

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 16 December 2016 10:16  
**To:** LDF  
**Cc:** [REDACTED]  
**Subject:** RE: Southend Central Area Action Plan - Revised Proposed Submission Consultation November 2016  
**Attachments:** P16-1409 - Southend on Sea AJB 16.12.16.pdf; Sutton Road Sales Particulars 2015.pdf  
**Importance:** High

Dear Sir/Madam,

Further to my e-mail of yesterday in which I enclosed representations on behalf of The Co-operative Group, we have noted an error in the version that was circulated to you. We have now corrected this and we would be grateful if you could swap those submitted yesterday with the version attached.

We apologise for any inconvenience caused.

I would be grateful if you could confirm that this request has been actioned.

Kind regards,

**Alex Bullock**

Principal Planner

**Pegasus Group**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

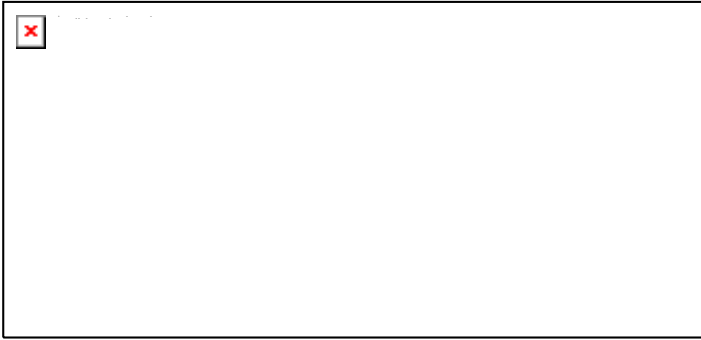
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Cert no. FS 577092



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**From:** [REDACTED]  
**Sent:** 15 December 2016 12:36  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Southend Central Area Action Plan - Revised Proposed Submission Consultation November 2016

Dear Sir/Madam,

On behalf of our clients The Co-operative Group, I am pleased to attach to this e-mail a copy of our representations in relation to the Southend Central Area Action Plan consultation which runs until the end of tomorrow.

Copies of our comments on the relevant sections of the document have also been submitted via the online portal.

Please kindly confirm safe receipt of this e-mail.

Kind regards,

**Alex Bullock**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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**From:** Southend-on-Sea Borough Council <southend@jdi-consult.net>  
**Sent:** 15 December 2016 12:39  
**To:** [REDACTED]  
**Subject:** Representation received. ID:2535

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Pegasus Group (Bristol) (Mr Alex Bullock),

Thank you for your representation which we received as follows:

The Co-operative Group [653] represented by Pegasus Group (Bristol) (Mr Alex Bullock) [652] Representation ID: 2535

Document: Southend Central Area Action Plan (SCAAP) - Revised Proposed Submission 2016

Section: Policy PA9: Sutton Gateway Neighbourhood Policy Area Development Principles

Support/Object: Support

Please see the attached letter.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

AJB/P16-1409

16 December 2016

FAO Business Intelligence Officer  
Department for Place  
Southend-on-Sea Borough Council  
PO Box 5557  
Civic Centre  
Victoria Avenue  
Southend-on-Sea  
Essex  
SS2 6ZF

**BY E-MAIL ONLY**

Dear Sir/Madam

**Southend Central Area Action Plan (SCAAP) Revised Proposed Submission  
(November 2016)  
53-57 Sutton Road, Southend-On-Sea, Essex**

Pegasus Group are writing on behalf of The Co-operative Group in relation to land which they own at 53-57 Sutton Road, Southend-on-Sea. This site is identified within the SCAAP Proposed Submission document as Opportunity Site PA9.2: Guildford Road. This letter and enclosed attachments set out The Co-operative Group's formal response to the current consultation.

Examining Local Plans

The National Planning Policy Framework (NPPF) at paragraph 182 sets out that a local planning authority should submit a plan (including Area Action Plans) for examination where it considers them to be "sound". The paragraph goes on to outline that for a plan to be considered sound it must be demonstrated that it is:

- **Positively prepared**
- **Justified**
- **Effective**
- **Consistent with national policy**

These representations have been prepared with these 'tests' in mind and where necessary specific reference is made to these tests.

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## SCAAP

The SCAAP is considered by Southend-on-Sea Borough Council (the Council) to be a key driver in stimulating investment and for the delivery of the remaining planned regeneration by 2021. This includes the following targets:

- 2,474 additional dwellings
- 7,250 additional jobs

The SCAAP aims to develop a 'City by the Sea' and central to this is its vision that Southend will be:

*"A prosperous and thriving regional centre and resort, it will be an area that is vibrant, safe and hospitable, rich in heritage, 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."*

In order to deliver this vision, the SCAAP breaks down the Central Area into a series of sub-policy areas. For the purposes of these representations the focus is on the Sutton Gateway Neighbourhood (PA9).

### Housing

The Core Strategy requires at least 2,474 net additional dwellings to be delivered (Policy CP8) within the Southend Central Area by 2021. Table 1 of the SCAAP seeks to break this figure down by sub-policy area.

In the case of Sutton Gateway Neighbourhood, it identifies that a minimum of 211 dwellings should be delivered. 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.

A series of Opportunity Sites (proposed allocations) are identified within Table 5. The land which our client controls is identified within this table as Opportunity Site PA9.2 with an indicative delivery of 50 units.

### Sutton Gateway Neighbourhood Policy Area

The SCAAP identifies its aim for the Sutton Gateway that the area will be:

*"regenerated, with high quality, sustainable buildings helping to restore the urban grain, creating a distinctive sense of place where people are proud to live and work. It will be supported by a thriving local shopping parade on Sutton Road."*

This vision is intended to be delivered through 'Draft Policy PA9: Sutton Gateway Neighbourhood Policy Area Development Principles'. This policy identifies the proposed allocation of PA9.2: Guildford Road and states that:

*"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."*

The Co-operative Group **supports** this proposed allocation in principle. As conveyed to the Council during pre-application discussions (and previous representations to earlier rounds of consultation) the site is significantly under-utilised. Paragraph 220 of the SCAAP notes that the upper two levels of the three storey building are vacant. 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 which is overly generous for the requirements of the convenience store. We consider that a comprehensive redevelopment of the site, including the car park area can result in scheme which delivers high quality, sustainable development.

Whilst The Co-operative Group supports this allocation in principle there are however a couple of detailed aspects of the policy wording that The Co-operative Group would wish to see amended as the Plan progresses.

#### 'Replacement convenience store'

Firstly, Paragraph 3ii notes the Council's support for the redevelopment of this site "to achieve a replacement convenience store". We are concerned that such a statement is too vague and imprecise and could be interpreted as necessitating a like for like replacement. It is not clear what the Council is seeking.

Whilst we acknowledge that the site is located within an area of secondary shopping frontage (Policy DM13<sup>1</sup>: Secondary Shopping Frontage), this should not necessitate the retention of like for like floorspace. The Co-operative Group would like flexibility within the policy in terms of size of any replacement retail floorspace i.e. to provide opportunity to increase or decrease the size compared to what is currently present.

The Co-operative Group agrees that the current arrangement sees the entrance facing rearwards and that a comprehensive re-development of the site could create a more active street frontage. The Co-operative Group see this enhancement as being of more fundamental importance in this location than a like for like replacement.

We therefore 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. This does not have to be of equivalent size to the existing store."*

We consider at present the policy cannot be considered to be either **justified** or **effective** if it is intended to requiring a like for like replacement.

#### 'façade of the current building'

Secondly, The Co-operative Group is concerned that the wording of paragraph 220 and Policy PA9(ii) will necessitate the retention of the existing façade, in any circumstance.

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<sup>1</sup> Development Management Document (July 2015)

The site is not located within a defined Conservation Area and the building itself is not listed either nationally or locally.

The SCAAP at section 4.9 identifies landmark buildings which are described as buildings which “*may become, a point of reference because of its positive contribution to place making*”. This site, and its buildings, are not identified within this category. Accordingly, the facade has not been considered of value to be protected by other policy.

As currently worded, the policy requires that the facade must be retained. This results in an unnecessary constraint which would reduce the flexibility associated with any redevelopment of this site. We 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.

We would therefore request the following amendment:

*“The façade of the current building fronting onto Sutton Road **should preferably** be retained subject to viability and architectural/engineering constraints.”*

Without this amendment we are concerned that this element of this policy is **not justified** as per the requirements of Paragraph 182 of the NPPF.

*Amenity open space, urban greening and sustainability measures.*

Thirdly, the final sentence of 3(ii) states that:

*“The scheme should also incorporate amenity open space, urban greening and sustainability measures.”*

We consider that this wording 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 development management policies within the Development Plan. 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.

## **Summary**

The Co-operative Group **support** the proposed allocation of 53-57 Sutton Road for mix use development. They own the freehold of the site and are therefore in control of its future. They 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 (see enclosed details at Appendix 1).

## **APPENDIX 1 – MARKETING BROCHURE**

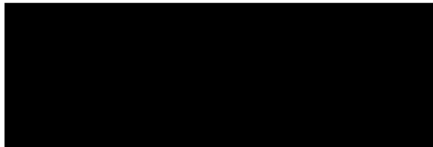
As a result of this exercise the Co-operative Group have been in discussions with a number of developers.

Whilst The Co-operative Group has general support of the allocation, as identified above they have concerns with the detailed wording of the policy in relation to:

- Requirements for a replacement foodstore.
- Retention of the façade.
- Other policy requirements.

We have set out above our proposed suggestions and can confirm that The Co-operative Group would be keen to work with the Council to ensure that any policy allocation for this site is both **justified** and **effective**. There is a concern that the SCAAP may not be found sound and The Co-operative Group request that our suggestions are incorporated into the SCAAP to address this concern.

Yours faithfully



**Jonathan Rainey**  
**Director**



enc.





On the instructions of **The co-operative**

Mixed use retail and residential opportunity (STP)

0.37 hectare (0.91 acre)

Prominent corner position on Sutton Road, with return frontage onto Guildford Road

Offers invited for freehold; with leaseback opportunity for ground floor



## Location

The property is located on the west side of Sutton Road (B1015) which provides direct access to the Queensway roundabout (A13).

Southend Victoria Train Station is located circa 0.4 mile to the southwest and the High Street is a further circa 0.2 mile beyond. Journey time via rail is approx. 1hr 10m to London Fenchurch Street.

Southend-on-Sea has a residential population of circa 173,600 (2011 Census).

## Description

The 0.37 hectare (0.91 acre) site comprises a three storey building and associated surface level car parking. The building fronts onto Sutton Road and comprises a Co-op food store at ground floor. The first and second floors are currently vacant. The car park and service yard is located to the rear of the store accessed directly from Guildford Road.

Sutton Road comprises a mix of uses however the surrounding area is largely residential.

It is not within a conservation area and the building is not listed, however, interested parties should satisfy themselves on the site and building's current status.

## Planning

A pre-app meeting has been held with Southend-on-Sea Borough Council and a copy of the council's response is available upon request.

Interested parties are advised to make their own planning enquiries in respect of the site.

## Tenure and Deal Structure

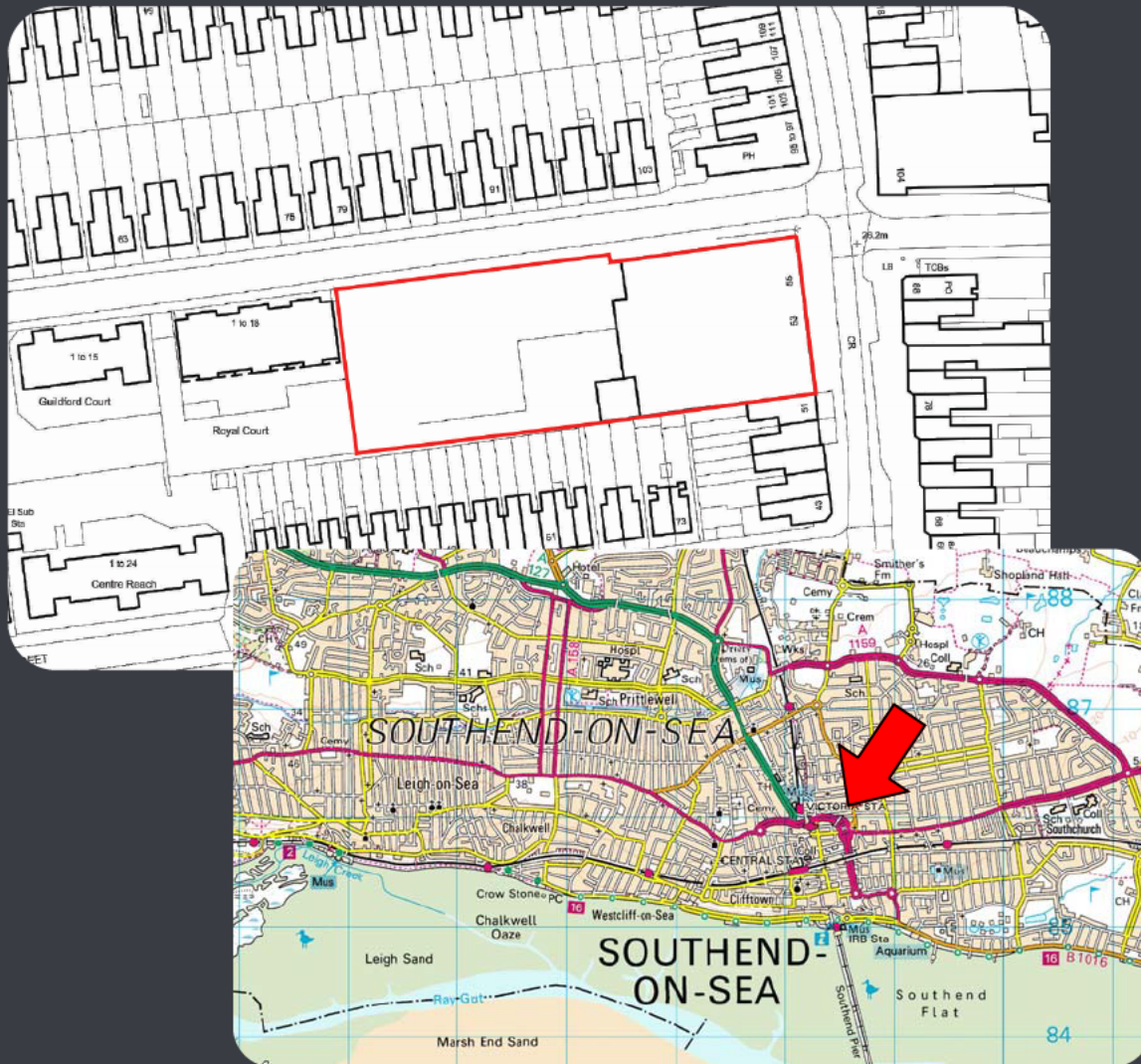
The site is available freehold however the Co-op would like to retain an option to occupy any ground floor retail unit provided as part of the scheme. It is envisaged that the site will accommodate a mixed use development with retail at ground floor and residential above. Some indicative schemes have been drawn up for the purposes of a pre-application submission and these are available in the information pack.

The Co-op propose to take a leasehold interest of a food store in the ground floor comprising approximately 7,000 sq ft GIA. Detailed lease terms would need to be agreed but the standard lease term is 15 years with five yearly rent reviews.

## Energy Performance

Energy Performance Asset Rating - D.





### Offers

We are seeking subject to planning offers for the freehold interest.

Offers should be submitted on two bases:

- a) Assuming the Co-op take a leaseback on the ground floor
- b) Assuming the Co-op do not take a leaseback on the ground floor

**Closing date for offers is 12 noon on Friday 10 July 2015.**

### VAT

All figures quoted are exclusive of Value Added Tax which will be charged at the prevailing rate.

### Viewing

The site is visible and accessible from the main road and informal inspections can be undertaken on this basis. Access to the rear of the store and upper floors is available by appointment through sole agents.

### Information Pack

Further information is available upon request including copies of initial sketch layouts, pre-application submissions and additional technical information and reports.

### Contact

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Alun Jones

07917 536612

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