



HEARING STATEMENT

Project Title: Southend Central Area Action Plan (SCAAP)

Date: 4 May 2017

MATTER 6: INFRASTRUCTURE, DELIVERY AND MONITORING

RESPONSE BY THE STOCKVALE GROUP

6.1 Are the key infrastructure providers signed up to the Infrastructure Delivery Plan (IDP)?

1 This question appears to be aimed at the Council.

6.2 Are there any showstoppers in the IDP?

2 The CIL charging schedule has been adopted after being approved by an Inspector, which included the IDP. The only real issue that could be regarded as a 'showstopper' relates to Southend not getting the funding they envisaged from grants etc which could have implications on deliverability.

6.3 What is the critical path for securing the effectiveness of the SCAAP?

3 Before the SCAAP can be taken much further there needs to be further work on the Plan's evidence base. RPS has identified a number of significant issues with the evidence base, and in particular the Steer Davies Gleave Parking Study, the conclusions of which have influenced a number of policies, particularly DS5 and the site specific policies. We have set out in our representations the extent to which this is impacting on policies within the SCAAP, and how it would have a far-reaching effect on the future of the seafront tourism industry. This has been of great concern to seafront operators for some time now, and businesses will not be satisfied with the Plan until these issues have been rectified. The RPS Transport Technical Note, that was submitted with our representations, explains in more detail these shortcomings.

4 Until this has been resolved satisfactorily resolved, we do not consider that the Plan can be adopted as it will not have the confidence of the business community. We estimate that this will take a large part of 2017 to get right as surveys will need to be undertaken in the peak periods so that a robust evidence base can be assembled that will allow policies to be considered and amended. It is possible that some policies will have to change substantially, or even be withdrawn, when this work is undertaken. RPS's representations show the types of issue that are emerging, and certainly a number of development site allocations will need to be substantially amended. But we must make clear that, on receipt of a robust amended parking survey that correctly identifies the issues, Stockvale may wish to review its comments on the policies and the changes that we have suggested may no longer be appropriate. However, our approach has been to try and be as helpful as we can in setting out the likely changes that will need to be made.

- 5 It is unlikely, in our view, that the Plan could be adopted within the next 12 months, although Spring 2018 would be our best estimate.
- 6 This is concerning because Paragraph 6 of the SCAAP states that the SCAAP is considered to be an important catalyst and driver for inward investment and for the delivery of the remaining proportion of planned regeneration and growth in the Southend Central Area to meet or exceed Core Strategy targets up to 2021. Similarly, Paragraph 223 states: “The SCAAP proposals are expected to come forward within 5 years, the plan period to 2021.”
- 7 If the Plan is not adopted until 2018, this would only give it three years in which to operate, which is not really long enough for any of its key policies or development proposals to be delivered.
- 8 As stated in Paragraph 222, the SCAAP proposes 11 opportunity sites, some with complex land issues (some with multiple land ownerships), and many that will need to be considered carefully to ensure that the operation of the seafront area is not harmed. There will probably need to be substantial conditions and potentially complex Section 106 agreements to ensure they are delivered in a way that benefits the town as a whole. In our view, Paragraph 223 is unrealistic and it is highly unlikely that many of these sites will come forward within the next four years. Table 5 of the SCAAP provide more detail on the various sites, and we will cover these below, but the indicative phasing within this Table seems unrealistic.
- 9 We cover some of the specific sites under the question below.
- 10 Given the difficulties being experienced with the current version of the SCAAP, and the very short timescale in which it is expected to operate, it would make sense to focus efforts on a new version of the Local Plan. As Paragraph 223 states: “Preparation of the Local Plan will act as an early review of the SCAAP and will consider all development sites over a longer time period.” It would seem to be a much better use of resources to go straight to the preparation of the new Local Plan and take forward the draft proposals of the SCAAP within this Plan, taking into account the points that have been raised by respondents to the SCAAP.

6.4 What is the likelihood of implementation within the plan period of the following key developments within the plan area: PA3.1; 4.1; 7.1; 8.1; 8.2; 9.1; 9.2 and CS1.1; 1.2; 1.3; and 1.4.

- 11 We make comment on three specific sites.
- 12 PA7.1 is a retail and residential-led development at Tylers Avenue. It may include a new public transport interchange. The land is owned by Southend Borough Council. Table 5 expects this site to be delivered by 2021, but a number of significant risks are identified in the Monitoring schedule. The SCAAP states that alternative parking/additional parking will be found on site or nearby. We understand that a multi-storey car park will be built, although there is a proposal to move the bus garage and put in additional commercial development as well. In our view, this is unlikely to be delivered within the Plan period.
- 13 CS1.2 is the redevelopment of the main seafront car park, Seaways, owned by Southend Borough Council, but we understand that it is now controlled by a developer. This is a very large development, which will take a number of years to bring forward. As with PA7.1, Table 5 expects it to be delivered by 2021, which seems highly ambitious, if not unrealistic. We understand that there is a deal in place with a potential developer, but we are not clear about the extent to which plans have been drawn up, level of tenant interest, viability and current timetable. In Policy CS1 this site is shown as a “New Allocation”, which effectively means little or no progress has been made. In addition to this, there are the serious

concerns about the ability of this car park to continue to serve the seafront if the proposals set out in the SCAAP are implemented. The scheme also appears to involve highway land, and will undoubtedly require a very complex S106 agreement in order to deliver it. This does not appear to be a scheme that can reasonably be expected to be delivered within the Plan period.

- 14 CS1.3 is the redevelopment of the 'Dizzyland' car park opposite the Kursaal, which is now known as Marine Plaza. This is a private car park with 200 spaces that has operated for well over 10 years, and we understand is the subject of a current lawful development certificate application confirming its lawful status as a car park. Planning permission was granted for the redevelopment of this site in 2015, but this has not yet been commenced. It is not known why the permission has not been implemented, but this is normally a viability issue. It is possible that this site could be completed by the end of the Plan period, if the currently permitted scheme is implemented. If the applicant seeks changes prior to implementing, then it may not be complete by the end of the Plan period.

6.5 Which schemes are likely to require compulsory purchase orders and/or Section 106 contributions?

- 15 All three sites listed above are likely to require Section 106 contributions or other obligations.

6.6 How will the monitoring arrangements work? Should this matter be addressed by a policy in the SCAAP? (This applies to the plan as a whole, not just infrastructure.)

- 16 In our view this should be addressed in a policy. At the present time, the grouping of sites together in the Monitoring schedule at the end of the Plan makes it difficult to understand which issues relate to which specific site. It would be clearer if each site was shown individually.

6.8 In the light of the trends set out in Topic Paper 4 (Deliverability), how easily could the SCAAP be knocked off course by future economic trends at a regional or national level?

- 17 The BNP Paribas report suggests that the developments proposed in the SCAAP are viable. However, it is clear that build costs are increasing and affordable housing contributions could render some of the schemes marginal. I note that the Council is stating that it will treat its affordable housing policies flexibly, which should help. However, if schemes have planning permission but cannot be implemented because of viability issues – affordable housing or other issues – then it is going to require renegotiation of Section 106 agreements. This can create delay in bringing forward schemes.
- 18 One example of a scheme that has planning permission but has not been commenced is Marine Plaza. It is not clear why this development has not moved forward, but viability is normally the reason. There may need to be an amendment to the planning permission or a renegotiation of the Section 106 agreement to enable this project to move forward.