



for official use only

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

1 C DEC 2016

Time 15-26

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: tillió/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

omplete Title, I	etails - if an agent is appointed, please only Name & Organisation boxes below but Il contact details of the agent.	,	Agent Details (if a	applicable)
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irst Name	PAUL			
urname	THOMPSON			
ob Title*	CHAIRMAN			
Organisation*	SOUTHEND SEMEROUT TRADERS			
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	tual content on which you wish to ob ther assistance)	ect/ suppor	rt. See guidance	Yes No

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

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4(2) Justified (The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence)	\int
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 Please give details of why you consider the DPD is not legally compliant or is unsound. It is precise as possible. If you wish to support the legal compliance or soundness of the please also use this box to set out your comments	Please
continue on a separate sheet if	necessary
6. What changes would you suggest should be made to this part of the plan? Please swhat change(s) you consider necessary to make the DPD legally compliant or sound, regard to the test you have identified at 4 above where this relates to soundness. You witto say why this change will make the DPD legally compliant or sound. It will be helpful if yable to put forward your suggested revised wording of any policy or text. Please be as passible.	having II need ou are
SEE ATTACKED SMEETS continue on a separate sheet if Please note your representation should cover succinctly all the information, evidence and supporting information necessary.	
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4. Do you consider the DPD is UNSOUND because it is not:

and issues he/she identifies for examination.

7. If your repr _{or} al part of th			ge, do you consid	ler it necessary t	o participate at the
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Please note: All representations will be published on our website excluding address, telephone number and email address.

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 confidentially.

Section 8

Southend Seafront Traders Association

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.

I 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.

NOT POSITIVELY PREPARED

Policy DS5 page 44

- 1. In order to improve access to, from and within Southend Central Area through the implementation of the Opportunity Sites and Policies within this Plan, the determination of planning applications and other initiatives, and partnership working, the Council will:
- c. Implement sustainable transport measures in line with the Transport, Access, and Public Realm Strategy as set out in Appendix 5;
- f. Ensure bus priority measures enhance the A13 passenger transport corridor and the connections with London Southend Airport and the seafront, focusing on the Queensway dual-carriage way junctions at London Road, Southchurch Road and Seaways;
- g. Improve the quality of existing and promote the creation of new pedestrian and cycle priority routes to improve access to the SCAAP area, considering the potential for mixed-mode or segregated priority routes where appropriate.
- 2. In order to support the vitality and viability of the SCAAP area the Council will:
- 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 accommodate visitor trips;
- b. Ensure that there is no net loss in car parking to the south of the Southend Central Area;
- f. Seek to relieve the pressure on the more well-used car parks at peak times and encourage use of less occupied car parks through a combination of dynamic signage, competitive pricing and pre-journey information;

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. 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.

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 the capacity shortages this extra demand will create.

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 A127 and many cars turn around and go elsewhere.

This means on warm sunny days the seafront has reached it's maximium 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.

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.

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.

JUSTIFIED

Paragraph 130 page 41

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.

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. 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.

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 LTP3 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 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.

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 gthan elsewhere in the town.

paragraph 2.1 recognises this by stating:

"The LTP highlights a seasonal shortfall of parking capacity in certain car parks in summer and in December."

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 10c (storm Katie weekend)

30 May 2016 Mostly Cloudy, Av temp 14c

Please see attached time stamped photos taken on seafront on 4 of the dates above

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 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)

Not including this car park underestimates the total car parking supply for tourists and visitors within the Southend Central Area and also (by not counting cars parked here) underestimates 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.

Policy CS1

The scaap document has very little meaningful substance in terms or a strategic approach to tourism within the central area. 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.

Changes to the plan

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.

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.



30 May 13:33

Edit





26 March

14:22





Camera •••• 4G

11:19

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26 March 14:22

Details



Camera ●●○○○ 4G

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25 March 15:40

Details





Ref **2810**

for official use only

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

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Department for Place

Southend-on-Sea Borough Council

PO Box 5557

Civic Centre

Victoria Avenue

Southend-on-Sea

Essex SS2 6ZF

PartA		
	etails - if an agent is appointed, please only	Agent Details (if applicable)
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Title	MR	
First Name	PAUL	
Surname	MORSONT	
Job Title*	CHARMAN	
Organisation*	SEAFRONT TRABERS ASSOCIATION	
Address line I		
Address line 2		
Ad. ess line 3		
Address line 4		
Postcode		
Telephone No		
Email Address*		
		representation outlining the relevant
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Policy (e.g DS I) WHOLE BOC Paragraph	Policies Map
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	ual content on which you wish to object her assistance)	/ support. See guidance Yes No
If you have ente	red No to 3(2), please continue to Q4. In all oth	er 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)	18 81 252 208
4(4) Consistent with National Policy (The plan should enable the delivery of sustainable development in accordance with the	
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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 what change(s) you consider necessary to make the DPD legally compliant or sound regard to the test you have identified at 4 above where this relates to soundness. You was to say why this change will make the DPD legally compliant or sound. It will be helpful it able to put forward your suggested revised wording of any policy or text. Please be as as possible.	e set out d, having will need f you are
The consultation process should be done again in a way that complies with the Council's Statement Community Involement. The 6 week consultation period in which representations can be made prior Government Inspector's hearing should be done again in a way that allows everyone to submit a representation in a simple manner.	of to the
continue on a separate sheet	if necessary
Please note your representation should cover succinctly all the information, evidence and supporting information ne support/ justify the representation and the suggested change, as there will not normally be a subsequent opportunit further representations. After this stage, further submissions will be only at the request of the Inspector, based on the	ecessary to ty to make

and issues he/she identifies for examination.

Alfyour 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.
3. 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.
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 13/12/16
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 confidentially.

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

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 21st 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.

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 **Idf@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:

Fax:

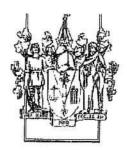
01702 215000

Your ref:

Date: Contact Name: 13 January 2016

Debee Skinner

E-mail: DX 2812 Southend council@southend.gov.uk



The Occupier Southend-On-Sea Essex

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

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

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



There are 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.

- 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 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:
 - o via email: ldf@southend.gov.uk
 - o 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

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



From:

Sent:

12 December 2016 11:30

To:

Subject:

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 developement 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 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. 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.

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

To have your say and view the full reports:

- · Head online and visit: www.southend.gov.uk/scaap
- Call 01702 215004 and request a printed copy
- Visit your local library
- · Visit the Southend Civic Centre
- Respond using Response Form:
 - o online at: www.southend.gov.uk/planningpolicyconsultations
 - o via email: ldf@southend.gov.uk

o Post: FAO Debee Skinner
Department for Place
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