	Support	Yes if improvements to shopping area are made. A bright and clean shopping area will attract custom but much of the shopping area is uneven and dirty.	Noted.
Question 6; Policy DS1	Southend and District Pensioners Campaign (Mr Robert Howes) [476]	2363	Support	Yes – need reliable buses	Noted.
Question 6; Policy DS1	Procurement Consulting (Mr Barrie Evans) [513]	2385	Comment	The city centre lacks large retailers such as John Lewis etc and the shopping centres are outdated and house little of use to the population. Smaller retailers should be housed in the more traditional road side areas as opposed to shopping centres. A regular farmers market should be promoted further in the pedestrian centre and local Essex produce	The SCAAP in Policy DS1 seeks to provide for a prosperous retail centre and promotes the provision of street markets. No changes proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				promoted. This should run over the weekend to allow workers to take advantage of this useful and enhancing function. Chelmsford has a new John Lewis and a thriving farmers market and the town centre is better for it.	
Question 6; Policy DS1	Procurement Consulting (Mr Barrie Evans) [513]	2386	Comment	Shop fronts should have strict planning permission on them and rid the town of dilapidated and tacky cheap plastic oversized advertising frontage. This will enhance the areas look (Bury St Edmunds), assist with job creation and the local economy.	Policy DS1 6. Seeks to ensure that shop fronts are of a high standard of design. The adopted Design Guide provides for appropriate shop front design. Policy DM5 sets out provision for frontages of townscape merit. No changes proposed.
Question 6; Policy DS1	Historic England (Dr Natalie Gates) [514]	2399	Comment	Note that the current wording does not explicitly set out the importance of roof scape as a part of overall building frontages in paragraph 6.	Noted. It is proposed that the word 'roofscape' be inserted into Policy DS1 6. So that it reads: 'All new shop frontages will be of a high standard of design that is compatible with the architectural style, <u>roofscape</u> and character of the building and surrounding area....'
Question 6; Policy DS1	National Federation for the Blind (Mrs Jill Allen-King) [516]	2427	Comment	All shops in the High street should have flat entrances and therefore be totally accessible for all customers including disabled people. Shops should not have A-boards or other obstacles outside them, restricting the safe passage of pedestrians especially Blind people. If restaurants and cafes want to have tables outside then they must have a metre high barrier, preventing blind people from walking in to them. When market stalls are positioned in the high street it is very difficult and dangerous for blind and partially sighted people to walk.	Noted. Access arrangements to shops are considered as part of the design stage of planning applications to ensure accessibility for all users. No changes to policy are proposed. The Council seeks to discourage the use of 'A' Boards as outlined in the Streetscape Guide SPD.
Managing Primary Shopping Frontages - Policy Options DS1a, DS1b and DS1c					
Question 7: Managing Primary Shopping Frontages; Policy Options DS1a, DS1b and DS1c	Burges Estate Residents Association [176]	1996	Comment	On balance Option B is to be preferred for providing the greatest flexibility in what is a fast changing situation. There is also the question mark about one or two centres. The plan makes implicit reference to reinforcing routes to the two main areas which suggests that the middle might become less of a Class A1 retail use. Overall while there is a case for upgrading and improving the shopping environment both in terms of public space and retail stores, the overall volume of retail space should not increase.	Noted.
Question 7: Managing Primary Shopping Frontages; Policy Options DS1a, DS1b and DS1c	Indigo Planning on behalf of Royals Shopping Centre (Helen McManus) [498]	2303	Object	Three policy options are presented which seek to maintain a prosperous retail centre. In the first instance, further clarity is required as to how the length of frontage should be calculated when assessing the percentage of A1 units.	The Policy options refer to length of measured frontage which is depicted on the Policies Map. This is considered to be clear in its intent and has been successfully implemented as Council policy for over 20 years. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 7: Managing Primary Shopping Frontages; Policy Options DS1a, DS1b and DS1c	Indigo Planning on behalf of Royals Shopping Centre (Helen McManus) [498]	2304	Support	<p>Valad (Europe) support Option C as it will allow for more restaurant (A3) uses which the town centre is currently lacking. More A3 uses will increase footfall and linked trips and support the night time economy thus adding to the vitality and viability of the town centre. Further flexibility should be built into this policy to allow other town centre appropriate uses to be permitted providing there is not an over concentration of these uses within a certain length of the frontage.</p> <p>It is widely acknowledged that the nature of retail is changing. It must be acknowledged that retail frontage policy needs to change, to allow capacity for other, new innovative uses, as well as other leisure and supporting uses which will create vitality in the borough's centres.</p>	Noted.
Question 7: Managing Primary Shopping Frontages; Policy Options DS1a, DS1b and DS1c	Indigo Planning on behalf of Royals Shopping Centre (Helen McManus) [498]	2305	Comment	The Council should also consider directing new large comparison retail developments onto existing car parks in order to help strengthen the town centre and prevent it from going into decline. This would achieve the town centre first approach to retail of the NPPF. Car parking could then be re-provided in the form of under croft or multi storey parking facilities. This would assist in relieving pressure on existing parking facilities whilst bolstering the town centre, thus enhancing its vitality and viability.	The policy provisions in the Plan promote mixed use developments on the existing car parks which would not preclude retail development if this were to come forward for consideration. No changes are proposed.
Question 7: Managing Primary Shopping Frontages; Policy Options DS1a, DS1b and DS1c; para 47, para 48	Bowhill Planning Partnership (Anthony Bowhill) [474]	2319	Comment	It is clear (paras 47 & 48) that vacancy is higher than the average national town centre rate. While this may partly be as a result of the high level of vacancies in the Victoria Shopping Centre, inspection shows that there are also many vacant units in the High Street itself. In relation to this the increasing flexibility with regard to non-retail floor space set out in policy options DS1a-c provides a pragmatic approach to ensuring vacant units are used in an appropriate way, particularly for restaurant use.	Noted.
Question 7: Managing Primary Shopping Frontages; Policy Options DS1a, DS1b and DS1c	Bowhill Planning Partnership (Anthony Bowhill) [474]	2320	Support	DS1a-c provides a pragmatic approach to ensuring vacant units are used in an appropriate way, with each option providing greater flexibility. Policy DS1c is to be supported as it provides the greatest flexibility, thus allowing more restaurants. The increase in the number of restaurants and cafes are to be welcomed as they will encourage shoppers to remain longer.	Noted.
Question 7: Managing	Belfairs Garden	2335	Support	Option B supported.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Primary Shopping Frontages; Policy Options DS1a, DS1b and DS1c	Residents Association (Barbara Armitage) [511]				
Question 7: Managing Primary Shopping Frontages; Policy Options DS1a, DS1b and DS1c	Procedures Consulting (Mr Barrie Evans) [513]	2387	Comment	Quality restaurants should be promoted in the area and quiet bars should also be promoted instead of chain sports bars which degrade the area. Bars etc should not be concentrated in one area as this will again cause degradation and poor maintenance. This never works and if you look at union street in Plymouth and Botchergate in Carlisle a concentration of Lively bars ruins an area, promoting drugs, prostitution and dilapidated buildings.	Policy DS1 seeks to retain a balanced mix of uses within the town centre.
Employment					
Question 8	Essex Chambers of Commerce (Mr John Dallaway) [452]	1940	Support	Agree with proposed approach to employment development as it seeks to take advantage of the important opportunities that the central area has over the coming years.	Noted.
Question 8	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2040	Support	The aspirations and preferred options are supported in relation to the further regeneration, renewal and economic growth in the SCAAP area.	Noted.
Question 8	Stockvale Group representing Sands & Southend	2084	Support	Wholeheartedly support the encouragement and expansion of businesses in the Southend Central Area, although note that the issues around transport, access and parking need further consideration and understanding.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]				
Question 8	Southend Bid (Mr S Kearney) [496]	2141	Support	The aspirations and preferred options are supported in relation to the further regeneration, renewal and economic growth in the SCAAP area.	Noted.
Question 8	Southend Bid (Mr S Kearney) [496]	2187	Support	Wholeheartedly support the encouragement and expansion of businesses in the Southend Central Area, although note that the issues around transport, access and parking need further consideration and understanding.	Noted.
Question 8	Southend Bid (Mr S Kearney) [496]	2241	Support	Southend BID received a 100% consultation responses having sent the Pro Forma out to 50 plus business consultees. The results of these can also be found in the tables in Appendix 4. Overwhelmingly the business consultees supported the SCAAP aspiration for Southend to be a prosperous, vibrant, safe cultural hub and City by the Sea. 94% of respondents supported that. In relation to the SCAAP's aspirational growth in homes in the Central Area 74% of the consultees supports the Councils vision. In relation to the job growth within the SCAAP area 90% of the respondents supported the Councils aspiration.	Noted
Question 8	National Federation for the Blind (Jill Allen King) [516]	2428	Comment	With reference to employment opportunities, consideration should be given to the employment of people with disabilities. The Council does have a responsibility under the Equality Act to take the needs of disable people in to account.	Noted
Housing					
Question 9: Residential Development (site allocations)	Basildon Borough Council (Amanda Parrott) [492]	2033	Support	It is recognised that additional work has been undertaken by Southend-on-Sea Borough Council to identify opportunity sites with the potential to deliver additional housing supply within the Southend Central Area, over and above that initially proposed in the Core Strategy. This is welcomed by Basildon Borough Council in terms of meeting housing needs arising within the South Essex Housing Market Area.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 10: Residential Development (proposed approach)	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2074	Comment	Given that there is a shortage of housing and surplus retail property, there is no doubt that conversion to residential use should form part of the future of the Town Centre.	Noted. The Plan seeks to achieve this. In relation to ground floor conversion, this would be outside of designated shopping frontage and in accordance with national policy.
Question 10: Residential Development (proposed approach)	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2080	Support	As noted in the British Property Federation Report 'Meeting the Town Centre Challenge' Town Centres are accessible places suitable for densification and accommodating more housing. In this regards the Stockvale Group supports the aspirations of the Local Planning Authority through the SCAAP.	Noted.
Question 10: Residential Development (proposed approach)	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2087	Support	Support a higher intensification of residential uses in the Central Area together with a broader mix of commercial uses ranging from A1 retail, A3 restaurant café, D2 leisure and B1 offices to provide a more diverse multi-use High Street and Central Seafront.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 10: Residential Development (proposed approach)	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2094	Support	The STOCKVALE GROUP understand the concept of a much greater residential intensification of the SCAAP area and would wholeheartedly support the Councils aspirations for an additional 4000+ homes however, this must be in the context of insuring there is suitable amenity and infrastructure. The intensification together with a greater mix of uses in the Town Centre and Central Seafront create a much more buoyant and sustainable economy and the STOCKVALE GROUP welcome the Councils proposals as part of the SCAAP planning document.	Noted.
Question 10: Residential Development (proposed approach)	Southend Bid (Mr S Kearney) [496]	2176	Comment	Given that there is a shortage of housing and surplus retail property, there is no doubt that conversion to residential use should form part of the future of the Town Centre.	Noted. The Plan seeks to achieve this. In relation to ground floor conversion, this would be outside of designated shopping frontage and in accordance with national policy.
Question 10: Residential Development (proposed approach)	Southend Bid (Mr S Kearney) [496]	2182	Support	As noted in the British Property Federation Report 'Meeting the Town Centre Challenge' Town Centres are accessible places suitable for densification and accommodating more housing. In this regards the BID supports the aspirations of the Local Planning Authority through the SCAAP.	Noted.
Question 10: Residential Development (proposed approach)	Southend Bid (Mr S Kearney) [496]	2190	Support	Support a higher intensification of residential uses in the Central Area together with a broader mix of commercial uses ranging from A1 retail, A3 restaurant café, D2 leisure and B1 offices to provide a more diverse multi-use High Street and Central Seafront.	Noted.
Question 10: Residential Development (proposed approach)	Southend Bid (Mr S Kearney) [496]	2197	Support	The BID understand the concept of a much greater residential intensification of the SCAAP area and would wholeheartedly support the Councils aspirations for an additional 4000+ homes however, this must be in the context of insuring there is suitable amenity and infrastructure. The intensification together with a greater mix of uses in the Town Centre and Central Seafront create a much more buoyant and sustainable economy and the BID welcome the Councils proposals as part of the SCAAP planning document.	Noted.
Question 10: Residential Development	Southend Bid (Mr S Kearney) [496]	2242	Support	Southend BID received a 100% consultation responses having sent the Pro Forma out to 50 plus business consultees. The results of these can also be found in the tables in Appendix 4. Overwhelmingly the business consultees supported the SCAAP	Noted

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
(proposed approach)				aspiration for Southend to be a prosperous, vibrant, safe cultural hub and City by the Sea. 94% of respondents supported that. In relation to the SCAAP's aspirational growth in homes in the Central Area 74% of the consultees supports the Councils vision. In relation to the job growth within the SCAAP area 90% of the respondents supported the Councils aspiration.	
Question 10: Residential Development (proposed approach)	Bowhill Planning Partnership (Anthony Bowhill) [474]	2324	Support	It is crucial that more housing be provided in and close to the town centre. This is because Southend is ringed by the green belt and thus there is no room for outward expansion. Every effort should be made to find suitable new sites, including the use of redundant office blocks which are now no longer required. Owners and developers should be encouraged to bring these forward with the emphasis on the lower end of the market.	Noted.
Question 10: Residential Development (proposed approach)	Southend and District Pensioners Campaign (Mr Robert Howes) [476]	2364	Comment	We must have more affordable family homes in the Borough of two storeys with gardens	Noted.
Question 10: Residential Development (proposed approach)	Procuresure Consulting (Mr Barry Evans) [513]	2376	Comment	Southend-On-Sea central residential area is dilapidated due to poor land lord management. Houses should be returned from multiple occupancy to private family homes. The property management companies and landlords in Southend are in it for pure profit, and many don't even live in Southend. This culture has been proven to bring down the standard of living in an area which is demonstrated all over Southend. The planning department should be promoting family owned homes in central Southend allowing private money to turn the dilapidated properties back in to quality family homes steering away from flats and multiple occupancy. This would attract London professionals who have the disposable income to significantly invest in their own properties, providing employment for local tradesmen.	A key aspect of the SCAAP is to promote residential development in the central area to provide a range of dwelling types suited to housing needs. Policy DM7 of the Development Management Document also seeks to promote family accommodation. No changes proposed.
Question 10: Residential Development (proposed approach)	Procuresure Consulting (Mr Barry Evans) [513]	2381	Comment	Southend-On-Sea central area should make use of more student halls as opposed to multiple occupancy private landlord ran accommodation. The multiple occupancy student accommodation in residential areas has been studied elsewhere and is proven to bring down the area in which it is situated. Students living in residential areas do not do anything for that area. Students should be accommodated in halls which should be funded by the university. The current university halls are a complete eye sore and do nothing to enhance the local area. This architectural design is not sensitive to the culture in Southend and not built to last. Private	Noted. The Plan seeks to enhance and promote improved educational facilities and to provide opportunities for the provision of additional student accommodation, No changes proposed. Policy PA3.4. outlines that new student accommodation should be accompanied by a long term management and maintenance plan, to ensure the development has a positive impact on local amenity and environment for the lifetime of its use.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				landlords should be strictly controlled and forced to maintain properties to a high standard, which is currently not happening.	
Question 10: Residential Development (proposed approach)	National Federation for the Blind (Mrs Jill Allen-King) [516]	2429	Comment	In section 65 you talk about new housing in the Central area. This should include housing for elderly and disabled people. I think you should also have sheltered housing and homes for elderly and disabled people. This would enable elderly and disabled people to walk to shops and take an active part in the life of their community.	The Plan seeks to provide for a range of housing types to meet housing needs.
Question 10: Residential Development (proposed approach)	National Federation for the Blind (Mrs Jill Allen-King) [516]	2430	Comment	<i>In paragraph 75</i> all student accommodation should also be made fully accessible, so that not only disabled students can live there but they can be visited by their friends and family.	Noted. Access arrangements to residential accommodation are considered as part of the design stage of planning applications and will meet building regulations to ensure accessibility for all users.
Culture, Leisure, Tourism and Recreation					
Question 11	Essex Chambers of Commerce (Mr John Dallaway) [452]	1941	Support	Agree with the proposed approach to culture, leisure and recreation as it recognises its importance to the local economy	Noted.
Question 11	Burges Estate Residents Association [176]	1999	Support	The drive towards enhanced culture, leisure and recreational activities is supported and indeed is essential if we are to take advantage of the huge potential for visitors from the continent. This must be coupled with more and better hotel accommodation to encourage longer stays.	Noted
Question 11	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2049	Object	Many of the Seafront businesses consulted as part of the Stockvale Group's own consultation have identified their concerns that leisure and tourism is not a strong focus of the SCAAP.	<p>The Central Seafront Policy Area aims and policy provisions (Policy CS1) seek to actively promote Southend as a 'thriving and vibrant leisure, cultural and tourism area' (page 110). However, it is recognised that this approach is not strongly reflected and identified in the vision, the strategic objectives or section 4.5 of the Plan (Culture, Leisure, Tourism and Recreational Facilities). It is therefore recommended that the words 'and resort' is added in the vision after 'regional centre'. The vision would then read:</p> <p><i>'Our vision for Southend Central Area, which includes the Town Centre and Central Seafront Area, is for it to be a City by the Sea. As a prosperous and thriving regional centre <u>and resort</u>, it will be an area...'</i></p> <p>Strategic Objective 10 (page 18) would be amended and split to address these issues, and placed further up the ordering:</p> <p><i>'To promote and enhance the tourism, cultural and leisure offer within the central area, including visitor accommodation, having</i></p>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
					<p><i>regard to the assets offered by the area, in order to attract greater visitor numbers and promote more overnight stays.</i></p> <p><i>To promote the central area as a thriving learning quarter that provides state of the art facilities and well-designed student accommodation’.</i></p> <p>Amend the last sentence of paragraph 76 (page 39) to read: <i>‘This will build on the town’s role as a major resort and contribute to a stronger, more vibrant centre.</i></p>
Question 11	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2151	Object	Many of the Seafront businesses consulted as part of the Stockvale Group’s own consultation have identified their concerns that leisure and tourism is not a strong focus of the SCAAP.	<p>The Central Seafront Policy Area aims and policy provisions (Policy CS1) seek to actively promote Southend as a ‘thriving and vibrant leisure, cultural and tourism area’ (page 110). However, it is recognised that this approach is not strongly reflected and identified in the vision, the strategic objectives or section 4.5 of the Plan (Culture, Leisure, Tourism and Recreational Facilities). It is therefore recommended that the words ‘and resort’ is added in the vision after ‘regional centre’. The vision would then read: <i>‘Our vision for Southend Central Area, which includes the Town Centre and Central Seafront Area, is for it to be a City by the Sea. As a prosperous and thriving regional centre <u>and resort</u>, it will be an area...’</i></p> <p>Strategic Objective 10 (page 18) would be amended and split to address these issues, and placed further up the ordering: <i>‘ To promote and enhance the tourism, cultural and leisure offer within the central area, including visitor accommodation, having regard to the assets offered by the area, in order to attract greater visitor numbers and promote more overnight stays.</i> <i>To promote the central area as a thriving learning quarter that provides state of the art facilities and well-designed student accommodation’.</i></p> <p>Amend the last sentence of paragraph 76 (page 39) to read: <i>‘This will build on the town’s role as a major resort and contribute to a stronger, more vibrant centre.</i></p>
Question 11	Southend Bid (Mr S Kearney) [496]	2243	Comment	Leisure and Tourism received 70% response as a top scoring 10 priority.	Noted.
Question 11	Belfairs Garden Residents Association (Barbara Armitage) [511]	2336	Comment	<p>Much better promotion of the Pier and its Museum and better Quality building on the Pier is required. Tourist information is tucked away on the Pier and promotions at the railway stations and airport are needed as well as some direction in the town for information.</p> <p>The new Beecroft Art Gallery is bare inside and does not announce what it is outside with any colour</p>	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 11	Belfairs Garden Residents Association (Barbara Armitage) [511]	2337	Comment	Public Art should not be a factor in planning permission.	Public art provision is considered essential to improving the public realm and environment.
Question 11	Southend and District Pensioners Campaign (Mr Robert Howes) [476]	2365	Support	Yes, but we need later running transport, and a concert hall.	Noted.
Question 11	Procedures Consulting (Mr Barry Evans) [513]	2389	Comment	Southend-On-Sea Council need a clearer tourist and seafront strategy. It is no good just stating that the pier is open to development and the seafront enhanced. Building high rise flats will not enhance the seafront and any developer that wishes to build should be prepared to enhance the infrastructure including car parks and access.	The vision and strategy is considered to be forward looking and ambitious. No changes proposed. Policy CS1 sets out the development principles that will be used to assess development proposals within the central seafront area. Policy DM4 of the Development Management Document sets out policy to manage tall and large buildings. Specific tourist and cultural strategies are prepared by other Council services outside of the SCAAP.
The Historic Environment					
Question 12	Milton Conservation Society (Mr Andy Atkinson) [488]	1977	Support	The broad intentions, including statutory obligations, are supported.	Noted.
Question 12	Milton Conservation Society (Mr Andy Atkinson) [488]	1978	Object	Far too little importance is given to our historic past, both designated and un-designated and instead it is seen as something of the past, to be preserved rather than part of our aggregated and improved future.	Noted. Detailed policy on the historic environment is contained within the Development Management Document (Policy DM5). It would be inappropriate and repetitive to include such policy provisions within the SCAAP. To emphasise the importance of the historic environment it is proposed to add a new sentence after 79 to read: 'Heritage assets will be promoted and enhanced as part of the future development of the town'.
Question 12	Milton Conservation Society (Mr Andy)	1980	Comment	In particular we would like to see far more recognition given to historic Southend, including the non-designated building frontages 'of townscape merit' in the High Street. This 'townscape merit' should not just be a 'material consideration' in future planning decisions but should be woven into the future planning of our town	Frontages of Townscape Merit are identified on the Policies Map and in Policy PA1. Detailed policy on the historic environment, including 'frontages of townscape merit', is set out in the Development Management Document (Policy DM5). No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Atkinson) [488]			centre. This is not because of some sort of nostalgic affection for these buildings (although this does strongly exist) but because these are amongst the best buildings in our town and future construction should aggregate from these with the best of human scaled, modern or traditional 'living' architecture.	
Question 12	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2081	Support	Supports the enhancement and quality of the Green and Open spaces along the Central Seafront and the protection of Southend's unique heritage including the nationally important Grade II Listed Southend Pier.	Noted.
Question 12	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2102	Support	The STOCKVALE GROUP note the townscape improvements and guidance on design quality and Heritage preservation and enhancement are inextricably linked to improvements to Public Realm and pedestrian connectivity. The STOCKVALE GROUP like the majority of the Town support the continued regeneration and reinvention of the Towns greatest icon Southend's Pleasure Pier. As there are a number of opportunity sites outlined in the SCAAP document, the STOCKVALE GROUP would suggest that the Council (through the SCAAP document) develop design codes and development briefs to ensure that the townscape improvements and quality of design of future developments meet the aspirational high standard to create a coherent and consistent Central Area. This needs to reflect on the Towns Heritage and look towards the future to create Southend as unique place and destination for leisure, shopping, living and working.	Noted. The Plan seeks to achieve this and will be updated to identify a number of proposal sites that could be subject to a masterplanning approach.
Question 12	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion,	2136	Support	There is wholeheartedly a support for regeneration and renewal of the SCAAP Area, the STOCKVALE GROUP would support the improvements to the Victoria Gateway through to the top end of London Road, down the High Street including Tylers Avenue, connection through to the Seafront from the High Street, improvements to the Seafront, the Public Realm, landscaping of the Public Realm, enhancement of key views and connectivity,	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Adventure Island, Adventure Sealife (Mr S Kearney) [483]			preservation enhancement of the iconic Southend Pier and the general approach to intensification of the Town Centre	
Question 12	Southend Bid (Mr S Kearney [496])	2183	Support	Supports the enhancement and quality of the Green and Open spaces along the Central Seafront and the protection of Southend's unique heritage including the nationally important Grade II Listed Southend Pier.	Noted.
Question 12	Southend Bid (Mr S Kearney [496])	2205	Support	The BID townscape improvements and guidance on design quality and Heritage preservation and enhancement are inextricably linked to improvements to Public Realm and pedestrian connectivity. The BID like the majority of the Town support the continued regeneration and reinvention of the Towns greatest icon Southend's Pleasure Pier. As there are a number of opportunity sites outlined in the SCAAP document, the BID would suggest that the Council (through the SCAAP document) develop design codes and development briefs to ensure that the townscape improvements and quality of design of future developments meet the aspirational high standard to create a coherent and consistent Central Area. This need to reflect on the Towns Heritage and look towards the future to create Southend as unique place and destination for leisure, shopping, living and working.	Noted. The Plan seeks to achieve this and will be updated to identify a number of proposal sites that could be subject to a masterplanning approach.
Question 12	Southend Bid (Mr S Kearney [496])	2250	Comment	Townscape Improvements and Guidance on Design, Quality and Heritage Preservation were given a top 10 priority by 36% of respondents.	Noted.
Question 12	Southend Bid (Mr S Kearney [496])	2265	Support	There is wholeheartedly a support for regeneration and renewal of the SCAAP Area, the BID would support the improvements to the Victoria Gateway through to the top end of London Road, down the High Street including Tylers Avenue, connection through to the Seafront from the High Street, improvements to the Seafront, the Public Realm, landscaping of the Public Realm, enhancement of key views and connectivity, preservation enhancement of the iconic Southend Pier and the general approach to intensification of the Town Centre	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 12: Management of the historic environment	Belfairs Garden Residents Association (Barbara Armitage) [511]	2338	Comment	The policy is well stated but the delivery of it is questioned.	Noted.
Question 12	Procuressure Consulting (Mr Barry Evans) [513]	2382	Comment	Southend-On-Sea conservation areas should be extended and cover the majority of Southend's Georgian and Victorian buildings, both residential and commercial. Shop owners and retailers should have strict planning guidelines and be forced to maintain shop fronts. Shops such as Bargain buy with their over use of on street advertising and garish and tacky shop fronts should be banned and in place smaller and more traditional shop fronts should be used. Hitchin, Bury St Edmunds etc have good planning control which maintains the heritage look and feeling of pride in those towns.	Conservation Area reviews are undertaken periodically to assess whether there is merit in seeking to extend/promote new areas in the town. Shop front design is covered in the Council's adopted design guide. Policy DS1 also seeks to ensure shop frontages are of a high standard of design. Policy PA1.2.b. supports the conservation and restoration of historic shop fronts. No changes proposed.
Question 12	Historic England (Dr Natalie Gates) [514]	2400	Comment	We note the rationale to not duplicate the policies contained elsewhere. We would suggest deleting "...and much of the archaeology in these locations is likely therefore to have been destroyed" from paragraph 91 as even previously developed sites have potential for archaeology and the focus should be on those sites of high potential.	This point is accepted. It is therefore proposed to delete the words ' <i>...and much of the archaeology in these locations is likely therefore to have been destroyed</i> ' from paragraph 91.
Question 12	Historic England (Dr Natalie Gates) [514]	2401	Comment	We would recommend including Policy Linkages to Policies DM1, DM4 and DM6 in the Development Management DPD and Policy DS3 in the SCAAP itself.	Noted. It is proposed to include references in the policy linkages box to <i>Policies DM1, DM4 and DM6 in the Development Management DPD and Policy DS3 in the SCAAP itself.</i>
Open and Green Space Provision					
Question 13	Essex Chambers of Commerce (Mr John Dallaway) [452]	1942	Support	Agree with proposed approach to open and green space provision in Southend Central Area	Noted.
Question 13	Stockvale Group representing Sands & Southend Radio, Three Shells,	2082	Support	Supports the enhancement and quality of the Green and Open spaces along the Central Seafront and the protection of Southend's unique heritage including the nationally important Grade II Listed Southend Pier.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]				
Question 13	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2137	Support	There is wholeheartedly a support for regeneration and renewal of the SCAAP Area, the STOCKVALE GROUP would support the improvements to the Victoria Gateway through to the top end of London Road, down the High Street including Tylers Avenue, connection through to the Seafront from the High Street, improvements to the Seafront, the Public Realm, landscaping of the Public Realm, enhancement of key views and connectivity, preservation enhancement of the iconic Southend Pier and the general approach to intensification of the Town Centre	Noted.
Question 13	Southend Bid (Mr S Kearney [496]	2184	Support	Supports the enhancement and quality of the Green and Open spaces along the Central Seafront and the protection of Southend's unique heritage including the nationally important Grade II Listed Southend Pier.	Noted.
Question 13	Southend Bid (Mr S Kearney [496]	2266	Support	There is wholeheartedly a support for regeneration and renewal of the SCAAP Area, the BID would support the improvements to the Victoria Gateway through to the top end of London Road, down the High Street including Tylers Avenue, connection through to the Seafront from the High Street, improvements to the Seafront, the Public Realm, landscaping of the Public Realm, enhancement of key views and connectivity, preservation enhancement of the iconic Southend Pier and the general approach to intensification of the Town Centre	Noted
Question 13	Mr Alan Grubb [59]	2296	Comment	There is also a need to create green spaces in each of the new developments with semi matured trees, this will then invite the wild life (birds and squirrels)	Such provisions for urban greening are included in the various policies of the Plan. No changes are proposed.
Question 13	Belfairs Garden Residents Association (Barbara	2339	Comment	There is a plan to build on Blenheim Park an overlarge sports building. It is difficult to understand why the policies for the above culture and green spaces have been 'rationalised and removed. Does this mean that their importance has been allowed to downgrade?	Outside the Plan area.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Armitage) [511]				
Question 13	National Federation for the Blind (Mrs Jill Allen-King) [516]	2431	Comment	There are many guide dog owners who live in the Southend district and close to the high street as well as many that visit the high street for shopping and holidays. Currently there is no safe free running areas for our dogs and nowhere is there an area where our dogs can go to the toilet. Up to the time when the Odeon cinema was built in Victoria Circus area, there was always some grass where our dogs could go. Although our dogs are trained to go in a gutter there are very few of these now except in a few side streets. So please plan for designated areas close to bus and train stations and to shops. You cannot complain about dog mess when no areas are provided. When building blocks of flats and other housing this should also be provided, not only for guide dog owners but for other dog owners. Green areas should be provided with seating and shelters. The shelters to protect people from the rain and hot sun. There is no mention of Public Toilets in the document and they should be available throughout the town in shopping areas and green space areas.	The Plan seeks to enhance and provide new areas of open and green throughout the Central Area. No changes are proposed.
Key Views – Policy DS2					
Question 14; Policy DS2	Essex Chambers of Commerce (Mr John Dallaway) [452]	1943	Support	Important to protect and enhance the management of Key Views in Southend Central Area.	Noted.
Question 14; Policy DS2	Burges Estate Residents Association [176]	2000	Comment	The management of key views is acceptable but I have tried and failed to see Porters other than from inside the grounds. It is so well screened by trees and shrubs I doubt many people know it's there. In that sense it can hardly rank as a landmark building.	Policy DS3 not only sets out criteria protecting the views to and from landmark buildings, but the policy also seeks to conserve landmarks and enhance their setting. It is considered that the setting of Porters and links to the Queensway Policy Area can be improved. Furthermore, maintaining and enhancing key views to Porters is considered important and beneficial to the aesthetic quality of the local area. No change required.
Question 14; Policy DS2	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure	2043	Support	Wholly support enhancement and retention of key views	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Island, Adventure Sealife (Mr S Kearney) [483]				
Question 14; Policy DS2	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2138	Support	There is wholeheartedly a support for regeneration and renewal of the SCAAP Area, the STOCKVALE GROUP would support the improvements to the Victoria Gateway through to the top end of London Road, down the High Street including Tylers Avenue, connection through to the Seafront from the High Street, improvements to the Seafront, the Public Realm, landscaping of the Public Realm, enhancement of key views and connectivity, preservation enhancement of the iconic Southend Pier and the general approach to intensification of the Town Centre	Noted.
Question 14	Southend Bid (Mr S Kearney) [496]	2144	Support	Wholly support enhancement and retention of key views	Noted.
Question 14; Policy DS2	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2248	Comment	Key Views were given a 20% top 10 priority.	Noted.
Question 14; Policy DS2	Stockvale Group representing Sands & Southend	2267	Support	There is wholeheartedly a support for regeneration and renewal of the SCAAP Area, the BID would support the improvements to the Victoria Gateway through to the top end of London Road, down the High Street including Tylers Avenue, connection through to the Seafront from the High Street, improvements to the Seafront, the	Noted

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]			Public Realm, landscaping of the Public Realm, enhancement of key views and connectivity, preservation enhancement of the iconic Southend Pier and the general approach to intensification of the Town Centre	
Question 14; Policy DS2	Historic England (Dr Natalie Gates) [514]	2402	Support	Welcome the identification of a number of key views, from within and of the central area, with the aim that they will not be adversely impacted by development.	Noted.
Landmarks and Landmark Buildings – Policy DS3					
Question 15; Policy DS3	Essex Chambers of Commerce (Mr John Dallaway) [452]	1944	Support	Agree with the proposed approach to landmarks/landmark buildings in Southend Central Area	Noted.
Question 15; Policy DS3	Milton Conservation Society (Mr Andy Atkinson) [488]	1979	Object	The document seems to place landmarks and landmark buildings (section 4.9) above the best quality aggregated urban design. This attitude of <i>landmark</i> (or 'iconic' building to use the popular language) is becoming discredited so it seems rather odd that it so strongly features in our forward looking planning. As an example, the Sainsbury site was, not many years ago, hailed by the planners of our town as an important and focal town centre development. Not many years passed before the folly of this development was then realised so that the site has been proposed for re-development, should Sainsbury's relocate, and this is included in the document. Your document feels like it will lead to similar, repeated mistakes in future. The student housing building, now proposed as nothing less than a new potential landmark building demonstrates exactly what we are claiming. This building is largely disliked and ridiculed because it was built as an iconic or landmark building that paid virtually no relation to its urban surroundings. This type of arrogant 'look at me' building should not be the focus of future urban development in the town centre.	<p>Landmarks and landmark buildings provide orientation and aid way-finding, being recognisable and distinctive, and it is important that they are conserved. Policy DS3 sets out the provision for the development of new landmark buildings to ensure they are well designed and detailed to help reinforce local character and distinctiveness.</p> <p>The Sainsbury's site will not be included in the final version of the SCAAP as there is insufficient evidence that it will be redeveloped by 2021.</p>
Question 15; Policy DS3	Southend Bid (Mr S	2247	Comment	Landmarks and Landmark Buildings 36% of respondents gave that top 10 priority.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Kearney) [496]				
Question 15; Policy DS3	Belfairs Garden Residents Association (Barbara Armitage) [511]	2340	Support	Yes to the list of Landmark Buildings.	Noted.
Question 15; Policy DS3	Belfairs Garden Residents Association (Barbara Armitage) [511]	2341	Object	No to Potential Locations as already publicised at Opportunity Site 8: Seaway Car Park, Marine Parade and Opportunity Site 9 : New Southend Museum.	Seaway car park, Marine Parade and the New Southend Museum are key development sites identified in the SCAAP and are considered appropriate for the provision of new landmark buildings. Design and detailing will be important in such provision as set out in Policy DS3. No changes proposed.
Question 15; Policy DS3	Historic England (Dr Natalie Gates) [514]	2403	Comment	Recommend that a bullet point d) is added to paragraph two of Policy DS3 stating: "d. the proposals do not harm the setting of nearby heritage assets."	These points are accepted. It is therefore proposed to include an additional criteria in paragraph 2 of Policy DS3 stating: ' <u>d. the proposals do not harm the setting of nearby heritage assets.</u> '
Question 15; Policy DS3	National Federation for the Blind (Mrs Jill Allen-King) [516]	2432	Comment	In paragraph 99 which refers to Landmark buildings, these buildings can help blind and partially sighted people to locate where they are, so long as they are well lit and have good colour contrast with their surroundings. Also tactile information should be given and provided. For example, a water fountain or chiming clock can help to find a building.	Noted.
Flood Risk Management and Sustainable Drainage					
Question 16; Policy DS4	Essex Chambers of Commerce (Mr John Dallaway) [452]	1945	Support	Agree with the proposed approach to flood risk management and sustainable drainage in Southend Central Area	Noted.
Question 16; Policy DS4	Anglian Water (Sue Ball) [37]	2028	Comment	For Surface water disposal we would expect a SuDS solution to be utilised where at all viable and under no circumstances will surface water be permitted to discharge into the foul sewerage system. (Infrastructure Provision 4.12 paragraph 140)	Noted. It is proposed to add the following text to Policy DS4 point 2 as follows: '...Under no circumstances will surface water be permitted to discharge into a separate foul sewer or sewerage system. Surface runoff that cannot be discharged into the ground, a surface water body or a surface water sewer or local highway drain, must be discharged to a public, combined sewer system.'

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 16; Policy DS4	Southend Bid (Mr S Kearney) [496]	2246	Comment	Flood Risk Management and Sustainable Drainage 48% of respondents gave that a top 10 priority.	Noted.
Question 16; Policy DS4	Belfairs Garden Residents Association (Barbara Armitage) [511]	2342	Comment	The Council persisted in its shared space along the sea front where flooding has damaged commercial properties and even put at risk the business of the owners.	Policy DS4 seeks effective flood risk management and sustainable drainage within new development. The maintenance and improvement of existing flood defence and mitigation is administered through complimentary Council services. It is proposed to include reference in Central Seafront policies to flood mitigation measures.
Question 16; Policy DS4	Environment Agency (Miss Lizzie Griffiths) [334]	2420	Support	<i>Paragraph 105</i> - We are pleased to note reference is made here to the Strategic Flood Risk Assessment and emerging Surface Water Management Plan, which clearly form a key part of your evidence base.	Noted.
Question 16; Policy DS4	Environment Agency (Miss Lizzie Griffiths) [334]	2421	Comment	<i>Paragraph 116</i> - With regards to surface water management, we wish to remind you that, whether or not the receiving water body is a main river, the Environment Agency is no longer the statutory consultee in the planning process. All surface water management scheme proposals and their associated discharge rates must therefore be approved by Southend Borough Council in its role as Lead Local Flood Authority.	Noted. Amend paragraph 116 last sentence to read, 'For main rivers and ordinary water courses, this will be the Council, and for public surface water sewers Anglian Water,'
Question 16; Policy DS4	Environment Agency (Miss Lizzie Griffiths) [334]	2422	Comment	We consider that further clarity could be provided within this policy. Our suggested changes are as follows 1 a. Will be accompanied by a flood risk assessment that considers all sources of flooding. 1 c. i. For more vulnerable uses, the floor levels of habitable rooms will be above the design flood level, <i>with an allowance for climate change</i> . Within Flood Zone 3 the floor level must be situated above the design flood level <i>with climate change</i> , incorporating an allowance of at least 300mm for freeboard. (This is to ensure it is clear that floors must be set above the 1 in 200 annual probability event level plus climate change).	Noted, the following amendments are therefore proposed to DS4: '1a. Will be accompanied by a flood risk assessment <u>that considers all sources of flooding</u>'. And '1ci. For more vulnerable uses, the floor levels of habitable rooms will be above the design flood level, with an allowance for climate change*. Within Flood Zone 3 the floor level must be situated above the design flood level with allowance for to climate change*, incorporating an allowance of at least 300mm for freeboard. * This is to ensure that floors must be set above the 1 in 200 annual probability event level plus climate change

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Transport, Access and Public Realm					
Question 17; Policy DS5	Rev. Phyllis Owen [456]	1929	Object	Insufficient allowance for parking to take into account the number of residential units proposed.	The Councils parking standards are set out in the Development Management Document and these have been found sound by a planning inspector and subsequently adopted.
Question 17; Policy DS5	Essex Chambers of Commerce (Mr John Dallaway) [452]	1946	Comment	Agree with the proposed approach to the management of transport, access and the public realm in the Southend Central Area, with the proviso that it should be amended to state that the Council 'will maintain car parking capacity at a level that supports the vitality and viability of the town centre' rather than 'seeking to maintain car parking capacity...'	Agree; the amendment is appropriate in the context of Policy DS5.2.a. Remove the word 'seek' . The Council has commissioned an independent car parking study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.
Question 17; Policy DS5	Mr David Batley [479]	1975	Support	I strongly support the introduction of bus priority measures along the A13 (London Road). Most of Westcliff and Leigh near this road consist of high-density housing with no off-street parking, a land-use pattern which works well with high-frequency public transport.	Noted.
Question 17; Policy DS5	Mr Harry Chandler [219]	1988	Comment	It might be worth considering the creation of a tramway based on the bus station to connect Southend airport, Victoria Avenue, Southend Victoria railway station, Southend Central, the High Street and the sea front. It is likely that the creation of a tramway would encourage more visitors to come to Southend by train and help reduce our car parking problems.	Policy PA8 identifies the need for a priority route to be provided linking Southend Central Area with London Southend Airport. This does not preclude innovative transport schemes to link these points. Such improvements will be pursued mainly through the provisions of the Southend Local Transport Plan. A tramway is not considered viable or deliverable by 2021, and therefore is not included within the SCAAP. No changes are proposed.
Question 17; Policy DS5	Burges Estate Residents Association [176]	1990	Comment	There is an anti- car feeling about some of the comments. A reluctance to acknowledge its importance in sustaining the central area's economy and over emphasis on suppressing it in favour of other modes. Car parking is only mentioned in terms of capacity ignoring the issue of pricing which is one of the major disincentives that the centre faces.	The SCAAP seeks improvements to the transport network for all users. There have already been a number of major junction improvements. Further reference will be included in Policy DS5 to highlight proposed strategic junction improvements as outlined on the Policies Map. There will also be a review of signage and implementation of an integrated signage strategy to assist road users around the transport network and direct them to the most convenient car parks.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
					The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.
Question 17; Policy DS5	Burges Estate Residents Association [176]	2001	Comment	Car parking on the sea front is mostly kerbside and it is difficult to believe that on- street parking duration is only 5mins. However the capacity needed to support the vitality of the town centre is not just a function of demand as it stands but the price mechanism. It must be a significant factor where choosing where to shop especially when so much of the competition has free parking.	The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP. It is proposed that specific reference to the 5 minute on-street parking duration will be removed.
Question 17; Policy DS5	Burges Estate Residents Association [176]	2002	Comment	The only other point on transport is mixed mode priority routes. Mixed in the sense of ped/cycle routes are not working because too many cyclists now have it in their heads that any footway or footpath is fair game. I know this is an enforcement issue but if it cannot or will not be enforced effectively then it is bad policy.	The implementation of new pedestrian and cycle routes will have regard to national guidance and best practice.
Question 17; Policy DS5	Mr Michael Davies [493]	2037	Comment	Serious thought needs to be given to what to do to the local traffic situation. If the plan includes a large number of residential flats, how many cars will that mean? Which way will they go to get out of town? Along the 'Golden Mile' and seafront towards Westcliff, then up Chalkwell Avenue to the London Road, or up Southchurch Avenue to try to join the A127 arterial road via Bournemouth Park Road, Sutton Road, or Victoria Avenue? Either way, it will mean added congestion, frustration, and stress for road users in an already very congested town.	Noted. Policy DS5 and related Policy Area policies make provision for a number of transport improvements, particularly junction improvements and the promotion of passenger transport. These will be actioned through the Local Transport Plan and partnership working. No changes are proposed.
Question 17; Policy DS5	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2041	Comment	Transport and Access into the Town is a key theme and in order to deliver the aspired number of new dwellings and new jobs in the Central Area the Stockvale Group wish to see this appropriately addressed through the SCAAP documentation. At present Stockvale Group does not believe that the Transport, Access and Parking Issues have been given enough consideration. Nor the highway infrastructure on existing businesses let alone the aspirational growth.	Policy DS5 together with the Policy Area policies provide for a number of transport and highway improvements within Southend Central Area to improve accessibility and provide for more sustainable methods of transport. The Local Transport Plan will develop these further in line with planned growth. The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.
Question 17; Policy DS5	Stockvale Group representing	2042	Support	Wholly support townscape improvements, improvements to the public realm, vastly improved connectivity from car parks to the	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]			Seafront, car parks to the high street and the creation of active public spaces in an otherwise linear High Street.	
Question 17; Policy DS5	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2050	Comment	<p>As part of this representation we have reviewed Blackpool's Local Plan Making as a similar seaside town and comparable seaside resort. As part of the Blackpool Core Strategy Consultation and examination in public, the seafront businesses made succinct clear representation regarding the impact of traffic and parking on the sustainability and future growth of Blackpool as a tourist resort and destination of choice. The [Blackpool] Seafront business representation noted that the major attractions that make Blackpool a tourist destination rely on easy access to car parking and good access from car parks to the attractions by foot and public transport.</p> <p>The Seafront businesses further noted that this matter is often not well understood by councils, who generally consider that it is not necessary to plan car parking for peak periods only. In most industries, for example planning the levels of parking for shopping areas based only on the Christmas peak, this a reasonable approach but for the businesses which are seasonal and need to meet visitor targets to survive (or at least to continue at the present scale), this approach can have far reaching consequences.</p>	Noted.
Question 17; Policy DS5	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S	2051	Object	<p>The Southend Seafront businesses feel this particular issue [related to peak periods for car parking] is not understood by the Local Authority and as such the level of tourism and investment has peaked. Many of the Seafront businesses have expressed their view as part of this consultation that they cannot invest further in the town due to the issue of access and parking and as such they already have a declining customer base.</p>	<p>Policy DS5 and related Policy Areas include a number of proposals for improving transport accessibility. These policies will sit alongside the Local Transport Plan which aims to address issues of congestion, circulation and accessibility to Southend to assist economic growth.</p> <p>The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.</p>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Kearney) [483]				
Question 17; Policy DS5	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2052	Comment	Members of the Stockvale Group together with representatives of local businesses within the SCAAP area discussed highways and parking issues with Southend on Sea Borough Council's Head of Planning and Transport. As the Chief Officer responsible for transport he was recorded as saying 'the issue with parking is if you create more parking spaces, more people will come and they will create congestion i.e. there will be greater numbers of visitors to the Town meaning greater business! This exasperates the concerns of local businesses that parking and transport issues are not fully understood and have no serious consideration as part of the Council's preferred option and SCAAP Framework.	Noted, no agreed minutes are recorded of this meeting. The purpose of the SCAAP is to plan for regeneration, growth and inward investment whilst taking account of impacts on matters such as amenity and the local environment. This is planned for within a range of travel mode options and the infrastructure necessary to support them.
Question 17; Policy DS5	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2053	Comment	Interestingly the representations made by the Seafront businesses in Blackpool persuaded the Government Inspector of their position. The Inspector concluded in their report that 'Car Parks need to accommodate peak weekend/bank holiday parking'.	Noted. The Council is unable to identify this direct quote in the Inspector's Report that has been cited.
Question 17; Policy DS5	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S	2076	Object	RICS paper 'High Streets Adapting for Change' discusses parking changes and out of town retail which provides free parking. Since 2007 many local authorities have increased parking charges significantly. In the SCAAP area this is a key issue which requires essential review. This is in contrast to the smaller districts of wider Southend on Sea, Leigh and Southchurch where the Council have extended free parking to 2 hours. Compared to Central Southend and the SCAAP area where parking for 2 hours is in excess of £3.30. In Stockvale Group's view this is a deterrent for people coming into Southend particularly for shopping. This combined with the poor spatial and environmental quality is a contributing factor to the decline of Southend's Town Centre.	The SCAAP recognises the importance of car parking provision to the vitality and viability of the centre. The wider implications of car parking charges are a matter which will be kept under review by the Borough Council as part of its overall approach to car parking for the Borough. The SCAAP is a planning policy document and does not directly cover parking charges. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Kearney) [483]				
Question 17; Policy DS5	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2085	Support	Wholeheartedly support the encouragement and expansion of businesses in the Southend Central Area, although note that the issues around transport, access and parking need further consideration and understanding.	Noted.
Question 17; Policy DS5	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2086	Object	Transport, access and parking issues need further consideration and are a particular issue for the Seafront businesses and the tourist economy. The highway infrastructure makes journeys into the town prolonged and difficult. Many visitors and customers simply don't return.	<p>Policy DS5 and related Policy Areas include a number of proposals for improving transport accessibility.</p> <p>The Council has commissioned an independent car parking study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.</p>
Question 17; Policy DS5	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S	2090	Comment	Southend's Unique Selling Point is the Seafront which is a destination of choice. The Seafront and High Street inter relate on each other for business with the major attractions of Southend relying on easy access to car parking and good access from the car parks to the High Street and the Seafront attractions by foot or public transport.	Noted. The SCAAP seeks to improve and enhance connectivity between the seafront and town centre. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Kearney) [483]				
Question 17; Policy DS5	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2091	Comment	Access into the Town is problematic certainly on peak days, but also in evenings when there are events on in the Town and Central Seafront. There is a view that from the Victoria Gateway junction to the Raleigh Weir on days of high visitation and sunny days the key route is completely grid locked between these two key points. This represents somewhere in the region of 3840 cars parked nose to tail across the main artery into the Town which is mainly a dual carriageway.	Accessibility improvements are on-going as part of the Local Transport Plan and other regeneration initiatives. No changes are proposed.
Question 17; Policy DS5	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2092	Comment	<p>Some members of the STOCKVALE GROUP and representatives of the Seafront businesses believe that one way in which the congestion into the Town could be improved is for an additional 3840 parking spaces to be made accessible and available within close proximity to the Seafront and core High Street Area. This is due to the day visitor attraction industry, particularly family attractions such as the Seafront receiving the vast majority of its income in a few weeks of the year. These generally coincide with the school holidays. During this peak period a visitor attraction business needs to be able to accommodate every visitor that wants to visit as these peak days effectively subsidise the operation for the rest of the year.</p> <p>If the access to the main attractions is limited on peak days by the availability of car parking spaces, this could and does have serious impact on the viability of the Seafront businesses. The main parking areas are generally at capacity on peak holiday periods. Any loss of capacity as a result of the SCAAP proposals would result in a cap of visitors during these peak periods. This limits the amount of investment within the Seafront to the current status quo.</p> <p>Transport and access is not just limited to the Seafront and does have a huge impact on the High Street, combined with parking tariffs, access and egress, and poor legibility around the Town Centre. Whilst the changes outlined in the SCAAP from a space and use perspective will do an awful lot to reinvigorate and regenerate the High Street, this must be inclusive of a renewed and fresh approach to parking provision within the SCAAP Area.</p>	The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 17; Policy DS5	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2096	Comment	<p>Various improvements have been made to the Central Seafront including improved connectivity through Pier Hill and the City Beach. Whilst there have been some improvements to the landscape of the High Street, this needs a much greater consideration and linking to new development. There needs to be greater inclusion of soft landscaping and public spaces and improved connections from the High Street through to the Seafront. This is particularly the case with Seaway Development. This development site represents a great opportunity to create a gateway development and pedestrian links and improved Public Realm linked to the Seafront.</p> <p>The STOCKVALE GROUP would wish to see a breaking down of the linearity of the High Street and the creation of a number of destination and unique quarters. This resonates particularly through with the Tylers Avenue, London Road and Alexandra and Clarence Street opportunity sites.</p>	Noted. The Plan seeks to achieve these aspects through its policy provisions. No changes are proposed.
Question 17; Policy DS5	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2104	Comment	<p>Before the SCAAP document is enshrined, the STOCKVALE GROUP would ask that the Council carry out thorough research, analysis and investigation into the capabilities of the existing infrastructure and the capabilities of utility suppliers to meet the aspirational growth. This is essential and will need some degree of consideration in terms of new sub stations around the SCAAP area. This directly links to townscape and Public Realm improvements as these sub stations represent an opportunity to not create a negative space in the overall townscape. Many of the Members of the STOCKVALE GROUP are continuously seeking to improve their offer and find that the limitation of the existing utilities coming into the SCAAP area prohibit their future plans and proposals. This has not been at all addressed in the SCAAP document.</p>	<p>Infrastructure provision is addressed in the Plan. Such provisions have been subject to consultation with utility companies as part of the Plan preparation process. No changes are proposed.</p> <p>Further consultation with the National Grid will reveal whether further capacity is required to support the additional development in the Central Area. There was no objection from the National Grid to the housing and job targets in the Core Strategy.</p>
Question 17; Policy DS5	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure	2110	Comment	<p>There is the further opportunity to reopen the deepening alleviating some of the traffic stress that has resulted of the Highway alterations.</p>	Noted. The Deeping was closed a number of years ago as part of transport improvements to the area. Its future use will be kept under review as part of on-going transport monitoring.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Sealife (Mr S Kearney) [483]				
Question 17; Policy DS5	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2126	Comment	There are a couple of issues that the STOCKVALE GROUP want to ensure are adequately addressed through the SCAAP. The first of those is the potential of having residents parking zones, this could have a negative effect on the existing Town Centre on and off street parking and consume spaces that are vital for visitors.	Noted. Such aspects will be kept under review as part of the on-going transport monitoring of the area.
Question 17	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2139	Object	Major concerns relating to all supported aspirations being achieved falls into a number of categories - transport, access and parking is a key theme and at present the existing parking provision is woefully inadequate. The access route into the Town is often unable to cater for the number of visitors on sunny days and this is likely to be detrimental to economic sustainability and the projected growth of 6,000 jobs within the SCAAP Area.	<p>Policy DS5 and related Policy Areas make a number of proposals for the improvement of transport and accessibility in the central area. These policies will sit alongside the Local Transport Plan which aims to address issues of congestion, circulation and accessibility to Southend to assist economic growth. No changes are proposed.</p> <p>The Council has commissioned an independent car parking study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.</p>
Question 17	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure	2140	Object	The identified opportunity development sites are mainly existing public car parks. Through the SCAAP the Local Authority should seek a minimum of a replacement like for like number of public spaces on each of the sites whilst also meeting the development requirements in accordance with the Council's Development Management Policy.	<p>The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.</p> <p>The Development Management Document establishes maximum parking standards for commercial development and appropriate standards for residential development in the Central Area. The amount of parking provided for a development scheme will be assessed against these policy standards, together with a</p>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Sealife (Mr S Kearney) [483]				consideration of the sites local context, location and distance from public transport links.
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2142	Comment	Transport and Access into the Town is a key theme and in order to deliver the aspired number of new dwellings and new jobs in the Central Area the Stockvale Group wish to see this appropriately addressed through the SCAAP documentation. At present Stockvale Group does not believe that the Transport, Access and Parking Issues have been given enough consideration. Nor the highway infrastructure on existing businesses let alone the aspirational growth.	<p>Policy DS5 together with the Policy Area policies provide for a number of transport and highway improvements within the Central Area to improve accessibility and provide for more sustainable methods of transport. These policies will sit alongside the Local Transport Plan which aims to address issues of congestion, circulation and accessibility to Southend to assist economic growth.</p> <p>The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.</p>
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2143	Support	Wholly support townscape improvements, improvements to the public realm, vastly improved connectivity from car parks to the Seafront, car parks to the high street and the creation of active public spaces in an otherwise linear High Street.	Noted.
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2152	Comment	<p>As part of this representation we have reviewed Blackpool's Local Plan Making as a similar seaside town and comparable seaside resort. As part of the Blackpool Core Strategy Consultation and examination in public, the seafront businesses made succinct clear representation regarding the impact of traffic and parking on the sustainability and future growth of Blackpool as a tourist resort and destination of choice.</p> <p>The [Blackpool] Seafront business representation noted that the major attractions that make Blackpool a tourist destination rely on easy access to car parking and good access from car parks to the attractions by foot and public transport.</p> <p>The Seafront businesses further noted that this matter is often not well understood by councils, who generally consider that it is not necessary to plan car parking for peak periods only. In most industries, for example planning the levels of parking for shopping areas based only on the Christmas peak, this a reasonable approach but for the businesses which are seasonal and need to meet visitor targets to survive (or at least to continue at the present scale), this approach can have far reaching consequences.</p>	Noted.
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2153	Object	The Southend Seafront businesses feel this particular issue [related to peak periods for car parking] is not understood by the Local Authority and as such the level of tourism and investment has peaked. Many of the Seafront businesses have expressed their view	Policy DS5 and related Policy Areas include a number of proposals for improving transport accessibility. These policies will sit alongside the Local Transport Plan which aims to address

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				as part of this consultation that they cannot invest further in the town due to the issue of access and parking and as such they already have a declining customer base.	issues of congestion, circulation and accessibility to Southend to assist economic growth. The Council has commissioned an independent car parking study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2154	Comment	Members of the Stockvale Group together with representatives of local businesses within the SCAAP area discussed highways and parking issues with Southend on Sea Borough Council's Head of Planning and Transport. As the Chief Officer responsible for transport he was recorded as saying 'the issue with parking is if you create more parking spaces, more people will come and they will create congestion i.e. there will be greater numbers of visitors to the Town meaning greater business! This exasperates the concerns of local businesses that parking and transport issues are not fully understood and have no serious consideration as part of the Council's preferred option and SCAAP Framework.	Noted, no agreed minutes are recorded of this meeting. The SCAAP is planning for growth and inward investment and seeks to attract greater visitor numbers.
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2155	Comment	Interestingly the representations made by the Seafront businesses in Blackpool persuaded the Government Inspector of their position. The Inspector concluded in their report that 'Car Parks need to accommodate peak weekend/bank holiday parking'.	Noted. This quotation could not be cited within the Blackpool Inspectors Report. The Council has nevertheless noted the modifications made by the Inspector.
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2178	Object	RICS paper 'High Streets Adapting for Change' discusses parking changes and out of town retail which provides free parking. In contrast to this Since 2007 many local authorities have increased parking charges significantly. In the SCAAP area this is a key issue which requires essential review. This is in contrast to the smaller districts of wider Southend on Sea, Leigh and Southchurch where the Council have extended free parking to 2 hours. Compared to Central Southend and the SCAAP area where parking for 2 hours is in excess of £3.30. In Stockvale Group's view this is a deterrent for people coming into Southend particularly for shopping. This combined with the poor spatial and environmental quality is a contributing factor to the decline of Southend's Town Centre.	The SCAAP recognises the importance of car parking provision to the vitality and viability of the centre. The SCAAP is a planning policy document and does not directly cover parking charges. The wider implications of car parking charges are a matter which will be kept under review by the Borough Council as part of its overall approach to car parking for the Borough. No changes are proposed.
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2188	Support	Wholeheartedly support the encouragement and expansion of businesses in the Southend Central Area, although note that the issues around transport, access and parking need further consideration and understanding.	Noted.
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2189	Object	Transport, access and parking issues need further consideration and are a particular issue for the Seafront businesses and the tourist economy. The high way infrastructure makes journeys into the town	Policy DS5 and related Policy Areas include a number of proposals for improving transport accessibility. These policies will sit alongside the Local Transport Plan which aims to address

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				prolonged and difficult. Many visitors and customers simply don't return.	<p>issues of congestion, circulation and accessibility to Southend to assist economic growth.</p> <p>The Council has commissioned an independent car parking study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.</p>
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2193	Comment	Southend's Unique Selling Point is the Seafront which is a destination of choice. The Seafront and High Street inter relate on each other for business with the major attractions of Southend relying on easy access to car parking and good access from the car parks to the High Street and the Seafront attractions by foot or public transport.	Noted. The SCAAP seeks to improve and enhance connectivity between the seafront and town centre. No changes are proposed.
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2194	Comment	Access into the Town is problematic certainly on peak days, but also in evenings when there are events on in the Town and Central Seafront. There is a view that from the Victoria Gateway junction to the Raleigh Weir on days of high visitation and sunny days the key route is completely grid locked between these two key points. This represents somewhere in the region of 3840 cars parked nose to tail across the main artery into the Town which is mainly a dual carriageway.	Accessibility improvements are on-going as part of the implementation of the Local Transport Plan and other regeneration initiatives. No changes are proposed.
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2195	Comment	<p>Some members of the BID and representatives of the Seafront businesses believe that one way in which the congestion into the Town could be improved is for an additional 3840 parking spaces to be made accessible and available within close proximity to the Seafront and core High Street Area. This is due to the day visitor attraction industry, particularly family attractions such as the Seafront receiving the vast majority of its income in a few weeks of the year. These generally coincide with the school holidays. During this peak period a visitor attraction business needs to be able to accommodate every visitor that wants to visit as these peak days effectively subsidise the operation for the rest of the year.</p> <p>If the access to the main attractions is limited on peak days by the availability of car parking spaces, this could and does have serious impact on the viability of the Seafront businesses. The main parking areas are generally at capacity on peak holiday periods. Any loss of capacity as a result of the SCAAP proposals would result in a cap of visitors during these peak periods. This the amount of investment within the Seafront to the current status quo. Transport and access is not just limited to the Seafront and does have a huge impact on the High Street, combined with parking tariffs, access and egress, and poor legibility around the Town Centre. Whilst the changes</p>	The Council has commissioned an independent car parking study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				outlined in the SCAAP from a space and use perspective will do an awful lot to reinvigorate and regenerate the High Street, this must be inclusive of a renewed and fresh approach to parking provision within the SCAAP Area.	
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2199	Comment	Various improvements have been made to the Central Seafront including improved connectivity through Pier Hill and the City Beach. Whilst there has been some improvements to the landscape of the High Street, this needs a much greater consideration and linking to new development. There needs to be greater inclusion of soft landscaping and public spaces and improved connections from the High Street through to the Seafront. This is particularly the case with Seaway Development. This development site represents a great opportunity to create a gateway development and pedestrian links and improved Public Realm linked to the Seafront. The BID would wish to see a breaking down of the linearity of the High Street and the creation of a number of destination and unique quarters. This resonates particularly through with the Tylers Avenue, London Road and Alexandra and Clarence Street opportunity sites.	Noted. The Plan seeks to achieve these aspects through its policy provisions.
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2207	Comment	Before the SCAAP document is enshrined, the BID would ask that the Council carry out thorough research, analysis and investigation into the capabilities of the existing infrastructure and the capabilities of utility suppliers to meet the aspirational growth. This is essential and will need some degree of consideration in terms of new sub stations around the SCAAP area. This directly links to townscape and Public Realm improvements as these sub stations represent an opportunity to not create a negative space in the overall townscape. Many of the Members of the BID are continuously seeking to improve their offer and find that the limitation of the existing utilities coming into the SCAAP area prohibit their future plans and proposals. This has not been at all addressed in the SCAAP document.	Infrastructure provision, particularly flood risk management, which has been a major issue in the central seafront area, is addressed in the Plan. Such provisions have been subject to consultation with utility companies as part of the Plan preparation process. No changes are proposed.
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2213	Comment	There is the further opportunity to reopen the deepening alleviating some of the traffic stress that has resulted of the Highway alterations	Noted. The Deeping was closed some years ago as part of transport improvements to the area. Its future use will be kept under review as part of on-going transport monitoring.
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2229	Comment	There are a couple of issues that the BID want to ensure are adequately addressed through the SCAAP. The first of those is the potential of having residents parking zones, this could have a negative effect on the existing Town Centre on and off street parking and consume spaces that are vital for visitors.	Noted. Such aspects will be kept under review as part of the on-going transport monitoring of the area.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2245	Comment	Transport and Access and Public Realm also received 70% of respondents giving this a score of 10 and a top priority.	Noted.
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2268	Object	Major concerns relating to all supported aspirations being achieved falls into a number of categories, transport, access and parking is a key theme and at present the existing parking provision is woefully inadequate. The access route into the Town is often unable to cater for the number of visitors on sunny days and this is likely to be detrimental to economic sustainability and the projected growth of 6,000 jobs within the SCAAP Area.	<p>Policy PA5 and related Policy Areas make a number of proposals for the improvement of transport and accessibility in the central area. No changes are proposed.</p> <p>The Council has commissioned an independent car parking study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.</p>
Question 17; Policy DS5	Southend Bid (Mr S Kearney) [496]	2269	Object	The identified opportunity development sites are mainly existing public car parks. Through the SCAAP the Local Authority should seek a minimum of a replacement like for like number of public spaces on each of the sites whilst also meeting the development requirements in accordance with the Council's Development Management Policy.	<p>The Council has commissioned an independent car parking study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.</p> <p>The Development Management Document establishes maximum parking standards for commercial development and appropriate standards for residential development in the Central Area. The amount of parking provided for a development scheme will be assessed against these policy standards, together with a consideration of the sites local context, location and distance from public transport links.</p>
Question 17; Policy DS5	Mr Rod Levin[497]	2271	Comment	Provision of pavement seating throughout the borough	The Plan seeks to improve existing and provide new public spaces within Southend Central Area. Seating provision will be considered on a scheme by scheme basis in line with the Streetscape Manual Supplementary Planning Document. No changes are proposed.
Question 17; Policy DS5	Mr Rod Levin [497]	2276	Comment	Upgrade the Street lighting from the current dismal effect	A programme of street lighting improvements is being implemented as part of the Local Transport Plan provisions. No changes are proposed.
Question 17; Policy DS5	Mr Rod Levin [497]	2279	Comment	Reduce / eliminate all car-parking charges on Sundays and Bank holidays and, hospital car parks completely	The SCAAP recognises the importance of car parking provision to the vitality and viability of the centre. The wider implications of car parking charges are a matter which will be kept under review by the Borough Council as part of its overall car parking strategy for the Borough. No changes are proposed.
Question 17; Policy DS5	Mr Rod Levin [497]	2280	Comment	Ensure all new houses are provided with car parking room for at least two cars	Residential car parking is set out in the Council's adopted car parking standards in the Development Management Document. No changes are proposed.

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Question 17; Policy DS5	Mr Rod Levin [497]	2284	Comment	Plan to improve Road access to Southend (Additional to A127) by 2020	A number of road improvements to the strategic highway network have been completed in recent years and further improvements are proposed as part of the Local Transport Plan provisions. No changes are proposed.
Question 17; Policy DS5	Mr Rod Levin [497]	2285	Comment	Plan week-end Park and ride scheme for visitors by road to leave their cars Out-of-Town	Park and Ride schemes have been considered a number of times in recent years but have not been considered feasible given the limited land available and linear peninsula geography of the town. The provision of Park and Ride would only be feasible outside the SCAAP boundaries. Such options will be kept under review as part of the on-going Local Transport Plan provisions and development of the Southend Local Plan. No changes are proposed.
Question 17; Policy DS5	Mr Rod Levin [497]	2286	Comment	As in towns abroad, make commercial deliveries to be during Night hours only - eg: Monaco	Commercial delivery times are kept under review as part of on-going traffic management proposals. The SCAAP Transport, Access and Public Realm Strategy and Policy DS5 seeks to ensure the efficient and effective servicing and delivery arrangements. No changes are proposed.
Question 17; Policy DS5	Indigo Planning on behalf of Royals Shopping Centre (Helen McManus) [498]	2306	Comment	Policy DS5 states that the Council will work with the freight industry and logistics to implement more efficient use of vehicles in terms of guidance, zoning and delivery timetables and suggests that this can be set out in freight management plans. Valad (Europe) Ltd suggest that the requirement for freight management plans is not set out in policy but dealt with on a case by case basis.	Policy purely sets out intent to provide for a freight management plan in the interests of efficient traffic management. No changes are proposed.
Question 17; Policy DS5	Belfairs Garden Residents Association (Barbara Armitage) [511]	2343	Object	Vulnerable groups' need transport and the statement that car travel is to be discouraged is discriminatory against those of us who cannot get on public transport and need cars for accessibility to all areas of the town and the profoundly disabled who use nothing else, not only motability cars but blue badge users and those taken by friends or taxis. Also need to be relief areas for guide and assistance dogs. The Southend Local Transport Plan 3 to 2026 notes as a Key Fact p87 the expected rise in population over 65 and that all public transport should be accessible by 2017 which does not appear likely. It also notes the lack of buses along the seafront.	The SCAAP does not seek to discourage car travel, rather it seeks to encourage and promote better public transport. The Local Transport Plan seeks to promote public transport for all, including concessionary fares for those of retirement age. Site occupiers with reference to national parking guidance and legislation are responsible for providing an adequate number of spaces for people with disabilities. The SCAAP seeks to promote a positive approach to public car parking provision that provides public car parking levels that support the vitality of the town centre and access to the seafront by encouraging improvements to the quality of access to parking so that it is convenient, well-signposted, safe and secure. It is considered that reference to a range of parking types, including for disabled people, should be made within Policy DS5.


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Question 17; Policy DS5	Belfairs Garden Residents Association (Barbara Armitage) [511]	2344	Object	<p>Reducing car parking space, particularly in the streets, is nonsense. Some of the spaces calculated have been within shopping malls such as the Royals. Local businesses need short term spaces for their customers including care agencies, accountants, lawyers etc. if clients do not find somewhere to park nearby, e.g Clarence Rd. area, the business will relocate somewhere else. This could have an effect upon employment considered elsewhere in the plan and under threat. Disabled people need nearby spaces. So do people with shopping and mums with children. Multi storey car parks are not good for those with walking difficulty or indeed women on their own for safety in darkness.</p> <p>Going to park in a multi storey or driving around for a space just to have lunch in a cafe in The High Street opposite Marks and Spencers does not make sense for boosting the town economy at all.</p> <p>The car park next to SAVS building is vital for users of that building and the meetings and workshops there. It also gives access to the Royals complex without having to drive around to the Royals car park where there is often long waiting to get in especially on Saturdays and when it is raining. Likewise the Clarence Road car park is vital for the residents and business people around there and of course the Baptist Church and Salvation Army.</p>	<p>The Council has commissioned an independent car parking study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.</p> <p>Policy seeks to better manage demand on the road network and balance this with the needs of other modes, particularly where this would give greater reliability to road users and priority to pedestrians, cyclists, public transport users and other vulnerable road users.</p> <p>The SCAAP seeks to promote a positive approach to public car parking provision that provides public car parking levels that support the vitality of the town centre and access to the seafront by encouraging improvements to the quality of access to parking so that it is convenient, well-signposted, safe and secure. It is considered that reference to a range of parking types, including for disabled people, should be made within Policy DS5.</p>
Question 17; Policy DS5	Belfairs Garden Residents Association (Barbara Armitage) [511]	2345	Comment	<p>The travel centre and management of access to buses is hopeless. Real consultation on the location of the travel centre and safe places for people to wait and queue for buses is overdue. Good and accessible public toilets should be incorporated here and elsewhere in the central area.</p>	<p>Policy PA7 identifies the potential to relocate the bus station to provide for improved facilities. The detailed design of a scheme will be considered at planning application stage and will be subject to consultation. No changes proposed.</p>
Question 17 DS5	Southend and District Pensioners Campaign (Mr Robert Howes) [476]	2366	Comment	<p>Would LGO's please stop using the term 'public transport' We only have private companies operating trains and buses.</p>	<p>'Public transport' is a term generally used to refer to transport services provided directly to the public. No change proposed.</p>
Question 17 DS5	Southend and District Pensioners Campaign (Mr Robert Howes) [476]	2367	Support	<p>Yes, but we need 24/7 concessionary fares for old aged pensioners</p>	<p>Concessionary fares are a matter outside of planning influence. No changes proposed.</p>
Question 17; Policy DS5	Procedures Consulting	2375	Comment	<p>Southend-On-Sea needs more innovative transport solutions. Other cities such as Manchester etc have reverted back to the tram</p>	<p>The Plan seeks to enhance and improve public transport within the central area. Innovative transport solutions have been</p>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	(Mr Barrie Evans) [513]			system and park and ride schemes. There is no connectivity from rail other than car or walking. To resurrect a tram system would not only provide an efficient form of transport but enhance the sea side feel that Southend is missing. Parking is also an issue and any new development should provide a self-sufficient parking solution and stop commercial and retail parking in residential areas	investigated as part of the Local Transport Plan. All development schemes are assessed against adopted car parking standards. No changes proposed.
Question 17; Policy DS5	Procedures Consulting (Mr Barrie Evans) [513]	2377	Comment	Southend-On-Sea central area is poorly lit and pedestrian routes for commuters from Southend Central station are seen as unsafe. Most commuters will travel in the hours of darkness whether it be morning or night and to encourage walking around the central areas better lighting is required.	Policy DS5 seeks to ensure the provision of appropriate street lighting. Reference will be included for improved lighting in Policy PA1.
Question 17; Policy DS5	Procedures Consulting (Mr Barrie Evans) [513]	2379	Comment	The central area is highly residential and traffic speed is too high; especially in the residential areas of Clifftown. Traffic calming options should be installed to reduce traffic speed in these areas.	Policy DS5 seeks to improve traffic management within the central area. However, it is recognised that the Policy makes no reference to the potential to improve the road safety and environment of the pockets of predominantly residential areas within the central area. It is therefore proposed that the following criteria is added to Policy DS5, <u>'Improve road safety and the quality of the environment by introducing traffic calming and related measures within predominantly residential areas as appropriate.'</u> Policy PA6.5.b seeks a reduction in general vehicle circulation in residential street.
Question 17; Policy DS5	Procedures Consulting (Mr Barrie Evans) [513]	2388	Comment	1 parking space per flat is totally unrealistic in this age	The Councils parking standards are set out in the Development Management Document and these have been found sound by a planning inspector and subsequently adopted.
Question 17; Policy DS5	National Federation for the Blind (Mrs Jill Allen-King) [516]	2433	Comment	All pedestrian areas should be kept free of obstacles, and no cycling should be allowed in these areas. All walking areas should be well lit, and where there are seats they should be so positioned that they do not cause a hazard.	Policy seeks to give priority to pedestrians, cyclists, public transport and other vulnerable users. It also seeks to maintain street lighting. Reference will be included to Policy DS5 to ensure that public realm improvements consider the needs of more vulnerable users as follows: <u>'In order to promote and reinforce local distinctiveness, ensure all public realm improvement works, including those outlined in the relevant Policy Areas, should seek to provide a coordinated palette of materials, facilitate a reduction in street clutter, consider the needs of all users including vulnerable and disabled users, the provision of additional seating where appropriate to provide resting places, and have regard to guidance within the Design and Townscape Guide and Streetscape Manual.'</u>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 17; Policy DS5	National Federation for the Blind (Mrs Jill Allen-King) [516]	2434	Comment	Parking should be provided for disabled drivers close to shops. There is no mention of parking for disabled people in the document.	Site occupiers with reference to national parking guidance and legislation are responsible for providing an adequate number of spaces for people with disabilities The SCAAP seeks to promote a positive approach to public car parking provision that provides public car parking levels that support the vitality of the town centre and access to the seafront by encouraging improvements to the quality of access to parking so that it is convenient, well-signposted, safe and secure. It is considered that reference to a range of parking types, including for disabled people, should be made within Policy DS5.
Question 17; Policy DS5	National Federation for the Blind (Mrs Jill Allen-King) [516]	2435	Comment	There should be bus routes to cover all parts of the town these should be reliable, frequent, accessible and available 7 days a week and at Bank holidays. Currently there are no bus routes from Chalkwell to the Kursaal.	Policy DS5, as part of a sustainable approach to transport, seeks to improve provisions for public transport users and for bus priority measures. Specific bus routes are considered as part of on-going partnership working with bus operators. No changes are proposed.
Infrastructure Provision					
Question 18	Essex Chambers of Commerce (Mr John Dallaway) [452]	1947	Support	Agree with the proposed approach to providing infrastructure in Southend Central Area	Noted.
Question 18	Anglian Water (Sue Ball) [37]	2015	Comment	Treatment capacity at Southend Water Recycling Centre is available to serve the proposed level of growth in the plan.(Infrastructure Provision 4.12 paragraph 139)	Noted
Question 18	Anglian Water (Sue Ball) [37]	2016	Comment	There may be a need for upgrades to the foul sewerage network to accommodate the used water flows from the proposed development. (Infrastructure Provision 4.12 paragraph 140) This will be assessed for each site when we are approached via our pre planning service and a solution identified. Details can be found at: http://www.anglianwater.co.uk/developers/pre-planning-service.aspx . Developers should be encouraged to submit a pre planning enquiry at the earliest opportunity.	Noted
Question 18	Anglian Water (Sue Ball) [37]	2027	Comment	For Surface water disposal we would expect a SuDS solution to be utilised where at all viable and under no circumstances will surface water be permitted to discharge into the foul sewerage system. (Infrastructure Provision 4.12 paragraph 140)	Noted. It is proposed to add to Policy DS4 point 2 the following: <u>'...Under no circumstances will surface water be permitted to discharge into a separate foul sewer or sewerage system. Surface runoff that cannot be discharged into the ground, a surface water body or a surface water sewer or local highway drain, must be discharged to a public, combined sewer system.'</u>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 18	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2095	Support	<p>The STOCKVALE GROUP understand the concept of a much greater residential intensification of the SCAAP area and would wholeheartedly support the Councils aspirations for an additional 4000+ homes however, this must be in the context of insuring there is suitable amenity and infrastructure.</p> <p>The intensification together with a greater mix of uses in the Town Centre and Central Seafront create a much more buoyant and sustainable economy and the STOCKVALE GROUP welcome the Councils proposals as part of the SCAAP planning document.</p>	<p>Noted. It is proposed to amend paragraph 139 as follows: <u>'Water companies are subject to a statutory duty to 'effectually drain' their area. This requires them to invest in infrastructure suitable to meet the demands of projected population growth. Southend Waste Water Treatment Works has adequate capacity to accommodate the Core Strategy growth targets to 2021 and beyond. However, developers will need to consider the effect of their development on the capacity of the local waste water network. Proposals will need to demonstrate that they will not overload this.'</u></p> <p>It is also proposed to insert a new paragraph under 139:</p> <p><u>'There is statutory provision for developers to fund additional sewerage infrastructure required to accommodate flows from a proposed development. Adequate sewerage infrastructure should be in place to serve the area before development progresses. Developers should seek pre-planning advice from Anglian Water at the earliest opportunity to ensure appropriate provision is made. Further details and useful guidance can be found on Anglian Water's website.'</u></p>
Question 18	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2105	Comment	<p>Before the SCAAP document is enshrined, the STOCKVALE GROUP would ask that the Council carry out thorough research, analysis and investigation into the capabilities of the existing infrastructure and the capabilities of utility suppliers to meet the aspirational growth. This is essential and will need some degree of consideration in terms of new sub stations around the SCAAP area. This directly links to townscape and Public Realm improvements as these sub stations represent an opportunity to not create a negative space in the overall townscape. Many of the Members of the STOCKVALE GROUP are continuously seeking to improve their offer and find that the limitation of the existing utilities coming into the SCAAP area prohibit their future plans and proposals. This has not been at all addressed in the SCAAP document.</p>	<p>Infrastructure provision is addressed in the Plan. Such provisions have been subject to consultation with utility companies as part of Plan preparation process. No changes are proposed.</p> <p>Further consultation with the National Grid will reveal whether further capacity is required to support the additional development in the central area. There was no objection from the National Grid to the housing and job targets in the Core Strategy.</p>
Question 18	Southend Bid (Mr S Kearney) [496]	2198	Support	<p>The BID understand the concept of a much greater residential intensification of the SCAAP area and would wholeheartedly support the Councils aspirations for an additional 4000+ homes however, this must be in the context of insuring there is suitable amenity and infrastructure. The intensification together with a</p>	<p>Noted.</p>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				greater mix of uses in the Town Centre and Central Seafront create a much more buoyant and sustainable economy and the BID welcome the Councils proposals as part of the SCAAP planning document.	
Question 18	Southend Bid (Mr S Kearney) [496]	2208	Comment	Before the SCAAP document is enshrined, the BID would ask that the Council carry out thorough research, analysis and investigation into the capabilities of the existing infrastructure and the capabilities of utility suppliers to meet the aspirational growth. This is essential and will need some degree of consideration in terms of new sub stations around the SCAAP area. This directly links to townscape and Public Realm improvements as these sub stations represent an opportunity to not create a negative space in the overall townscape. Many of the Members of the BID are continuously seeking to improve their offer and find that the limitation of the existing utilities coming into the SCAAP area prohibit their future plans and proposals. This has not been at all addressed in the SCAAP document.	Infrastructure provision, particularly flood risk management, which has been a major issue in the central seafront area, is addressed in the Plan. Such provisions have been subject to consultation with utility companies as part of the Plan preparation process. No changes are proposed.
Question 18	Southend Bid (Mr S Kearney) [496]	2249	Comment	Energy and Utilities 32% top priority.	Noted.
Question 18	Mr Alan Grubb [59]	2294	Comment	The nearest Health Centre is located in North Road Westcliff, will this health centre be able to handle the additional demand which would be created by the new developments, The old Ekco site, Roots Hall site, the old college site next to the Civic Centre, Heath House and Carby House.	The Plan recognises the potential need for additional community facilities, particularly in the Queensway, Victoria and Sutton Gateway policy areas (Policies PA4, PA8, PA9). No changes are proposed.
Question 18	Southend and District Pensioners Campaign (Mr Robert Howes) [476]	2368	Support	Yes, any new school may decide to convert to an Academy	Noted.
Question 18	Procedures Consulting (Mr Barrie Evans) [513]	2392	Comment	Southend-On-Sea Council should ensure that all new developments both business and residential have Fibre optic ultra high speed broadband infrastructure as standard. This will attract future business and technologies to the city. The Council should be the city to make Southend On Sea the first 100% fibre High speed broadband city in uk. This upgrade of communication across the city along with a wi-fi infrastructure as seen in cities across Romania (yes Romania) would make Southend extremely attractive to global business with high speed Broadband communications being a pinch point for companies across the UK both large and small.	The adopted Core Strategy (CP1) sets out provision for improving broadband infrastructure throughout the Borough.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 18	National Federation for the Blind (Mrs Jill Allen-King) [516]	2436	Comment	There is no mention of Public toilets or day centres for disabled people.	These are referred to in the Plan under the generic term 'community infrastructure'. No changes to Plan are proposed.
Part C: Policy Areas and Opportunity Sites					
Dwelling Capacity					
Question 19	The Co-operative Group (Mr A Thompson) [473]	1971	Object	The Co-operative Group would wish to see the inclusion of land at 53-57 Sutton Road Southend within the SCAAP as an additional Opportunity Site.	 The Council is considering inclusion of this site as an opportunity site. This will be assessed against information supplied by the owners of the site to demonstrate that development is deliverable by 2021.
High Street Policy Area – Policy PA1; Opportunity Sites 1 and 2					
Question 20 PA1	Anna Hyndnan Lahna [456]	1931	Comment	With regards to the invitation to comment on new plans for Southend High Street, I would like to propose that we introduce trees in an avenue style right down the centre of the pedestrianised area.	Policy PA1 seeks to provide for improved landscaping and 'urban greening' and tree planting in the High Street. No changes proposed.
Question 20 PA1	Anna Hyndnan Lahna [456]	1932	Comment	I think we need to bring the area more glamour. I think we need to curb the amount of pound and temporary shops. We need to encourage individual businesses along with higher class chains, Brown Brasseries for example.	Policy PA1 seeks to encourage development that would contribute to the vitality and viability of the town centre. No changes proposed.
Question 20 PA1	Anna Hyndnan Lahna [456]	1933	Comment	Southend has a reputation for being for being downtrodden and cheap but it needn't be, we could follow the lead of Brighton for example and encourage boutique style shops and bring up the standards.	Policy PA1 seeks to encourage development that would contribute to the vitality and viability of the town centre. No changes proposed.
Question 20 PA1	Essex Chambers of Commerce (Mr John Dallaway) [452]	1948	Support	Agree with the proposed approach to managing development within the High Street Policy Area	Noted.
Question 20 PA1	London Southend Airport (Ms	1967	Support	LSA would like to see improvements made to the top of the high street to entice passengers arriving from the airport via. Southend Victoria Station into the High Street area before making their way to the seafront.	Noted. The Plan makes provision for improved signage and way marking throughout the central area, however, it is not directly referred to in Policy PA1 (High Street) where quality signage is important. <i>It is therefore proposed that the following words be</i>

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	Jo Marchetti [471]			Better signage is needed to encourage visitors to many of the bars and restaurants located in the side streets. Better signage should be considered from the Queensway area to the High Street via. Odeon/New Look alleyway.	<i>added to Policy PA1 3 d: <u>'through improved signage and public art provision'</u>.</i>
Question 20; PA1.3.c	Burges Estate Residents Association [176]	1997	Support	Southend has been the focus of working class seaside attractions for at least 80 years and continues to be so. It is the mainstay of many seafront businesses. Those day trippers often take advantage of the sea front and the town centre facilities so improving the connectivity between the two is crucial.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 20; PA1	Anglian Water (Sue Ball) [37]	2017	Comment	We would recommend within each Policy Area a requirement is stipulated that the necessary sewerage infrastructure is in place to serve the area before development progresses.	<p>The Council understands that water companies are subject to a statutory duty to ‘effectually drain’ their area. This requires them to invest in infrastructure suitable to meet the demands of projected population growth. There is also statutory provision for developers to fund additional sewerage infrastructure required to fund additional sewerage from a proposed development. In relation to this Ofwat provides information for developers where a development would require a new water main or sewer. It is considered, therefore, that there is an obligation on water companies to ensure that sewerage infrastructure is provided to a level to meet housing target in an adopted plan, unless it is a circumstance where a development would be required to provide additional capacity.</p> <p>Specifically, for foul drainage, Section 42 of the Flood and Water Management Act requires developers who want to connect to a public sewer to enter into a binding agreement for the adoption of new connecting sewers by the undertaker (under section 104 of the Water Industry Act 1991). The agreement must specify that new sewers will be built to a standard published by the Minister, or any other such standard as may be agreed. (Review above)</p> <p>Reference to this has been included within section 4.12 Infrastructure Provision. As it is a statutory undertaking it is not considered necessary to repeat it in planning policy.</p> <p>Noted. Additional supporting text is proposed to be included in 4.12 Infrastructure Provision, referencing the need for developers to make provision for the foul sewerage network.</p>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 20	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2058	Comment	The Government has also introduced measures to make it easier to change use into residential however this is probably fairly restrictive in the High Street itself but Southend as the Local Planning Authority should consider the widening of that, certainly into some of the units off the High.	Policy DS1 and related Policy Area provisions actively promotes residential use above commercial premises and within proposed mixed use developments. No changes are proposed.
Question 20	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2063	Comment	High Streets Adapting for Change (RICS) introduces the Governments recognition that our High Streets have to offer something new and different that neither the shopping centres nor the internet can match. They need to offer an experience that goes beyond retail and they need to be a destination for the socialising culture, health, well being, creativity and learning. Offices alongside shops, alongside housing, alongside eateries.	Noted. The Plan seeks to achieve this.
Question 20	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2072	Support	Support the Council in their aspiration to (i) improve Competitive Performance (ii) Reduce the cost base (iii) Diversify away from retail uses (iv) grow the local economy and/or population, which is a strong theme in the preferred option principle. Recognise that the High Street should be a social place that makes creative use of public space with a vibrant evening economy.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 20	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2078	Comment	Many of our High Streets have been shaped by their past; however they are now trapped in their current configurations and often in poor shape to face the future. In relation to Southend on Sea, this is certainly the case. The High Street in particular has a linearity with no social space for congregation, interaction and the alternative commercial uses that would reactivate these spaces such as cafes, coffee shops, office space and importantly a high intensification of residential uses both at ground level and above The SCAAP and the Stockvale Group recognise that the High Street in particular requires a restructuring on a significant scale.	The SCAAP recognises the need to enhance and broaden the offer in the High Street and seeks to do this by providing a more flexible approach in the determination of planning applications to encourage a mix of retail, cafe and restaurant uses. The Plan also seeks to enhance and promote new public spaces within the centre. No changes are proposed.
Question 20	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2088	Support	Support a higher intensification of residential uses in the Central Area together with a broader mix of commercial uses ranging from A1 retail, A3 restaurant café, D2 leisure and B1 offices to provide a more diverse multi-use High Street and Central Seafront.	Noted.
Question 20	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2097	Comment	Various improvements have been made to the Central Seafront including improved connectivity through Pier Hill and the City Beach. Whilst there have been some improvements to the landscape of the High Street, this needs a much greater consideration and linking to new development. There needs to be greater inclusion of soft landscaping and public spaces and improved connections from the High Street through to the Seafront. This is particularly the case with Seaway Development. This development site represents a great opportunity to create a gateway development and pedestrian links and improved Public Realm linked to the Seafront. The STOCKVALE GROUP would wish to see a breaking down of the linearity of the High Street and the creation of a number of destination and unique quarters. This	Noted. The Plan seeks to achieve these aspects through its policy provisions. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				resonates particularly through with the Tylers Avenue, London Road and Alexandra and Clarence Street opportunity sites.	
Question 20	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2111	Comment	There is a great opportunity to display public art in terms of film projection on to the rear of the Victoria Plaza and the existing Odeon building. This further runs in to the top end of the High Street where there is a greater opportunity to enhance Victoria Circus.	<p>Noted. Additional wording is proposed to emphasise the use of visually active frontages within Policy PA2.2 as follows: <u>'Encourage visually active frontages, through public art, green walls, architectural fenestration to buildings on Queensway dual carriage-way'</u></p> <p>Include an additional criteria to Policy PA1 to encourage visually active frontage within PA1 to the rear of buildings on Queensway dual carriage way to read as follows: <u>'Encourage visually active frontages, through public art, green walls, and architectural fenestration to buildings on Queensway dual carriage way'</u></p>
Question 20	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2113	Comment	In relation to the middle of the High Street from Pitmans Close, Whitegate Road through to Tylers Avenue, the STOCKVALE GROUP support the extension of the education and cultural quarter into this area and would further suggest that the SCAAP looks at office use within the High Street itself and some residential uses above these offices. This would stimulate a broader economy and a safer pedestrian environment.	Noted. The SCAAP identifies a number of opportunities for achieving residential/office development within this locality. No changes are proposed.
Question 20	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2116	Comment	There could also be an improvement of pedestrian connection from the Central railway station of Southend on Sea into the Public Realm and a vast and extensive soft landscape scheme introduced around the Tylers Avenue/High Street connection to the railway station.	<p>Noted. It is proposed that PA7 is updated as follows: <u>'facilitate better pedestrian access to the High Street and Southend Central railway station'</u></p> <p>And the following amendment is proposed to PA6.3.b: 'streetscape and landscape design improvements, including urban greening and tree planting, to create well lit walking circuits through Clifftown from a newly created public plaza at Southend Central <u>Railway</u> Station/ Central House, to Cliff Gardens and Pier Hill, <u>facilitating better pedestrian access to the High Street'</u></p>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Kearney) [483]				
Question 20	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2119	Support	The STOCKVALE GROUP support the Public Realm improvements and further connectivity down through and into the Seafront. The STOCKVALE GROUP recognise that Pier Hill has had a huge success in this regard.	Noted.
Question 20	Southend Bid (Mr S Kearney) [496]	2160	Comment	The Government has also introduced measures to make it easier to change use into residential however this is probably fairly restrictive in the High Street itself but Southend as the Local Planning Authority should consider the widening of that, certainly into some of the units off the High Street.	Policy PA1 and related Policy Area provisions promotes residential use above commercial premises and within proposed mixed use developments where appropriate. No changes are proposed.
Question 20	Southend Bid (Mr S Kearney) [496]	2165	Comment	High Streets Adapting for Change (RICS) introduces the Governments recognition that our High Streets have to offer something new and different that neither the shopping centres nor the internet can match. They need to offer an experience that goes beyond retail and they need to be a destination for the socialising culture, health, well being, creativity and learning. Offices alongside shops, alongside housing, alongside eateries.	Noted. The Plan seeks to achieve this.
Question 20	Southend Bid (Mr S Kearney) [496]	2174	Support	Support the Council in their aspiration to (i) improve Competitive Performance (ii) Reduce the cost base (iii) Diversify away from retail uses (iv) grow the local economy and/or population, which is a strong theme in the preferred option principle. Recognises that the High Street should be a social place that makes creative use of public space with a vibrant evening economy	Noted.
Question 20	Southend Bid (Mr S Kearney) [496]	2180	Comment	Many of our High Streets have been shaped by their past, however they are now trapped in their current configurations and often in poor shape to face the future. In relation to Southend on Sea, this is certainly the case. The High Street in particular has a linearity with no social space for congregation, interaction and the alternative commercial uses that would reactivate these spaces such as cafes, coffee shops, office space and importantly a high intensification of residential uses both at ground level and above. The SCAAP and the	The SCAAP recognises the need to enhance and broaden the offer in the High Street and seeks to do this by encouraging a mix of retail, cafe and restaurant uses. The Plan also seeks to enhance and promote new public spaces within the centre. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				Stockvale Group recognise that the High Street in particular requires a restructuring on a significant scale.	
Question 20	Southend Bid (Mr S Kearney) [496]	2191	Support	Support a higher intensification of residential uses in the Central Area together with a broader mix of commercial uses ranging from A1 retail, A3 restaurant café, D2 leisure and B1 offices to provide a more diverse multi-use High Street and Central Seafront.	Noted.
Question 20	Southend Bid (Mr S Kearney) [496]	2200	Comment	Various improvements have been made to the Central Seafront including improved connectivity through Pier Hill and the City Beach. Whilst there has been some improvements to the landscape of the High Street, this needs a much greater consideration and linking to new development. There needs to be greater inclusion of soft landscaping and public spaces and improved connections from the High Street through to the Seafront. This is particularly the case with Seaway Development. This development site represents a great opportunity to create a gateway development and pedestrian links and improved Public Realm linked to the Seafront. The BID would wish to see a breaking down of the linearity of the High Street and the creation of a number of destination and unique quarters. This resonates particularly through with the Tylers Avenue, London Road and Alexandra and Clarence Street opportunity sites.	Noted. The Plan seeks to achieve these aspects through its policy provisions.
Question 20	Southend Bid (Mr S Kearney) [496]	2214	Comment	There is a great opportunity to display public art in terms of film projection on to the rear of the Victoria Plaza and the existing Odeon building. This further runs in to the top end of the High Street where there is a greater opportunity to enhance Victoria Circus.	Noted. Additional wording is proposed to emphasise the use of visually active frontages within Policy PA2.2 as follows: <u>'Encourage visually active frontages, through public art, green walls, fenestration to buildings on Queensway dual carriage way'</u> It is proposed to include an additional criteria to Policy PA1 to encourage visually active frontages to the rear of buildings on Queensway dual-carriage way to read as follows: <u>'Encourage visually active frontages, through public art, green walls, and architectural fenestration to buildings on Queensway dual carriage way'</u>
Question 20	Southend Bid (Mr S Kearney) [496]	2216	Comment	In relation to the middle of the High Street from Pitmans Close, Whitegate Road through to Tylers Avenue, the BID support the extension of the education and cultural quarter into this area and would further suggest that the SCAAP looks at office use within the High Street itself and some residential uses above these offices. This would stimulate a broader economy and a safer pedestrian environment.	Noted. The SCAAP identifies a number of opportunities for achieving residential/office development within this locality. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 20	Southend Bid (Mr S Kearney) [496]	2219	Comment	There could also be an improvement of pedestrian connection from the Central railway station of Southend on Sea into the Public Realm and a vast and extensive soft landscape scheme introduced around the Tylers Avenue/High Street connection to the railway station.	<p>Noted. It is proposed that PA7 is updated as follows: <u>'facilitate better pedestrian access to the High Street and Southend Central railway station'</u></p> <p>And the following amendment is proposed to PA6.3.b: 'streetscape and landscape design improvements, including urban greening and tree planting, to create well lit walking circuits through Clifftown from a newly created public plaza at Southend Central Railway Station/ Central House, to Cliff Gardens and Pier Hill, facilitating better pedestrian access to the High Street'</p> <p>And the following amendment to PA6.3.b: 'streetscape and landscape design improvements, including urban greening and tree planting, to create well lit walking circuits through Clifftown from a newly created public plaza at Southend Central Railway Station/ Central House, to Cliff Gardens and Pier Hill, facilitating better pedestrian access to the High Street'</p>
Question 20	Southend Bid (Mr S Kearney) [496]	2222	Support	The BID support the Public Realm improvements and further connectivity down through and into the Seafront. The BID recognise that Pier Hill has had a huge success in this regard.	Noted.
Question 20	Southend Bid (Mr S Kearney) [496]	2251	Comment	84% of respondents scored the High Street as a top 10 priority	Noted.
Question 20; PA1	Mr Alan Grubb [59]	2298	Comment	Walking up the High Street I cannot help but notice the area where Elmer Approach joins the High Street there does not appear to be any signs directing the pedestrian to the new library (Forum).	The provision of signage in the town centre is reviewed as appropriate. The Plan makes provision for improved signage and way marking throughout the central area, however, it is not directly referred to in Policy PA1 (High Street) where quality signage is important. <i>It is therefore proposed that the following words be added to Policy PA1 3 d 'through improved signage and public art provision'.</i>
Question 20; PA1	Indigo Planning on behalf of Royals Shopping Centre (Helen McManus) [498]	2307	Comment	Policy PA1 seeks to enhance the High Street experience through a number of improvements such as improving, enhancing and creating new public spaces, improved landscaping and interlinking access roads. Our client requests that specific mention is made to the Council's aspiration to open up the southern façade of The Royals Shopping Centre through the provision of a new restaurant(s) and outdoor public space etc to create a link between the High Street and the Seafront area. This, together with improved	The Plan seeks to achieve this as set out in Policies PA 1 3c and Policy CS1 10b. It is proposed that an additional criteria is inserted into Policy PA1.2 outlining the Council's support for proposals that create active frontage on the southern façade of The Royals Shopping Centre as follows: <u>'...the following, will be supported in principle... The provision of active frontage on the southern façade of The Royals Shopping Centre'</u>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				signage and access would help to link the seafront with the town centre and High Street benefitting the town centre as a whole.	
Question 20; PA1	Indigo Planning on behalf of Royals Shopping Centre (Helen McManus) [498]	2308	Object	Opportunity sites 1 and 2 (Whitegate Road and Pitmans Close) have been identified as being suitable for mixed use office/residential, commercial uses, with the timescale for delivery being post 2021. The delivery timescales within which the development should be delivered should be brought forward with the aim of delivering it pre-2021 on the basis that it will bring further investment to the town centre sooner.	There is insufficient evidence that these sites will be delivered by 2021, the end of the SCAAP's plan period. They will however, be considered during preparation of the Southend Local Plan. No changes are proposed.
Question 20, PA1	Southend and District Pensioners Campaign (Mr Robert Howes) [476]	2369	Comment	Yes, more public toilets and any "steps" must be complimented by ramps for disabled people	Noted. This would be considered during the detailed design stage of any scheme.
Question 20; PA1	Historic England (Dr Natalie Gates) [514]	2406	Comment	Paragraph 4 of Policy PA6 relates to energy efficiency and relates to existing development. We note that versions of this paragraph appear under other policy areas and opportunity sites, so the following comments also apply. Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. Any policy encouraging energy efficiency should note that the application will be different in relation to these classes of buildings. Further information can be found in the Historic England advice Energy Efficiency and Historic Buildings –Application of Part L of the Building Regulations to historically and traditionally constructed buildings https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/ . This similarly applies to Policy PA1, PA2, PA3, PA4, PA5, PA7, CS1, PA8 and PA9.	This point is noted. It is therefore proposed to reference this in paragraph 85 as follows: <i>'It should be noted that listed buildings, buildings in Conservation Areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance.'</i> It is proposed to add the words 'as appropriate' in paragraph 4 of Policy PA6 so that it reads, <i>'Promote energy efficiency as appropriate, including.....'</i> This would necessitate similar changes to all other policy areas.
Question 20	National Federation	2438	Comment	The High street should be kept at one level.	The High Street is predominantly at one level and elevators/lifts are provided at the multi-level Victoria Shopping Centre. A public

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	for the Blind (Mrs Jill Allen-King) [516]				lift was also constructed as part of wider regeneration proposals at the southern end of the High Street to improve accessibility between the differing levels of the High Street and the seafront.
London Road Policy Area – Policy PA2					
Question 21, PA2	Essex Chambers of Commerce (Mr John Dallaway) [452]	1949	Support	Agree with the proposed approach to managing development within the London Road Policy Area	Noted.
Question 21; PA2	Burges Estate Residents Association [176]	2003	Comment	I have no problem with London Road policy area except in one regard, the proposal for an active frontage along the dual carriageway. It is inconceivable that one would wish to encourage footfall along a busy dual carriageway. Far better to improve and emphasise London road as the focus for pedestrian traffic with the enhanced pedestrianisation. By all means improve the appearance but to create active frontages is wrong.	Noted, OS15 Sainsburys & Adjacent Building Site will not be in the final version of the SCAAP as it is unlikely to be implemented by 2021. It is proposed that Policy PA2 will be amended to encourage visually active frontage on Queensway dual-carriage way as follows: <i>‘Encourage visually active frontages, through public art, green walls, and architectural fenestration to buildings on Queensway dual carriage way’</i>
Question 21; PA2	Cllr Nevin [489]	2012	Comment	London Road public toilets please so that traders don’t bear the brunt of urinating doorways, a bench with public art/sculpture near to roundabout or top of Princes Street and pedestrianize as much as possible.	In setting out broad development principles for London Road, Policy PA3 seeks the provision of public art. However, the provision of toilets will not be addressed in the SCAAP, this would be considered during the detailed design stage of future development proposals.
Question 21; PA2	Anglian Water (Sue Ball) [37]	2018	Comment	We would recommend within each Policy Area a requirement is stipulated that the necessary sewerage infrastructure is in place to serve the area before development progresses.	Refer to Rep. 2017. Reference to this has been included within section 4.12 Infrastructure Provision. As it is a statutory undertaking it is not considered necessary to repeat it in planning policy. Noted. Additional supporting is proposed to be included in 4.12 Infrastructure Provision, referencing the need for developers to make provision for the foul sewerage network.
Question 21	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion,	2060	Support	Recognise-the importance of the Town Centre in viability and vitality terms and the need to enhance the existing markets where appropriate and introduce and create new markets.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Adventure Island, Adventure Sealife (Mr S Kearney) [483]				
Question 21	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2064	Comment	High Streets Adapting for Change (RICS) introduces the Governments recognition that our High Streets have to offer something new and different that neither the shopping centres nor the internet can match. They need to offer an experience that goes beyond retail and they need to be a destination for the socialising culture, health, well being, creativity and learning. Offices alongside shops, alongside housing, alongside eateries.	Noted. The Plan seeks to achieve this.
Question 21	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2079	Comment	Both the Council and Stockvale Group recognise the need to diversify the uses within the Central Area and indeed cite the success of London Road eateries. However, this needs to have some further consideration in relation to pedestrianising the stub-end of London Road, introducing a series of stalls that would allow for street food to further define this zone as a place that people come to enjoy, to eat, to meet and to use the cinema, which would include a reconfiguration and animation around Victoria Circus bleeding across into the northern end of the High Street.	The SCAAP seeks to achieve this in Policy PA2. No changes are proposed.
Question 21	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion,	2098	Comment	Various improvements have been made to the Central Seafront including improved connectivity through Pier Hill and the City Beach. Whilst there have been some improvements to the landscape of the High Street, this needs a much greater consideration and linking to new development. There needs to be greater inclusion of soft landscaping and public spaces and improved connections from the High Street through to the Seafront. This is particularly the case with Seaway Development. This	Noted. The Plan seeks to achieve these aspects through its policy provisions. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Adventure Island, Adventure Sealife (Mr S Kearney) [483]			<p>development site represents a great opportunity to create a gateway development and pedestrian links and improved Public Realm linked to the Seafront.</p> <p>The STOCKVALE GROUP would wish to see a breaking down of the linearity of the High Street and the creation of a number of destination and unique quarters. This resonates particularly through with the Tylers Avenue, London Road and Alexandra and Clarence Street opportunity sites.</p>	
Question 21	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2109	Comment	The STOCKVALE GROUP would further make recommendation that there is an opportunity lost on the Victoria Gateway Public Realm Improvements and the large public space should be activated with a small commercial use and extensive landscaping and planting.	The Victoria Avenue/ Queensway junction has benefitted from significant public realm and access improvements as part as the implemented Victoria Gateway Scheme. However, it is considered that policy should still seek further improvements to the public realm and accessibility. Therefore the following amendments in Policy PA2.7.g. are proposed: <i><u>'seek provision of public art and integrated signage that combine with more traditional signage to signal entry to the Town Centre from Victoria Gateway and facilitate clear way-finding to improve legibility and pedestrian access, together with further improvements to the public realm and accessibility.'</u></i>
Question 21	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2112	Comment	There is a great opportunity to display public art in terms of film projection on to the rear of the Victoria Plaza and the existing Odeon building. This further runs in to the top end of the High Street where there is a greater opportunity to enhance Victoria Circus.	<p>Additional wording proposed to emphasise the use of visually active frontage within Policy PA2.2 as follows: <i><u>'Encourage visually active frontages, through public art, green walls, and architectural fenestration to buildings on Queensway dual carriage way'</u></i></p> <p>Include an additional criteria to Policy PA1 to encourage visually active frontage within PA1 to the rear of buildings on Queensway dual-carriage way to read as follows: <i><u>'Encourage visually active frontages, through public art, green walls, and architectural fenestration to buildings on Queensway dual carriage way'</u></i></p>
Question 21	Stockvale Group representing Sands & Southend	2122	Comment	In relation to the existing Sainsburys site and redevelopment of the whole block OS15. This is a site that could take a significantly higher building to cater for a larger number of residential units, complementing the Victoria Gateway proposals to re-use the redundant office space to residential. Fantastic views are offered	Noted. Opportunity Site 15 will not be included in the final version of the SCAAP as there is insufficient evidence that the site will come forward before 2021, the end of the SCAAP's plan period.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]			here and the larger number of residential units would sustain the A3 restaurant and café uses around the top end of the High Street and stub end of London Road. This all needs to be considered in relation to adequate onsite parking provision, greater connectivity to public transport and a greatly enhanced Public Realm. The Stockvale Group would call for the Council to present design codes to ensure the design quality of development meets the Councils high aspirations.	Comments in relation to the site will be considered during preparation of the Southend Local Plan, which will consider the delivery of sites post 2021. Nevertheless the development principles as set out in Policy PA2, in combination with other adopted local policy and guidance, will provide the necessary framework to guide development proposals in this area.
Question 21	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2123	Comment	The stub end of London Road should be landscaped and enhanced to include mature tree planting as a boulevard into Victoria Circus. The A3 restaurant and café uses at the top end of the High Street have been a huge success and through the SCAAP document this could be further encouraged with the inclusion of some small stalls to encourage street food and pop up food outlets centred around a large kiosk or amphitheatre at Victoria Circus. These small pavilions could then spread to the northern quadrant of the High Street. This would further stimulate the eastern end of London Road and the top end of the High Street as a destination for eateries and later entertainment to extend the evening economy.	Noted. These aspects are incorporated into Polices PA1 and PA2.
Question 21	Southend Bid (Mr S Kearney) [496]	2162	Support	Recognise the importance of the Town Centre in viability and vitality terms and the need to enhance the existing markets where appropriate and introduce and create new markets	Noted.
Question 21	Southend Bid (Mr S Kearney) [496]	2166	Comment	High Streets Adapting for Change (RICS) introduces the Governments recognition that our High Streets have to offer something new and different that neither the shopping centres nor the internet can match. They need to offer an experience that goes beyond retail and they need to be a destination for the socialising culture, health, well being, creativity and learning. Offices alongside shops, alongside housing, alongside eateries.	Noted. The Plan seeks to achieve this.
Question 21	Southend Bid (Mr S Kearney) [496]	2181	Comment	Both the Council and the BID recognise the need to diversify the uses within the Central Area and indeed cite the success of London Road eateries. However, this needs to have some further consideration in relation to pedestrianising the stub-end of London Road, introducing a series of stalls that would allow for street food to further define this zone as a place that people come to enjoy, to eat, to meet and to use the cinema, which would include a	The SCAAP seeks to achieve this in Policy PA2. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				reconfiguration and animation around Victoria Circus bleeding across into the northern end of the High Street.	
Question 21	Southend Bid (Mr S Kearney) [496]	2201	Comment	<p>Various improvements have been made to the Central Seafront including improved connectivity through Pier Hill and the City Beach. Whilst there has been some improvements to the landscape of the High Street, this needs a much greater consideration and linking to new development. There needs to be greater inclusion of soft landscaping and public spaces and improved connections from the High Street through to the Seafront. This is particularly the case with Seaway Development. This development site represents a great opportunity to create a gateway development and pedestrian links and improved Public Realm linked to the Seafront.</p> <p>The BID would wish to see a breaking down of the linearity of the High Street and the creation of a number of destination and unique quarters. This resonates particularly through with the Tylers Avenue, London Road and Alexandra and Clarence Street opportunity sites.</p>	Noted. The Plan seeks to achieve these aspects through its policy provisions.
Question 21	Southend Bid (Mr S Kearney) [496]	2211	Support	Wholeheartedly support the improvement on Victoria Avenue as a gateway in to the Town. The BID recognises that much of this work is already underway with the on-going redevelopment of Heath and Carby House.	Noted. The Victoria Avenue/ Queensway junction has benefitted from significant public realm and access improvements as part as the implemented Victoria Gateway Scheme. However, it is considered that policy should still seek further improvements to the public realm and accessibility.
Question 21	Southend Bid (Mr S Kearney) [496]	2212	Comment	The STOCKVALE GROUP would further make recommendation that there is an opportunity lost on the Victoria Gateway Public Realm Improvements and the large public space should be activated with a small commercial use and extensive landscaping and planting.	The Victoria Avenue/ Queensway junction has benefitted from significant public realm and access improvements as part as the implemented Victoria Gateway Scheme. However, it is considered that policy should still seek further improvements to the public realm and accessibility. Therefore the following amendments are proposed to Policy PA2.7.g.: <u>'seek provision of public art and integrated signage that combine with more traditional signage to signal entry to the Town Centre from Victoria Gateway and facilitate clear way-finding to improve legibility and pedestrian access, together with further improvements to the public realm and accessibility.'</u>
Question 21	Southend Bid (Mr S Kearney) [496]	2215	Comment	There is a great opportunity to display public art in terms of film projection on to the rear of the Victoria Plaza and the existing Odeon building. This further runs in to the top end of the High Street where there is a greater opportunity to enhance Victoria Circus.	<p>Additional wording proposed to emphasis the use of visually active frontage within Policy PA2.2 as follows: <u>'Encourage visually active frontages, through public art, green walls, and architectural fenestration to buildings on Queensway dual carriage way'</u></p> <p>Include an additional criteria to Policy PA1 to encourage visually active frontage within PA1 to the rear of buildings on Queensway dual-carriage way to read as follows: <u>'Encourage visually active</u></p>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
					<i><u>frontages, through public art, green walls, and architectural fenestration to buildings on Queensway dual carriage way'</u></i>
Question 21	Southend Bid (Mr S Kearney) [496]	2225	Comment	In relation to the existing Sainsburys site and redevelopment of the whole block OS15. This is a site that could take a significantly higher building to cater for a larger number of residential units, complementing the Victoria Gateway proposals to re-use the redundant office space to residential. Fantastic views are offered here and the larger number of residential units would sustain the A3 restaurant and café uses around the top end of the High Street and stub end of London Road. This all needs to be considered in relation to adequate onsite parking provision, greater connectivity to public transport and a greatly enhanced Public Realm. The BID would call for the Council to present design codes to ensure the design quality of development meets the Councils high aspirations.	Noted. Opportunity Site 15 will not be included in the final version of the SCAAP as there is insufficient evidence that the site will come forward before 2021, the end of the SCAAP's plan period. Comments in relation to the site will be considered during preparation of the Southend Local Plan, which will consider the delivery of sites post 2021. Nevertheless the development principles as set out in Policy PA2, in combination with other adopted local policy and guidance, will provide the necessary framework to guide development proposals in this area.
Question 21	Southend Bid (Mr S Kearney) [496]	2226	Comment	The stub end of London Road mature tree planting as a boulevard into Victoria Circus. The A3 restaurant and café uses at the top end of the High Street have been a huge success and through the SCAAP document this could be further encouraged with the inclusion of some small stalls to encourage street food and pop up food outlets centred around a large kiosk or amphitheatre at Victoria Circus. These small pavilions could then spread to the northern quadrant of the High Street. This would further stimulate the eastern end of London Road and the top end of the High Street as a destination for eateries and later entertainment to extend the evening economy.	Noted. These aspects are incorporated into Polices PA1 and PA2
Question 21	Southend Bid (Mr S Kearney) [496]	2253	Comment	34% scored the London Road as a top 10 priority.	Noted.
Question 21, PA2	Mr Alan Grubb [59]	2295	Comment	In connection with the shared space located outside Southend Victoria Rail Station, I did raise this issue at the time of the redevelopment, saying that in my opinion in order to reduce the possibility of accidents to pedestrians crossing to and from the rail station, Victorian style metal railings could be erected on the feeder road outside the station, the railings should extend from the main entrance of the station, extending down to the area outside the British Transport Police car park and corresponding railings on the opposite side with a gap at the bus stops and a gap in each of the railing outside the side entrance to the rail station with a pedestrian controlled facility. Although some trees have been planted at Victoria Circus, they are not mature enough to attract the wild life (Birds) More trees do need to be planted but the trees do need to be semi matured and be able to support wild life.	The workings of the 'shared space' outside Victoria Railway Station will be kept under review as part of the on-going traffic monitoring of the area. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				<p>My comments refer to the road part of the shared access which takes buses from Victoria Avenue into the bus stops outside the side entrance of the rail station this part of the road is also being used by drivers of vehicles who are using Victoria Avenue to access the ring road without using the traffic light at Victoria Circus.</p> <p>There does need to be signs before the start of this section of the road restricting the drivers other than bus or taxi drivers from using this area of road together with A N P R cameras. The problem is further compounded by unauthorised vehicles using the road in the opposite direction. The problem is further compounded by some vehicle owners/ delivery drivers parking their vehicles on the pavement before the side entrance to the Rail station thereby blocking the visibility of the pedestrian who is wishing to cross the road from the station.</p>	
Question 21; PA2.7a	Belfairs Garden Residents Association (Barbara Armitage) [511]	2346	Object	Policy PA2.7a - Pedestrianisation of that section of road will make life extremely difficult for anyone with mobility problems and prevent access to cafes shops and the Odeon as detailed elsewhere.	Any pedestrianisation scheme will take into account the needs of vulnerable road users. These issues will be further considered during the detailed design and implementation stage of the scheme. No changes proposed.
Question 21; PA2.7b	Belfairs Garden Residents Association (Barbara Armitage) [511]	2347	Object	Policy PA2.7b - Relocating the taxis will be discriminatory and taxis to the West of College Way will really leave anyone with a walking difficulty stranded. This proposal could sound attractive but has not been properly thought through. There are not enough disabled parking spaces along there now and removing them really hits the Equality legislation.	Any pedestrianisation scheme will take into account the needs of vulnerable road users and taxi provision. These issues will be further considered during the detailed design and implementation stage of the scheme. No changes proposed.
Question 21; PA2.7g	Belfairs Garden Residents Association (Barbara Armitage) [511]	2348	Comment	Policy PA2.7g - Signage is good, public art maybe - but what is essential for people using the station is a crossing across that shared space.	The workings of the 'shared space' outside Victoria Railway Station will be kept under review as part of the on-going traffic monitoring of the area. No changes are proposed.
Question 21; PA2	Historic England (Dr Natalie Gates) [514]	2407	Comment	<p>Paragraph 4 of Policy PA6 relates to energy efficiency and relates to existing development. We note that versions of this paragraph appear under other policy areas and opportunity sites, so the following comments also apply.</p> <p>Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Regulations where compliance would</p>	This point is noted. It is therefore proposed to reference this in paragraph 85 as follows: <i>'Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance.'</i>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				<p>unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. Any policy encouraging energy efficiency should note that the application will be different in relation to these classes of buildings. Further information can be found in the Historic England advice Energy Efficiency and Historic Buildings –Application of Part L of the Building Regulations to historically and traditionally constructed buildings https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-pt/. <i>This similarly applies to Policy PA1, PA2, PA3, PA4, PA5, PA7, CS1, PA8 and PA9.</i></p>	<p>It is proposed to add the words ‘as appropriate’ in paragraph 4 of Policy PA6 so that it reads, <i>‘Promote energy efficiency as appropriate, including.....’</i> This would necessitate similar changes to all other policy areas.</p>
Question 21	National Federation for the Blind (Mrs Jill Allen-King) [516]	2437	Comment	<p>Victoria Gateway should be made safe by installing a pedestrian crossing across the shared space outside the Victoria Railway station.</p>	<p>Junction improvements are proposed at a number of key junctions in the town. The Victoria Gateway scheme provided for significant pedestrian improvements at the Victoria Avenue/Queensway junction. Its function will be kept under review as part of wider traffic management monitoring.</p>
Question 21, PA2	National Federation for the Blind (Mrs Jill Allen-King) [516]	2439	Object	<p>London Road should not be pedestrianised. The taxi rank should not be moved further away from its current position. It is already quite a distance for elderly and disabled people to walk from the shops to the taxi rank. People visiting the cinema also need the taxi nearby. At night it could cause dangerous situations if people have to walk further to the taxi rank. I would even suggest a bus route to that area, certainly not a pedestrian area. There are many banks in that area where many elderly people need to go, and for safety reasons need taxis close by for their transport requirements. Also more disabled parking to be in that area. If you pedestrianise it you take away access for disabled people to get to their Banks. If you put tables and chairs in a pedestrian area in London Road this will be a nightmare for blind and partially sighted people to walk in this area.</p>	<p>Policy PA2 seeks to pedestrianise London Road in the interests of improving the environment and townscape of this part of the retail area. The provision of taxi facilities enhanced pedestrian facilities and facilities for vulnerable road users will all be considered at the detailed design stage of any scheme. No changes proposed.</p>
Question 21, PA2	National Federation for the Blind (Mrs Jill Allen-King) [516]	2440	Object	<p>Throughout the document there are references to pedestrian and cycling routes. Cycling routes should be built on road space and not on pavements. At no time should pedestrians have to share with cyclists. It is too dangerous and will prevent many people who are blind and partially sighted from walking out safely. Cycling should not be allowed in the high street or any other pedestrian area.</p>	<p>Pedestrian and cycle routes will be provided and designed in a safe manner in accordance with best practice and guidance, having regard to the locality, road safety needs and the needs of other road users.</p>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 21, PA2	National Federation for the Blind (Mrs Jill Allen-King) [516]	2441	Comment	The direct Link from Victoria railway station and the high street can only happen if a safe pedestrian crossing is installed across the shared space outside the station.	Junction improvements are proposed at a number of key junctions in the town. The Victoria Gateway scheme provided for significant pedestrian improvements at the Victoria Avenue/Queensway junction. Its function will be kept under review as part of wider traffic management monitoring.
Elmer Square Policy Area – Policy PA3, Opportunity Site 3					
Question 22, PA3	Essex Chambers of Commerce (Mr John Dallaway) [452]	1950	Support	Agree with the proposed approach to managing development within the Elmer Square Policy Area	Noted.
Question 22, PA3	Cllr Nevin [489]	2011	Comment	Elmer Square green area ideas to tidy up and prudential building needs redeveloping, units facing the forum, hide the traders rubbish bins with trees, bushes please, we have residents living facing onto this. Picnic area on green space and children's swings or water feature	Noted, detailed design elements will be considered at the implementation stage of Elmer Square Phase 2.
Question 22, PA3	Anglian Water (Sue Ball) [37]	2019	Comment	We would recommend within each Policy Area a requirement is stipulated that the necessary sewerage infrastructure is in place to serve the area before development progresses.	Refer to Rep. 2017. Reference to this has been included within section 4.12 Infrastructure Provision. As it is a statutory undertaking it is not considered necessary to repeat it in planning policy. Noted. Additional supporting is proposed to be included in 4.12 Infrastructure Provision, referencing the need for developers to make provision for the foul sewerage network.
Question 22	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S	2114	Comment	In relation to the middle of the High Street from Pitmans Close, Whitegate Road through to Tylers Avenue, the STOCKVALE GROUP support the extension of the education and cultural quarter into this area and would further suggest that the SCAAP looks at office use within the High Street itself and some residential uses above these offices. This would stimulate a broader economy and a safer pedestrian environment.	Noted. The SCAAP identifies a number of opportunities for achieving residential/office development within this locality. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Kearney) [483]				
Question 22	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2124	Support	The STOCKVALE GROUP wholly supports proposals for Elmer Square and repeats the comments that have been made in relation to the High Street. There is a greater opportunity for this segment of the High Street to have a mixture of uses as well as retail. This includes office space that directly correlates to the education hub and again a strong residential use above this segment of the High Street. The STOCKVALE GROUP recognise that the Local Authority, University and South East Essex College has already delivered significant achievements in realising the aspirations so far.	Noted. These aspects are included within the Plan (Policies DS1, PA1, PA2 and PA3).
Question 22	Southend Bid (Mr S Kearney) [496]	2217	Comment	In relation to the middle of the High Street from Pitmans Close, Whitegate Road through to Tylers Avenue, the BID support the extension of the education and cultural quarter into this area and would further suggest that the SCAAP looks at office use within the High Street itself and some residential uses above these offices. This would stimulate a broader economy and a safer pedestrian environment.	Noted. The SCAAP identifies a number of opportunities for achieving residential/office development within this locality. No changes are proposed.
Question 22	Southend Bid (Mr S Kearney) [496]	2227	Support	The BID wholly supports proposals for Elmer Square and repeats the comments that have been made in relation to the High Street. There is a greater opportunity for this segment of the High Street to have a mixture of uses as well as retail. This includes office space that directly correlates to the education hub and again a strong residential use above this segment of the High Street. The BID recognise that the Local Authority, University and South East Essex College has already delivered significant achievements in realising the aspirations so far.	Noted. These aspects are included within the Plan (Policies DS1, PA1, PA2 and PA3).
Question 22, PA3	Historic England (Dr Natalie Gates) [514]	2408	Comment	Paragraph 4 of Policy PA6 relates to energy efficiency and relates to existing development. We note that versions of this paragraph appear under other policy areas and opportunity sites, so the following comments also apply. Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered	This point is noted. It is therefore proposed to reference this in paragraph 85 as follows: <i>'Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance.'</i> It is proposed to add the words 'as appropriate' in paragraph 4 of Policy PA6 so that it reads, <i>'Promote energy efficiency as appropriate, including.....'</i> This would necessitate similar changes to all other policy areas.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. Any policy encouraging energy efficiency should note that the application will be different in relation to these classes of buildings. Further information can be found in the Historic England advice Energy Efficiency and Historic Buildings –Application of Part L of the Building Regulations to historically and traditionally constructed buildings https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-pt/ . <i>This similarly applies to Policy PA1, PA2, PA3, PA4, PA5, PA7, CS1, PA8 and PA9.</i>	
Question 22, PA3	National Federation for the Blind (Mrs Jill Allen-King) [516]	2442	Comment	The Forum is not accessible for many elderly people like it was when it was in Victoria avenue. It is not on a bus route and it is a long walk for many people to reach it from a bus stop. There should be taxi ranks and parking for disabled people next to the forum.	The Forum has been established at the heart of the town centre adjacent to the railway station. The provision of taxi ranks and improved connectivity for pedestrians will be considered as part of further phases of the scheme.
Question 22, PA3	National Federation for the Blind (Mrs Jill Allen-King) [516]	2443	Comment	There is mention of mixed pedestrian and cycling routes that should not be allowed on the grounds of safety as already mentioned above.	Pedestrian and cycle routes will be provided and designed in a safe manner in accordance with best practice and guidance, having regard to the locality, road safety needs and the needs of other road users.
Queensway Policy Area – Policy PA4, Opportunity Site 4					
Question 23, PA4	Essex Chambers of Commerce (Mr John Dallaway) [452]	1951	Support	Agree with the proposed approach to managing development within the Queensway Policy Area	Noted.
Question 23, PA4	Anglian Water (Sue Bull) [37]	2020	Comment	We would recommend within each Policy Area a requirement is stipulated that the necessary sewerage infrastructure is in place to serve the area before development progresses.	Refer to Rep. 2017. Reference to this has been included within section 4.12 Infrastructure Provision. As it is a statutory undertaking it is not considered necessary to repeat it in planning policy. Noted. Additional supporting is proposed to be included in 4.12 Infrastructure Provision, referencing the need for developers to make provision for the foul sewerage network.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 23	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2125	Support	Support a vastly regenerated and improved area. The STOCKVALE GROUP recognises the value in creating innovative housing typologies and a high quality built environment.	Noted.
Question 23	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2127	Comment	There are a couple of issues that the STOCKVALE GROUP want to ensure are adequately addressed through the SCAAP. The first of those is the potential of having residents parking zones, this could have a negative effect on the existing Town Centre on and off street parking and consume spaces that are vital for visitors.	Noted. Such aspects will be kept under review as part of the on-going transport monitoring of the area.
Question 23	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2128	Comment	The STOCKVALE GROUP would wish to ensure that the Queensway policy area provides connectivity into the Seaway Car Park and the opportunity to see Seaway as a Gateway to the Seafront and the first visual connection to the Sea is not lost.	Noted. These provisions are identified in Policy CS1.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 23	Southend Bid (Mr S Kearney) [496]	2228	Support	Support a vastly regenerated and improved area. The BID recognises the value in creating innovative housing typologies and a high quality built environment.	Noted.
Question 23	Southend Bid (Mr S Kearney) [496]	2230	Comment	There are a couple of issues that the BID want to ensure are adequately addressed through the SCAAP. The first of those is the potential of having residents parking zones, this could have a negative effect on the existing Town Centre on and off street parking and consume spaces that are vital for visitors.	Noted. Such aspects will be kept under review as part of the on-going transport monitoring of the area.
Question 23	Southend Bid (Mr S Kearney) [496]	2231	Comment	STOCKVALE GROUP would wish to ensure that the Queensway policy area provides connectivity into the Seaway Car Park and the opportunity to see Seaway as a Gateway to the Seafront and the first visual connection to the Sea is not lost .	Noted. These provisions are identified in Policy CS1.
Question 23	Southend Bid (Mr S Kearney) [496]	2254	Comment	Queensway was scored by 24% response as a top 10 priority	Noted.
Question 23, PA4	Mr Alan Grubb [59]	2299	Comment	The pedestrian accessibility at the roundabout at Porters Grange does need to be improved, one such improvement would be, to close the stairs which take the pedestrian across the roundabout and to have pedestrian controlled crossings in order the pedestrian can cross the roads in safety.	Junction improvements to improve safety, particularly pedestrian and cyclists, at Queensway/Sutton Road are included in Policy PA4. No changes are proposed.
Question 23, PA4	Mr Paul Bethell [499]	2317	Comment	OS4 – what is urban grain?	Further explanatory included in Para. 165 to define urban grain as follows ' <i>...to re-establish urban grain (i.e. the physical form of former and surrounding street patterns and blocks).</i> '
Question 23, PA4	Mr Paul Bethell [499]	2318	Comment	OS4 - When I see the word "regeneration" applied in these circumstances, I think that means the council intends to demolish a lot of buildings close to me and build something which gives people better living conditions. Good for them. I presume, however, that this will be rather noisy and dirty and disruptive and inconvenience anyone living in a house just over the road for however many years it takes. So what are your plans for dealing with that? I suppose what I really want to know is: are the tower blocks going to be demolished and replaced with some affordable low-level social housing? And are there any plans to match it on Coleman Street?	The hours of construction will be controlled though conditions on any planning application permission. Affordable housing levels will be determined in line with local planning policy. The Better Queensway project will outline the detailed plans for the area, which will be assessed as part of a planning application.
Question 23, PA4	Southend and District Pensioners Campaign	2370	Comment	Yes, whether to demolish or refurbish the tower blocks of flats needs to be carefully considered. Keep them for another 30 years, if possible	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	(Mr Robert Howes) [476]				
Question 23, PA4	Historic England (Dr Natalie Gates) [514]	2409	Comment	<p>Paragraph 4 of Policy PA6 relates to energy efficiency and relates to existing development. We note that versions of this paragraph appear under other policy areas and opportunity sites, so the following comments also apply.</p> <p>Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. Any policy encouraging energy efficiency should note that the application will be different in relation to these classes of buildings. Further information can be found in the Historic England advice Energy Efficiency and Historic Buildings –Application of Part L of the Building Regulations to historically and traditionally constructed buildings https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/. This similarly applies to Policy PA1, PA2, PA3, PA4, PA5, PA7, CS1, PA8 and PA9.</p>	<p>This point is noted. It is therefore proposed to reference this in paragraph 85 as follows: <i>Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance.</i></p> <p>It is proposed to add the words ‘as appropriate’ in paragraph 4 of Policy PA6 so that it reads, <i>Promote energy efficiency as appropriate, including.....</i></p> <p>This would necessitate similar changes to all other policy areas.</p>
Warrior Square Policy Area – Policy PA5, Opportunity Site 5					
Question 24, PA5	Essex Chambers of Commerce (Mr John Dallaway) [452]	1952	Support	Agree with the proposed approach to managing development within the Warrior Square Policy Area and Opportunity Site	Noted.
Question 24, PA5	Burges Estate Residents Association [176]	2004	Comment	Warrior Square would be enhanced by residential development on the south side to enclose and complete the square. There must be strong support for the stated principle of maintaining the quality of the square since it is the absence of any reasonable level of maintenance that led to the “improvement scheme”. There is no sign that maintenance levels have improved.	Noted, the SCAAP is not the appropriate document to set out the maintenance procedures of public spaces.
Question 24, PA5	Cllr Nevin [489]	2009	Comment	Warrior Square protecting green space in warrior square where swimming pool was, a five aside football pitch/ or multi use area, jogging track round outside. Happy with houses both sides of Whitegate, with trees please, or water feature.	Noted. This site is unlikely to be deliverable in the SCAAP timeframe and therefore will not be included in the final version of the document.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 24, PA5	Anglian Water (Sue Bull) [37]	2021	Comment	We would recommend within each Policy Area a requirement is stipulated that the necessary sewerage infrastructure is in place to serve the area before development progresses.	Refer to Rep. 2017. Reference to this has been included within section 4.12 Infrastructure Provision. As it is a statutory undertaking it is not considered necessary to repeat it in planning policy. Noted. Additional supporting is proposed to be included in 4.12 Infrastructure Provision, referencing the need for developers to make provision for the foul sewerage network.
Question 24	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2130	Comment	The retention of the green space is paramount and greater legibility needs to be brought through to the High Street. Clearly the previous swimming pool site is a development opportunity and the STOCKVALE GROUP would seek that that this is of the highest quality providing some activity around the ground floor to support the small pocket park of Warrior Square. The STOCKVALE GROUP recognise that this site could deliver a significant number of residential units.	Noted. Opportunity Site 5 will not be included in the final version of the SCAAP as there is insufficient evidence that the site will come forward before 2021. Comments in relation to the site will be considered during preparation of the Southend Local Plan, which will consider the delivery of sites post 2021. Nevertheless the development principles as set out in Policy PA5, in combination with other adopted local policy and guidance, will provide the necessary framework to guide development proposals in this location.
Question 24	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2131	Comment	The STOCKVALE GROUP would want to see that the existing public car park provision is retained and any residential and commercial development yield aims to meet the requirements of the Councils development management plan in regard to parking provision.	The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.
Question 24	Southend Bid (Mr S Kearney) [496]	2233	Comment	The retention of the green space is paramount and greater legibility needs to be brought through to the High Street. Clearly the previous swimming pool site is a development opportunity and the BID would seek that that this is of the highest quality providing some activity around the ground floor to support the small pocket	Noted. Opportunity Site 5 will not be included in the final version of the SCAAP as there is insufficient evidence that the site will come forward before 2021, the end of the SCAAP's plan period.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				park of Warrior Square. The BID recognise that this site could deliver a significant number of residential units.	Comments in relation to the site will be considered during preparation of the Southend Local Plan, which will consider the delivery of sites post 2021. Nevertheless the development principles as set out in Policy PA5, in combination with other adopted local policy and guidance, will provide the necessary framework to guide development proposals in this location
Question 24	Southend Bid (Mr S Kearney) [496]	2234	Comment	The BID would want to see that the existing public car park provision is retained and any residential and commercial development yield aims to meet the requirements of the Councils development management plan in regard to parking provision.	The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.
Question 24	Southend Bid (Mr S Kearney) [496]	2255	Comment	Warrior Square was scored by 18% as a top 10 priority.	Noted.
Question 24, PA5	Historic England (Dr Natalie Gates) [514]	2410	Comment	<p>Paragraph 4 of Policy PA6 relates to energy efficiency and relates to existing development. We note that versions of this paragraph appear under other policy areas and opportunity sites, so the following comments also apply.</p> <p>Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. Any policy encouraging energy efficiency should note that the application will be different in relation to these classes of buildings. Further information can be found in the Historic England advice Energy Efficiency and Historic Buildings –Application of Part L of the Building Regulations to historically and traditionally constructed buildings https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-pt/. This similarly applies to Policy PA1, PA2, PA3, PA4, PA5, PA7, CS1, PA8 and PA9.</p>	<p>This point is noted. It is therefore proposed to reference this in paragraph 85 as follows: <i>‘Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance.’</i></p> <p>It is proposed to add the words ‘as appropriate’ in paragraph 4 of Policy PA6 so that it reads, <i>‘Promote energy efficiency as appropriate, including.....’</i></p> <p>This would necessitate similar changes to all other policy areas.</p>
Question 24, PA5	National Federation for the Blind (Mrs Jill Allen-King) [516]	2444	Comment	<p>Pedestrian and cycle routes should be kept separate.</p> <p>No cycling should be allowed on the footway or footpath.</p>	Pedestrian and cycle routes will be provided and designed in a safe manner in accordance with best practice and guidance, having regard to the locality, road safety needs and the needs of other road users.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 24, PA5	National Federation for the Blind (Mrs Jill Allen-King) [516]	2445	Comment	All bus routes should be kept in this area with shelters and seating provided.	The Plan seeks to improve public transport provision in the Central Area.
Question 24, PA5	National Federation for the Blind (Mrs Jill Allen-King) [516]	2446	Comment	This is a suitable area for a day centre for disabled people. Since the Queensway building was closed there has been nowhere for disabled people to go.	<p>The site is considered to be most suitable for a mixed use residential led development, which could include an element of community uses. Opportunity Site 5 will not be included in the final version of the SCAAP as there is insufficient evidence that the site will come forward before 2021, the end of the SCAAP's plan period. Comments in relation to the site will be considered during preparation of the Southend Local Plan, which will consider the delivery of sites post 2021.</p> <p>Community infrastructure provision is promoted on the nearby Queensway site as part of the provisions of Policy PA4. No change proposed.</p>
Question 24, PA5	National Federation for the Blind (Mrs Jill Allen-King) [516]	2447	Comment	There is no longer a swimming pool in the centre of the Town as the Warrior Square pool was closed. A new facility should be provided in this central area.	Policy PA5 seeks to regenerate this area with a mixed use development that respects the character and setting of the adjacent Conservation Area. The former swimming pool site is identified as having the potential to provide additional open space to mirror that of Warrior Square Gardens. A new improved swimming pool facility has been established at Garon Park outside the Plan area. No changes proposed.
Clifftown Policy Area – Policy PA6					
Question 25, PA6	Essex Chambers of Commerce (Mr John Dallaway) [452]	1953	Support	Agree with the proposed approach to managing development within the Clifftown Policy Area	Noted.
Question 25 PA6	Cllr Nevin [489]	2013	Support	Clifftown great to see development of Empire Theatre and Alexandra Street.	Noted, specific site allocations for these areas will not be included in the final version of the SCAAP as there remains insufficient evidence that they will be delivered by 2021. However, this does not preclude development coming forward and this will be guided by the policy area development principles.
Question 25 PA6	Anglian Water (Sue Bull) [37]	2022	Comment	We would recommend within each Policy Area a requirement is stipulated that the necessary sewerage infrastructure is in place to serve the area before development progresses.	Refer to Rep. 2017.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
					<p>Reference to this has been included within section 4.12 Infrastructure Provision. As it is a statutory undertaking it is not considered necessary to repeat it in planning policy.</p> <p>Noted. Additional supporting is proposed to be included in 4.12 Infrastructure Provision, referencing the need for developers to make provision for the foul sewerage network.</p>
Question 25	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2061	Support	Recognise the importance of the Town Centre in viability and vitality terms and the need to enhance the existing markets where appropriate and introduce and create new markets.	Noted.
Question 25	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2099	Comment	<p>Various improvements have been made to the Central Seafront including improved connectivity through Pier Hill and the City Beach. Whilst there have been some improvements to the landscape of the High Street, this needs a much greater consideration and linking to new development. There needs to be greater inclusion of soft landscaping and public spaces and improved connections from the High Street through to the Seafront. This is particularly the case with Seaway Development. This development site represents a great opportunity to create a gateway development and pedestrian links and improved Public Realm linked to the Seafront.</p> <p>The STOCKVALE GROUP would wish to see a breaking down of the linearity of the High Street and the creation of a number of destination and unique quarters. This resonates particularly through with the Tylers Avenue, London Road and Alexandra and Clarence Street opportunity sites.</p>	Noted. The Plan seeks to achieve these aspects through its policy provisions. No changes are proposed.
Question 25	Stockvale Group representing Sands &	2117	Comment	There could also be an improvement of pedestrian connection from the Central railway station of Southend on Sea into the Public Realm and a vast and extensive soft landscape scheme introduced around the Tylers Avenue/High Street connection to the railway station.	Noted. Further provision is made that seeks to improve the connectivity and public realm between Policy Area PA7 and the High Street and the Central Station, with an additional criteria to

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]				PA7 as follows: <u><i>‘facilitates better pedestrian access to the High Street and Southend Central railway station’</i></u> And the following amendment to PA6.3.b: <i>‘streetscape and landscape design improvements, including urban greening and tree planting, to create well lit walking circuits through Clifftown from a newly created public plaza at Southend Central <u>Railway</u> Station/ Central House, to Cliff Gardens and Pier Hill, <u>facilitating better pedestrian access to the High Street’</u></i>
Question 25	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2132	Support	Wholly support the aspirations for the Clifftown area and recognise the value of the Clifftown conservation area. There are two development sites namely Clarence Street and Alexandra Street car parks which have been identified for redevelopment. The STOCKVALE GROUP generally support the redevelopment of these areas providing they respond to the fine grain character of the Conservation area and the scale of Alexandra Street. The STOCKVALE GROUP recognise there is an opportunity to further enhance the boutique offer of this part of Southend by means of high quality architecture and high quality retail together with A3 uses and residential uses at upper levels.	Noted. Opportunity Sites 16 and 17 will not be included in the final version of the SCAAP as there is insufficient evidence that the site will come forward before 2021. Comments in relation to the sites will be considered during preparation of the Southend Local Plan, which will consider the delivery of sites post 2021. Nevertheless the development principles as set out in Policy PA6, in combination with other adopted local policy and guidance, will provide the necessary framework to guide development proposals in this location
Question 25	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2133	Comment	In relation to car parking, the STOCKVALE GROUP would seek that the existing public car parking spaces are either allocated as part of the museum provision or are included elsewhere within the south west corner of the SCAAP area. There is an opportunity with the Empire Theatre as a large basement already exists. A public car park could form part of a wholesale mixed use redevelopment of the Empire theatre.	OS9: New Southend Museum includes provision for public parking.
Question 25	Southend Bid (Mr S Kearney) [496]	2163	Support	Recognise the importance of the Town Centre in viability and vitality terms and the need to enhance the existing markets where appropriate and introduce and create new markets	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 25	Southend Bid (Mr S Kearney) [496]	2202	Comment	<p>Various improvements have been made to the Central Seafront including improved connectivity through Pier Hill and the City Beach. Whilst there has been some improvements to the landscape of the High Street, this needs a much greater consideration and linking to new development. There needs to be greater inclusion of soft landscaping and public spaces and improved connections from the High Street through to the Seafront. This is particularly the case with Seaway Development. This development site represents a great opportunity to create a gateway development and pedestrian links and improved Public Realm linked to the Seafront.</p> <p>The BID would wish to see a breaking down of the linearity of the High Street and the creation of a number of destination and unique quarters. This resonates particularly through with the Tylers Avenue, London Road and Alexandra and Clarence Street opportunity sites.</p>	Noted. The Plan seeks to achieve these aspects through its policy provisions.
Question 25	Southend Bid (Mr S Kearney) [496]	2220	Comment	<p>There could also be an improvement of pedestrian connection from the Central railway station of Southend on Sea into the Public Realm and a vast and extensive soft landscape scheme introduced around the Tylers Avenue/High Street connection to the railway station.</p>	<p>Noted. Further provision is made that seeks to improve the connectivity and public realm between Policy Area PA7 and the High Street and the Central Station, with an additional criteria to PA7 as follows: <u>'improve pedestrian accessibility and public realm enhancement that facilitates better access to the High Street and Southend Central railway station'</u></p> <p>And the following amendment to PA6.3.b: 'streetscape and landscape design improvements, including urban greening and tree planting, to create well lit walking circuits through Clifftown from a newly created public plaza at Southend Central Railway Station/ Central House, to Cliff Gardens and Pier Hill, facilitating better pedestrian access to the High Street'</p>
Question 25	Southend Bid (Mr S Kearney) [496]	2235	Support	<p>Wholly support the aspirations for the Clifftown area and recognise the value of the Clifftown conservation area. There are two development sites namely Clarence Street and Alexandra Street car parks which have been identified for redevelopment. The BID generally support the redevelopment of these areas providing they respond to the fine grain character of the Conservation area and the scale of Alexandra Street. The BID recognise there is an opportunity to further enhance the boutique offer of this part of Southend by means of high quality architecture and high quality retail together with A3 uses and residential uses at upper levels.</p>	<p>Noted. Opportunity Sites 16 and 17 will not be included in the final version of the SCAAP as there is insufficient evidence that the site will come forward before 2021, the end of the SCAAP's plan period.</p> <p>Comments in relation to the sites will be considered during preparation of the Southend Local Plan, which will consider the delivery of sites post 2021. Nevertheless the development principles as set out in Policy PA6, in combination with other adopted local policy and guidance, will provide the necessary framework to guide development proposals in this location</p>
Question 25	Southend Bid (Mr S	2236	Comment	<p>In relation to car parking, the BID would seek that the existing public car parking spaces are either allocated as part of the museum provision or are included elsewhere within the south west corner of</p>	Noted. OS9: New Southend Museum will include public parking provision.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Kearney) [496]			the SCAAP area. There is an opportunity with the Empire Theatre as a large basement already exists. A public car park could form part of a wholesale mixed use redevelopment of the Empire theatre.	
Question 25	Southend Bid (Mr S Kearney) [496]	2256	Comment	Clifftown was scored by 18% as a top 10 priority	Noted.
Question 25; PA6	Belfairs Garden Residents Association (Barbara Armitage) [511]	2349	Object	Against redevelopment of Alexandra Street and Clarence Road Car Parks. Both needed for local business and for access to Royals, shops in the High Street and cafes and restaurants for short term use. People will be deterred from using the facilities if they have to go some way to park. Families, older people, those helping older/disabled people all want to set down nearby and not be banished to a multi storey.	<p>Opportunity Sites 16 and 17 will not be included in the final version of the SCAAP as there is insufficient evidence that the site will come forward before 2021, the end of the SCAAP's plan period.</p> <p>Comments in relation to the site will be considered during preparation of the Southend Local Plan, which will consider the delivery of sites post 2021.</p> <p>The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.</p>
Question 25, PA6	Procuresure Consulting (Mr Barrie Evans) [513]	2378	Comment	The Clifftown conservation area is poorly lit and pedestrian routes for commuters from Southend Central station are seen as unsafe, where the traditional lighting is cosmetic and does not assist in the safety and security of pedestrians.	Policy DS5 seeks to ensure the provision of appropriate street lighting. Reference will be included for improved lighting in PA6.
Question 25, PA6	Procuresure Consulting (Mr Barrie Evans) [513]	2380	Comment	Southend-On-Sea central area parking currently relies on parking in residential streets. This is especially true in the Clifftown area where the theatre and London commuters, rely on on-street parking in the residential areas surrounding. Clifftown Parade is particularly bad and has become dangerous for locals due to speed and congestion made by over parking. This causes stress and major issues for local residents. Car parks on the fringes of the city centre should be built to host and rectify these issues. Any sea front investment, regeneration or build should have a self-sustaining carpark which does not impede the local residents. A Tram system should be investigated further which would solve the train to car issue and reduce road congestion in the area; in turn reducing carbon emissions.	The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.
Question 25, PA6	Procuresure Consulting (Mr Barrie Evans) [513]	2393	Comment	All regeneration of the Clifftown conservation area should be in keeping with the surrounding residential areas in Clifftown. The whole area should come under planning consent within the Clifftown Article 4 planning policy. There should not be a concentration of Bars and restaurants in the area and if these are brought to the area then no such planning	Policy PA6 seeks to protect and enhance the character, heritage and amenities of the Clifftown Conservation Area. The provisions of Article 4 Directions are kept under review as appropriate. No changes proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				should be given to Wetherspoons or budget chain pubs which cause drinking issues and encourage daytime drinking lowering the tone of the area and degrading surrounding properties. Concentrating bars in one area has proven to be bad for the area and its surroundings. union street in plymouth proves this. sports pubs and night clubs should not be allowed in the clifftown conservation area. only quality high end pubs, restaurants and cafes should be allowed to reflect the residential area of clifftown, thus drawing in financially solvent residents who will naturally have the capital to improve the area themselves and in turn create employment.	
Question 25, PA6	Procedures Consulting (Mr Barrie Evans) [513]	2395	Comment	Clifftown conservation area should have strict parking control as seen in the residential areas of Thorpe Bay. More double yellow lines should be introduced on all roads in Clifftown especially Clifftown Parade where parking congestion makes the road dangerous due to speeding vehicles and the narrowing of the road by parked cars. The theatre should provide parking as should the Council facilitate parking for commuters elsewhere. All official driveways should be white lined by the council to stop illegal parking and allow residents access to their own driveways. Over parking in Clifftown is a major issue, especially in Clifftown Parade. Over parking ruins what is supposed to be a conservation area, the vehicle fumes is also bad for the buildings and occupants themselves. The summer time parking restrictions do not go far enough and they should be year round. why should we the residents have to adhere to the planning rules in article 4 when all the extra money we spend on keeping our properties in aesthetic order is then ruined by hundreds of cars jam packed in along the streets we live in which ruin the look of the area anyway?! Clifftown Parade should have no on street parking at all.	<p>Traffic management will be kept under review as part of the provisions of Policy DS5 and the Local Transport Plan. No changes proposed.</p> <p>The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.</p>
Question 25, PA6	Historic England (Dr Natalie Gates) [514]	2404	Comment	Recommend that paragraph 2 is extended to cover proposals that are outside of a conservation area (particularly those that are adjacent to a conservation area) but offer an opportunity for enhancement of setting.	This is covered by Policy DM5 of the Development Management DPD and Policy DS3 of the SCAAP.
Question 25, PA6	Historic England (Dr Natalie Gates) [514]	2405	Comment	Paragraph 4 of Policy PA6 relates to energy efficiency and relates to existing development. We note that versions of this paragraph appear under other policy areas and opportunity sites, so the following comments also apply. Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings,	<p>This point is noted. It is therefore proposed to reference this in paragraph 85 as follows: <i>'Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance.'</i></p> <p>It is proposed to add the words 'as appropriate' in paragraph 4 of Policy PA6 so that it reads, <i>'Promote energy efficiency as appropriate, including.....'</i></p>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. Any policy encouraging energy efficiency should note that the application will be different in relation to these classes of buildings. Further information can be found in the Historic England advice Energy Efficiency and Historic Buildings –Application of Part L of the Building Regulations to historically and traditionally constructed buildings https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-pt/ . <i>This similarly applies to Policy PA1, PA2, PA3, PA4, PA5, PA7, CS1, PA8 and PA9.</i>	This would necessitate similar changes to all other policy areas.
Question 25, PA6	National Federation for the Blind (Mrs Jill Allen-King) [516]	2448	Comment	It is not clear about the plan for outside the Central railway Station. Taxi ranks need to be kept and bus routes need to improve in this area to encourage more people to travel to the station and High street by bus and not use their cars.	Policy PA6a seeks to improve the forecourt, public realm and space in front of Central Railway Station. The provision for taxis, bus stops, street furniture etc. will be taken forward at the design stage. No changes proposed.
Question 25, PA6	National Federation for the Blind (Mrs Jill Allen-King) [516]	2449	Comment	What is a public square? I do not agree with outside dining unless tables and chairs are properly guarded by a metre high barrier to prevent blind and partially sighted people walking in to them.	The Plan seeks to provide an improvement to soft landscaping and open space provision within the Clifftown policy area. Access arrangements to shops are considered as part of the design stage of planning applications to ensure accessibility for all users. No changes to policy are proposed.
Question 25, PA6	National Federation for the Blind (Mrs Jill Allen-King) [516]	2450	Object	Again pedestrian and cycle routes are suggested these must be kept separate. Cyclists should be on road space and not pedestrian areas.	Pedestrian and cycle routes will be provided and designed in a safe manner in accordance with best practice and guidance, having regard to the locality, road safety needs and the needs of other road users.
Tylers Policy Area – Policy PA7, Opportunity Site 6 (OS6)					
Question 26, PA7	Essex Chambers of Commerce (Mr John Dallaway) [452]	1954	Support	Agree with the proposed approach to managing development within the Tylers Policy Area and Opportunity Site	Noted.
Question 26, PA7, OS6	Mr Harry Chandler [219]	1987	Comment	OS6 - For many years I have been disappointed by the lack of a comprehensive bus station in Southend. The present arrangements in Chichester Road are unsatisfactory for both residents of Southend	Policy PA 7 identifies the potential to relocate the existing Travel Centre (bus station) to the adjacent Tylers Avenue car park as part of a comprehensive redevelopment scheme. However, it is

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				<p>and surrounding area and visitors to Southend. Many people especially elderly residents, mothers with babies and small children and the disabled have to stand in cold and wet weather without adequate shelter and heating. Visitors to Southend to whom I have spoken have been appalled by current arrangements. The glazed structure south of Heygate Avenue is shunned by most bus passengers as it does not appear to be fit for purpose. To be constructive a bus station along the lines of the one in Preston, Lancashire shown below, seems the obvious solution.</p> <p>Having used this bus station for many years, is a joy to use compared with the arrangements in our town, Southend. I understand that the bus station in Preston, opened in 1969, is to be refurbished. On a smaller scale, the bus stations in Harrogate and Bath, both residential and tourist towns, also work well for passengers.</p> <p>The current location of our bus station does not seem to be ideal. The large car park adjacent to the bus station seems to work. It would seem sensible to use this large car par to build a structure similar in purpose to the one in Preston and to provide car parking and a first class bus station for the people of Southend and district and visitors as part of the Better Southend.</p>	<p>accepted that OS6 does not clearly state why such relocation would be appropriate. It is therefore proposed that the following wording be added to the end of point 5ii of OS6: <i>'...to provide for enhanced passenger transport facilities and improved pedestrian connectivity to the town centre.'</i></p>
Question 26, PA7	Burges Estate Residents Association [176]	2005	Comment	Tylers policy area is a big challenge to get right and maybe the fact that the travel centre is coming down reflects that difficulty. Either way explaining to the public how so much public money was wasted is necessary as well as explaining why it will not happen again.	Noted, OS6 simply sets out the opportunity for relocation of the travel centre.
Question 26, PA7	Cllr Nevin [489]	2010	Comment	Tylers Home zoning approach design features with trees for Quebec Ave to York Rd & Heygate Ave & cul-de-sac where possible, redirecting traffic flows down York Road, to design out difficult areas.	Noted. The final design of any Home Zone scheme for these areas will be taken forward in conjunction with transport schemes. They will be able to explore the opportunities of redirection of traffic flows.
Question 26, PA7	Anglian Water (Sue Bull) [37]	2023	Comment	We would recommend within each Policy Area a requirement is stipulated that the necessary sewerage infrastructure is in place to serve the area before development progresses.	<p>Refer to Rep. 2017.</p> <p>Reference to this has been included within section 4.12 Infrastructure Provision. As it is a statutory undertaking it is not considered necessary to repeat it in planning policy.</p> <p>Noted. Additional supporting is proposed to be included in 4.12 Infrastructure Provision, referencing the need for developers to make provision for the foul sewerage network.</p>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 26	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2100	Comment	<p>Various improvements have been made to the Central Seafront including improved connectivity through Pier Hill and the City Beach. Whilst there have been some improvements to the landscape of the High Street, this needs a much greater consideration and linking to new development. There needs to be greater inclusion of soft landscaping and public spaces and improved connections from the High Street through to the Seafront. This is particularly the case with Seaway Development. This development site represents a great opportunity to create a gateway development and pedestrian links and improved Public Realm linked to the Seafront.</p> <p>The STOCKVALE GROUP would wish to see a breaking down of the linearity of the High Street and the creation of a number of destination and unique quarters. This resonates particularly through with the Tylers Avenue, London Road and Alexandra and Clarence Street opportunity sites.</p>	Noted. The Plan seeks to achieve these aspects through its policy provisions. No changes are proposed.
Question 26	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2115	Comment	<p>The STOCKVALE GROUP would want to ensure that OS6 Tylers Avenue includes a replacement car park for the existing public spaces plus the parking requirements for a future development. In relation to Public Realm improvements, there is an opportunity to create a southern square as part of the Tylers Avenue proposals and link this through to the pedestrianised High Street.</p>	<p>Noted. Adjustments to the boundary of the OS6: Tylers opportunity site will be made and will accommodate such proposals.</p> <p>The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.</p>
Question 26	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure	2118	Comment	<p>There could also be an improvement of pedestrian connection from the Central railway station of Southend on Sea into the Public Realm and a vast and extensive soft landscape scheme introduced around the Tylers Avenue/High Street connection to the railway station.</p>	<p>Noted. Further provision is made that seeks to improve the connectivity and public realm between Policy Area PA7 and the High Street and the Central Station, with an additional criteria to PA7 as follows: <u>'improve pedestrian accessibility and public realm enhancement that facilitates better access to the High Street and Southend Central railway station'</u></p> <p>And the following amendment to PA6.3.b: 'streetscape and landscape design improvements, including urban greening and tree planting, to create well lit walking circuits through Clifftown from a newly created public plaza at Southend Central Railway Station/ Central House, to Cliff</p>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Sealife (Mr S Kearney) [483]				Gardens and Pier Hill, <u>facilitating better pedestrian access to the High Street'</u>
Question 26	Southend Bid (Mr S Kearney) [496]	2203	Comment	<p>Various improvements have been made to the Central Seafront including improved connectivity through Pier Hill and the City Beach. Whilst there has been some improvements to the landscape of the High Street, this needs a much greater consideration and linking to new development. There needs to be greater inclusion of soft landscaping and public spaces and improved connections from the High Street through to the Seafront. This is particularly the case with Seaway Development. This development site represents a great opportunity to create a gateway development and pedestrian links and improved Public Realm linked to the Seafront.</p> <p>The BID would wish to see a breaking down of the linearity of the High Street and the creation of a number of destination and unique quarters. This resonates particularly through with the Tylers Avenue, London Road and Alexandra and Clarence Street opportunity sites.</p>	Noted. The Plan seeks to achieve these aspects through its policy provisions.
Question 26	Southend Bid (Mr S Kearney) [496]	2218	Comment	The BID would want to ensure that OS6 Tylers Avenue includes a replacement car park for the existing public spaces plus the parking requirements for a future development. In relation to Public Realm improvements, there is an opportunity to create a southern square as part of the Tylers Avenue proposals and link this through to the pedestrianised High Street.	<p>Noted. Adjustments to the boundary of the OS6: Tylers Opportunity Site will be made and will accommodate such proposals.</p> <p>The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.</p>
Question 26	Southend Bid (Mr S Kearney) [496]	2221	Comment	There could also be an improvement of pedestrian connection from the Central railway station of Southend on Sea into the Public Realm and a vast and extensive soft landscape scheme introduced around the Tylers Avenue/High Street connection to the railway station.	<p>Noted. Further provision is made that seeks to improve the connectivity and public realm between Policy Area PA7 and the High Street and the Central Station, with an additional criteria to PA7 as follows: <u>'improve pedestrian accessibility and public realm enhancement that facilitates better access to the High Street and Southend Central railway station'</u></p> <p>And the following amendment to PA6.3.b: 'streetscape and landscape design improvements, including urban greening and tree planting, to create well lit walking circuits through Clifftown from a newly created public plaza at Southend Central <u>Railway</u> Station/ Central House, to Cliff Gardens and Pier Hill, <u>facilitating better pedestrian access to the High Street'</u></p>
Question 26	Southend Bid (Mr S	2257	Comment	Tylers was scored by 22% of respondents as a top 10 priority	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Kearney) [496]				
Question 26, PA7	Mr Alan Grubb [59]	2297	Comment	I understand that there is thought of transferring the Travel Centre to a larger site, one site might be the Tyler's Avenue car park. If so I would hope that the Council engages with the residents and the bus user in order to create a travel centre fit for purpose together with flats above the travel centre.	Policy PA7 provides for the possible relocation of the Travel Centre to Tylers Avenue car park. Further consultation will be carried out at the planning application stage, if this were considered to be a viable and feasible option. No changes are proposed.
Question 26, PA7	Indigo Planning on behalf of Royals Shopping Centre (Helen McManus) [498]	2309	Support	Policy PA7 seeks to ensure stronger integration within the Central Seafront Policy Area including improved walking and cycling linkages via St John's Church and Seaway Car Park and Marine Parade Opportunity Site (OS8) and via Pier Hill. Enhancing linkages will help to increase footfall, linked trips and in turn, help to bolster the vitality and viability of the town centre and on this basis, Valad (Europe) Ltd support this policy.	Noted.
Question 26, PA7	Historic England (Dr Natalie Gates) [514]	2411	Comment	Paragraph 4 of Policy PA6 relates to energy efficiency and relates to existing development. We note that versions of this paragraph appear under other policy areas and opportunity sites, so the following comments also apply. Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. Any policy encouraging energy efficiency should note that the application will be different in relation to these classes of buildings. Further information can be found in the Historic England advice Energy Efficiency and Historic Buildings –Application of Part L of the Building Regulations to historically and traditionally constructed buildings https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/ . This similarly applies to Policy PA1, PA2, PA3, PA4, PA5, PA7, CS1, PA8 and PA9.	This point is noted. It is therefore proposed to reference this in paragraph 85 as follows: <i>'Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance.'</i> It is proposed to add the words 'as appropriate' in paragraph 4 of Policy PA6 so that it reads, <i>'Promote energy efficiency as appropriate, including.....'</i> This would necessitate similar changes to all other policy areas.
Question 26, PA7	National Federation for the Blind (Mrs Jill	2451	Comment	A new travel centre should be covered completely. It would be better located next to Victoria railway station on the old B&Q site, jf not next to the Central railway station. In most towns this happens. Buses would not then hold up the traffic near to the Royals.	A central location for the bus station is considered the most appropriate to serve the needs of the town centre and central seafront area.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Allen-King) [516]				
Question 26, PA7	National Federation for the Blind (Mrs Jill Allen-King) [516]	2452	Comment	What is the public square you refer to? We certainly do not want a shared space like at Victoria Gateway and City Beach. Why are railings to be removed at crossing points? This will cause danger for all pedestrians including children.	Policy identifies the potential for a new public space, as part of an overall development, in the locality of the current travel centre; should this be relocated to the Tylers Avenue car park site.
Question 26, PA7	National Federation for the Blind (Mrs Jill Allen-King) [516]	2453	Comment	Cycle routes must be on road space and not on footpaths or footways. Pedestrians must have uncluttered walk ways with safe pedestrian crossings at all junctions, with audible signals and tactile markings.	Pedestrian and cycle routes will be provided and designed in a safe manner in accordance with best practice and guidance, having regard to the locality, road safety needs and the needs of other road users.
Central Seafront Policy Area – Policy CS1, Opportunity Sites 7, 8, 9 and 10					
Question 27, CS1 and OS8	Mr Kenton Theobald [1930]	1930	Comment	OS8 - new cinema not needed already one up top of high street, small low rent curio/artisan shops needed instead to compliment new square at OS8 (make a Southend lanes like in Brighton), new seaway car park to recognise blue badges and give them free parking	Policy CS1 identifies the potential of the seaway car park site to provide for a mixed use development comprising leisure, cultural and tourism facilities which are considered to be appropriate in this location. The Policy allows for design and layout solutions and seeks to take advantage of the sites elevation with views of the estuary (OS8). The SCAAP is a planning policy document and does not directly cover parking charges. No changes are proposed.
Question 27, CS1	Anna Hyndnan Lahna [456]	1934	Comment	Let's hope that when the jetty is up and running, the nasty slot machine seafront will be brought upmarket with nice restaurants and shops.	Noted.
Question 27, CS1	Essex Chambers of Commerce (Mr John Dallaway) [452]	1955	Support	Agree with the proposed approach to managing development within the Central Seafront Policy Area and sites OS7, OS8, OS9 AND CS1.1 on the proviso that there is adequate car parking provision to support the growth in footfall.	Noted. The Council has commissioned an independent car parking study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.
Question 27, CS1	London Southend Airport (Ms Jo Marchetti) [471]	1968	Support	LSA supports the development of new hotels, tourist attractions and would strongly encourage the development of a dedicated conference and exhibition centre. LSA has the opportunity to host and attract aviation conferences which would bring interest for the town from other countries. The centre and supporting infrastructure would need to be able to host 500+ delegates and should be positioned in the best place possible to highlight Southend's key tourist sites.	Noted. The Plan seeks to develop the new museum which provides potential provision for new conference facilities (OS 9).

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 27, CS1, OS8	Ms Lise Hodgson [467]	1982	Object	<p>OS8 - Placing a cinema that close to the beach is a waste of valuable land. A cinema will not attract more people to the town. I do not know anyone who has ever decided to go on holiday somewhere because there is a cinema. If the Council wants another cinema in the town an area further inland would be far more appropriate.</p> <p>Once you are inside a cinema you are not going to spend a lot of money in the area. In the SCAAP the Council says they want to create an area where people want to live, but who would want to live in a place where they have to look out on a cinema instead of beautiful sea views. The Council's plans are completely devaluing our homes and destroying our enjoyment of them.</p> <p>If the Council really wanted to do the best for this area, (which I am beginning to doubt) instead of destroying it as at present, a series of restaurants and cafes with green areas in between would be more in keeping with a seaside town, perhaps with a large underground car park. That would attract people and get them to spend money in the area. Once you are inside a cinema you are not going to spend a lot of money in the area.</p>	Policy CS1 identifies the potential of the seaway car park site to provide for a mixed use development comprising leisure, cultural and tourism facilities which are considered to be appropriate in this location. The possible inclusion of a cinema is considered to be compatible with providing a mix of leisure uses to enhance the offer on this key site. The Policy also sets out design and layout principles to guide development and allow for 'urban greening', creation of new public and private green space, and seek to take advantage of the sites elevation with views of the estuary (OS8). No changes are proposed.
Question 27, CS1, OS8	Ms Lise Hodgson [467]	1983	Object	OS8 - Regarding the hotel, is there a need? Since I moved to Southend in 2006 the Royal Hotel in the High Street has been empty and is now being developed as a restaurant. If there was a need for another hotel in the area, surely someone smart would have snapped up this gem long ago.	A hotel development is considered appropriate in this location. Southend has the potential for further hotel development to promote 'longer stay' holidays (see Southend Hotel Futures Report 2010). No changes are proposed.
Question 27, CS1, OS8	Ms Lise Hodgson [467]	1984	Object	OS8 - Traffic. Have anybody from the Council ever been in this area during a summer weekend or even weekends leading up to Christmas? The area around the roundabout and Chancellor Road get completely gridlocked at least once a day and the few extra parking spaces in the developer's plan will barely fill the shortfall, let alone accommodate more traffic.	Policy CS1 provides for junction improvements at Queensway/Seaway Car Park/Chancellor Road. All major development proposals will be accompanied by a transport assessment and will have to take account of adopted parking standards. The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.
Question 27, CS1	Ms Lise Hodgson [467]	1985	Object	<p>Regarding the plans for the seafront, I am worried about all the high rise buildings being planned. If the Council are trying to create Benidorm on Sea, don't forget, we don't have the climate to make up for the dreadful buildings.</p> <p>The Council do not want to make the most of the natural attractions of this place, but please, please, please do not destroy it completely.</p>	The Plan, alongside Policy DM4 of the Development Management Document, seeks to provide for appropriately sited taller and larger buildings having regard to the amenity of the area (Policy CS1). It also seeks to enhance and protect the natural attractions of the area (Policies CS2 and 3). No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 27, CS1.10.a	Burges Estate Residents Association [176]	1998	Support	Southend has been the focus of working class seaside attractions for at least 80 years and continues to be so. It is the mainstay of many seafront businesses. Those day trippers often take advantage of the sea front and the town centre facilities so improving the connectivity between the two is crucial.	Noted.
Question 27, CS1	Burges Estate Residents Association [176]	2006	Comment	Central seafront policy area principles contain reference to the "use of high quality coordinated materials, durable and easy to maintain". May I suggest that such a requirement be applied to all policy areas where appropriate. There is no reason why the seafront should be singled out for exceptional treatment.	Noted, reference to the ' <i>use of high quality coordinated materials, durable and easy to maintain</i> ' will be removed from CS1, as this is covered by Streetscape Manual Supplementary Planning Guidance.
Question 27, CS1	Cllr Nevin [489]	2014	Support	Seaway Like cycle paths, would be happy to have more green area here, as natural viewing point towards seafront and Spanish steps	Noted.
Question 27, CS1	Anglian Water (Sue Bull) [37]	2024	Comment	We would recommend within each Policy Area a requirement is stipulated that the necessary sewerage infrastructure is in place to serve the area before development progresses.	Refer to Rep. 2017. Reference to this has been included within section 4.12 Infrastructure Provision. As it is a statutory undertaking it is not considered necessary to repeat it in planning policy. Noted. Additional supporting is proposed to be included in 4.12 Infrastructure Provision, referencing the need for developers to make provision for the foul sewerage network.
Question 27, CS1, OS8	Mr Michael Davies [493]	2034	Support	OS8 - As a long-time resident of the Southend area (since 1959), I have the following comments to make about the proposed development. This area obviously needs development, as it has become progressively more and more run down over the past few years. The council is right to develop the area, and understandably, local business people are excited about the prospect. The SCAAP plan is bold and ambitious.	Noted.
Question 27, CS1, OS8	Mr Michael Davies [493]	2035	Comment	In para 192, it mentions a proposed large development area known as Marine Plaza", and that "The site offers potential for taller and larger buildings" However, I feel that this proposed development requires carefully consideration as regards its impact on the local area. Has the Council considered the following aspects? The Kursaal is a historic landmark in a historic seaside town. A tall, multi-storey buildingg right next to it will completely overshadow it, and in my view, look totally out of place. I believe that any building plan should take the current building style into account. In my view, the proposed development may well not do that. If this proposal goes ahead, it will probably not be sympathetic with the existing architecture, and character of the area. I realise that the developers need to make a reasonable profit from their endeavours, and building upwards is always a good way of achieving that end. However, the people of Southend will be the ones that have to live	It should be noted that Marine Plaza now has planning permission (July 2015) for a residential led mixed-use development and will be allocated within the SCAAP. The Grade II listed Kursaal is recognised as a Landmark Building (Policy DS3) within the SCAAP and any new development proposals within the area will be expected to demonstrate that it is compatible with and/ or enhances key views of the building (Policy DS2). Furthermore, Policy DM5 of the Development Management Document provides detailed policy regarding the historic environment, recognising the significance of heritage assets.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				<p>with the result, not the developers, who may not live in the area, and therefore it may not be too much of a consideration for them. A local example of a development that does not fit into the local scene can be found not far away, along the Cliff tops near the Cliffs Pavilion in Westcliff. There are two high rise buildings along there. One is Westward Ho, which has 10/11 storeys (depending on whether you count the ground floor). A little further along is Tower Court, rising 16 storeys into the sky. What a couple of eyesores they are! In my view they should never have been given planning permission. These two buildings look totally and completely out of place. But, now, of course, it's too late. They will remain there, in all their 'glory', and outlive us all. Once mistakes like that have been made, that's it. End of story. <i>There's</i> no going back. Demolition, (although desirable!), is not a realistic option now.</p> <p>In my view, they are on a par with what's now being proposed for the Seaway area. Two nearby cliff top buildings, Stratton House (7 storeys?) and Heathfield House (5 storeys?), are about the same height as the historic Westcliff Hotel (5 Storeys), and the former Overcliff Hotel (long since demolished), and so, don't look too out of place. In my view, a similar approach should be taken with the proposed Seaway development. Another example is- in the 1960s, a long string of tall, square office blocks were thrown up along Victoria Avenue. They now look like shabby eyesores. They served their purpose at the time, of course, but I hope that Southend Council will consider these examples, and bear the future in mind.</p>	
Question 27, CS1, OS8	Mr Michael Davies [493]	2038	Comment	<p>If the whole of the Seaway car park is built on, where will people who now park there to shop in Southend High Street and the Royals, and use the seafront facilities, park? The Royals car park and the ones at the back of Marks and Spencer already get filled up. If Seaway car park disappears, or is severely reduced in size, those two car parks will have even more strain put upon them, much to the frustration of local shoppers and visitors to the town, some of whom may well decide it's just not worth the bother, and head out to Basildon, or other seaside resorts. I note that local traders are also now expressing concerns about parking, as reported on the front page of the Yellow Advertiser of Friday 29 January 2016.</p>	<p>Noted. OS 8 makes provision for car parking in any development scheme.</p> <p>The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.</p>
Question 27	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island,	2083	Support	<p>Supports the enhancement and quality of the Green and Open spaces along the Central Seafront and the protection of Southend's unique heritage including the nationally important Grade II Listed Southend Pier.</p>	<p>Noted.</p>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Adventure Sealife (Mr S Kearney) [483]				
Question 27	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2469	Support	Support enhancement of the Pier as national icon and a significant regeneration and enhancement of this key tourist attraction, which at present underperforms both in terms of its attraction and in terms of its visitor experience.	Noted
Question 27	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2089	Support	Support a higher intensification of residential uses in the Central Area together with a broader mix of commercial uses ranging from A1 retail, A3 restaurant café, D2 leisure and B1 offices to provide a more diverse multi-use High Street and Central Seafront.	Noted.
Question 27	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island,	2093	Comment	Some members of the STOCKVALE GROUP and representatives of the Seafront businesses believe that one way in which the congestion into the Town could be improved is for an additional 3840 parking spaces to be made accessible and available within close proximity to the Seafront and core High Street Area. This is due to the day visitor attraction industry, particularly family attractions such as the Seafront receiving the vast majority of its income in a few weeks of the year. These generally coincide with the school holidays. During this peak period a visitor attraction business needs to be able to accommodate every visitor that wants	The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Adventure Sealife (Mr S Kearney) [483]			<p>to visit as these peak days effectively subsidise the operation for the rest of the year.</p> <p>If the access to the main attractions is limited on peak days by the availability of car parking spaces, this could and does have serious impact on the viability of the Seafront businesses. The main parking areas are generally at capacity on peak holiday periods. Any loss of capacity as a result of the SCAAP proposals would result in a cap of visitors during these peak periods. This limits the amount of investment within the Seafront to the current status quo.</p> <p>Transport and access is not just limited to the Seafront and does have a huge impact on the High Street, combined with parking tariffs, access and egress, and poor legibility around the Town Centre. Whilst the changes outlined in the SCAAP from a space and use perspective will do an awful lot to reinvigorate and regenerate the High Street, this must be inclusive of a renewed and fresh approach to parking provision within the SCAAP Area.</p>	
Question 27	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2101	Comment	<p>Various improvements have been made to the Central Seafront including improved connectivity through Pier Hill and the City Beach. Whilst there have been some improvements to the landscape of the High Street, this needs a much greater consideration and linking to new development. There needs to be greater inclusion of soft landscaping and public spaces and improved connections from the High Street through to the Seafront. This is particularly the case with Seaway Development. This development site represents a great opportunity to create a gateway development and pedestrian links and improved Public Realm linked to the Seafront.</p> <p>The STOCKVALE GROUP would wish to see a breaking down of the linearity of the High Street and the creation of a number of destination and unique quarters. This resonates particularly through with the Tylers Avenue, London Road and Alexandra and Clarence Street opportunity sites.</p>	Noted. The Plan seeks to achieve these aspects through its policy provisions. No changes are proposed.
Question 27	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island,	2103	Support	<p>The STOCKVALE GROUP note the townscape improvements and guidance on design quality and Heritage preservation and enhancement are inextricably linked to improvements to Public Realm and pedestrian connectivity. The STOCKVALE GROUP like the majority of the Town support the continued regeneration and reinvention of the Towns greatest icon Southend's Pleasure Pier. As there are a number of opportunity sites outlined in the SCAAP document, the STOCKVALE GROUP would suggest that the Council (through the SCAAP document) develop design codes and development briefs to ensure that the townscape improvements</p>	Noted. The Plan seeks to achieve this and will be updated to identify a number of proposal sites that could be subject to a masterplanning approach.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Adventure Sealife (Mr S Kearney) [483]			and quality of design of future developments meet the aspirational high standard to create a coherent and consistent Central Area. This needs to reflect on the Towns Heritage and look towards the future to create Southend as unique place and destination for leisure, shopping, living and working.	
Question 27, OS8	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2106	Comment	There is concern that proposals for the Seaway Car Park (OS8) are missing the opportunity to see this as a key gateway site for both the Town and Seafront and an opportunity to provide a greatly enhanced Public Car Park provision as part of the overall site redevelopment.	OS8 recognises that this is a key gateway site and opportunities exist to improve connectivity with the central seafront area. Provisions are included within OS8 to achieve this. The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.
Question 27, OS9	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2107	Support	In relation to OS9 the STOCKVALE GROUP wholly support the Museum but would seek the inclusion of a public car park which would appear to be feasible as the construction method for creating the Museum would involve extensive ground work, which could utilise the lower levels for a covered car park.	OS9 makes provision for public car parking (Policy CS1). No changes are proposed.
Question 27	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure	2120	Support	The STOCKVALE GROUP support the Public Realm improvements and further connectivity down through and into the Seafront. The STOCKVALE GROUP recognise that Pier Hill has had a huge success in this regard.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Island, Adventure Sealife (Mr S Kearney) [483]				
Question 27, OS8	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2121	Comment	There is a greater opportunity to look at the Seaway site as a Gateway both connecting the High Street around St Johns through Lucy Road and down onto the Seafront. This is a fantastic opportunity that could yield both greatly improved Public Realm, High Street offer and experience and a significant number of residential units.	Noted. The Plan seeks to achieve this (Policy CS1).
Question 27	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2129	Comment	The STOCKVALE GROUP would wish to ensure that the Queensway policy area provides connectivity into the Seaway Car Park and the opportunity to see Seaway as a Gateway to the Seafront and the first visual connection to the Sea is not lost.	Noted. These provisions are identified in Policy CS1.
Question 27	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2135	Comment	Due to the topography of the Seaway Car Park there is an opportunity to cut into the site and create a formal entrance that can create a visual gateway as part of the access route. There is an opportunity to accommodate somewhere in the region of 1500 parking spaces arranged over 2-3-4 floors. Traffic movements would then come in directly at the northern edge of the site and filter through into the layered car park. To the south side Lucy Road could then be completely pedestrianised and a punch through to the seafront creating a large	Noted, Some of these aspects are included in Policy CS1. The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Island, Adventure Sealife (Mr S Kearney) [483]			piazza activated by new A1, A3 uses to compliment both the Central Seafront and the links into the High Street. The pedestrian link would then improve the environs around St John's church. To drive some additional value it is perfectly legitimate to consider a number of floors of residential uses above the car park and retail/A3 commercial offer.	
Question 27	Southend Bid (Mr S Kearney) [496]	2185	Support	Supports the enhancement and quality of the Green and Open spaces along the Central Seafront and the protection of Southend's unique heritage including the nationally important Grade II Listed Southend Pier.	Noted.
Question 27	Southend Bid (Mr S Kearney) [496]	2186	Support	Support enhancement of the Pier as national icon and a significant regeneration and enhancement of this key tourist attraction, which at present underperforms both in terms of its attraction and in terms of its visitor experience.	Noted.
Question 27	Southend Bid (Mr S Kearney) [496]	2192	Support	Support a higher intensification of residential uses in the Central Area together with a broader mix of commercial uses ranging from A1 retail, A3 restaurant café, D2 leisure and B1 offices to provide a more diverse multi-use High Street and Central Seafront.	Noted.
Question 27	Southend Bid (Mr S Kearney) [496]	2196	Comment	Some members of the BID and representatives of the Seafront businesses believe that one way in which the congestion into the Town could be improved is for an additional 3840 parking spaces to be made accessible and available within close proximity to the Seafront and core High Street Area. This is due to the day visitor attraction industry, particularly family attractions such as the Seafront receiving the vast majority of its income in a few weeks of the year. These generally coincide with the school holidays. During this peak period a visitor attraction business needs to be able to accommodate every visitor that wants to visit as these peak days effectively subsidise the operation for the rest of the year. If the access to the main attractions is limited on peak days by the availability of car parking spaces, this could and does have serious impact on the viability of the Seafront businesses. The main parking areas are generally at capacity on peak holiday periods. Any loss of capacity as a result of the SCAAP proposals would result in a cap of visitors during these peak periods. This the amount of investment within the Seafront to the current status quo. Transport and access is not just limited to the Seafront and does have a huge impact on the High Street, combined with parking tariffs, access and egress, and poor legibility around the Town Centre. Whilst the changes outlined in the SCAAP from a space and use perspective will do an awful lot to reinvigorate and regenerate the High Street, this must	The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				be inclusive of a renewed and fresh approach to parking provision within the SCAAP Area.	
Question 27	Southend Bid (Mr S Kearney) [496]	2204	Comment	<p>Various improvements have been made to the Central Seafront including improved connectivity through Pier Hill and the City Beach. Whilst there has been some improvements to the landscape of the High Street, this needs a much greater consideration and linking to new development. There needs to be greater inclusion of soft landscaping and public spaces and improved connections from the High Street through to the Seafront. This is particularly the case with Seaway Development. This development site represents a great opportunity to create a gateway development and pedestrian links and improved Public Realm linked to the Seafront.</p> <p>The BID would wish to see a breaking down of the linearity of the High Street and the creation of a number of destination and unique quarters. This resonates particularly through with the Tylers Avenue, London Road and Alexandra and Clarence Street opportunity sites.</p>	Noted. The Plan seeks to achieve these aspects through its policy provisions.
Question 27	Southend Bid (Mr S Kearney) [496]	2206	Support	<p>The BID townscape improvements and guidance on design quality and Heritage preservation and enhancement are inextricably linked to improvements to Public Realm and pedestrian connectivity. The BID like the majority of the Town support the continued regeneration and reinvention of the Towns greatest icon Southend's Pleasure Pier. As there are a number of opportunity sites outlined in the SCAAP document, the BID would suggest that the Council (through the SCAAP document) develop design codes and development briefs to ensure that the townscape improvements and quality of design of future developments meet the aspirational high standard to create a coherent and consistent Central Area. This need to reflect on the Towns Heritage and look towards the future to create Southend as unique place and destination for leisure, shopping, living and working.</p>	Noted. The Plan seeks to achieve this and will be updated to identify a number of proposal sites that could be subject to a masterplanning approach.
Question 27	Southend Bid (Mr S Kearney) [496]	2209	Comment	<p>There is concern that proposals for the Seaway Car Park (OS8) are missing the opportunity to see this as a key gateway site for both the Town and Seafront and an opportunity to provide a greatly enhanced Public Car Park provision as part of the overall site redevelopment.</p>	<p>OS8 recognises that this is a key gateway site and opportunities exist to improve connectivity with the central seafront area. Provisions are included within OS8 to achieve this.</p> <p>The Council has commissioned an independent car parking Study which will investigate and present findings on the capacity of the car parks that service the town centre and central seafront area. This will be included in the submission version of the SCAAP.</p>
Question 27	Southend Bid (Mr S	2210	Support	<p>In relation to OS9 the STOCKVALE GROUP wholly support the Museum but would seek the inclusion of a public car park which</p>	OS9 makes provision for public car parking. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Kearney) [496]			would appear to be feasible as the construction method for creating the Museum would involve extensive ground work, which could utilise the lower levels for a covered car park.	
Question 27	Southend Bid (Mr S Kearney) [496]	2223	Support	The BID support the Public Realm improvements and further connectivity down through and into the Seafront. The BID recognise that Pier Hill has had a huge success in this regard.	Noted
Question 27	Southend Bid (Mr S Kearney) [496]	2224	Comment	There is a greater opportunity to look at the Seaway site as a Gateway both connecting the High Street around St Johns through Lucy Road and down onto the Seafront. This is a fantastic opportunity that could yield both greatly improved Public Realm, High Street offer and experience and a significant number of residential units.	Noted. The Plan seeks to achieve this (Policy CS1).
Question 27	Southend Bid (Mr S Kearney) [496]	2232	Comment	STOCKVALE GROUP would wish to ensure that the Queensway policy area provides connectivity into the Seaway Car Park and the opportunity to see Seaway as a Gateway to the Seafront and the first visual connection to the Sea is not lost .	Noted. These provisions are identified in Policy CS1.
Question 27	Southend Bid (Mr S Kearney) [496]	2252	Comment	68% of recipients scored the Seafront as a top 10 priority.	Noted.
Question 27	Southend Bid (Mr S Kearney) [496]	2260	Comment	Due to the topography of the Seaway Car Park there is an opportunity to cut into the site and create a formal entrance that can create a visual gateway as part of the access route. There is an opportunity to accommodate somewhere in the region of 1500 parking spaces arranged over 2-3-4 floors. Traffic movements would then come in directly at the northern edge of the site and filter through into the layered car park. To the south side Lucy Road could then be completely pedestrianised and a punch through to the seafront creating a large piazza activated by new A1, A3 uses to compliment both the Central Seafront and the links into the High Street. The pedestrian link would then improve the environs around St John's church. To drive some additional value it is perfectly legitimate to consider a number of floors of residential uses above the car park and retail/A3 commercial offer.	Noted. These aspects are included in Policy CS1.
Question 27, CS1	Mr Rod Levin [497]	2281	Comment	Put 'The Golden Mile' under a high-level cover to provide for inclement weather	Policy CS1 seeks to achieve a whole range of environmental and related improvements to the 'Golden Mile'. It will be an issue of practicability and viability when or whether development proposals come forward. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 27, CS1	Indigo Planning on behalf of Royals Shopping Centre (Helen McManus) [498]	2310	Comment	Valad (Europe) Ltd are concerned about the proposal to produce a development brief in relation to Seaway Car Park and Marine Parade. There is sufficient opportunity to provide an appropriate level of detail in Policy CS1 and avoid the potential delay and uncertainty that may arise if a development brief is now progressed. The submission of an application for its redevelopment should not be delayed a result of a failure to produce a development brief	As Policy CS1 sets out a number of design and layout solutions, and any major development of OS8 will be the subject of detailed consultation, reference to a development brief is to be removed.
Question 27, CS1	Indigo Planning on behalf of Royals Shopping Centre (Helen McManus) [498]	2311	Support	Valad (Europe) support the proposed allocation of Opportunity Site 8 on the basis that it proposes a mixed use development that will help to bolster the town centre economy. The indicative phasing for the redevelopment of Opportunity Area 8 is supported but the Council must actively resist developments that would undermine this policy and what it seeks to achieve for the town centre.	Noted.
Question 27, CS1	Indigo Planning on behalf of Royals Shopping Centre (Helen McManus) [498]	2312	Comment	Further wording should be provided which states that the redevelopment of the Central Seafront Policy Area will be key to the success of the Southend Central Area Action Plan and that in turn, it will help to improve the vitality and viability of the town centre and sustain existing facilities in the town centre such as The Royals by increasing footfall and linked trips within the town centre.	There is considered to be merit in bringing greater attention to the role of the central seafront area. It is therefore proposed that paragraph 184 (page 111) be amended to read as follows: <u>'The Central Seafront Policy Area, as defined on the Policies Map, is a thriving leisure and tourism area. Although there has always been a physical separation of the Central Seafront Policy Area and Town Centre, if access was more straightforward and more pronounced there may be a better exchange of visitors between the Central Seafront and Town Centre and their functions.'</u>
Question 27, CS1	Indigo Planning on behalf of Royals Shopping Centre (Helen McManus) [498]	2313	Comment	The Council should consider whether the inclusion of retail at Opportunity Site 8 would bring further benefits to the town centre. The success of this development and the subsequent beneficial spin off effects will largely be down to how well the site links in with the town centre.	OS8 is a key development site in the central seafront area. The uses identified in the Plan are considered to be the most appropriate given its location adjacent to tourism and leisure facilities. No changes are proposed.
Question 27, CS1	Indigo Planning on behalf of Royals Shopping	2314	Comment	The provision of appropriate signage to increase and enhance connectivity between the High Street and the seafront should also be included in the design criteria for both the Policy Area and Opportunity Site 8.	It is recognised that quality signage is essential in the central area. It is therefore proposed that the words 'improve and' are added to Policy CS1 10e so that it would read: 'remove unnecessary street furniture and <u>improve and</u> rationalise signage in accordance with.....'

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Centre (Helen McManus) [498]				In OS8 add: 'h. the provision of appropriate <u>seating, signage and way finding.</u>'
Question 27, CS1	Indigo Planning on behalf of Royals Shopping Centre (Helen McManus) [498]	2315	Comment	There is a real concern that if the revised proposals (yet to be submitted to the Council) for Fossetts Farm are approved, then town centre developments such as that at Seaway Car Park and further town centre investment generally will not go ahead to the detriment of the town centre.	The Fossetts Farm proposals are located outside the SCAAP boundaries. Planning permission for retail development at Fossetts Farm has been previously granted and its potential impact taken into consideration in the preparation of the Core Strategy and SCAAP (see also Southend Retail Study). Any new proposal at Fossetts Farm will require planning permission, be subject to planning policy and require a further retail impact assessment. No changes are proposed.
Question 27, CS1.13.2	Carter Jonas on behalf of Turnstone Southend Ltd (Mr Matt Hare) [503]	2325	Support	Policy CS1.13.2 - Broadly support the proposed policy approach for OS8, but we do suggest some minor changes to the policy wording to Section 13ii in Policy CS1 to ensure the delivery of the development. The proposed development would make more efficient use of previously developed land within the town centre	Noted
Question 27, CS1.13.2	Carter Jonas on behalf of Turnstone Southend Ltd (Mr Matt Hare) [503]	2326	Comment	Policy CS1.13.2 - Delete the requirement for a development brief to be prepared for the site. A planning application is currently being prepared for the Seaway Car Park site. Section 13ii of Policy CS1 already provides sufficient detail to guide the proposed development on the site. The land required to deliver the proposed development at the Seaway Car Park site is controlled by a single developer. A development brief would add unnecessary delay and cost to the proposed development. Suggested Change: This should be taken forward through the preparation of a development brief. Design and layout solutions should allow for:	Reference to the development brief will be removed as it is considered that there is sufficient detailed contained in the OS8 of CS1 and further detailed will be provided at the design stage as part of the planning proposal and be subject to consultation.
Question 27, CS1.13.2	Carter Jonas on behalf of Turnstone Southend Ltd (Mr Matt Hare) [503]	2327	Comment	Policy CS1.13.2 It should be clearly stated that residential development should be located on the Marine Parade site. Planning permission has already been granted for residential development on the Marine Parade site; referred to as Marine Plaza. Residential uses are not proposed within the current scheme on the Seaway Car Park site. It is not clear whether residential uses would be compatible with the proposed leisure uses, and further investigation would be required if residential uses were proposed. Suggested Change: We request the following changes to Section 13ii of Policy CS1:	The final version of the SCAAP will separate OS8 into Seaway Car Park and Marine Parade, with the latter benefitting from an approved planning permission. It is considered that Seaways may be able to provide some residential development and reference to this is considered appropriate to apply flexibility to the policy. The policy wording has been changed to allow for this to be explored. Policy OS8.13.2 will read: <u>'...including the provision of leisure, cultural and tourism attractions including: restaurants, cinema, gallery, hotel, public and private open spaces, and vehicle and cycle</u>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				ii Opportunity Site 8: Seaway Car Park and Marine Parade, the Council will pursue with private sector partners, landowners and developers a high quality, mixed use development including the provision of leisure, cultural and tourism attractions including: restaurants, cinema, gallery, hotel, residential development, public and private open spaces, and car parking. The Marine Parade site would provide most of the residential development for the opportunity site.	<i><u>parking. The potential for residential development may also be explored. Design and layout solutions should allow for:</u></i>
Question 27, CS1.13.2	Carter Jonas on behalf of Turnstone Southend Ltd (Mr Matt Hare) [503]	2328	Comment	Policy CS1.13.2 There is a requirement for allocated sites to be deliverable and viable, and as such all parts of a policy should meet those requirements. The delivery of a new link from the Seaway Car Park site to Marine Parade is uncertain, and this should be expressed in the policy. Suggested Change: c. explore opportunities for a new link to Marine Parade from the Seaway site designed around 'Spanish Steps' subject to deliverability and viability;	This part of policy seeks to identify possible innovative design solutions to improving connectivity across this key site between the town centre and seafront and seeks to 'explore opportunities.' Including the words 'subject to deliverability and viability' is considered inappropriate. These matters would be considered as part of the planning application process. No changes proposed.
Question 27, CS1.13.2	Carter Jonas on behalf of Turnstone Southend Ltd (Mr Matt Hare) [503]	2329	Comment	Policy CS1.13.2 It is not clear at this stage where the coach drop-off point would be relocated to, and it could be on or off site or a combination of both, and as such this uncertainty should be expressed in the policy. Suggested Change e. relocation of the coach-drop off point, either on or off-site or a combination of both, following the development of the Seaway site.	The wording of Policy CS1 will be amended to state that relocation of the coach drop off point should be provided on the Seaways site. Coach parking bays may be provided either on or off-site or a combination of both, as long as offsite provision is well connected to the Seaways site and would not significantly adversely impact the local transport network. Policy OS8 13.2 will be amended as follows: ' <i><u>relocation of a coach-drop off point within the site. The relocation of coach parking bays may be provided either on or off-site or a combination of both, provided offsite provision is well connected to the Seaways site and would not significantly adversely impact the local transport network;</u></i> '
Question 27, CS1.10g	Belfairs Garden Residents Association (Barbara Armitage) [511]	2350	Object	Policy CS1.10g - Against proposal 10g to further develop City Beach. Comments have been made about flooding, accidents, risks to pedestrians in non-stopping traffic and no marked and lighted official crossing with blister paving put down where there is no crossing risking the lives of blind people. City Beach - Kerbs are not only a safety zone for pedestrians but help to direct rain water to drains which should be adequate. The seafront shared space is dangerous, has no formal crossings and various accidents have occurred. A proper crossing should be in place and not further extension of any shared space.	The extension of the City Beach scheme is considered to be essential to regenerating the central seafront area and to improving the leisure and tourism offer and environment. Issues such as flooding, road safety and provision for vulnerable road users will need to form an integral part of the design stage of the scheme. No changes proposed. Reference to flood mitigation measures will be included in Policy CS1. Reference to managing the road network safely will be incorporated into Policy DS5.a
Question 27, CS1.12.ii.c	Belfairs Garden Residents	2351	Object	Policy CS1.12.ii.c - The 'Spanish Steps' are a thoroughly dangerous idea for all users and will have to go through property(ies). This should not be pursued.	This is a key gateway site in the town. This part of policy seeks to identify possible innovative design solutions to improving connectivity across this key site between the town centre and

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Association (Barbara Armitage) [511]				seafront and seeks to 'explore opportunities'. It is essential that the design and layout of the site is of the highest quality that enhances the area and takes full advantage of its location and setting. The needs of vulnerable road users will be taken into account at this design stage. No changes are proposed.
Question 27, CS1.12.iii	Belfairs Garden Residents Association (Barbara Armitage) [511]	2352	Object	Policy CS1.12.iii - The Museum is in the wrong place not in tune with the leisure area. If just to shore up the cliffs it should be a leisure building. We do not have the like of the Mary Rose in the town and the thought that people coming down for the day to the beach, pier or lagoon will spend time in a museum is not considered to be sensible.	The museum is one of a number of cultural and leisure uses proposed to be incorporated within the new building. No changes proposed. It is considered that a museum is complimentary to other leisure uses and will provide a valued destination.
Question 27, CS1 & OS8	Southend and District Pensioners Campaign (Mr Robert Howes) [476]	2371	Comment	(191) Seaways car park and Marine Parade. We do not believe another cinema is sustainable in Southend	Policy CS1 identifies the potential of the seaway car park site to provide for a mixed use development comprising leisure, cultural and tourism facilities which are considered to be appropriate in this location. The possible inclusion of a cinema is considered to be compatible with providing a mix of leisure uses to enhance the offer on this key site. The Policy also proposes design and layout solutions, for 'urban greening' and seeks to take advantage of the sites elevation with views of the estuary (OS8). No changes are proposed.
Question 27, CS1 & OS9	Southend and District Pensioners Campaign (Mr Robert Howes) [476]	2372	Comment	(193) We believe that the Saxon King find should be housed in Prittlewell. It is not appropriate to have this displayed on our seaside tourist area.	The museum is one of a number of cultural and leisure uses proposed to be incorporated within the new building on the seafront, which is considered to be the best location for such a scheme where visitor numbers are at their greatest. No changes proposed.
Question 27, CS1	Southend and District Pensioners Campaign (Mr Robert Howes) [476]	2373	Comment	Yes agree with the proposed approach to managing development within the central seafront policy area apart from the above	Noted.
Question 27, CS1 & OS9	Procedures Consulting (Mr Barrie Evans) [513]	2383	Support	OS9 - Southend-On-Sea museum position on the seafront below Clifftown parade is a good idea in principle but the residents of Clifftown will not allow access to be gained from Clifftown parade and all access to development whether it be by bus coach or car should be via the sea front road and not Clifftown parade, which is a residential road. The Museum should be reduced in height from its current plan to ensure it steps down from the cliff and not in line with the cliff. This drop down would stop the extension that juts out impeding on the Clifftown area, local views and the Victorian	The detailed design and layout of any new development at this location will be considered and consulted upon during the planning application process. Policy CS1.13.3 outlines that the design of new development will need to retain the 'open feel' of the area. Policy DM1 of the Development Management Document and the Design and Townscape Guide provides additional design related guidance. In addition the conservation area will be a material consideration.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				design of the area. Any brickwork used in the build should be of high quality and fit with the old red brick of the backdrop houses on the clifftop. The band stand and shelters should be incorporated in to the design of the museum to gently mix new with old and celebrate the heritage as the museum should not only exhibit artefacts and images but the local architecture of the seaside town too. Should the conservation area be extended this would assist in making the whole seafront and town in to a living museum but with a modern function. Remember shabby Chic is the new modern!! If the museum is built then all parking for the museum should be provided by the museum in underground parking (including coaches) and access should be from the seafront and no access at all from Clifftown Parade. This is a residential area and should be protected as such.	It is recognised that the policy can be further enhanced by outlining that vehicular access of a new development in this location should be via Western Esplanade. Therefore, the following wording is proposed to be added to the policy 13.iii <i>'Vehicular access should ensure that the primary road network, i.e. via Western Esplanade, is used to access the development and any new parking facilities.'</i>
Question 27, CS1 & OS7	Procurement Consulting (Mr Barrie Evans) [513]	2390	Comment	OS7 - The Council should actively seek investment for the pier and include such things as a proper boat marina for Southend, 24 hour access to the pier, ferry access to the pier, quality restaurants and cafes. Why not move the museum to the end of the pier, have yacht club facilities and a purpose built sheltered marina at the end of the pier?	Policy CS1 seeks to provide for a mix of cultural and leisure uses. Any development would need to have regard to the environmental designation on the foreshore. No changes proposed.
Question 27, CS1	Historic England (Dr Natalie Gates) [514]	2412	Comment	Paragraph 4 of Policy PA6 relates to energy efficiency and relates to existing development. We note that versions of this paragraph appear under other policy areas and opportunity sites, so the following comments also apply. Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. Any policy encouraging energy efficiency should note that the application will be different in relation to these classes of buildings. Further information can be found in the Historic England advice Energy Efficiency and Historic Buildings –Application of Part L of the Building Regulations to historically and traditionally constructed buildings https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/ . <i>This similarly applies to Policy PA1, PA2, PA3, PA4, PA5, PA7, CS1, PA8 and PA9.</i>	This point is noted. It is therefore proposed to reference this in paragraph 85 as follows: <i>'Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance.'</i> It is proposed to add the words 'as appropriate' in paragraph 4 of Policy PA6 so that it reads, <i>'Promote energy efficiency as appropriate, including.....'</i> This would necessitate similar changes to all other policy areas.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 27, CS1	Historic England (Dr Natalie Gates) [514]	2415	Comment	<i>In the aims of the Central Seafront Policy Area</i> we would suggest a small word order change as it currently reads as if the Pier is not an iconic landmark, but will be rejuvenated into one, instead of being the iconic landmark that it is which you are proposing will be rejuvenated.	Agreed. It is therefore proposed to amend the first paragraph of the Aims of the Central Seafront Policy Area so that it reads, <i>'The Central Seafront will be a thriving and vibrant leisure, cultural and tourism area centred on the <u>iconic</u> Grade II listed Pier which will be rejuvenated as a <u>key</u> local landmark and attraction.'</i>
Question 27, CS1, Para 184	Historic England (Dr Natalie Gates) [514]	2416	Comment	Recommend that paragraph 184 in the supporting text includes conservation areas and listed buildings as specific 'environmental designations' as this links through to paragraph 1 of Policy CS1 which talks about the impact of proposals on 'environmental designations'.	Environmental designations cover SSSI, SPA and Ramsar sites. The term is not meant to cover heritage assets, which are covered by Policy CS1.4. However, it is proposed to include reference to conservation areas and listed buildings in paragraph 185 as follows: <i>'There is a need to strike a balance between the protection and conservation of natural and built assets, <u>including Conservation Areas and listed buildings</u>, with the needs of residents and visitors'</i>
Question 27, CS1.8	Historic England (Dr Natalie Gates) [514]	2417	Support	We welcome paragraph 4 of Policy CS1	Noted.
Question 27, CS1	Environment Agency (Miss Lizzie Griffiths) [334]	2423	Support	We are very supportive of this policy. Point 5, in particular, is very positive, as it recognises the opportunity that new development provides for integrating tidal defences into the public realm.	Noted.
Question 27, CS1	Environment Agency (Miss Lizzie Griffiths) [334]	2424	Comment	Point 7 could potentially be strengthened by allowing development south of the sea wall only by exception and where the proposed land use is deemed to be 'water compatible' as defined in the Planning Practice Guidance.	Noted, therefore the following amendment is proposed: <i>'Not normally permit development south of the seawall. <u>Any proposed use will also have to be water compatible as defined in the Planning Practice Guidance.</u></i>
Question 27, CS1	National Federation for the Blind (Mrs Jill Allen-King) [516]	2454	Comment	Up to 1970 we had a direct bus route from Southend Victoria Railway station down the High street, down Pier Hill to and along the sea front. Unfortunately engineers of the day ignored our access committee and went along with their plans of pedestrianising the high street and cutting off the sea front from the high street restricting hundreds of people getting to the shops by bus.	Policy, as part of the sustainable approach to transport, seeks to improve the provision for public transport users and provides for bus priority measures. Specific bus routes are considered as part of on-going partnership working with bus operators.
Question 27, CS1	National Federation for the Blind (Mrs Jill Allen-King) [516]	2455	Comment	OS8 - Spanish steps will certainly stop many disabled people from getting to the sea front. Spanish steps are not accessible and should not be used.	The provision of 'spanish steps' is part of an innovative design approach to the site. The needs of vulnerable users to access and cross the site will also be taken into account at the design stage of any scheme.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 27, CS1	National Federation for the Blind (Mrs Jill Allen-King) [516]	2456	Comment	The City Beach scheme was built without proper consultation and did not take into account the needs of disabled people. The Courtesy crossings are not legal crossings and cannot be used safely by blind people. The whole area should be reinstated to a proper road with kerbs and proper pedestrian crossings, with audible signals and tactile markings. The City Beach scheme should not be extended.	Further phases of the City Beach scheme will consider the needs of all users and be subject to public consultation.
Question 27, CS1	National Federation for the Blind (Mrs Jill Allen-King) [516]	2457	Comment	A bus service should be established from the Kursaal to Chalkwell along the sea front.	Policy, as part of the sustainable approach to transport, seeks to improve the provision for public transport users and provides for bus priority measures. Specific bus routes are considered as part of on-going partnership working with bus operators.
Question 27, CS1	National Federation for the Blind (Mrs Jill Allen-King) [516]	2458	Comment	OS9 - The proposed new Museum will not be able to be visited by non car drivers if you do not have a bus service, which is discrimination.	Policy, as part of the sustainable approach to transport, seeks to improve the provision for public transport users and provides for bus priority measures. Specific bus routes are considered as part of on-going partnership working with bus operators.
Question 27, CS1	National Federation for the Blind (Mrs Jill Allen-King) [516]	2459	Comment	Currently there is no cycle route at City Beach and cycles ride illegally on the foot path. A cycle route should be built the whole length of the sea front on the road and not on the footway. The cyclists should stop at pedestrian crossings.	This area has been established as a shared walking and cycling route. Cycle provision forms part of the shared space in the central seafront area.
Question 27, CS1	National Federation for the Blind (Mrs Jill Allen-King) [516]	2460	Comment	There should be more public toilets, none are listed.	Noted. Toilets and related facilities will be considered at the design stage of any redevelopment scheme and through on-going review of current provision.
Question 27, CS1	National Federation for the Blind (Mrs Jill Allen-King) [516]	2461	Comment	In the central seafront policy area there should also be parking for disabled people at frequent intervals.	Site occupiers with reference to national parking guidance and legislation are responsible for providing an adequate number of spaces for people with disabilities. The SCAAP seeks to promote a positive approach to public car parking provision that provides public car parking levels that support the vitality of the town centre and access to the seafront by encouraging improvements to the quality of access to parking so that it is convenient, well-signposted, safe and secure.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
					It is considered that reference to a range of parking types, including for disabled people, should be made within Policy DS5.
Nature Conservation and Biodiversity					
Question 28, Policy CS2	Natural England (Mr Gordon Wyatt) [264]	2032	Comment	<p><i>Wording of Policy not considered accurate and it is suggested that Policy CS2.1, is amended to read as follows:</i></p> <p><i>"1. Ensure that all development proposals within the Central Seafront Area are accompanied by a Habitats Regulations Assessment and associated documentation to ensure there will be no adverse effect on the European and International foreshore designations (SPA and Ramsar) either alone or in combination with other plans or projects;"</i></p> <p>The Habitats Directive requires competent authorities to decide whether or not a plan or project can proceed having undertaken the following "appropriate assessment requirements" to:</p> <ol style="list-style-type: none"> 1. Determine whether a plan or project may have a significant effect on a European site, either alone or in combination; 2. If required (ie when there is a likely significant effect), undertake an appropriate assessment of the plan or project; 3. Decide whether there may be an adverse effect on the integrity of the European site in light of the appropriate assessment. <p>This whole process is generally referred to as Habitats Regulations Assessment (HRA).</p> <p>The responsibility for carrying out a HRA rests squarely upon the decision-making competent authority; except insofar as it may be appropriate for the competent authority to adopt the reasoning or conclusions of another competent authority as to whether a plan or project is likely to have a significant effect on a European site, or will adversely affect the integrity of a European site. The Regulations transposing the Habitats Directive also provide that a competent authority is not required to assess any implications of a plan or project that would be more appropriately assessed by another competent authority. Planning applications are often accompanied by a document which is described as being a HRA; however</p>	Noted. It is proposed to amend the wording of Policy CS2 point 1 to read: <i>'Ensure that all development proposals within the Central Seafront Area are accompanied by a Habitats Regulations Assessment and associated documentation to ensure there will be no adverse effect on the European and International foreshore designations (SPA and Ramsar) either alone or in combination with other plans or projects.'</i>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				such a document produced by or on behalf of an applicant does not have any legal weight and is therefore sometimes referred to as a 'shadow HRA'. As the competent authority, it remains Southend-on-Sea Borough Council's responsibility to produce the definitive HRA; either by adopting an applicant's 'shadow HRA', or by carrying out its own HRA. Where a competent authority chooses to carry out its own HRA, it will normally require the applicant to provide the necessary background information to support the assessment process.	
Question 28, CS2.3	Belfairs Garden Residents Association (Barbara Armitage) [511]	2353	Comment	Policy CS2.3 - Under what circumstances could there be development and what is the 'public interest' that could make this possible.	Policy CS2.3 provides for exceptional circumstances where exceptions may be made if there are no alternative solutions or the reasons for the development clearly outweigh the nature conservation value of the site and is in the public interest. Potential flood defence improvements may be an example of where this might apply. No changes proposed.
Question 28, CS2.6	Belfairs Garden Residents Association (Barbara Armitage) [511]	2354	Comment	Policy CS2.6 - Would want to know more about 6 and what kind of high quality visitor facility is envisaged	Such a facility would be subject to a planning application and wider publicity where more detailed information will be available. No changes proposed.
Question 28	Environment Agency (Miss Lizzie Griffiths) [334]	2425	Support	We are supportive of this policy which seeks to relieve pressures on the seafront area. We support the idea of drawing people to the waterfront, especially where it may help to raise awareness of the ecosystems and their importance, provided the sensitive areas themselves are protected.	Noted.
The Waterfront					
Question 29, CS3	Essex Chambers of Commerce (Mr John Dallaway) [452]	1956	Support	Agree with the proposed approach to managing the Waterfront	Noted.
Question 29, CS3	Mr Rod Levin [497]	2287	Comment	Provide public Slipways over beach to promote use of small (sail) boats.	Public slipways are provided along the foreshore. The Plan (Policy CS3) seeks to improve such facilities as appropriate. No changes are proposed.
Question 29, CS3	Belfairs Garden Residents Association	2355	Comment	Similar to above in that it appears to open the possibility of development which could be manipulated. Transparency will be required in both nature conservation and the waterfront.	The policy wording is considered to achieve an appropriate balance between protecting the waterfront whilst seeking to provide improved leisure facilities. No changes proposed.


Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	(Barbara Armitage) [511]				
Question 29, CS3	Procedures Consulting (Mr Barrie Evans) [513]	2391	Comment	People come to the sea side to sit on the beach so create more sand beaches. Yes there are small stretches that have been rejuvenated, however a lot more of the water front and shoreline need to be more accessible and enlarged, with the spits rebuilt and sand infilled to create beaches the length of the seafront; yes there are natural sites of interest and beach expansion can still happen if managed correctly. Reclaimed beaches across the world are the main success of any area. Example being the new beaches in Gibraltar which were introduced with sheltered sea walls has been the main success of those areas. The beach rather than the seafront road is the most important part of Southend when it comes to attracting tourism and local well-being and fitness.	Policy CS3 promotes the beach and foreshore for appropriate cultural, leisure and tourism activities. Specific proposals for the maintenance of the beach and foreshore is implemented through other Council services. No changes proposed.
Question 29, CS3	Environment Agency (Miss Lizzie Griffiths) [334]	2426	Support	We support this policy which seeks to integrate tourism activities and recreation with the public realm and biodiversity features. We are particularly supportive of Point 2, which seems to prevent any impacts on biodiversity or flood risk.	Noted.
Victoria Gateway Neighbourhood Policy Area – Policy PA8, Opportunity Site 11, 12 and 13					
Question 30, PA8	Essex Chambers of Commerce (Mr John Dallaway) [452]	1957	Support	Agree with the proposed approach to managing development within the Victoria Avenue Gateway Neighbourhood Policy Area	Noted.
Question 30, PA8	London Southend Airport (Ms Jo Marchetti) [471]	1969	Support	We support the regeneration of this area as it is the entrance point to Central Southend from the airport by road. The area currently is not appealing and is run down. The airport is keen to push inbound passengers into the town before heading to London and this area needs to be more attractive in appearance in order for us to market Southend's tourism sites.	Noted.
Question 30	Rev Phyllis Owen [456]	1976	Comment	Whilst I agree these are good objectives, the reality is that people want to use cars. I am very concerned that the number of additional dwellings proposed in my area (OS11 and OS12 and Roots Hall) will lead to even more cars looking for places to park, increasing the problems that already exist in these area. I have raised this point when previous plans for Victoria Avenue have been raised and have never received an adequate or indeed any response. I feel very strongly that existing residents will be greatly disadvantaged.	Development Proposals that come forward in the SCAAP area will have regard to the Councils parking standards set out in the Development Management Document. These have been found sound by a planning inspector and subsequently adopted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 30, PA8	Burges Estates Residents Association [176]	2007	Comment	In the same way the Victoria Gateway policy principles contains reference to "promoting energy efficiency". Why is this policy area singled out? Why is that not one of a wide range of common policies applicable across the board?	All policy areas include reference to promoting energy efficiency.
Question 30, PA8	Burges Estates Residents Association [176]	2008	Comment	I have already mentioned that the church should be included in the area and that makes sense in the context of policy DP8: 7g.	St Marys Church is referenced in Policy DS2 – Key views and Policy DS3 – Landmarks and Landmark Buildings, and therefore development or infrastructure proposals that are likely to impact on the church will be required to have regard to the policy criteria contained within these policies. No change proposed.
Question 30, PA8	Anglian Water (Sue Bull) [37]	2025	Comment	We would recommend within each Policy Area a requirement is stipulated that the necessary sewerage infrastructure is in place to serve the area before development progresses.	Refer to Rep. 2017. Reference to this has been included within section 4.12 Infrastructure Provision. As it is a statutory undertaking it is not considered necessary to repeat it in planning policy. Noted. Additional supporting is proposed to be included in 4.12 Infrastructure Provision, referencing the need for developers to make provision for the foul sewerage network.
Question 30, PA8	Capitia Property Infrastructure On behalf of Genesis Housing [465]	2029	Comment	The SCAAP preferred approach is supported. However, Capita P&I and Genesis consider that the OS11 site does not extend far enough, and that the adjacent Genesis site at Baxter Avenue should be incorporated within the OS11 site boundary. There are several reasons as to why, these are all explored in the supporting document. These considerations are: <ul style="list-style-type: none"> The overall shortfall in housing supply and how the development of the site can help deliver the target; The policy compliance of the proposal; The removal of low quality housing; Given the area of the site, a coherent regeneration masterplan approach should be adopted in accordance with OS11; The site is well positioned on an access vista and therefore well located for a housing led regeneration initiative. The site is available, achievable and deliverable. The redevelopment of the site would allow for the residential density of the site to be optimised, whilst also providing a quality mixed use development with active frontages.	The Council is considering inclusion of this site as an opportunity site. This will be assessed against information supplied by the owners of the site to demonstrate that development is deliverable by 2021.
Question 30	Stockvale Group representing Sands &	2108	Support	Wholeheartedly support the improvement on Victoria Avenue as a gateway in to the Town. The STOCKVALE GROUP recognises that much of this work is already underway with the on-going redevelopment of Heath and Carby House.	Noted. The Victoria Avenue/ Queensway junction has benefitted from significant public realm and access improvements as part as the implemented Victoria Gateway Scheme. However, it is

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
	Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]				considered that policy should still seek further improvements to the public realm and accessibility.
Question 30	Southend Bid (Mr S Kearney) [496]	2147	Object	The proposed redevelopment of Roots Hall and Roots Hall Stadium are predicated on the Football Club relocating to Fossetts Farm with a significant volume of retail use. Whilst the redevelopment of these sites is supported the retail use and volume at Fossetts Farm would see the end of the High Street as a retail offer. The BID most strongly opposes the Fossetts Farm proposals and any movement of retail away from the SCAAP area and Town Centre.	The Fossetts Farm proposals are located outside the SCAAP boundaries. Planning permission for retail development at Fossetts Farm has been previously granted and its potential impact was taken into consideration in the preparation of the Core Strategy and SCAAP (see also Southend Retail Study). Any new proposal at Fossetts Farm will require planning permission, be subject to planning policy and require a further retail impact assessment. No changes are proposed.
Question 30	Southend Bid (Mr S Kearney) [496]	2259	Comment	Victoria Neighbourhood was scored by 22% of respondents as a top 10 priority.	Noted.
Question 30	Southend Bid (Mr S Kearney) [496]	2262	Comment	Whilst the BID do not object or have any particular concern regarding the moving of the Southend Football Club the move is predicted on the suggested development requirement to combine a significant number of retail outlets. This is being presented as a financial necessity to allow the Club to move to new premises, however, if this is supported many if not all the High Street chains are likely to follow.	Noted.
Question 30, OS13	Southend Bid (Mr S Kearney) [496]	2270	Object	Another major issue for the BID is the opportunity site (OS13) redevelopment of Roots Hall, and Roots Hall Stadium. There is extreme concern that the redevelopment of these sites is predicated on Southend Football Club moving out to Fossetts Farm and the supposed enabling development to allow this to happen, which consists of a large quantum of A1 retail units. As highlighted earlier in this representation the retail proposals at Fossetts Farm would be fatal to Southend's retail offer in the High Street and the aspirations for a vast improvement to the retail provision in the SCAAP area.	Noted. Opportunity Site 13 and will not be included in the final version of the SCAAP as there is insufficient evidence that the site will come forward before 2021, the end of the SCAAP's plan period. Comments in relation to the sites will be considered during preparation of the Southend Local Plan, which will consider the delivery of sites post 2021. Nevertheless the development principles as set out in Policy PA8, in combination with other adopted local policy and guidance, will provide the necessary framework to guide development if a proposal was to come forward.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
					The Fossetts Farm proposals are located outside the SCAAP boundaries. Planning permission for retail development at Fossetts Farm has been previously granted and its potential impact taken into consideration in the preparation of the Core Strategy and SCAAP (see also Southend Retail Study). Any new proposal at Fossetts Farm will require planning permission, be subject to planning policy and require a sequential test and further retail impact assessment. No changes are proposed.
Question 30 PA8, OS13	Mr Alan Grubb [59]	2290	Comment	OS13 - As the parking situation in the ladder roads which connect Fairfax Drive with West Road/Westborough Road is chronic, if planning permission is granted for additional housing on the Roots Hall site, the parking provision on the site does need if possible to be increased by 15% above the normal requirements.	Any planning application on the Roots Hall site would be determined in accordance with adopted car parking standards as set out in the Development Management Document. No changes are proposed.
Question 30 PA8, OS13	Mr Alan Grubb [59]	2291	Comment	OS13 - The site used by Prospects Collage located next to Roots Hall was to become part of the Sainsbury development. There is a strong possibility that if Sainsbury do not buy the site, the site will be used for additional housing development. Last year the company Lidi wanted to buy the Prospect site to build a Lidi store. As the site also includes a car park, in my view this development would have been ideally suited for this location, providing employment and services to the local community which would also include the new housing development on the Roots Hall Site. Southend Council should re-engage with Lidi in order to reach a successful conclusion.	OS 13 provides for the development of a mixed use scheme which may include a retail outlet. No changes are proposed. Opportunity Site 13 and will not be included in the final version of the SCAAP as there is insufficient evidence that the site will come forward before 2021, the end of the SCAAP's plan period. Comments in relation to the sites will be considered during preparation of the Southend Local Plan, which will consider the delivery of sites post 2021.
Question 30, PA8, OS11	Mr Alan Grubb [59]	2292	Comment	OS11 – <i>With reference to the redevelopment of the</i> old college site, located next to the Civic Centre, new homes <i>proposed in</i> Victoria Avenue old offices (Heath House and Carby House), parking of vehicles will be a problem unless the developers of large developments are forced to provide parking 15% in excess of the developments requirements. There is also a need for more Social Housing, Houses not Flats. I understand that additional housing in the High Street and possible Elmer Approach is also being contemplated.	Any planning application on these sites will be determined in accordance with adopted car parking standards. The provision of social housing will be sought in accordance with planning policy as appropriate. No changes are proposed.
Question 30 PA8	Mr Alan Grubb [59]	2293	Comment	While I accept the need for additional housing, there does need to be provision for additional school places and a location identified for a new primary school. To this effect I did suggest that serious consideration should be given to the building of a primary school on the old goods yard site at Prittlewell Rail Station. If a school is built on this site, the school would serve the population (children) who would be living in the new housing estates mentioned above and below and in close proximity to all of the proposed developments.	In terms of education provision the Plan considers that the planned population growth in the central area will be accommodated through the expansion of existing schools. However, it is recognised that in the longer term there may be a need for additional schools and this will be kept under review – see also Southend Infrastructure Delivery Plan. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				Any new school must be built at the same time as the new developments are converted or built.	
Question 30, PA8.2	Belfairs Garden Residents Association (Barbara Armitage) [511]	2356	Comment	Policy PA8.2 - Concerns that <i>use of</i> backland for 'lanes' <i>type development</i> might occupy car park areas needed for the redevelopment of the substantial buildings in this area into residential and business units <i>forcing</i> cars on to the nearby streets causing problems.	Car parking provision will be taken into account in the detailed design and planning application stage of any scheme. No changes proposed.
Question 30, PA8.8g	Belfairs Garden Residents Association (Barbara Armitage) [511]	2357	Comment	Policy PA8.8g - This is a sensitive junction with an historic building and St, Mary's churchyard. While it will be the Council's intention to take care with any design and appointment of contractors some reassurance perhaps in the press would save questions from local people.	Noted.
Question 30, PA8	Historic England (Dr Natalie Gates) [514]	2413	Comment	Paragraph 4 of Policy PA6 relates to energy efficiency and relates to existing development. We note that versions of this paragraph appear under other policy areas and opportunity sites, so the following comments also apply. Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. Any policy encouraging energy efficiency should note that the application will be different in relation to these classes of buildings. Further information can be found in the Historic England advice Energy Efficiency and Historic Buildings –Application of Part L of the Building Regulations to historically and traditionally constructed buildings https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/ . This similarly applies to Policy PA1, PA2, PA3, PA4, PA5, PA7, CS1, PA8 and PA9.	This point is noted. It is therefore proposed to reference this in paragraph 85 as follows: <i>'Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance.'</i> It is proposed to add the words 'as appropriate' in paragraph 4 of Policy PA6 so that it reads, <i>'Promote energy efficiency as appropriate, including.....'</i> This would necessitate similar changes to all other policy areas.
Question 30, PA8, OS11	Historic England (Dr Natalie Gates) [514]	2418	Comment	The Grade II museum building is within Opportunity Site 11 and reference should be made to conserving or enhancing its significance through the comprehensive redevelopment of the area.	Agreed. It is therefore proposed to add to the end of OS 11 the following, <i>'The grade II listed old museum building will be conserved and its setting enhanced as part of the proposals for the policy area.'</i>

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 30, PA8	National Federation for the Blind (Mrs Jill Allen-King) [516]	2462	Comment	Victoria Avenue should be rebuilt with more safety features for pedestrians. The cycle route built on the footway outside the Civic centre should be removed. The road should be widened and the cycle track should be on the road, leaving the pavement clear for pedestrians.	These issues will be considered at the detailed design stage of any highway improvements.
Question 30, Policy PA8	National Federation for the Blind (Mrs Jill Allen-King) [516]	2463	Comment	Traffic lights at Victoria gateway and at the West Road, East Street junctions should have a red light phase to enable pedestrians to cross safely.	These issues will be considered at the detailed design stage of any highway improvements.
Question 30, PA8	National Federation for the Blind (Mrs Jill Allen-King) [516]	2464	Comment	There is no mention of public toilets or parking for disabled people in the Victoria Gateway area , why not?	These issues would be considered as part of the detailed design of any planning application.
Sutton Gateway Neighbourhood Policy Area – Policy PA9, Sites PA9.1, PA9.2, PA9.3 and Opportunity Site 14					
Question 31, PA9	Essex Chambers of Commerce (Mr John Dallaway) [452]	1958	Support	Agree with the proposed approach to managing development within the Sutton Gateway Neighbourhood Policy Area	Noted.
Question 31, PA9	The Co-Operative Group (Mr A Thompson) [473]	1972	Object	The Co-operative Group would wish to see the inclusion of land at 53-57 Sutton Road Southend within the SCAAP as an additional Opportunity Site. 	The Council is considering inclusion of this site as an opportunity site. This will be assessed against information supplied by the owners of the site to demonstrate that development is deliverable by 2021.
Question 31, PA9	Anglian Water (Sue Bull) [37]	2026	Comment	We would recommend within each Policy Area a requirement is stipulated that the necessary sewerage infrastructure is in place to serve the area before development progresses.	Refer to Rep. 2017. Reference to this has been included within section 4.12 Infrastructure Provision. As it is a statutory undertaking it is not considered necessary to repeat it in planning policy. Noted. Additional supporting is proposed to be included in 4.12 Infrastructure Provision, referencing the need for developers to make provision for the foul sewerage network.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 31	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2134	Support	Support the Councils aspiration but have no further comments to make in relation to the Sutton Neighbourhood. The STOCKVALE GROUP also support the improvements to connect the Sutton Neighbourhood into the Town Centre, improve connections to key public transport nodes and retail and employment areas.	Noted.
Question 31	Southend Bid (Mr S Kearney) [496]	2237	Support	Support the Councils aspiration but have no further comments to make in relation to the Sutton Neighbourhood. The BID also support the improvements to connect the Sutton Neighbourhood into the Town Centre, improve connections to key public transport nodes and retail and employment areas.	Noted.
Question 31	Southend Bid (Mr S Kearney) [496]	2258	Comment	Sutton Neighbourhood was scored by 22% of respondents as a top 10 priority.	Noted.
Question 31, PA9	Historic England (Dr Natalie Gates) [514]	2414	Comment	<p>Paragraph 4 of Policy PA6 relates to energy efficiency and relates to existing development. We note that versions of this paragraph appear under other policy areas and opportunity sites, so the following comments also apply.</p> <p>Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. Any policy encouraging energy efficiency should note that the application will be different in relation to these classes of buildings. Further information can be found in the Historic England advice Energy Efficiency and Historic Buildings –Application of Part L of the Building Regulations to historically and traditionally constructed buildings </p>	

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				books/publications/energy-efficiency-historic-buildings-pt/ . This similarly applies to Policy PA1, PA2, PA3, PA4, PA5, PA7, CS1, PA8 and PA9.	
Question 31	National Federation for the Blind (Mrs Jill Allen-King) [516]	2465	Comment	In the Sutton Gateway neighbourhood this whole area is not very clear about open spaces and I would like to know what this means.	This refers to the Opportunity Site 14 at Sutton Road and the potential to incorporate open space within the development scheme.
Part D: Implementation and Monitoring Framework					
Development Phasing					
Question 32	Essex Chambers of Commerce (Mr John Dallaway) [452]	1959	Support	Agree with the indicative phasing of development within the SCAAP area	Noted.
Question 32	The Co-Operative Group (Mr A Thompson) [473]	1973	Object	The Co-operative Group would wish to see the inclusion of land at 53-57 Sutton Road Southend within the SCAAP as an additional Opportunity Site.	The Council is considering inclusion of this site as an opportunity site. This will be assessed against information supplied by the owners of the site to demonstrate that development is deliverable by 2021.
Question 32	Capitia Property Infrastructure On behalf of Genesis Housing [465]	2031	Comment	<p>The SCAAP preferred approach is supported. However, Capita P&I and Genesis consider that the OS11 site does not extend far enough, and that the adjacent Genesis site at Baxter Avenue should be incorporated within the OS11 site boundary. There are several reasons as to why, these are all explored in the supporting document. These considerations are:</p> <ul style="list-style-type: none"> • The overall shortfall in housing supply and how the development of the site can help deliver the target; • The policy compliance of the proposal; • The removal of low quality housing; • Given the area of the site, a coherent regeneration masterplan approach should be adopted in accordance with OS11; • The site is well positioned on an access vista and therefore well located for a housing led regeneration initiative. <p>The site is available, achievable and deliverable. The redevelopment of the site would allow for the residential density of the site to be optimised, whilst also providing a quality mixed use development with active frontages.</p>	The Council is considering inclusion of this site as an opportunity site. This will be assessed against information supplied by the owners of the site to demonstrate that development is deliverable by 2021.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Indicative Figures for SCAAP Potential New Developments					
Question 33	Essex Chambers of Commerce (Mr John Dallaway) [452]	1960	Support	Believe it to be useful to include indicative figures for potential new development to enable private sector partners to fully appreciate the level of commitment required which will help to facilitate partnership working and delivery	Noted.
Implementation – Projects and Tasks					
Question 34	Essex Chambers of Commerce (Mr John Dallaway) [452]	1961	Support	Agree. Please see response to question 33 <i>'Believe it to be useful to include indicative figures for potential new development to enable private sector partners to fully appreciate the level of commitment required which will help to facilitate partnership working and delivery'.</i>	Noted.
Implementation - Approach					
Question 35	Essex Chambers of Commerce (Mr John Dallaway) [452]	1962	Support	Agree with overall approach for the Implementation Plan	Noted.
Question 35	Belfairs Garden Residents Association (Barbara Armitage) [511]	2358	Comment	Regular updates on progress of projects would be valuable. The Council needs to be in control of its own plan and not be unduly influenced by the objectives of partners.	Progress is regularly provided in Annual Monitoring Reports.
SCAAP Monitoring Framework					
Question 36	Essex Chambers of Commerce (Mr John Dallaway) [452]	1963	Support	Agree with Monitoring Framework	Noted.
General and Further Comments					

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 37	Essex Chambers of Commerce (Mr John Dallaway) [452]	1964	Support	No further comments	Noted.
Question 37	London Southend Airport (Ms Jo Marchetti) [471]	1970	Support	Overall LSA strongly supports the redevelopment of the areas outlined in the SCAAP documents and is pleased to see that improvements are planned for the area which will in turn make it easier to attract inbound visitors.	Noted.
Question 37	Milton Conservation Society (Mr Andy Atkinson) [488]	1981	Comment	Town centre planning in Southend (as in many other towns it has to be acknowledged) has been little short of disastrous since the war with only odd examples of good buildings. The last people to build to a consistently high quality were the Edwardians, saying very little for modern town planning. If we can adopt the right, aggregated approach with genuinely good quality architecture we might start again to build a long term high quality, human town centre where the best retailers want to participate, mixed uses can succeed and the town might earn the thriving city status it so wants.	The SCAAP seeks to promote design excellence and good quality development proposals and public realm improvements to reinforce a distinctive sense of place. The importance of high quality, innovative design is also set out within the Development Management Document Policy DM1 and further guidance contained within the Design and Townscape Guide SPD. No changes are proposed.
Question 37	Ms Lise Hodgson [467]	1986	Comment	Finally I would ask the Council to be more open with your plans. When I bought my flat my solicitor did the usual searches and got told there were no plans for the area. A few months later the first plans for Seaway were published. I do not believe these were drawn up in such a short time. I know the Council does not have a legal obligation to reveal plans, but surely you have a MORAL obligation so that people can make the right decision where to live. Had I known about the Council's plans for this area I would have saved myself the heartache I'm going through now and not bought the flat.	The SCAAP has been subject to extensive public consultation since 2007. The development potential of Seaway Car Park has been recognised for a number of years and was identified in earlier iterations of the Plan and other plans (adopted Borough Local Plan, March 1994). No changes are proposed.
Question 37 Part A, Strategic Planning Context	Burges Estates Residents Association [176]	1989	Comment	Reference is made to work being jointly undertaken to establish jobs and housing need. Jointly with whom? And is <i>there a</i> need to review the core strategy in the light of that further work. What timescales are we talking about? To what extent will anyone be able place any reliance on the SCAAP knowing it is so very tentative?	The SCAAP seeks to deliver the remaining growth targets for the town centre and central area set out in the Core Strategy by 2021. Paragraph 7 of the SCAAP explains the preparation of a new Southend Local Plan. It will replace the existing Core Strategy and include a review of the SCAAP. Evidence on housing and economic need is being prepared by the south Essex authorities.
Question 37 Context G	Burges Estate Residents Association [176]	1991	Comment	On page 7 there is reference to successful recent public realm and access improvement schemes. Some examples would be useful because I cannot think of them.	Such schemes include City Beach and Victoria Gateway. It is not considered necessary to reference these in the context and issues section.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 37	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2066	Comment	Changes in consumer behaviour, the growth in car ownership and its impact on accessibility of in and out of Town Centre shopping are reasonably well understood. This is particularly likely to be an issue should the Council grant the Fossetts Farm application to subsequently increase a retail offer in an out of town centre location.	Noted.
Question 37	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2068	Comment	The growth of out of town shopping centre has been widely blamed for Town Centre decline and planning policies have attempted to restrict this growth, which the Stockvale Group wish to see reflected in the Council's determination of planning applications at Fossetts Farm. (The outcome of Planning Applications for extensive retail at Fossetts Farm will determine the value of the Council progressing the SCAAP process. If Fossetts Farm retail development is approved the Stockvale Group feel the SCAAPs aspirations will be undeliverable.	The Fossetts Farm proposals are located outside the SCAAP boundary. Planning permission for retail development at Fossetts Farm has been previously granted and its potential impact was taken into consideration in the preparation of the Core Strategy and SCAAP (see also Southend Retail Study). Any new proposal at Fossetts Farm will require planning permission, be subject to planning policy provisions and require a further retail impact assessment. No changes are proposed.
Question 37	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2168	Comment	Changes in consumer behaviour, the growth in car ownership and its impact on accessibility of in and out of Town Centre shopping are reasonably well understood. This is particularly likely to be an issue should the Council grant the Fossetts Farm application to subsequently increase a retail offer in an out of town centre location.	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
Question 37	Stockvale Group representing Sands & Southend Radio, Three Shells, Pavilion, Adventure Island, Adventure Sealife (Mr S Kearney) [483]	2170	Comment	The growth of out of town shopping centre has been widely blamed for Town Centre decline and planning policies have attempted to restrict this growth, which the Stockvale Group wish to see reflected in the Council's determination of planning applications at Fossetts Farm. (The outcome of Planning Applications for extensive retail at Fossetts Farm will determine the value of the Council progressing the SCAAP process. If Fossetts Farm retail development is approved the Stockvale Group feel the SCAAPs aspirations will be undeliverable).	<p>The Fossetts Farm proposals are located outside the SCAAP boundaries. Planning permission for retail development at Fossetts Farm has been previously granted and its potential impact was taken into consideration in the preparation of the Core Strategy and SCAAP (see also Southend Retail Study).</p> <p>Any new proposal at Fossetts Farm will require planning permission, be subject to planning policy and require a further retail impact assessment. No changes are proposed.</p>
Question 37	Southend Bid (Mr S Kearney) [496]	2264	Object	<p>In relation to the Fossetts Farm development. Proposals to have a large quantum of A1 retail provision would have a major impact on the Town Centre which is highly likely to lead to a further decline of an already struggling retail offer within the High Street and surrounding environs. Furthermore, the highway connection and infrastructure would not support the level of traffic journeys that the proposals at Roots Hall are likely to generate.</p> <p>The BID would ask that the Council ensure that in accordance with advice in the National Planning Policy Framework (NPPF) a sequential test is undertaken and would like to be informed of the conclusions in relation to the impact on the vitality and viability of the Town Centre. The BID are rightly concerned that the Fossetts Farm proposals will have negative impact on the future of the High Street and the existing retail economy of the SCAAP area.</p>	<p>The Fossetts Farm proposals are located outside the SCAAP boundaries. Planning permission for retail development at Fossetts Farm has been previously granted and its potential impact taken into consideration in the preparation of the Core Strategy and SCAAP (see also Southend Retail Study).</p> <p>Any new proposal at Fossetts Farm will require planning permission, be subject to planning policy and require a sequential test and further retail impact assessment. No changes are proposed.</p>
Question 37	Mr Rod Levin [497]	2272	Comment	Ensure that all local parks have sufficient toilet facilities	Toilet provision is administered and maintained through associated Council services and will not be detailed within the SCAAP. No changes are proposed.
Question 37	Mr Rod Levin [497]	2273	Comment	In particular to insist that the Tea-shop / Café in Southchurch park is regularly cleaned, re-painted and that an appropriate menu is available.	This is outside the plan area.
Question 37	Mr Rod Levin [497]	2274	Comment	Maintain the Free Bus passes for elderly residents	This is not a planning matter.
Question 37	Mr Rod Levin [497]	2275	Comment	Ensure there are Police available to respond to incidents 24/7	This is not a planning matter.
Question 37	Mr Rod Levin [497]	2470	Comment	Crack down on crime	The Plan in association with other local planning policy seeks to achieve quality design in new developments to design out crime, to maintain and upgrade CCTV provision where appropriate. No changes are proposed.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/ Support	Summary of Representation	Response to Representation
Question 37	Mr Rod Levin [497]	2277	Comment	Educate people Out of Spitting in public	This is not a planning matter.
Question 37	Mr Rod Levin [497]	2278	Comment	Action heavily on people for not picking-up their dog's Faeces	This is not a planning matter.
Question 37	Mr Rod Levin [497]	2282	Comment	Ensure local Tax-breaks, of Real Value, to attract New / Start-up businesses	This is not a planning matter.
Question 37	Mr Rod Levin [497]	2283	Comment	Provide for local residents to travel to Pier head Free or Half-price	Pricing of leisure and tourism facilities is not a planning issue.
Question 37	Mr Rod Levin [497]	2288	Comment	Widely advertise Air routes from Southend Airport	Outside the Plan area and not a planning matter.
Question 37	Mr Rod Levin [497]	2289	Comment	Review plans for Old Leigh. It has the potential for a First Rate Marina and Pleasure-land with residential and Hotel accommodation. Develop as 'Oldie-World'.	This is outside the plan area.
Question 37	Mr Paul Bethell [499]	2316	Comment	It is far too technical for most people not involved in planning to understand	A non-technical summary document was published along with the Preferred Approach version. A similar document will be published with the Proposed Submission Plan.
Question 37	Belfairs Garden Residents Association (Barbara Armitage) [511]	2359	Comment	The demographics have not been considered. There are statistics to show that the proportion of older people in Southend will increase. With age these people will become less able or mobile and therefore it is unlikely that the emphasis on walking or cycling will be viable. The plan is based on more active folk to the detriment of those who are living longer and still expect a reasonable quality of life.	It is considered that the Plan adequately addresses the needs of all road users. No changes proposed.
Question 37	Procedures Consulting (Mr Barrie Evans) [513]	2374	Comment	This process has not been made user friendly at all and it even appears to have been made deliberately complex so that the general public get lost in legal jargon and policy grammar. You will not gain a real sense of what Southend people want or need through a complex series of download PDFs and this form!	Public consultation has been carried out throughout the Plan making process and every effort has been made to make the documents as 'user friendly' as possible. A non-technical summary document was published along with the Preferred Approach version. A similar document will be published with the Proposed Submission Plan.
Question 37	Procedures Consulting (Mr Barrie Evans) [513]	2384	Comment	Southend-On-Sea Council need to draw large companies out of London and encourage large build office space and technology parks on the outskirts of the city.	Noted. The SCAAP only covers the central area of the town.
Question 37	Procedures Consulting (Mr Barrie Evans) [513]	2394	Comment	Like it or not the founding reasons of Southend's original success was rich London families who wanted to live by the sea. Their money was its reason for success and the city needs that cash injection again. Attracting London professionals to the area would not force out social or affordable housing but actually pay for it, create jobs and maintain a balance in society which	Noted.

Policy, Para, Section, or Qs	Respondent (Name) [No]	Rep No	Object/Support	Summary of Representation	Response to Representation
				Southend Centre currently lacks. This would also break down that Leigh On Sea and Southend social divide which is ridiculous as Southend itself could be far nicer than crammed in Leigh On Sea with its lack of sea front and crammed streets.	
Question 37	Historic England (Dr Natalie Gates) [514]	2396	Support	Pleased to see that heritage has been integrated into the plan. We do not have any over-riding concerns in relation to the plan.	Noted.
Question 37	National Federation for the Blind (Mrs Jill Allen-King) [516]	2466	Comment	<p>When considering any of this plan you must take in to account your responsibilities under the Equality Act.</p> <p>With the numbers of elderly and disabled people that will live in Southend during the next ten years I do not think you have taken enough account of it. No listed Sheltered housing, no day centre facilities for disabled people, no parking for disabled people, no facilities for guide dog owners or other assistance dogs, no public toilets.</p> <p>The maps referred to were not explained on the cd so I could not comment on them.</p> <p>There were many references to your Website which I and many other blind people do not have access to.</p>	The Plan seeks to provide facilities for all users that are safe and accessible. The SCAAP will be accompanied by an Equalities Impact Assessment.
Question 37	National Federation for the Blind (Mrs Jill Allen-King) [516]	2467	Comment	<p>Millions of pounds were wasted on the Travel Centre, Victoria Gateway and City beach. Before wasting millions of pounds will the Council please consult with local residents and listen to what we say and not ignore us like you did in 1970 and in 2006 and 2008.</p> <p>When consulting Stakeholders, please include all residents living in the Southend district and not only a few listed in your appendix.</p>	Appropriate public consultation in line with statutory requirements is carried out at all stages of plan preparation.
Question 37	Amec Foster Wheeler on behalf of National Grid [519]	2468	Comment	We have no comment to make	Noted.

Appendix 8: Summary of issues raised through consultation on the first Proposed Submission SCAAP (Sept – Oct 2011)

General Approach

Vision, Strategic Objectives and Strategy well supported
Need to ensure high quality design in new developments
Approach to the subdivision of the Area into urban quarters well supported
The recognition of heritage throughout the plan is supported
Residential development generally in central area supported

Policy DS2: Shopping frontages and use of floors above shops

The Policy is supported

Policy DS4: Employment Development within the Central Area

The flexibility regarding the loss of office space within this policy is supported

Policy DS6: Provision of facilities for Culture, Leisure, Tourism and Entertainment

This policy is generally supported
The respect for nature designations on the foreshore within this policy is welcomed
The importance of a vibrant evening economy for the town centre should be better highlighted

Policy DS8: Housing

The provision of additional housing in the central area is supported
The policy should highlight the flooding implications for sites on the seafront

Policy PR1: Open Space Provision and the Environment

The policy is generally supported particularly in relation to biodiversity, surface water drainage, expansion of the green grid and general public realm enhancements
The importance of green space and tree protection within conservation areas should be specifically recognised
The benefits of green walls and green roofs in relation to suds and biodiversity should be included

Policy PR2: Public Realm Enhancements

This policy is generally supported
Public realm within historic areas should be informed by historic precedents

Policy PR3: Visually Active Frontages

This policy is supported
The proposal for greater active frontages on the south side of The Royals should be encouraged

Policy PR4: Protection of Visually Important Views

This policy is generally supported

Policy PR5: Landmark Buildings

This policy is generally supported

Policy HE1: The Clifftown Quarter

The recognition of the heritage value of Clifftown is welcomed

Policy HE2: The Central Seafront Area

The recognition of the importance of historic frontages within the High Street is welcomed

Policy HE4: The High Street

The recognition of the importance of historic frontages within the High Street is welcomed

HE5: Frontages of Townscape Merit in the Central Area

Historic England welcomes the concept of Frontages of Townscape Merit in recognising the importance of historic frontages outside the Borough's Conservation Areas. It is recommended that the importance of the roofscapes is also recognised.

Policy HE7: Areas of Archaeological Potential in the Central Area

This policy is supported

Policy TA1: Town Centre and Central Area Highway Network

The policy is supported

It is important that a holistic approach is taken to by the relevant Highways Authorities in Essex particularly in relation to the A13 corridor to ensure a coordinates approach

Policy TA1b: 'City Beach' Phase 2 – Traffic and Public Realm Scheme

Development in this area must not impact on the foreshore designations including illuminations

Policy TA2: Public Transport

The policy is generally supported

The importance of improving links between public transport interchanges should be highlighted

The policy should be more explicit in defining what public transport improvements could be achieved

Bus priority measures are supported

Policy TA3: Walking and Cycling

This policy is generally supported

Provision should also be made for mobility scooters

Policy TA4: Town Centre Parking Management

The proposed additional parking is inadequate for the amount of new jobs and houses planned for the central area

Policy TA5: Other Measures to Improve Accessibility

Provision should also be made for mobility scooters

Policy IF1: Central Area Infrastructure

New development should be required to make provision for additional waste water treatment works as current facilities are at capacity within this area

Policy IF2: S106 Planning Obligations and Developer Contributions

No comments were made on this policy

Policy IF3: Flood Risk Management

This policy is generally supported

The importance of flood risk as a key issue for development in this area

The policy should highlight the need for FRAs within flood zones 2 and 3 and the importance of integrating flood mitigation measures into new development where appropriate

Policy DP1: The High Street Development Principles

Weather protection for shoppers should be considered as part of the public realm improvements

Policy DP2: Queensway and London Road / Broadway Development Principles

Urban greening would be welcomed in this area

Policy DP3: Elmer Square Development Principles

The need to assess surface water flood risk for this site is supported

Policy DP4: Queensway and Southchurch Avenue Development Principles

This policy is supported especially in respect of residential led development

The requirement to assess surface water flood risk for this site is supported

Policy DP6: Clifftown Development Principles

The requirement to assess surface water flood risk for this site is supported

Policy DP7: Tylers Avenue Development Principles

It is important that the principal public transport interchange is maintained in the central area close to the bus routes. This must be in a single location where all buses call although there would be no objections to additional secondary interchanges provided they are also close to the bus routes.

The requirement to assess surface water flood risk for this site is supported

Policy CS2: Central Seafront Strategy – Key Principles

This policy is generally supported

The requirement to assess flood risk and mitigation measures for this site is supported

Policy CS3: Flood Risk

This policy is supported

The importance of flood risk as a key issue for new development in the central seafront area should be strengthened

Policy CS4: Nature Conservation and Biodiversity

There was support for the protection of the foreshore generally

Policy CS5: The Waterfront

This policy is generally supported

New or enhanced marine facilities on the foreshore may need to be restricted to seasonal usage to comply with this policy

Policy CS6: Central Seafront Development Principles

This policy is supported

Any new lighting should avoid direct impact on the foreshore

Policy CS7: Western Esplanade, The Cliffs and Shrubbery

Native species planting should be encouraged

Any new lighting should avoid direct impact on the foreshore

Policy CS8: Eastern Esplanade and City Beach Gateway

This policy is generally supported

Proposals will need to demonstrate that there will be no adverse impacts on the biodiversity of the foreshore or flood risk

Any new lighting should avoid direct impact on the foreshore

Proposal Site Policy PS2a: Sainsbury's and adjacent Buildings, London Road Proposal

The policy is too restrictive in relation to uses that would be acceptable on this site and that a development brief should be prepared if the site is vacated by Sainsburys

Proposal Site Policy CS6a: Southend Pier

The recognition of the need to protect the Ramsar site in relation to any pier development was supported

The value of the Pier as an attraction was supported

Any new lighting on the pier should avoid direct impact on the foreshore

Proposal Site Policy CS6b: Seaway Car Park and Marine Parade

The potential for Seaways for development including remodelled car parking was supported

Accessibility for pedestrians through this area should be a key consideration

Improvements to the access between St Johns Church and The Park Inn Palace needs to be sensitive to the historic buildings

This site should include the adjacent redundant ice cream factory

This site should include pedestrian event spaces and views to the sea

The levels on the site will need to be carefully integrated into any development

The requirement to fully assess flood risk and mitigation measures for this site is important

Proposal Site Policy CS7a: Cultural Centre and new Southend Museum

This policy is supported

Every effort should be made to minimise the severance of green infrastructure and maintain links across the cliffs

Proposal Site Policy CS8a: Woodgrange Drive (Kursaal Estate)

Flood risk must be managed appropriately through an adequate FRA

Proposal Site Policy PS9a: The Victoria Office Area Site

The Victoria Avenue Landowners Consortium supports the aims of this policy

The proposal for Sert in this area is supported by the bus operators

Proposal Site Policy PS9c: Roots Hall Football Ground and Environs

This policy is supported

Proposal Site Policy PS10a: Former B&Q Site

It is considered that the policy for this site would compromise the deliverability of Roots Hall in terms of network capacity

The capacity of the junction needs to be properly considered in any proposal for this site as it is already congested

Appendix 9: Response to the issues raised through consultation on the first Proposed Submission SCAAP (Sept – Oct 2011)

Summary Table

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
3	Stargas Nominees [279]	1383	Comment	<p>We consider the AAP to be, in the most part, 'sound' in its current format, on the basis that the document broadly complies with National Policy. Notwithstanding this, we submit a formal request for our client's site to be included in the document as a proposal site for residential development or mixed-use residential development. This is especially relevant as the Council has introduced new zoning within the Central Area, which places the site in the Queensway and Southchurch Road, Area where the priority is to provide new and improved residential accommodation.</p> <p>In this regard, we consider that the Council has failed to appropriately consider previous representations and zone the site for residential or residential-led mixed-use development, which fails to meet the advice of National Policy.</p>	<p>It should also be noted that not all potential development sites in the SCAAP area are allocated, but this does not prevent development coming forward and be considered against the development principles set out within each Policy Area.</p> <p>The development principles support a net increase in dwellings above existing or new commercial development as well as mixed use development with active ground floor frontages.</p>
3	The British Horse Society (Mrs Marlene Curtis) [275]	1395	Object	<p>Because of the existing paucity of Southend Bridleways and off-road opportunity for equestrians to travel, the BHS objects strongly to Southend Borough Council's DPD for completely omitting consideration of safe equestrian routes to travel east/west and north/south through the Borough to get where they want to go.</p> <p><i>BHS requests that equestrians are given parity of treatment in off-road access provision as provided for walkers and cyclists. Public money should be for all users. In addition adequate and equitable on-road provision (including road crossings) should include all vulnerable NMUs, not facilities singled out and provided for pedestrians and cyclists alone.</i></p>	<p>This planning document only includes planning policies and proposals for Southend Central Area, which includes the central seafront area and the town centre. It is not considered that there will be opportunity for the inclusion of bridleways and off road opportunities for equestrians within this area. Nevertheless, these needs will be taken into account as the the Local Plan is progressed under the timetable outlined in the Local Development Scheme.</p>
3	The British Horse Society (Mrs Marlene Curtis) [275]	1396	Comment	<p>1. Rights of Way Improvement Plan (ROWIP): SBC has ignored the Countryside and Rights of Way Act 2000 (CROW Act) stated duty for Highway Authorities to prepare, publish, assess and review a ROWIP prepared to secure an improved and accessible network of local rights of way, and to assess the extent to which they meet the present and future needs of the public, to fulfil opportunities for exercise (including cross boundary links) open-air recreation and enjoyment of the Authority's area. Preparation of the ROWIPs were due within 5 years (2005), with Plan approval by 2007. SBC's ROWLP should also have formed an integral part of the LTP2 from 2010 onwards superseding the "Milestones Statement" 2001/2 to 2005/6 policy document. Further, in 2001 DEFRA promised, under the ROWIP, that horse riders, carriage drivers and cyclists plus those with mobility problems would benefit from greater accessibility to the ROW network.</p>	<p>Comments noted and this will be referred to the relevant officers at Southend Borough Council, however, this is not an issue that may be addressed by the SCAAP or is relevant to it.</p>

Policy, para or section	Respondent Name [No]	Rep No	Object/ Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
				<p>SBC, however, has so far only prepared a draft ROWJP in 2009 (4 years late) in which the bridleway (BR) network was recognised as being very minimal with only 3 BRs recorded (one just 2 metres long and the other two BRs relating to just one path). However, despite this inadequate figure comparing to 236 (96%) Footpaths recorded to date, no further action has been taken to implement the plan. The fact, too, that the 2009 total of public rights of way remains exactly the same as the number recorded in the 1999 Milestones Statement illustrates the non- action of SBC to address the improvements promised under the CROW ACT 2000.</p> <p>In addition, the entire draft ROWIP is so heavily weighted in favour of cycleway provision that at times it is difficult to believe equestrians exist at all. Relevant to the provision of cross boundary links, this prevailing omission was particularly highlighted in 2009 when 83 equestrian respondents (covering 143 users) requested SBC to include a safe equestrian crossing over the busy and restrictive A 127 within the "A 127/Progress Road Improvement Works". This was followed by the presentation of a 1623 Petition requesting this facility but where, in the event, 6-7 new "high spec" A127 crossings were provided singularly for walkers and cyclists within the Works, while not one crossing facility materialised for the safety of equestrians.</p>	
3	The British Horse Society (Mrs Marlene Curtis) [275]	1399	Comment	<p>2. Local Transport Plans: The CROW Act also requires ROWIPs to be incorporated into Local Transport Plans with the aim of ensuring that 'as public highways, rights of way are embraced by the LTP process and recognised in LTPs as a key ingredient in the development of an integrated transport network that provides a variety of transport modes'. So far, however, again SBC has omitted to carry out this legal requirement with past LTPs 1 and 2, and also seemingly with LTP3 (BHS ltr. No 1 refers. No reply received). The omission not only ignores the law but also ignores a specific request for implementation by the BHS.</p>	Comments noted and this will be referred to the relevant officers at Southend Borough Council, however, this is not an issue that may be addressed by the SCAAP or is relevant to it.
3	The British Horse Society (Mrs Marlene Curtis) [275]	1400	Comment	<p>Horse Riding Strategy: While both walking and cycling strategies are already in force within the draft ROWIP, a strategy for horse riding is singularly Lacking. On 17th April 2010, the BHS requested the immediate preparation of a "horse riding" strategy with its inclusion within the ROWTP. BHS reminders were sent on the 21st June 10 the 16 July 10 and the 18 November 10 but, to date, a strategy for horse riding has not materialised. We do not accept SBC's 2011 reason of lacking financial resources for non-provision and feel it is yet further proof that SBC is determined to ignore the interests of their horse riding residents.</p> <p>The inclusion of equestrians in access facilities is strongly supported by Richard Benyon MP, Minister for Natural Environment and Fisheries, in his letter sent this year to Anne Main MP concerning Alban Way. He strongly advised that local authorities should ensure that off-road routes include horse riders as well as other users. The Minister stated:-</p>	Comments noted and this will be referred to the relevant officers at Southend Borough Council, however, this is not an issue that may be addressed by the SCAAP or is relevant to it.

Policy, para or section	Respondent Name [No]	Rep No	Object/ Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
				<p>"Unless there are good and specific reasons not to expressly allow horse riders to use such routes, local authorities should take steps to accommodate them. Local authorities should be making the most of their off-road networks through integration of use. Multi user routes have been shown to be readily adopted and well appreciated by local people. Where they are done well they bolster community cohesion and create a better understanding between users". Also:- "Horse riders are particularly vulnerable road users, and cycle routes can provide appropriate and important opportunities to avoid busy roads. There is potential for conflict in any situation where people *share a public space, but the possibility of conflict is not reason enough to disregard ridden access; actual conflict could be resolved am/ any misplaced Concerns reduced over time."</p>	
3	The British Horse Society (Mrs Marlene Curtis) [275]	1402	Comment	<p>4. Greenways: "Gree11ways" were a concept of the Countryside Commission (now Natural England) with equestrians included as a fundamental part of the Greenways Strategy, along with walkers and cyclists. It is therefore a travesty of natural justice that the draft ROWIP completely omits the inclusion of equestrians on Greenways, with this policy already actioned by SBC excluding vulnerable equestrians from the off-road Prittle Brook Greenway providing approximately 3.5 miles of safe, off-road and attractive travel through Southend's built-up area. The draft ROWIP "Walking and Cycling Strategies" (pg. 16 BHS No.2) then confirms that SBC relies on the support of The Greengrid Strategy (Thames Gateway South Essex - see also pg. 17 BHS No. 3) identifying Greenways" to provide corridors of pleasant environments across the Borough between green spaces and urban areas singularly for pedestrians and cyclists. However, this statement is inaccurate and is in complete opposition to the Thames Gateway South Essex - Greengrid Strategy (4.0 Strategic Frameworks and Guidance) which states:-</p> <p>"Greenways: Greenways are national, regional and sub~regional footpaths, cyclepaths and bridlepaths that connect to and through towns and the rest of the Strategy Area, and where they are not directly associated with parkways, railways and riverways. In addition to their role as leisure and recreational routes they will also provide alternative transport options." (BHS No.4) Thames Gateway Greengrid Strategy continues:-</p> <p>"Greenways Vision: To create a continuous network of safe, clean, attractive, well sign-posted, well promoted and accessible footpaths, cycle paths and bridleways that connect attractive, culturally and visually diverse towns, villages, parks and open spaces by preparing and promoting a Strategic Greenway Plan with design codes as a key element of the Greengrid Strategy." (BBS No.5)</p> <p>The BHS, therefore, strongly feels to omit equestrians and to alter this key Thames Gateway Greengrid Strategy simply underlines the fact that Southend Council is acting in opposition to national policies. The additional fact that Southend's Consultation Draft Action Plan DPD (Pg. 61 BHS No. 6) includes the objective "To enhance the Green Grid and interconnection of spaces and attractions by attractive "green" corridors that have the ability to provide good quality cycling</p>	Comments noted and this will be referred to the relevant officers at Southend Borough Council, however, this is not an issue that may be addressed by the SCAAP or is relevant to it.

Policy, para or section	Respondent Name [No]	Rep No	Object/ Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
				and walking routes in and around the town " once more confirms SBC's equestrian exclusion policy so should be amended to read provision of " ... good quality cycling walking and horse riding routes in and around the town .	
3	The British Horse Society (Mrs Marlene Curtis) [275]	1405	Comment	5. "The Three Rivers Trail: SBC recently issued a media release on this European Urban Habitats Initiative to create a network of green trails across Southend and Rochford's urban and rural areas to ensure green spaces are there for all to enjoy. To form the green trails it was intended to link public rights of way, bridleways and cycle routes enclosed by the Thames, Roach and Crouch rivers, enabling people to access the area's parks, natural green spaces, heritage sites, quiet estuary areas and seafronts in a more sustainable way. (So far, so good - equestrian access inclusion!) However, SBC then revert to their "equestrian exclusion policy" by stating they felt the Trail had the potential to be a major tourist attraction solely for walkers and cyclists wanting to explore the many historic and environmental sites in the area. "Horseriders" need to be included.	Comments noted and this will be referred to the relevant officers at Southend Borough Council, however, this is not an issue that may be addressed by the SCAAP or is relevant to it.
3	The British Horse Society (Mrs Marlene Curtis) [275]	1406	Comment	6. New development (Pg. 55 OPD BHS No. 7): With the expected minimum of 2,000 new homes for the Town Centre over the 2001-2021 period the Central Area Master Plan identifying a capacity within its boundary of 3,160 additional dwellings and SHLAA identifying another 4,000 new dwelling capacity, we feel the likely additional equestrians, based on British Equestrian Trade Association (BETA) 2005/6 national survey figures, warrant very close consideration:- <ul style="list-style-type: none"> * 4.3m people - 7% of the British population - are horse riders. * Some 2.8m households contain at least one rider. * 43% of the British population have an interest in some aspect of equestrianism. * There are 1.35m horses in the UK. * £4 billion per year is spent on horses and riding. * In England horse riders have access to only 22% of the public rights of way network. 	Comments noted.
3	The British Horse Society (Mrs Marlene Curtis) [275]	1407	Comment	We feel the DPD is unsound in its present form and in considering these objections. The BHS requests that equestrians are given parity of treatment in off-road access provision as provided for walkers and cyclists. Public money should be for all users. In addition, adequate and equitable on-road provision (including road crossings) should include all vulnerable NMUs, not facilities singled out and provided for pedestrians and cyclists alone.	Comments noted and this will be referred to the relevant officers at Southend Borough Council, however, this is not an issue that may be addressed by the SCAAP or is relevant to it. Nevertheless, these needs will be taken into account as the Local Plan is progressed under the timetable outlined in the Local Development Scheme.
8	Anglian Water (Mrs Sue Bull) [37]	1307	Comment	I have no issues or concerns to raise	Comment noted.

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
33	Herbert Grove Residents (Mr Steve Tomlin) [115]	1306	Comment	There is no provision for mobility scooters. As the population ages provision should be made for this relatively new type of transport.	Comments noted. Accessibility is considered to be a fundamental concept within the SCAAP and to ensure that all members of the public have legible and connected environments and public realm. The transport strategy highlights the need for mobility management measures for vulnerable road users. These principles will be addressed in schemes and projects which are developed in the SCAAP area to ensure that they meet the needs of vulnerable road users and those with mobility needs. In addition, it will also be addressed through the Local Transport Plan which sits alongside the Core Strategy, Development Management Document and the SCAAP.
47	Herbert Grove Residents (Mr Steve Tomlin) [115]	1313	Support	Many large houses which have been turned into poor apartments could be zoned as office space and gradually allowed to change from residential to office use. Chancellor Road and Herbert Grove may be suitable.	The planning authority will balance the need for provision of residential accommodation and retention of office space for current and future need. The development principles in the Policy Area in the SCAAP are intended to ensure that this balance is maintained and quality development is achieved. In addition the Development Management Document, includes policies to ensure that good quality and sustainable development throughout the Borough, including the central area. It has not been considered necessary to include this type of zoning in the SCAAP.
49	Herbert Grove Residents (Mr Steve Tomlin) [115]	1314	Comment	New building should not be detrimental to the environment of the present residents.	Comments noted. A key objective of the SCAAP is to create a high quality public realm as well as high quality, sustainable new development. It is intended that the Council's planning policies in combination will ensure that

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
					development is not to the detriment of existing residents.
53	Environment Agency (Lindsay Black) [255]	1274	Support	We are pleased to see that the impact on the Ramsar site has been recognised in relation to any redevelopment on the pier.	Noted
53	Herbert Grove Residents (Mr Steve Tomlin) [115]	1316	Comment	The pier needs to be an attraction! It could be an ecology centre with examples of wind power, tide power and solar power. See this example of a site in rural Norfolk that has transformed their area with such an attraction. http://www.ecotech.org.uk/education.html	The Pier is included in the SCAAP as an Opportunity Site. The approach is to allow for further rejuvenation of the Pier as a landmark and destination, building on the success of recent developments such as the Royal Pavilion.
62	Environment Agency (Lindsay Black) [255]	1275	Support	We support the need to ensure minimal impact on the protected foreshore and creation of new habitats.	Noted.
66	Herbert Grove Residents (Mr Steve Tomlin) [115]	1317	Comment	Many possible pedestrian routes are unattractive. Houses that were proposed for demolition in the previous town plans have been allowed to run down and now some are almost derelict. A grant of, say, £300 to paint the front of houses from a Council chosen palate of colours could create rows of 'candy striped' property on route to the beach enhancing the 'seaside' feel of Southend.	Comments noted. The SCAAP seeks to improve the public realm and overall attractiveness of the environment of the area.
69	Environment Agency (Lindsay Black) [255]	1276	Support	Comment in relation to 'Climate change and Flood risk' box below para 69: This box is essential to this document. Due to the physical location of the town centre, in close proximity to the sea front, flood risk and climate change is a key theme running through out this AAP and must not be overlooked.	Noted.
3.2.3	Herbert Grove Residents (Mr Steve Tomlin) [115]	1318	Comment	3. Railway Station Enhancement There is no public transport route between these mainline stations.	The SCAAP seeks to address along with the Local Transport Plan legibility and accessibility to ensure that routes between major public transport interchanges are high quality and safe.
3.2.6	Herbert Grove Residents (Mr Steve Tomlin) [115]	1319	Support	6. Opportunities for Improved Pedestrian Links A glass canopy over the middle of chosen pedestrian routes could help extend the holiday season and direct tourists on preferred routes.	Noted. Public realm improvements are set out within the SCAAP.
3.2.12	Herbert Grove Residents (Mr	1320	Comment	12. Widening the Town Centre:	Seaway is included in the SCAAP as an Opportunity Site and development for

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
	Steve Tomlin [115]			The Seaway car park can have direct access from the Queensway roundabout. It provides parking for both High Street and Seafront visitors. Replacement car parks should be underground and the space above them used for development.	<p>mixed use is planned for the site, including car parking provision.</p> <p>The configuration of parking will be taken into account at the design stage.</p>
3.2.17	Herbert Grove Residents (Mr Steve Tomlin) [115]	1321	Comment	<p>17. Pier</p> <p>The pier needs to be an attraction! It could be an ecology centre with examples of wind power, tide power and solar power. See this example of a site in rural Norfolk that has transformed their area with such an attraction. http://www.ecotech.org.uk/education.html</p>	The Pier is included in the SCAAP as an Opportunity Site. The approach is to allow for further rejuvenation of the Pier as a landmark and destination, building on the success of recent developments such as the Royal Pavilion.
3.2.18	Environment Agency (Lindsay Black) [255]		Object	<p>18. Foreshore Designations</p> <p>Flood risk should also be mentioned in section 3.2 as a constraint to the development within the AAP.</p> <p><i>Include 20: Flood Risk: There are a number of areas along the seafront falling within the Flood zones. Flood Risk must be avoided where possible or mitigated to minimise the risk.</i></p>	Noted. Provision will be made within the policy to ensure that flood risk is considered when development takes place.
3.2.19	Herbert Grove Residents (Mr Steve Tomlin) [115]	1327	Comment	<p>19. Gateway neighbourhoods</p> <p>In previous Council plans many houses close to the centre were listed for demolition and consequently the owners have left them to decline. The Council should now make amends by offering grants to residents (not developers) to bring them back to the best condition.</p>	Noted.
70	Herbert Grove Residents (Mr Steve Tomlin) [115]	1330	Support	We support this ambition (for it to be a prosperous and thriving regional centre that is vibrant, safe and hospitable and rich in commerce, learning and culture).	Noted.
70	Stargas Nominees [279]	1385	Support	<p>We support the Council's overall ambitions for the Southend Central Area to become a "prosperous and thriving regional centre that is vibrant, safe and hospitable and rich in commerce, learning and culture".</p> <p>We also support the eight objectives set out by the Council to deliver the vision and the concept of establishing eight urban Quarters to which development is appropriate to the local context.</p>	Noted.
72	Herbert Grove Residents (Mr Steve Tomlin) [115]	1332	Comment	These objectives are laudable but should not be pursued to the detriment of current residents.	Noted. The SCAAP will ensure that there is high quality, sustainable development and a good quality public realm that will be to the benefit of existing residents as well as additional population.

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
79	Herbert Grove Residents (Mr Steve Tomlin) [115]	1340	Comment	Map 4 - Vision - Key Diagram shows a proposed Pedestrian/Cycle Link between the Royals and the Seaway Car Park. This is impractical because it passes through St John's Church. If the Royals car park were made underground then the link could easily go under the Church as part of the rebuild.	Noted. There may be significant cost implications involved in this proposal and it would require the co-operation of the owners of the Royals. A cost benefit analysis would need to be satisfied.
81	Herbert Grove Residents (Mr Steve Tomlin) [115]	1341	Comment	The High Street could be enlivened by placing the Bandstand in Victoria Plaza or on a site in the redeveloped Seaway Car Park.	The cultural and leisure offer within the central seafront and town centre will be extended by the SCAAP. A new location for the bandstand has been agreed. However, event space is required and this will be considered as part of developments within the Policy Area and opportunity sites.
146	Herbert Grove Residents (Mr Steve Tomlin) [115]	1344	Comment	If you bring 6500 additional workers into the central area you will need at least 2000 car parking spaces and decent access.	The SCAAP includes a transport and access strategy and this has been informed by the Council's car park strategy and this has taken into account the transport requirements of additional workers, who will be encouraged to use public transport as a realistic alternative to the car with good transport connections in the town centre.
Policy DS2	Stargas Nominees [279] (represented by BNP Paribas Real Estate (Miss Grace Sim) [246])	1386	Support	Policy DS2: Shopping frontages and use of floors above shops Our client supports the principle of this policy and in particular the Council's encouragement to "safeguard and enhance the vitality and viability of the Town Centre". Further, we recognise and support the Council's policy approach, which states "Planning permission will be granted for the change of use of upper floors above shops to residential, appropriate service or community uses, which maintain or enhance the character and vitality of the centre and broaden the range of services".	Noted.
PDS4	Stargas Nominees [279] (represented by BNP Paribas Real Estate (Miss Grace Sim) [246])	1387	Support	Policy DS4: Employment development within the central area We note and support the Council's ambition to provide a diverse and balanced economy which is both healthy and sustainable. Further, we note that the Town Centre will be the primary location for major economic growth, particularly for Class B1 office provision. Further, we support the flexibility provided in paragraph 3 of the policy which states: "Within the core Town Centre, development proposals resulting in a loss of B1 office floorspace will only be acceptable if: a. office floorspace is re-provided as part of a mixed-use development of the site, or	Noted. Policy removed as this is covered by the Development Management DPD, Core Strategy and the Policy Area development principles and each opportunity site. This approach makes navigation of policy easier for those using the document.

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				<p>b. the loss of office floorspace is outweighed by the achievement of other AAP objectives through the proposed development".</p> <p>We consider that this policy meets with the requirements of National Policy.</p>	
Policy DS6	The Theatres Trust (Mrs Rose Freeman) [67]	1308	Support	<p>Policy DS6: Provision of facilities for culture, leisure, tourism and entertainment</p> <p>We support the document with regard to Policy DS6 but have not read any other part of the document.</p> <p><i>We suggest the addition of an extra paragraph to Policy DS6 for clarity - 1.c. To protect and enhance existing leisure and cultural facilities throughout the Borough.</i></p>	Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
Policy DS6	Natural England (Mr Gordon Wyatt) [264]	1322	Support	<p>Southend Central Area Action Plan & Proposals Map - Proposed Submission: Policy DS6: Provision of facilities for culture, leisure, tourism and entertainment</p> <p>Natural England welcomes the recognition of the environmental importance of the foreshore, as expressed in the wording of point 2.ii</p>	Noted.
Policy DS6	Environment Agency (Lindsay Black) [255]	1278	Support	<p>Southend Central Area Action Plan & Proposals Map - Proposed Submission: Policy DS6: Provision of facilities for culture, leisure, tourism and entertainment</p> <p>2 b) important to ensure that the foreshore designations are recognised, protected and not compromised.</p> <p><i>b. promote the beach, foreshore and Estuary for appropriate cultural, leisure and tourism activities provided that environmental designations are respected, protected and not compromised.</i></p>	Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
165	The Theatres Trust (Mrs Rose Freeman) [67]	1309	Comment	<p>Paragraph 165 deals with concerns about the evening economy and we are surprised that the document does not have a policy for this important topic. Evening and night-time activities are a fundamental part of urban renaissance because they ensure the vitality of an area beyond normal working hours.</p>	Noted. The evening economy is addressed in other Council plans and strategies although it should be noted that the SCAAP encourages the provision of tourism and cultural and leisure facilities which will include activities that will relate to the nighttime economy. The key aim is to ensure the vitality and viability of the SCAAP area.
Policy DS8	Environment Agency (Lindsay Black) [255]	1279	Object	<p>Policy DS8: Housing</p> <p>Object to Policy DS8: Housing (no comment box available online)</p> <p>2b) site CS8a is partially within Flood Zone 3. There is no recognition of this within the policy.</p> <p>4b) Reference should also be made to the Flood risk policies of the CS</p>	Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In

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				and DM DPD. KP1 & 2 and DM6 <i>Reference needs to be made to environmental constraints and , Flood Risk Sequential test needs to be applied and mitigation proposed where necessary.</i> <i>4b) Reference should also be made to the Flood risk policies of the CS and DM DPD. KP1 & 2 and DM6</i>	addition, this is covered by overarching policy in the Core Strategy.
Policy DS8	Stargas Nominees [279] (represented by BNP Paribas Real Estate (Miss Grace Sim) [246])	1388	Support	Policy DS8: Housing We support the principle of Policy DS8 which seeks to provide 2,000 new homes in the Town Centre and central area over the plan period. Further, we particularly support the Council's policy approach to housing development on Proposals Sites. We note the Council will: "...work with private sector partners and land and property owners to deliver... an appropriate level and type of housing development on other Proposals Sites, as part of well designed Mixed Use Schemes in line with associated policy requirements for that site".	Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
192	Environment Agency (Lindsay Black) [255]	1280	Support	Creation of a network of green spaces is important in aiding biodiversity and habitat gain, but also in reducing impacts of climate change in the urban environment. Providing urban cooling, space for water, and biodiversity.	Noted.
199	Environment Agency (Lindsay Black) [255]	1281	Support	Support the objectives for open space, green space and urban greening within the CAAP.	Noted. These have now been incorporated into the policy aims.
Policy PR1	Environment Agency (Lindsay Black) [255]	1282	Support	PR1: Open Space Provision and the Environment Support the provision of an integrated network of open spaces to provide positive biodiversity benefits. An enhanced network of green spaces may aid in surface water management and therefore contribute to reducing flood risk.	Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
Policy PR1	Natural England (Mr Gordon Wyatt) [264]	1323	Comment	PR1: Open Space Provision and the Environment Natural England welcomes this policy. <i>We would, however, recommend that:</i> <i>under point 2 the reference to the Ramsar site should be amended to also refer to the SPA, as this is the more relevant designation in terms of the strict legal applicability of the EU Habitats Directive.</i> <i>In relation to point 3.b, whilst we recognise the legitimate safety concerns of users, we would recommend that any such lighting should be so designed as to minimise its impacts upon</i>	Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.

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				<i>wildlife (eg by use of 'orange' low-pressure sodium lighting, rather than 'pink' high-pressure sodium or 'white' lighting).</i>	
Policy PR1	English Heritage (Ms Katherine Fletcher) [109]	1371	Support	PR1: Open Space Provision and the Environment Open Space and the environment. We welcome the discussion of green and civic spaces and their identification in the preceding 6.3.1. A number of these spaces are within conservation areas, however another important feature are the street trees, which survive especially in Cliff Town. <i>We suggest that a positive strategy for their protection, regeneration and where appropriate reinstatement should be part of Policy PR1.</i>	Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
204	Environment Agency (Lindsay Black) [255]	1283	Support	Encourage the use of green walls, roofs and roof gardens. These will add biodiversity benefit and they can contribute to increasing the energy efficiency of buildings and assist in attenuating rain water flow. Section 4.9 of the Sustainability Appraisal supports this.	Noted.
Policy PR2	Environment Agency (Lindsay Black) [255]	1284	Support	PR2: Public Realm Enhancements Encourage the use of green walls, roofs and roof gardens. These will add biodiversity benefit and they can contribute to increasing the energy efficiency of buildings and assist in attenuating rain water flow. Section 4.9 of the Sustainability Appraisal supports this.	Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
Policy PR2	Natural England (Mr Gordon Wyatt) [264]	1324	Support	PR2: Public Realm Enhancements Natural England welcomes this policy and, in particular, the references to urban greening in point 1.e, street tree planting in point 1.f, and promotion of sustainable access in point 2.	Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
Policy PR2	English Heritage (Ms Katherine Fletcher) [109]	1372	Support	PR2: Public Realm Enhancements We support the principles of the Public Realm Enhancements, especially the reduction of clutter. The sea front is an area that would benefit greatly, but its function as a busy traffic route requires imaginative thinking if the pedestrian is to be able to reclaim priority. Historic precedents could inform the materials and street furniture where evidence survives (as an example, the finial street name signs that were once a feature of the town). Areas of surviving original paving should be retained and augmented.	Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
213	Herbert Grove Residents (Mr Steve Tomlin) [115]	1345	Comment	Views of the sea and historic buildings enjoyed by current residents should also not be compromised.	Noted. This is addressed in Policy DS2: Key Views.
Policy	English	1373	Support	PR3: Visually Active Frontages	Noted.

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PR3	Heritage (Ms Katherine Fletcher) [109]			English Heritage supports the protection of visually active frontages and introduction of new elements especially from the Royals Centre onto Pier Hill.	
Policy PR4	English Heritage (Ms Katherine Fletcher) [109]	1374	Support	PR4: Protection of Visually Important Views We are pleased to see the emphasis on protection of visually important views.	Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. It is also addressed in Policy DS2 : Key Views.
Policy PR5	English Heritage (Ms Katherine Fletcher) [109]	1375	Support	PR5: Landmark Buildings English Heritage supports the Landmark Buildings policy with the important caveats relating to protection of existing landmarks as included in the schedule in Appendix 4. We are pleased to see inclusion of the Pier in the schedule, although, presumably by oversight this has been omitted on the Proposals Map. <i>As a matter of clarity and consistency, we recommend that the Proposals Map is amended to identify the Pier as a landmark building.</i>	Noted. The Pier has been included on the Proposals Map as a landmark building. Appendix will remain part of the SCAAP but the numbering may have changed with the rationalisation of the document.
226	English Heritage (Ms Katherine Fletcher) [109]	1376	Comment	In discussing conservation areas, we are disappointed that there is no commitment to appraise these areas on a regular basis and to review some of the boundary anomalies, such as the east boundary of Cliff Town. This reiterates previous advice that English Heritage included in our letter of 5 August 2010, when in commenting on the Issues and Options consultation for the Central Area Action Plan we commented "that in order to fully understand and address change in this area more investigative work needs to be carried out. Our Conservation Principles, Policy and Guidance emphasises (para 62 onwards) the need to understand the fabric and evolution of a place and to identify who values the place and why they do so. Paragraph 89 underlines the value of specific investigation into understanding the impacts, or consequences, of proposed change".	Noted. The conservation area appraisals are on on-going piece of work for the planning department. There is a schedule of appraisals to be carried out and this work is also monitored and feedback by a conservation working party. These areas would be appraised on a regular basis however there is a need to allocate time with the available resources and this has only allowed work in line with the current schedule. If there is any assistance that English Heritage may be able to provide to assist with this process it would be most welcomed.
226	English Heritage (Ms Katherine Fletcher) [109]	1377	Support	Nonetheless English Heritage welcomes your document's strong emphasis on the role of heritage in the distinctive character of the town centre. We are pleased to see that it has become a strong theme in specific policies especially those relating to High Street and Central Sea Front where the value of heritage-led regeneration has not always been acknowledged in the recent past. We would support all the policies.	Noted. The revised version of the SCAAP continues to ensure that all the heritage assets and historic buildings within the SCAAP area are carefully considered when and if any development takes place. This strong emphasis is carried through in the

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					development principles for each policy area. In addition, design and conservation matters are addressed in the Core Strategy, Development Management Document and the Design and Townscape Guide.
Policy HE1	English Heritage (Ms Katherine Fletcher) [109]	1378	Support	HE1: The Clifftown Quarter Clifftown. We support these proposals but recommend a stronger heritage strategy to include assessment of buildings for local listing and extension of the conservation area designation.	Noted. These matters are dealt with through the Council's Conservation Working Party which meets every two months to consider nominations for local listings and review the conservation areas and appraisals. The consideration of heritage assets in the Clifftown area is now considered in the development principles for that policy area in the revised SCAAP). This is also supplemented by conservation policy in the Core Strategy, Development Management Document and the Design and Townscape Guide.
Policy HE5	English Heritage (Ms Katherine Fletcher) [109]	1379	Support	HE5: Frontages of Townscape Merit in the Central Area Frontages of Townscape Merit. We commend this concept, especially in streets outside the conservation areas, notably High Street. This responds to our previous concerns on undesignated assets such as the former Keddies Store. We welcome the emphasis on shop fronts but would add that we consider it essential to acknowledge the importance of roofscape as part of the overall building frontage.	Noted. This policy approach has now been incorporated in the policy areas area where it is relevant to consider and protect locations of townscape merit. This is also supplemented by conservation policy in the Core Strategy, Development Management Document and the Design and Townscape Guide.
244	English Heritage (Ms Katherine Fletcher) [109]	1370	Comment	As a general point, we are pleased to see that heritage has been integrated into the plan throughout the various chapters. We do not have any over-riding concerns in relation to the plan that would raise questions of soundness.	Noted. It is intended that the heritage themes is imbedded within the specific policy area and opportunity sites where appropriate as well as being acknowledged in the development strategy section of the SCAAP. Heritage is also a key part of other planning documents and so this approach is supplemented by conservation policy in the Core Strategy, Development Management Document and the Design and Townscape Guide.

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244	English Heritage (Ms Katherine Fletcher) [109]	1382	Comment	For clarity, none of the comments should be taken as formal objections to the soundness of the Area Action Plan. We would, however, hope that you may be able to give the recommended changes, highlighted above, your consideration as minor amendments to the plan.	Noted. The Council welcomes the comments and has taken on board and incorporated the approach supported by English Heritage in the revised SCAAP.
250	English Heritage (Ms Katherine Fletcher) [109]	1380	Support	While we welcome the consideration given to archaeology we consider following minor amendments would be appropriate: <i>A slightly tighter summary would be helpful - for instance, Prittlewell is not technically the historic centre of Southend as the seaside town is itself quite distinct. There is a typographical error in the final sentence.</i>	Noted.
252	English Heritage (Ms Katherine Fletcher) [109]	1381	Support	While we welcome the consideration given to archaeology we consider following minor amendments would be appropriate: <i>provides explanatory text accompanying policy HE7. Since there remains a possibility that other sites of archaeological potential could be discovered in the central area, beyond those referred to specifically, we consider that the words 'These sites are:' (bottom page 78) should be replaced with 'in particular, these sites are likely to include:'. This would ensure that any additional sites within this area, which are subsequently identified as having archaeological potential, are also bound by this policy. The wording following points 1 to 4 might conclude with: 'Any additional areas, which are subsequently considered to exhibit significant archaeological potential, should be similarly treated in line with national guidance.</i>	Noted.
255	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1358	Comment	SCAAP Objectives seems to have something missing as states objectives 2, 3 and (blank). First bullet point does not make sense. <i>Amend first bullet point of the Objective Box in Transport and Access Strategy section as follows:</i> <i>To improve the buildings and public realm, including accessible green space, within the Central Area, to manage traffic and improve cycling and walking facilities so that Southend becomes a place that is more pleasant to experience and move around in;</i>	Noted. The document has been rationalized that the objectives are included in the front section of the document. Your comments have been taken into account in the updated transport section.
261	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1359	Comment	3rd bullet point: Might be helpful to define what 'further improve public transport' means. This could be improving journey times, predictability, frequency, fares levels, number of routes etc.	Noted. The Council will ensure that these measures are more explicit and the transport strategy included in the revised version provides further emphasis about what is intended. In addition the SCAAP should be read in

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					conjunction with the Local Transport Plan, which is referenced within the document, and this provides detailed information about what the Council is planning to do in relation to public transport improvements within the town centre.
261	Herbert Grove Residents (Mr Steve Tomlin) [115]	1346	Comment	The use of mobility scooters by an aging population has been ignored and forgotten	Comments noted. Accessibility is considered to be a fundamental concept within the SCAAP and to ensure that all members of the public have legible and connected environments and public realm. The transport Strategy highlights the need for mobility management measures for vulnerable road users. These principles will be addressed in schemes and projects which are developed in the SCAAP area to ensure that they meet the needs of vulnerable road users and those with mobility needs. In addition, it will also be addressed through the Local Transport Plan which sits alongside the Core Strategy, Development Management Document and the SCAAP.
261	Highways Agency Mr Mark Norman [273]	1440	Support	In broad terms, the emerging options are supported by the Highways Agency as at this early stage of development they appear to be consistent with the government policy of managing transport through sustainable methods, particularly with the encouragement of people to take appropriate journeys by appropriate means.	Noted.
262	Highways Agency Mr Mark Norman [273]	1369	Comment	The only aspect I would like to comment on, on which there appears to be no specific reference, is the need for a holistic approach to the Central Area Action Plan DPD. The Highways Agency is keen that there is joined up thinking with all the highway authorities along the A 13 corridor, to ensure there is consistency in approach in managing the route and that any unnecessary trips are managed down. There is little point in developing effective plans when there is a mismatch with those being developed in adjacent areas. Indeed in some situations, there may be a need for solutions which are jointly funded and developed.	The Council works alongside its neighbouring authorities in respect of strategic issues and transport is one of those. Under the Thames Gateway South Essex Partnership and under the duty to co-operate the Council is obliged to consider holistically the strategic highway network. The 6 authorities who are affected by the A13 and A127 strategic highway network have produced a Transport and

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					Planning Strategy which outlines these issues and seeks to address them in co-operation. Please note also that it will be for strategic documents i.e. the Local Plan to address these cross boundary matters.
Policy TA1	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1360	Comment	Southend Central Area Action Plan & Proposals Map - Proposed Submission: TA1: Town Centre and Central Area Highway Network Suggested amendment to point 3 of Policy TA1: <i>Amend point 3 of Policy TA1 as follows: Suggest this should read 'Ensure that the bus priority measures focused on the A13are progressed and effective'.</i>	Noted
Policy TA1b	Environment Agency (Lindsay Black) [255]	1285	Support	TA1b City Beach Phase 2 – Traffic and Public Realm Scheme 1h any development along City Beach must not impact on the foreshore designations.	Noted. Policy on Nature Conservation and Biodiversity addresses the need to ensure that foreshore designations are not impacted upon. It raises the need for a habitats regulations scoping report for development that may have an effect. The SCAAP is also accompanied by an HRA scoping report.
Policy TA1b	Natural England (Mr Gordon Wyatt) [264]	1325	Support	TA1b City Beach Phase 2 – Traffic and Public Realm Scheme Natural England is generally supportive of this policy provided that any extension of the tourist season as referred to in point 1e, and in particular any new lighting as referred to in point 1f, are so designed as to fully comply with point 1h.	Noted. This policy has now been incorporated in the development principles and opportunity sites where appropriate for the Central Seafront Area and the revised Transport and Public realm Policy.
Policy TA2	Natural England (Mr Gordon Wyatt) [264]	1326	Support	TA2 Public Transport Natural England welcomes measures to encourage increased usage of public transport.	Noted. These principles are now incorporated into the revised transport section. This policy approach sits alongside the approach in the Local Transport Plan to encourage greater use of public transport.
Policy TA2	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1362	Comment	TA2: Public Transport Support the content of this policy but, particularly in para 3, it is very broad and lacks definition of what improvements to public transport might be considered.	Noted. It is intended that the Policy in the SCAAP which has been revised and consolidated takes into account the comments. Nevertheless the SCAAP should be read in conjunction with the Local Transport Plan which provides detailed information on public

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					transport improvements. Any development or schemes within the central area will include consultation with the relevant transport policy officers.
280	Herbert Grove Residents (Mr Steve Tomlin) [115]	1347	Comment	No provision has been proposed for mobility scooters	Comments noted. Accessibility is considered to be a fundamental concept within the SCAAP and to ensure that all members of the public have legible and connected environments and public realm. The transport Strategy highlights the need for mobility management measures and vulnerable road users. These principles will be addressed in schemes and projects which are development in the SCAAP area to ensure that they meet the needs of vulnerable road users and those with mobility needs. In addition, it will also be addressed through the Local Transport Plan which sits alongside the Core Strategy, Development Management Document and the SCAAP.
287	Herbert Grove Residents (Mr Steve Tomlin) [115]	1348	Comment	This is not enforced, many people cycle in the High Street and are ignored by community police.	Noted. The Council will be seeking to increase the cycle network throughout Southend and central area to encourage more cycling with additional routes that may help alleviate this particular issue raised.
Policy TA3	Natural England (Mr Gordon Wyatt) [264]	1328	Comment	TA3: Walking & Cycling Natural England welcomes measures to encourage increased walking and cycling.	Noted.
295	Herbert Grove Residents (Mr Steve Tomlin) [115]	1349	Object	The provision of only 650 car spaces is woefully inadequate if an additional 6500 workers are to be accommodated in addition the increase in shoppers and tourists. <i>Provision for 2000 car spaces should be planned.</i>	The SCAAP includes a transport and access strategy and this has been informed by the Council's car park strategy and this has taken into account the transport requirements of additional workers, who will be encouraged to use public transport as a

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					realistic alternative to the car with good transport connections in the town centre.
298	Herbert Grove Residents (Mr Steve Tomlin) [115]	1350	Comment	No provision has been proposed for mobility scooters	Comments noted. Accessibility is considered to be a fundamental concept within the SCAAP and to ensure that all members of the public have legible and connected environments and public realm. The transport Strategy highlights the need for mobility management measures and vulnerable road users. These principles will be addressed in schemes and projects which are developed in the SCAAP area to ensure that they meet the needs of vulnerable road users and those with mobility needs. In addition, it will also be addressed through the Local Transport Plan which sits alongside the Core Strategy, Development Management Document and the SCAAP.
Policy IF1	Environment Agency (Lindsay Black) [255]	1286	Object	<p>IF1: Central Area Infrastructure Southend WCS scoping 2009, indicates that Southend WWTW cannot treat further effluent as it is already at capacity. There is a constraint on development in the Southend WWTW catchment until the quality and capacity issues are addressed.</p> <p>The policy must reflect this by saying that infrastructure improvements must be implemented prior to developments coming online.</p> <p><i>The policy needs to be stronger to recognise that infrastructure, particularly waste water collection and treatment facilities, must be provided ahead of Development where needed.</i></p>	<p>Comments noted. This approach will be taken on board in the wording of the Policy of infrastructure provision. This policy has now been revised and is covered in the Infrastructure section in the revised SCAAP with reference to the Core Strategy and CIL.</p> <p>This is also covered in the Core Strategy and Development Management Documents.</p>
Policy IF3	Environment Agency (Lindsay Black) [255]	1287	Object	<p>IF3: Flood Risk Management</p> <p>The policy only refers to areas of Local Flood risk and surface water drainage principles. This policy should also require Flood Risk Assessments in areas of Flood Zone 2 and 3, as shown in the SFRA maps and Environment Agency maps.</p> <p><i>Include the need for FRAs in flood zones 2/3 to manage and</i></p>	Noted. This has been incorporated into the revised policy on Flood Risk Management and Sustainable Drainage in the SCAAP which is Policy D4.

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				<p><i>migrate flood risk impacts arising from tidal and fluvial flooding as well as surface water.</i></p> <p><i>Flood risk mitigation measures can also influence the design and layout of the development so flood risk from all sources should be considered at the earliest stage of planning possible.</i></p>	
Policy IF3	Natural England (Mr Gordon Wyatt) [264]	1329	Support	IF3: Flood Risk Management Natural England welcomes this policy requiring Flood Risk Assessments and the widespread adoption of SuDS techniques.	Noted.
329	Environment Agency (Lindsay Black) [255]	1288	Object	<p>Southend Central Area Action Plan & Proposals Map - Proposed Submission: 329 development proposals should also include an energy and resource efficiency statement to detail sustainable construction methods and how the development will achieve a Code for Sustainable Homes level 3 as a minimum as required by policy DM2. The Sustainability appraisal conclusions supports this (ref para 19.28)</p> <p><i>Add a new bullet point requiring 'energy and resource efficiency statement'</i></p>	Noted. There is reference to local energy policy.
344	Herbert Grove Residents (Mr Steve Tomlin) [115]	1351	Comment	Unlike the 'Ramblas' in Barcelona, Southend High Street is a fair weather shopping destination whereas the competition in places like Lakeside and Blue Water shopping malls offer any weather shopping. The provision of a glass canopy along the centre of the High Street and along preferred pedestrian routes would help the retail offering be perceived as an all weather environment.	Noted. There would need to be a cost benefit analysis of any approach that would incorporate this. It has not been considered as part of the approach to date.
Policy DP2	Environment Agency (Lindsay Black) [255]	1289	Support	DP2: Queensway and London Road / Broadway Development Principles - We support the encouragement of urban greening projects. We encourage the use of green walls, roofs and roof gardens. These will add biodiversity benefit and they can contribute to increasing the energy efficiency of buildings and assist in attenuating rain water flow. Section 4.9 of the Sustainability Appraisal supports this.	Noted. These are key elements to the approach in the SCAAP to deliver sustainable development.
Proposal Site PS2a	Sainsbury's Supermarkets LTD [268] (represented by Indigo Planning Ltd (Mr Sean McGarth) [185])	1355	Object	<p>PS2a: Sainsbury's and adjacent Buildings, London Road Proposal</p> <p>We consider that proposal site policy ps2a is unsound as it is currently drafted as it is not justified nor effective. The policy does not take account of Sainsbury's obligation to prepare a joint development brief should they relocate from the site, nor is there any justification provided as to why uses not usually found in town centres are being promoted on a site which is predominantly located in the primary shopping area of Southend town centre.</p> <p><i>In order to make proposal site policy ps2a sound we consider that a greater degree of flexibility should be offered in the range of uses that could provide on site in the event of Sainsbury's relocation.</i></p> <p><i>Sainsbury's is obliged to work with the council to prepare a joint development brief redevelopment of London Road and consider that as the majority of the site is within the primary shopping area the site would be best suited to be revised for town centre uses.</i></p>	The Opportunity Site related to Sainsbury's has been taken out of the SCAAP. The potential for redevelopment is acknowledged within the policy area. However it is acknowledged that the development of this site is particularly related to the redevelopment of the Roots Hall Site. For the site to be included in the Policy Area as an Opportunity site the Council would require evidence that can be presented to a Planning Inspector that there is a deliverable and viable scheme to be included in this version of the Plan.

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
Policy DP3	Environment Agency (Lindsay Black) [255]	1290	Support	DP3: Elmer Square Development Principles - Support the need to assess the surface water flood risk to the development site.	Noted. The Flood Risk Policy allows for this to take place.
Policy DP4	Stargas Nominees [279] (represented by BNP Paribas Real Estate (Miss Grace Sim) [246])	1390	Support	DP4: Queensway and Southchurch Avenue Development Principles - Principles We note that the proposals plan for the CAAP has been amended since our last representations. Subsequently, our client's site now falls within the Queensway and Southchurch Road Area, opposed to the High Street area, as it was previously. We note and support the Council's intentions for the Queensway and Southchurch Road Area as follows: * "To play a role in reinforcing the northern primary retail circuit with the High Street * and the Victoria Shopping Centre at its heart. * Reinforce Shouthchurch Road as a secondary shopping area and provide new * employment opportunities. * To provide new and improved residential accommodation. * To create an area where streets and public space reflect a vibrant and busy * residential and shopping district".	Noted. The SCAAP has been revised and the site is now in the High Street Policy Area. The development principles support a net increase in dwellings above existing or new commercial development as well as mixed use development with active ground floor frontages.
Policy DP4	Stargas Nominees [279] (represented by BNP Paribas Real Estate (Miss Grace Sim) [246])	1391	Comment	DP4: Queensway and Southchurch Avenue Development Principles - With regards to the Council's objectives for this area, we particularly support Council's intentions to provide new and improved residential accommodation in the Quarter, given that Chartwell House is located here, and has the potential for residential use, within a residential-led mixed-use development. In this regard we propose the site is identified as a site allocation for residential-led mixed use development. We are unclear why the Council has not progressed the previous proposal for this site, and as the site will come forward in the short-term, and there are clear market signals that the site will not attract major ongoing employment occupiers, we consider the Council needs to act positively with regard to this site and allocate it as promoted. By not doing so, the Council is failing to accord with national policy, by not: * seeking to make the most efficient and effective use of land; * prioritising previously developed land which is suitable for re-use; * [taking] a flexible, responsive supply of land; * considering whether sites that are currently allocated for industrial or commercial use could be more appropriately re- allocated for housing development. The CAAP could address these points and ensure consistency with National Policy by allocating this site as proposed.	It is noted that planning reference 14/00917/PA3COU has under the Town And Country Planning (General Permitted Development) (Amendment) (England) Order 2013 been granted prior approval of change of use of the existing building from office use class B1(a) to dwelling houses use class C3 under Class J. The Policy area have also been updated since the last version of the SCAAP and the Policy Area within which the site, Chartwell House, is now located is the High Street Policy Area, which recognizes the function of the Victorias as part of the Primary Shopping Area. The development principles of this Policy Area will apply when applications are considered. The development principles support a net increase in dwellings above existing or new commercial development as well as

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
					<p>mixed use development with active ground floor frontages.</p> <p>It should also be noted that not all potential development sites in the SCAAP area are allocated, but this does not prevent development coming forward and be considered against the principles set out within each Policy Area.</p>
Policy DP4	Environment Agency (Lindsay Black) [255]	1291	Support	DP4: Queensway and Southchurch Avenue Development Principles - Support the need to assess surface water flood risk to development site	Noted.
Policy DP4	Environment Agency (Lindsay Black) [255]	1292	Support	DP4: Queensway and Southchurch Avenue Development Principles - Support the need to assess surface water flood risk on the site in relation to the development proposals	Noted.
Policy DP6	Environment Agency (Lindsay Black) [255]	1293	Support	DP6: Clifftown Development Principles – We support the need to assess the surface flood risk on the site in relation to development proposals.	Noted.
Policy DP7	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1363	Comment	<p>DP7: Tylers Avenue Development Principles</p> <p>Objectives for Tylers Avenue Quarter:</p> <p>Para vii: It is important there is one public transport interchange where all central bus services call. Other interchanges can be developed but need to be accessed without a tortuous diversion away from the principal public transport corridors.</p> <p>Fourth bullet point: Is this a reference to the second stage of the Travel Centre? If so then it is vital the Travel Centre is all in one cohesive location.</p>	Noted. This is addressed within the SCAAP which provides flexibility to consider this. It will also be addressed in the Local Transport Plan. Any development in relation to the Travel Centre would be done in conjunction with service providers.
Policy DP7	Environment Agency (Lindsay Black) [255]	1294	Support	DP7: Tylers Avenue Development Principles – We support the need to assess surface water flood risk on the site in relation to development proposals	Noted.
415	Environment Agency (Lindsay Black) [255]	1295	Support	We support the objectives for the Central Seafront Area.	Noted.
430	Herbert Grove	1352	Comment	The tasteful development of Seaway Car Park could enhance the area but must not be over developed to the detriment of the current environment.	The development principles are detailed in the Central Seafront Area Policy. This seeks high quality design

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
	Residents (Mr Steve Tomlin) [115]				with good public realm. This approach is also outlined more generally in the Development Management Document and Core Strategy and Design and Townscape Guide.
Policy CS2	Environment Agency (Lindsay Black) [255]	1296	Support	CS2: Central Seafront Strategy Key Principles 1b, (ii & iii) support the need to consider these aspects at the outset of all schemes. 4) agree: Development must not be permitted south of the sea.	Noted. This approach is taken forward in the revised SCAAP although the Policy layout is slightly revised although the Waterfront Policy remains from the previous version, and specifically addresses this.
Policy CS2	Natural England (Mr Gordon Wyatt) [264]	1331	Support	CS2: Central Seafront Strategy Key Principles – Natural England supports this policy and, in particular, points 1a.vi, 1b, iii, 2b and 4.	Noted. This approach is incorporated into Policy CS1 Central Seafront Policy Area Development Principles and other supporting policies within that section.
437	Environment Agency (Lindsay Black) [255]	1297	Support	We support this paragraph as this covers the need for sequential and exception tests in order to justify any development in flood risk areas within the central seafront regeneration areas.	Noted. This is now incorporated into the Flood Risk Management and Sustainable Drainage Policy.
440	Environment Agency (Lindsay Black) [255]	1298	Support	We support this paragraph and the requirements of a flood risk assessment are as stated.	Noted. This is now incorporated into the Flood Risk Management and Sustainable Drainage Policy.
Policy CS3	Environment Agency (Lindsay Black) [255]	1441	Support	CS3: Flood Risk – Support paragraphs 3 and 4	Noted. This Policy is now in the Flood Risk Management and Sustainable Drainage Policy and referred in the Central Seafront Area Development Principles Policy.
Policy CS3	Environment Agency (Lindsay Black) [255]	1299	Object	<p>CS3: Flood Risk</p> <p>This plan is likely to be adopted after the publication of the NPPF which will render PPS25 invalid. The principles of development in flood risk areas are likely to remain the same. To future proof the policy specific reference to PPS25 could be removed in places.</p> <p><i>Suggest rewording to remove references to PPS25 where not necessary. This plan is likely to be adopted after the publication of the NPPF which will render PPS25 invalid. The principles of development in flood risk areas are likely to remain the same.</i></p> <p><i>PPS25 could be replaced with 'relevant national policy' where appropriate or 'as shown in the SFRA or Environment Agency flood maps'.</i></p>	Noted. Policy has been revised to reflect the NPPF and Planning Policy Guidance.

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
				<i>Point 2: Flood Zone 3b is not actually mapped in the SFRA along the seafront. I suggest this sub-paragraph is removed.</i>	
Policy CS4	Environment Agency (Lindsay Black) [255]	1300	Support	CS4: Nature Conservation and Biodiversity Development should not have an adverse impact on any protected sites. Support this policy	Noted. This Policy is now Policy CS2 Nature Conservation and Biodiversity in the revised SCAAP.
Policy CS4	Natural England (Mr Gordon Wyatt) [264]	1333	Object	CS4: Nature Conservation and Biodiversity Natural England is strongly supportive of this policy. However, in point 1, the words "appropriate assessment" should be replaced by "Habitats Regulations Assessment" in order to more accurately reflect the requirements of The Conservation of Habitats and Species Regulations 2010 (HRA is a two-stage process in which 'appropriate assessment' is the second stage and is only required if the first stage indicates that the proposed development is likely to have a significant effect). <i>In point 1, the words "appropriate assessment" should be replaced by "Habitats Regulations Assessment" in order to more accurately reflect the requirements of The Conservation of Habitats and Species Regulations</i>	Noted. SCAAP updated to reflect wording. This Policy is now Policy CS2 Nature Conservation and Biodiversity in the revised SCAAP.
Policy CS5	Environment Agency (Lindsay Black) [255]	1301	Support	CS5: The Waterfront – the final paragraph of the policy is important to ensure protection of the natural environment.	Noted. This remains in the Policy in the revised version of the SCAAP. This Policy is now Policy CS3 The Waterfront in the revised SCAAP.
Policy CS5	Natural England (Mr Gordon Wyatt) [264]	1334	Comment	CS5: The Waterfront – Natural England is generally supportive of this policy. However, any new or enhanced marine facilities as referred to in point 1b may potentially need to be restricted to seasonal usage if they are to comply with the final sentence of the policy.	Noted. This Policy is now Policy CS3 The Waterfront in the revised SCAAP.
Policy CS6	Natural England (Mr Gordon Wyatt) [264]	1335	Comment	CS6 Central Seafront Development Principles - Natural England is generally supportive of this policy subject to any new lighting as referred to in point 1e, iii being so arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore.	Noted. This would be addressed as part of the development of any lighting schemes. This will ensure that it doesn't have a detrimental effect on the environmental designations. This Policy is now Policy CS1 Central Seafront Area Development Principles in the revised SCAAP.
Proposal Site CS6a	Natural England (Mr Gordon Wyatt) [264]	1336	Comment	CS6a Southend Pier – Natural England is generally supportive of this policy; subject to any new lighting as referred to in point 1d being so arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore.	Noted. This would be addressed as part of the development of any lighting schemes. This will ensure that it doesn't have a detrimental effect on the environmental designations. The Pier is now an Opportunity Site within

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
					the Central Seafront Development Principles Policy.
473	Herbert Grove Residents (Mr Steve Tomlin) [115]	1353	Comment	The Seaway car park provides a buffer between the main entertainment areas of Southend and the Retail and Living spaces. Provision late night movement between the various areas must take the condition of pedestrians into account.	Noted. The SCAAP includes policy related to accessibility and legibility in the public realm in each Policy Area and will be considered as part of development within the Opportunity Sites including Seaway.
474	Herbert Grove Residents (Mr Steve Tomlin) [115]	1354	Comment	The access between St. Johns Church and The Palace Hotel is only a yard wide. There is no room for increased access without damage to one of these important buildings.	The buildings in this locality would be considered as part of any scheme that was put forward – this would take into account the heritage assets and their preservation.
Proposal Site CS6b	Herbert Grove Residents (Mr Steve Tomlin) [115]	1310	Support	Proposal Site Policy CS6b: Seaway Car Park and Marine Parade In Milton Ward the site of the Rossi Factory already owned by the Council is an ideal site. Also if the Royals Car park was put under ground then an exhibition hall and a tall residential tower could go onto the site.	Noted. This site is now included in the Central Seafront Area Development Principles Policy. This would be a consideration for the owners of the Royals and would need to be subject to cost benefit analysis. Any development would need to adhere to the principles in the SCAAP for that area.
Proposal Site CS6b	Herbert Grove Residents (Mr Steve Tomlin) [115]	1311	Support	Proposal Site Policy CS6b: Seaway Car Park and Marine Parade Some space in the Seaway car park should be left open to allow views on the sea from the Queensway. The bandstand currently in Priory Park could be put there bringing it back as an attraction to central Southend.	Noted. This would be considered as part of any development proposals and brief. The site would need to adhere to the development principles in the SCAAP policy for the Seafront Policy Area and associated Opportunity Site which included Seaway. This site is now included in the Central Seafront Area Development Principles Policy
Proposal Site CS6b	Herbert Grove Residents (Mr Steve Tomlin) [115]	1312	Comment	Proposal Site Policy CS6b: Seaway Car Park and Marine Parade The Seaway Car Park is on a hill which makes it unsuitable for retail. People do not like to shop on hills, no body walks up hill when a lift is available at the pier.	Noted. This would depend on the accessibility and legibility of the site. Nevertheless the primary focus for retail development is in the town centre and in particular the High Street Policy Area. This site is now included in the Central Seafront Area Development Principles Policy
Proposal Site CS6b	Herbert Grove	1343	Comment	Proposal Site Policy CS6b: Seaway Car Park and Marine Parade	Noted. This would depend on the accessibility and legibility of the site.

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
	Residents (Mr Steve Tomlin) [115]			When looking at development area CS6b on a map it appears to have many attractions, however it should be emphasised that the entire site is on a hill and retail developers prefer level sites with adjacent ground level car parks. The drop from the High Street to Marine Parade through the Seaway Car Park is over 40 feet.	Nevertheless the primary focus for retail development is in the town centre and in particular the High Street Policy Area. This site is now included in the Central Seafront Area Development Principles Policy
Proposal Site CS6b	Environment Agency (Lindsay Black) [255]	1302	Support	CS6b: Seaway Car Park and Marine Parade support the wording 'All development will be required to demonstrate how flood risk has been taken into account and the measures which have been taken to mitigate against it if required.' This should be done through the provision of an adequate Flood risk assessment.	Noted.
Policy CS7	Environment Agency (Lindsay Black) [255]	1303	Comment	CS7: Western Esplanade, The Cliffs and Shrubbery – 4b native species planting should be encouraged	Noted. This will be encouraged as part of landscaping and public realm improvements.
Policy CS7	Natural England (Mr Gordon Wyatt) [264]	1337	Object	CS7: Western Esplanade, The Cliffs and Shrubbery Natural England is generally supportive of this policy; subject to any new lighting being so arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore. c (HRA is a two-stage process in which 'appropriate assessment' is the second stage and is only required if the first stage indicates that the proposed development is likely to have a significant effect). <i>Natural England is generally supportive of this policy; subject to any new lighting as referred to in point 4.e being so arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore. The reference to "appropriate assessment" in point 2.b should be replaced by "Habitats Regulations Assessment" in order to more accurately reflect the requirements of The Conservation of Habitats and Species Regulations 2010 (HRA is a two-stage process in which 'appropriate assessment' is the second stage and is only required if the first stage indicates that the proposed development is likely to have a significant effect).</i>	Noted. Wording has been revised appropriately. This would be addressed as part of the development of any lighting schemes. This will ensure that it doesn't have a detrimental effect on the environmental designations. The Policy has been now been incorporated in the Central Seafront Policy Area Development Principles in the revised version of the SCAAP.
Proposal Site CS7a	Natural England (Mr Gordon Wyatt) [264]	1338	Comment	CS7a Cultural Centre and New Southend Museum – Natural England is generally supportive of the proposals for a Cultural Centre and New Southend Museum. Every effort should be made to minimise the severance of green infrastructure	Noted
Policy CS8	Environment Agency (Lindsay Black) [255]	1304	Support	CS8 Eastern Esplanade and City Beach Gateway – support the paragraph 'Proposals for Seafront development along Eastern Esplanade will need to demonstrate that there will be no unacceptable impact upon navigation, biodiversity, flood risk or the special character and designations	Noted. This is now incorporated in the revised SCAAP in Policy CS1 Central Seafront Area Development Principles and Policy CS2 which addressed

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
					biodiversity. In addition Flood Risk Management is addressed in Policy DS4.
Policy CS8	Natural England (Mr Gordon Wyatt) [264]	1339	Comment	CS8: Eastern Esplanade and City Beach Gateway – Natural England is generally supportive of this policy – subject to any new lighting as referred to in point 8b being so arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore.	Noted. Wording has been revised appropriately. This would be addressed as part of the development of any lighting schemes. This will ensure that it doesn't have a detrimental effect on the environmental designations. The Policy has now been incorporated in the Central Seafront Policy Area Development Principles in the revised version of the SCAAP.
Proposal Site CS8a	Environment Agency (Lindsay Black) [255]	1305	Comment	Proposal Site Policy CS8a: Woodgrange Drive (Kursaal) Estate Support point 2) Flood risk must be managed appropriately through an adequate FRA.	Noted. This will be address within the development principles of the Central Seafront Policy Area and the Opportunity Site. In addition it will be addressed through the Flood Risk Management and Sustainable Drainage Policy.
Proposal Site CS8a	Environment Agency (Lindsay Black) [255]	1442	Comment	Proposal Site Policy CS8a: Woodgrange Drive (Kursaal) Estate Point 3) Water efficiency measures should also be included alongside energy efficiency. Achieving a minimum of level 3 of the code for sustainable homes should be referred to, in line with Core Strategy policy CP4 and Development Management policy DM2.	Note. This Policy has been revised to reflect the changes to Building Regulations. Water efficiency is addressed in the Development Management Document.
515	Stock Woolstencroft (Mr Owen O'Carroll) [272]	1368	Support	<p>Landowners at Victoria Avenue are in the process of joining together as a consortium to promote the comprehensive regeneration and redevelopment of their properties. The consortium supports the overall objectives of the Southend Central Area Action Plan (AAP) and the identification of the Victoria Gateway Neighbourhood as a key area for regeneration.</p> <p>In relation to the proposed AAP policies, the consortium has not had the opportunity, within the Proposed Submission consultation period, to provide a joint response . The consortium intends to actively contribute to the production of the AAP and will provide further comments in due course. We would request that the Council considers our consortium as a key stakeholder within the town centre and we would certainly wish to engage with the Council at all future stages of development of the AAP.</p>	Noted. The Council will welcome engagement with the consortium during development of the SCAAP.
Policy DP9	Arriva Southern Counties (Mr	1365	Support	DP9: Victoria Gateway Neighbourhood Development Principles	Noted. Unfortunately the Council has not been able to continue with SERT as

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
	Malcolm Spalding) [270]			Para 8a: Support the priority route for sert. Schedule 1: Part B Policies:	funding has not been allocated. Nevertheless the Council will explore other options for public transport as part of planning policy document and the Local Transport Plan.
Proposal Site PS9c	Sainsbury's Supermarkets LTD [268] (represented by Indigo Planning Ltd (Mr Sean McGarth) [185]	1356	Support	Proposal Site Policy PS9c: Roots Hall Football Ground and Environs support	Noted.
Proposal Site PS10a	Sainsbury's Supermarkets LTD [268] (represented by Indigo Planning Ltd (Mr Sean McGarth) [185]	1357	Object	<p>Policy PS10a: Former B&Q Site</p> <p>We consider that proposal site policy ps10a is unsound as the allocation is not effective nor justified and it would compromise the deliverability of the AAP as a whole by using up all the network capacity for the medium/long term and preventing schemes such as the redevelopment of roots hall which has outline consent and relocation of Sainsbury's from London round coming forward.</p> <p><i>We consider that in order to make the central area action plan sound then Proposal Site Policy PS10a should be removed, as its present allocation comprises the deliverability of the rest of the Central Area Action Plan.</i></p>	The Opportunity Site has been removed as there is a long term lease on the site for a business known as The Range. There has been no indication that the site will be built out for convenience retail in the short to medium term.
Proposal Site PS10a	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1366	Comment	<p>Policy PS10a: Former B&Q Site</p> <p>Former B&Q site: Vital the effects of any redevelopment of this site and any subsequent junction works can be accommodated within the capacity of the highway network on Queensway. Recent experience in this area has seen significant levels of congestion.</p>	Opportunity Site has been removed from the Plan. There is a long term lease on the site for a business known as The Range. There has been no indication that the site will be built out for convenience retail in the short to medium term.
580	Southend Properties (Guernsey) Ltd (Mr Ivan Walsh) [262]	1273	Comment	<p>Whilst we continue to support the redevelopment of Southend and in particular the Victoria Avenue corridor, following our receipt of the document we write to raise our objection to the following inclusion. PAGE 163, Para 2 reads "Project Heath & Carby, investment required £3.78m, description Purchase and enabling works of redundant office buildings at northern end of Victoria Avenue in order to kick start the provision of new housing, Outputs delivered 250 units total comprising 50 social rented and 50 intermediate units."</p> <p>This statement gives the impression that the council; is looking to the compulsory purchase of Heath House and Carby House for a sum not in line with our expectations with an end goal of</p>	Noted. These references have been removed from the revised SCAAP.

Policy, para or section	Respondent Name [No]	Rep No	Object/ Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
				delivering a reduced residential mix. Given our current planning permission for 280 residential units, current project expenditure and current committed works, we find the statement misleading. If the Council has a serious interest in purchasing these two development sites we request that you contact us first in writing with a suitable purchase offer. We therefore ask that the statement on page 163 be removed from the SCAAP.	
607	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1367	Comment	Schedule 1: Part B Policies: Page 190: Modal Split: Suggest in Target and Dates column this should include completion of priority measures on the A13 mentioned in Bus reliability section on page 189.	Noted. Targets will be developed in line with stakeholders during preparation of the SCAAP.
Proposal Map	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1361	Comment	Proposals Map Suggest the SERT route should be on the Proposals Map.	SERT has not been included as funding has not been allocated for it.
Proposal Map	Stargas Nominees [279] (represented by BNP Paribas Real Estate (Miss Grace Sim) [246])	1389	Comment	<p>Proposals Map Proposal Site Policies</p> <p>As per our previous representations, we remain of the opinion that Chartwell House is suited to residential led mixed-use development.</p> <p>We note that the AAP includes a number of Proposals Sites and Policies, such as Proposals Site 'PS4a: Queensway House and adjacent buildings', which is located immediately to the west of Chartwell House in the Queensway and Southchurch Road Area. This proposal site is designated for additional housing and a new commercial development, including office and secondary retail uses together with community facilities. We consider that Chartwell House has the potential for more efficient and effective uses on its site. However, without an allocation, the certainty that comes with an allocation and opportunity to secure the alternative uses proposed are reduced.</p> <p><i>In this regard, we request that the site is included within the AAP as a proposals site for a high-density residential and/or residential-led mixed use redevelopment.</i></p>	<p>It is noted that planning reference 14/00917/PA3COU has under the Town And Country Planning (General Permitted Development) (Amendment) (England) Order 2013 been granted prior approval of change of use of the existing building from office use class B1(a) to dwelling houses use class C3 under Class J.</p> <p>The Policy area have also been updated since the last version of the SCAAP and the Policy Area within which the site, Chartwell House, is now located is the High Street Policy Area, which recognizes the function of the Victorias as part of the Primary Shopping Area. The development principles of this Policy Area will apply when applications are considered. The development principles support a net increase in dwellings above existing or new commercial development as well as mixed use development with active ground floor frontages.</p> <p>It should also be noted that not all potential development sites in the</p>

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Representation (Summary of Original Submission) and Respondents Suggested Changes to Plan [<i>in italics</i>]	Response
					<p>SCAAP area are allocated, but this does not prevent development coming forward and be considered against the principles set out within each Policy Area.</p> <p>As such the site has not been included on the Proposals Map.</p>

Appendix 10: Summary of issues raised through consultation on the Issues and Options SCAAP (June – August 2010)

Development Management

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

Green Space and Biodiversity

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

The Historic Environment

The need to preserve and enhance the quality of the Historic Environment within the central area, in particular the Conservation Areas and Listed and Locally Listed Buildings.

The unique Victorian and Edwardian streetscapes and vistas within the central area need to be carefully preserved, both short and long views.

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

Public Realm

The AAP should include a framework for Public Realm and Environmental Improvements / Enhancements within the Central Area.

The rear of the Odeon building currently does little to support the attractiveness or vibrancy of the Victoria Gateway Area, and actions could be taken to improve this.

Transport and Access

Rather than depending on LTP3, the AAP should include some markers to maximise travel choice and encourage sustainable travel to work patterns.

Parking is a major problem, it has to be provided off road for all new build and future conversions. The paid for town centre car parks and on street parking should be for visitors and shoppers, workers car parking should be provided within a short walk and permits for residents to park on street should be phased out in central town centre areas.

The Seafront

A planning framework should be produced for the seafront, including the need to integrate the Quarters to provide a comprehensive strategy for development in the area.

The St Johns, Central Seafront and Eastern Esplanade Quarter do not form, nor are planned to be, a coherent Central Quarter and this issue must be addressed by the AAP.

The regeneration of the Golden Mile should be achieved with minimal intervention. The continuity of the Golden Mile is a key component of its vitality, vibrancy and attraction and should be retained.

The determination of the boundaries of each of the Quarters splits sites and will be difficult to interpret on the ground, and this issue needs to be addressed within the AAP.

Town Centre and Retail

With Southend town centre remaining the first preference for all forms of retail development and for other town centre uses, Town centre and prime retail frontages should be clearly defined on a proposals map.

The extension of the retail area of the central area to both the east and west is unlikely to resolve the issues affecting the central area, particularly when it is questionable whether any additional retail space is required.

Land Uses

The AAP should be specific in terms of land uses that could be brought forward through the proposals sites.

The Primary School Sites in the Central Area are all on tight sites with well below the minimum site area for the number of pupils. Additional land would relieve this pressure if available.

Tall Buildings

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

Housing

Housing density is not necessarily the problem, it is the quality that needs to be improved.

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

Gateway Neighbourhoods

The focus on protecting existing employment areas from loss in Gateway Neighbourhoods may only be necessary in part. Not all employment areas are in suitable location and cause inconvenience to residents and hold back residential improvement of streets/areas.

The character of each of the main Gateway Neighbourhoods identified are very different and each face different local issues and challenges. Each should therefore be separately assessed and have a separate policy approach.

The Quarters

The AAP will need to address the issue of an oversupply of outdated and poor quality office space.

Reference is made to the provision of a new library, it is not clear where this is to be or why the existing library needs replacing.

Promoting town centre living for families could be difficult on a number of levels including the noise, lack of parking, potential absence of homes with adequate private amenity space.

Given the constrained nature of the High Street the identification of the former B&Q site for a large foodstore is in accordance with an identified need, and will provide a second anchor at the northern end of the High Street. This approach should be taken forward.

The Development Brief for Warrior Square will need to make provision for suitable replacement of existing car parking provision as part of the proposed development of Warrior Square, or elsewhere within the town centre.

It is not clear how parking requirements for the Clifftown Quarter will be met and also how the network of lanes/mews will support deliveries to business premises.

The removal of all units, except for quality buildings, in the St Johns, Central Seafront and Eastern Esplanade quarter is unlikely to be viable in the current market and a more

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

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

Flood Risk

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

SA/SEA

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

Implementation and Monitoring

There is a need for an implementation and monitoring strategy.

The success of the 'City by the Sea' option will be dependent on the strength and effectiveness of, and continued commitment to, the implementation and delivery mechanisms which should be further elaborated on in the final document.

Appendix 11: Response to the issues raised through consultation on the Issues and Options SCAAP (June – August 2010)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7.5 Elmer Square

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Addressing biodiversity, green space provision and the green grid

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

