

## Representation Form

### Southend Central Area Action Plan (SCAAP) Revised Proposed Submission 2016

This form has two parts -

Part A - Personal Details

Part B - Your representation(s)

Customer Contact Centre

16 DEC 2016

Time 15:36

### Completing this Response Form

Please complete this form and submit it to the Council.

Your comments will be used to check the plan is the most appropriate for the area at an independent examination. Paragraph 182 of the National Planning Policy Framework sets out more detail.

All comments must be supported by your full name and address. As this is a statutory stage of consultation, no late comments can be accepted.

We are legally required to publish comments received as part of the consultation for public inspection and keep these records on our files for the purpose of the Local Plan. By submitting, you consent to your information being disclosed to third parties for this purpose.

Please return completed form(s) to Department for Place to the address below:

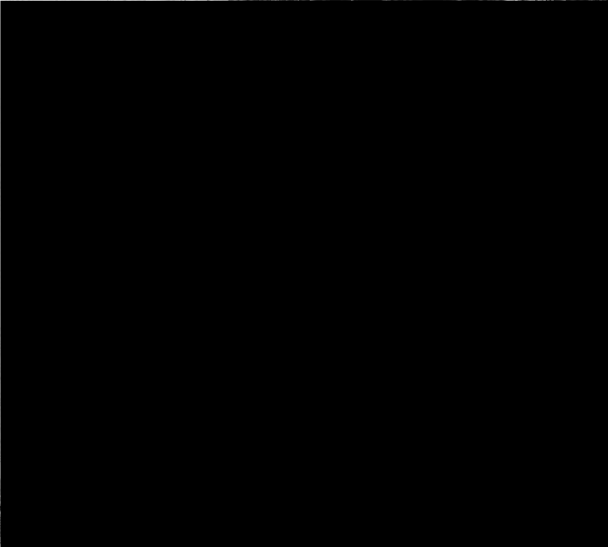
email: [ldf@southend.gov.uk](mailto:ldf@southend.gov.uk)

Post: 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

# Part A

**Personal Details** - if an agent is appointed, please only complete Title, Name & Organisation boxes below but complete the full contact details of the agent.

**Agent Details** (if applicable)

Title	MR
First Name	NEIL
Surname	RAVEN
Job Title*	M/DIRECTOR
Organisation*	RAVENS OF SOUTHEND
Address line 1	
Address line 2	
Address line 3	
Address line 4	
Postcode	
Telephone No	
Email Address*	


**Part B - Please use a separate sheet for each representation outlining the relevant section and page number.**

**1. To which part of the document does this representation relate?**

Policy (e.g DSI)  Paragraph  Policies Map

**2. Do you?** Support  Object

**3. Do you consider the document is:**

**3(1) Legally Compliant**  
(If your representation is due to the way in which the Council has prepared and published the DPD) Yes  No

**3(2) Sound**  
(If it is the actual content on which you wish to object/ support. See guidance notes for further assistance) Yes  No

*If you have entered No to 3(2), please continue to Q4. In all other circumstance, please go to Q5*

\* where relevant



**4. Do you consider the DPD is UNSOUND because it is not:**

**4(1) Positively Prepared**

(The plan should seek to meet local need where possible)

**4(2) Justified**

(The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence)

**4(3) Effective**

(The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities)

**4(4) Consistent with National Policy**

(The plan should enable the delivery of sustainable development in accordance with the

**5. Please give your reasons below why you are supporting/ objecting to this part of the plan. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments**

*Pls see Attached sheets.*

continue on a separate sheet if necessary

**6. What changes would you suggest should be made to this part of the plan? Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 4 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The consultation process should be done again in a way that complies with the Council's Statement of Community Involvement. The 6 week consultation period in which representations can be made prior to the Government Inspector's hearing should be done again in a way that allows everyone to submit a representation in a simple manner.

continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/ justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- No - I do not wish to participate at the oral examination
- Yes - I do wish to participate at the oral examination

*Please note the written comments you have made will hold the same weight as those discussed at the examination and will also be fully considered by the Inspector.*

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

8. Do you wish to be notified when the document is:

- Submitted for independent examination
- The Inspectors Report is published
- Adopted

**Please sign and date:**

Signature

Date

**Data Protection Act 1998**

Under the Data Protection Act 1998, we have a legal duty to protect any personal information we collect from you. We only use personal information you supply to us for the reason that you provided. All employees and contractors who have access to your personal data or are associated with the handling of that data are obliged to respect your confidentiality.

**Please note:** All representations will be published on our website excluding address, telephone number and email address.

5.

The document does not comply with the council's Statement of Community Involvement.

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.

### **“Have your say on future development of Southend's town centre and central seafront “**

Please see 2 attached letters showing the workshops on 21<sup>st</sup> Jan 10am to 1230pm, and 6 pm to 830 pm.

The actual workshops for businesses were on 20<sup>th</sup> Jan 3pm to 4pm and 21<sup>st</sup> jan 8am to 9am.

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**.

C – The online 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.

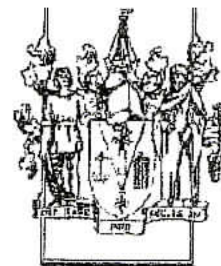


# Southend-on-Sea Borough Council

## Department for Place

### Peter Geraghty Head of Planning and Transport

Our ref: TP/100/489/DS Telephone: 01702 215000  
Your ref: Fax:  
Date: 13 January 2016 E-mail: council@southend.gov.uk  
Contact Name: Debee Skinner DX 2812 Southend



The Occupier

[REDACTED]  
Southend-On-Sea  
Essex  
[REDACTED]

Dear Occupier

### Have your say on our vision for the town centre and seafront

We are writing to invite you to have your say on our vision for the development of Southend's town centre, 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](http://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 **15 February**, so that we can take these into account as we fine-tune this document.

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 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 online here:  
[http://www.southend.gov.uk/downloads/file/4016/map\\_a\\_%E2%80%93\\_scaap\\_policy\\_area\\_s\\_site\\_allocations\\_and\\_outstanding\\_sites](http://www.southend.gov.uk/downloads/file/4016/map_a_%E2%80%93_scaap_policy_area_s_site_allocations_and_outstanding_sites)

Your property or premises has been identified as being near OS7 - Southend Pier and as such this public consultation may be of interest to you and you may wish to comment on the draft Plan

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](http://www.southend.gov.uk)



There are two public workshops planned on 21<sup>st</sup> January at the Laurel & Hardy Room, Park Inn Palace, where members of the public can learn more about the Action Plan and shape its content.

- Public Workshop 1 – 21st January, 10:00-12:30
- Public workshop 2 – 21st January, 18:00-20:30

Here you will be able to find out more about the SCAAP and how it affects you. You will meet members of the planning team and your feedback will help shape our final proposals.

### **Comment online**

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

You can send us your comments by selecting the relevant document then clicking on the pen symbol next to the section of the document on which you wish to comment. Before you submit comments for the first time, you will need to register on the system. This is a simple process requiring a valid email address. **If you are already registered on the online consultation system, you can use the same login and do not need to re-register.**


### **Other ways to have your say**

Copies of the Response Form are also available online at [www.southend.gov.uk/scaap](http://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](mailto: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

  
Matthew Thomas Team Leader  
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](http://www.southend.gov.uk)





**From:**  
**Sent:**  
**To:**  
**Subject:**

[REDACTED]  
12 December 2016 11:30  
[REDACTED]

Fw: HAVE YOUR SAY - The future of Southend's town centre and seafront

On Wednesday, 13 January 2016, 15:31, Southend BID <hello@southendbid.com> wrote:

If this email does not display properly, you can view it in your web browser.  
[Click here to unsubscribe from our newsletter.](#)



## Have your say on future development of Southend's town centre and seafront.

Here at Southend BID we are keen to offer a unified voice for you, the businesses. Therefore, we are sending to you the letter below on behalf of Southend Borough Council. The Council are eager to hear your views on the Preferred Approach Southend Central Area Action Plan (SCAAP) which is now out for public consultation. More information and details regarding the SCAAP are outlined in the letter.

Please do note two Public Workshops on 21st January 2016 are planned as part of the consultation exercise. Full details included below.



Dear Consultee

### Have your say on future development of Southend's town centre and central seafront

Residents, businesses and other stakeholders across the Borough are invited to help shape the Council's vision for the future development of the Town Centre and central Seafront over the next five years.

Southend-on-Sea Borough Council has prepared a Preferred Approach Southend Central Area Action Plan (SCAAP). The purpose of the SCAAP is to give more detailed consideration to how and where regeneration and growth can sustainably be accommodated in the Southend Central Area, including



th Town Centre, Central Seafront Area and gateway neighbourhoods of Victoria and Sutton. It contains proposals for 'Policy Areas' and 'Opportunity Sites' aimed at strengthening and transforming Southend Town Centre's sub-regional role as a successful retail and commercial destination, cultural hub and educational centre of excellence, leisure and tourist attraction and an excellent place to live.

It also seeks to safeguard, conserve and enhance the significant biodiversity, green space and other environmental resources in the area and on the foreshore, as well as to bring about public realm and access improvements.

The Preferred Approach version of the SCAAP is accompanied by a Policies Map, a Sustainability Appraisal Report and non-technical summary, a Consultation Statement and relevant supporting background documents.

The Plan can be viewed and commented upon by visiting [www.southend.gov.uk/scaap](http://www.southend.gov.uk/scaap).

Southend Borough Council would welcome your views on the draft SCAAP by 15th February 2016.

Your comments will then help shape the production of the final version of the Plan.

The quickest and easiest way to submit comments is via our online system at this link:<http://southend.jdi-consult.net/localplan/>

Comments may be submitted by selecting the relevant document then clicking on the pen symbol next to the section of the document on which you wish to comment. Before you submit comments for the first time you will need to register on the system. This is a simple process requiring a valid email address. If you are already registered on the online consultation system you can use the same login and do not need to re-register.

We recognise that not everyone has access to the Internet and that it is important that no one is excluded from participating. Copies of the Response Form are also available from Southend Civic Centre, or on request by calling 01702 215408.

There are also two public workshops planned on 21st January at the Laurel & Hardy Room, Park Inn Palace, where members of the public can learn more about the Action Plan and shape its content.

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To have your say and view the full reports:

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- Call 01702 215004 and request a printed copy
- Visit your local library
- Visit the Southend Civic Centre
  
- Respond using Response Form:
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  - o via email: [ldf@southend.gov.uk](mailto:ldf@southend.gov.uk)
  
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Essex SS2 6ZF



**Part A**

**Personal Details** - if an agent is appointed, please only complete Title, Name & Organisation boxes below but complete the full contact details of the agent.

**Agent Details** (if applicable)

Title	MR	
First Name	NAL	
Surname	RAVEN	
Job Title*		
Organisation*	RAVENS OF SUTHERLAND	
Address line 1		
Address line 2		
Address line 3		
Address line 4		
Postcode		
Telephone No		
Email Address*		

**Part B** - Please use a separate sheet for each representation outlining the relevant section and page number.

1. To which part of the document does this representation relate?

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2. Do you? Support  Object

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\* where relevant



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**4(1) Positively Prepared**

(The plan should seek to meet local need where possible)



**4(2) Justified**

(The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence)



**4(3) Effective**

(The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities)



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(The plan should enable the delivery of sustainable development in accordance with the



**5. Please give your reasons below why you are supporting/ objecting to this part of the plan. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments**

PLEASE SEE ATTACHED SHEET

continue on a separate sheet if necessary

**6. What changes would you suggest should be made to this part of the plan? Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 4 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Policy DS5 needs to include measures to increase parking capacity by a minimum of 25% in the southern central area. It should stipulate that any new development on existing car parks not only replaces the existing capacity but also provides sufficient capacity in addition to meet the demand from the new development's use. The CPS should be redone including data from new surveys done in Aug2017 on a number of hot sunny days, the entire parking stock across the central area to be included in these surveys. Roads and access via car should be prioritised over bike lanes, bus lanes, pedestrian priority routes etc.

continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/ justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

**1. In your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?**

**No** - I do not wish to participate at the oral examination

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*Please note the written comments you have made will hold the same weight as those discussed at the examination and will also be fully considered by the Inspector.*

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**3. Do you wish to be notified when the document is:**

Submitted for independent examination

The Inspectors Report is published

Adopted

**Please sign and date:**

Signature

Date

**Data Protection Act 1998**

Under the Data Protection Act 1998, we have a legal duty to protect any personal information we collect from you. We only use personal information you supply to us for the reason that you provided. All employees and contractors who have access to your personal data or are associated with the handling of that data are obliged to respect your confidentiality.

*Please note: All representations will be published on our website excluding address, telephone number and email address.*



## **UNSOUND**

### **Positively Prepared**

1. 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 Plan<sup>3</sup> stating demand for parking in the central area will increase by 25% in the next 4 years.
2. If adopted the transport section of the SCAAP will result in increased congestion and journey times.

### **Justified**

3. 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.
4. 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.

### **Effective**

5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.

### **Consistent with National Policy**

6. 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. Customers 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.
7. 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.