



REPRESENTATIONS

RPS Planning & Development,
[REDACTED]
[REDACTED]
[REDACTED]

RPS has prepared the following representations to Southend Borough Council's Southend Central Area Action Plan (SCAAP), Revised Proposed Submission Version (November 2016)

The following Headings represent Paragraphs or Policies contained within the SCAAP. These Representations should be read in conjunction with the accompanying completed Representations Forms.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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)

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

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.

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Marc"/>
Surname	<input type="text" value="Miller"/>
Job Title*	<input type="text" value="Managing Director"/>
Organisation*	<input type="text" value="The Stockvale Group"/>
Address line 1	<input type="text"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Address line 4	<input type="text"/>
Postcode	<input type="text"/>
Telephone No	<input type="text"/>
Email Address	<input type="text"/>

Agent Details (if applicable)

<input type="text" value="Mr"/>
<input type="text" value="Nick"/>
<input type="text" value="Laister"/>
<input type="text" value="Senior Director"/>
<input type="text" value="RPS Planning & Development"/>
<input type="text" value="20 Western Avenue"/>
<input type="text" value="[REDACTED]"/>

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)	<input type="text" value="Page 8, Item e"/>	Paragraph	<input type="text"/>	Policies Map	<input type="text"/>
------------------	---	-----------	----------------------	--------------	----------------------

2. Do you?	Support	<input type="text"/>	Object	<input checked="" type="checkbox"/>
------------	---------	----------------------	--------	-------------------------------------

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	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------

3(2) Sound

(If it is the actual content on which you wish to object/ support. See guidance notes for further assistance)

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
-----	--------------------------	----	-------------------------------------

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

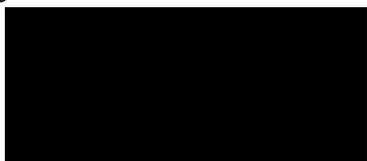
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.



REPRESENTATIONS

Policy/Para: Context and Issues for the Southend Central Area (Page 8, item e)

Enter your full representation here:

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.

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.

Please specify the changes needed to be made:

“...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.”

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)

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

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.

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Marc"/>
Surname	<input type="text" value="Miller"/>
Job Title*	<input type="text" value="Managing Director"/>
Organisation*	<input type="text" value="The Stockvale Group"/>
Address line 1	<input type="text"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Address line 4	<input type="text"/>
Postcode	<input type="text"/>
Telephone No	<input type="text"/>
Email Address	<input type="text"/>

Agent Details (if applicable)

<input type="text" value="Mr"/>
<input type="text" value="Nick"/>
<input type="text" value="Laister"/>
<input type="text" value="Senior Director"/>
<input type="text" value="RPS Planning & Development"/>
<input type="text" value="Western Avenue"/>
<input type="text"/>

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)	<input type="text" value="Page 9, Item g"/>	Paragraph	<input type="text"/>	Policies Map	<input type="text"/>
------------------	---	-----------	----------------------	--------------	----------------------

2. Do you?	Support	<input type="text"/>	Object	<input checked="" type="checkbox"/>
-------------------	---------	----------------------	--------	-------------------------------------

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	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------

3(2) Sound

(If it is the actual content on which you wish to object/ support. See guidance notes for further assistance)

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
-----	--------------------------	----	-------------------------------------

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

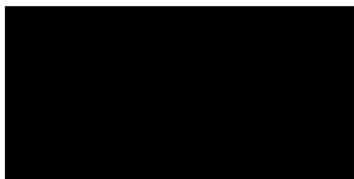
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.

Policy/Para: Context and Issues for the Southend Central Area (Page 9, item g)

Enter your full representation here:

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.

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.

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 overcapacity 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.

Please specify the changes needed to be made:

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



REPRESENTATIONS

from the seafront, including at peak periods, to support the ongoing success and growth of this thriving tourism area.”

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.”

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)

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

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.

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Marc"/>
Surname	<input type="text" value="Miller"/>
Job Title*	<input type="text" value="Managing Director"/>
Organisation*	<input type="text" value="The Stockvale Group"/>
Address line 1	<input type="text"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Address line 4	<input type="text"/>
Postcode	<input type="text"/>
Telephone No	<input type="text"/>
Email Address	<input type="text"/>

Agent Details (if applicable)

<input type="text" value="Mr"/>
<input type="text" value="Nick"/>
<input type="text" value="Laister"/>
<input type="text" value="Senior Director"/>
<input type="text" value="RPS Planning & Development"/>
<input type="text" value="20 Western Avenue"/>
<input type="text" value="[REDACTED]"/>

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)	<input type="text" value="Page 12 Vision"/>	Paragraph	<input type="text"/>	Policies Map	<input type="text"/>
------------------	---	-----------	----------------------	--------------	----------------------

2. Do you?	Support	<input checked="" type="checkbox"/>	Object	<input type="checkbox"/>
-------------------	---------	-------------------------------------	--------	--------------------------

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	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------

3(2) Sound

(If it is the actual content on which you wish to object/ support. See guidance notes for further assistance)

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

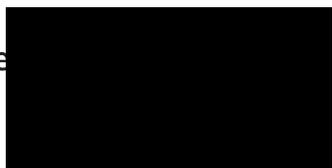
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.



REPRESENTATIONS

Policy/Para: Proposed Vision (page 12)

Enter your full representation here:

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.

Please specify the changes needed to be made:

No changes

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)

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

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.

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Marc"/>
Surname	<input type="text" value="Miller"/>
Job Title*	<input type="text" value="Managing Director"/>
Organisation*	<input type="text" value="The Stockvale Group"/>
Address line 1	<input type="text"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Address line 4	<input type="text"/>
Postcode	<input type="text"/>
Telephone No	<input type="text"/>
Email Address	<input type="text"/>

Agent Details (if applicable)

<input type="text" value="Mr"/>
<input type="text" value="Nick"/>
<input type="text" value="Laister"/>
<input type="text" value="Senior Director"/>
<input type="text" value="RPS Planning & Development"/>



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)	<input type="text" value="Page 12"/>	Paragraph	<input type="text" value="Para 5"/>	Policies Map	<input type="text"/>
------------------	--------------------------------------	-----------	-------------------------------------	--------------	----------------------

2. Do you?	Support	<input checked="" type="checkbox"/>	Object	<input type="checkbox"/>
------------	---------	-------------------------------------	--------	--------------------------

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	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------

3(2) Sound

(If it is the actual content on which you wish to object/ support. See guidance notes for further assistance)

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

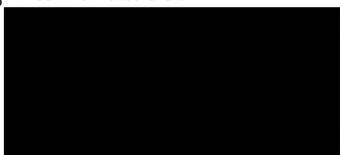
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.

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)

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

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

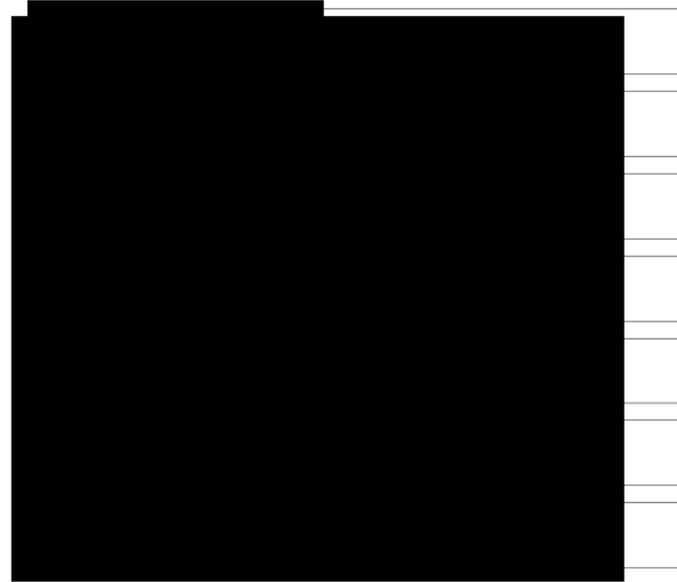
Part A

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

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Marc"/>
Surname	<input type="text" value="Miller"/>
Job Title*	<input type="text" value="Managing Director"/>
Organisation*	<input type="text" value="The Stockvale Group"/>
Address line 1	<input type="text"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Address line 4	<input type="text"/>
Postcode	<input type="text"/>
Telephone No	<input type="text"/>
Email Address	<input type="text"/>

Agent Details (if applicable)

<input type="text" value="Mr"/>
<input type="text" value="Nick"/>
<input type="text" value="Laister"/>
<input type="text" value="Senior Director"/>
<input type="text" value="RPS Planning & Development"/>



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)	<input type="text" value="Page 12"/>	Paragraph	<input type="text" value="Para 8"/>	Policies Map	<input type="text"/>
------------------	--------------------------------------	-----------	-------------------------------------	--------------	----------------------

2. Do you?	Support	<input checked="" type="checkbox"/>	Object	<input type="checkbox"/>
------------	---------	-------------------------------------	--------	--------------------------

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	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------

3(2) Sound

(If it is the actual content on which you wish to object/ support. See guidance notes for further assistance)

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

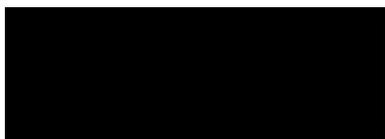
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.



REPRESENTATIONS

Policy/Para: Strategic objectives (Page 12, para 5 and 8)

Enter your full representation here:

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.

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.

Please specify the changes needed to be made:

None

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)

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

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

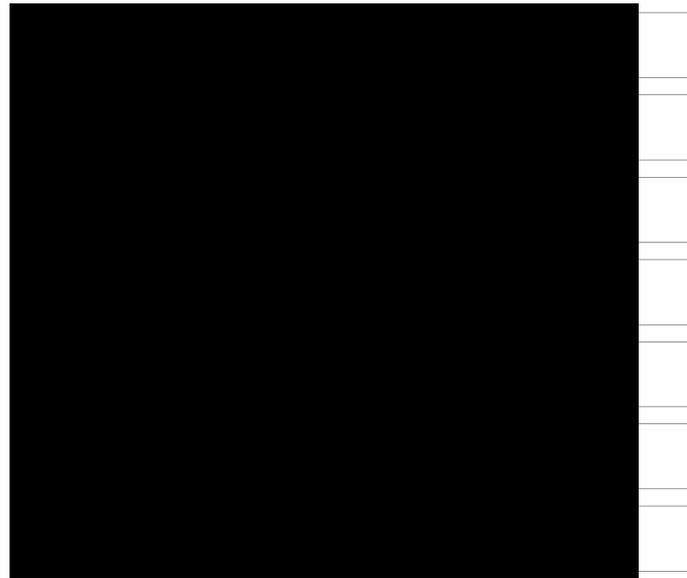
Part A

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

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Marc"/>
Surname	<input type="text" value="Miller"/>
Job Title*	<input type="text" value="Managing Director"/>
Organisation*	<input type="text" value="The Stockvale Group"/>
Address line 1	<input type="text"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Address line 4	<input type="text"/>
Postcode	<input type="text"/>
Telephone No	<input type="text"/>
Email Address	<input type="text"/>

Agent Details (if applicable)

<input type="text" value="Mr"/>
<input type="text" value="Nick"/>
<input type="text" value="Laister"/>
<input type="text" value="Senior Director"/>
<input type="text" value="RPS Planning & Development"/>



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) <input type="text"/>	Paragraph <input type="text" value="Para 30"/>	Policies Map <input type="text"/>
---------------------------------------	--	-----------------------------------

2. Do you?	Support <input type="text"/>	Object <input checked="" type="checkbox"/>
------------	------------------------------	--

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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>
---	-----------------------------

3(2) Sound

(If it is the actual content on which you wish to object/ support. See guidance notes for further assistance)

Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
------------------------------	--

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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

15th December 2016

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.

Policy/Para: Para 30

Enter your full representation here:

This is a very residential-based approach, which does not reflect the proposed Vision and Strategic Objectives in the previous chapter.

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:

"...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."

Please specify the changes needed to be made:

"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."

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)

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

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.

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Marc"/>
Surname	<input type="text" value="Miller"/>
Job Title*	<input type="text" value="Managing Director"/>
Organisation*	<input type="text" value="The Stockvale Group"/>
Address line 1	<input type="text"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Address line 4	<input type="text"/>
Postcode	<input type="text"/>
Telephone No	<input type="text"/>
Email Address	<input type="text"/>

Agent Details (if applicable)

<input type="text" value="Mr"/>
<input type="text" value="Nick"/>
<input type="text" value="Laister"/>
<input type="text" value="Senior Director"/>
<input type="text" value="RPS Planning & Development"/>



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) <input type="text"/>	Paragraph <input type="text" value="Para 48"/>	Policies Map <input type="text"/>
---------------------------------------	--	-----------------------------------

2. Do you?	Support <input type="text"/>	Object <input checked="" type="checkbox"/>
-------------------	------------------------------	--

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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>
---	-----------------------------

3(2) Sound

(If it is the actual content on which you wish to object/ support. See guidance notes for further assistance)

Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
------------------------------	--

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

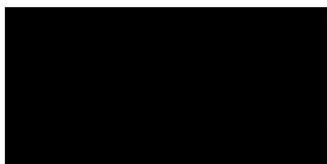
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature

 _____

Date

15th December 2016

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.

Policy/Para: Para 48

Enter your full representation here:

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) shows 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:

“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.”

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.

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.

Please specify the changes needed to be made:



REPRESENTATIONS

“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.”

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)

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

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.

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Marc"/>
Surname	<input type="text" value="Miller"/>
Job Title*	<input type="text" value="Managing Director"/>
Organisation*	<input type="text" value="The Stockvale Group"/>
Address line 1	<input type="text"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Address line 4	<input type="text"/>
Postcode	<input type="text"/>
Telephone No	<input type="text"/>
Email Address	<input type="text"/>

Agent Details (if applicable)

<input type="text" value="Mr"/>
<input type="text" value="Nick"/>
<input type="text" value="Laister"/>
<input type="text" value="Senior Director"/>
<input type="text" value="RPS Planning & Development"/>



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) <input type="text"/>	Paragraph <input type="text" value="Para 58"/>	Policies Map <input type="text"/>
---------------------------------------	--	-----------------------------------

2. Do you?	Support <input type="text"/>	Object <input checked="" type="checkbox"/>
-------------------	------------------------------	--

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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>
---	-----------------------------

3(2) Sound

(If it is the actual content on which you wish to object/ support. See guidance notes for further assistance)

Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
------------------------------	--

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

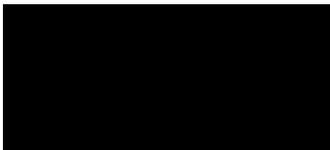
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



 15th December 2016

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.

Policy/Para: Para 58

Enter your full representation here:

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 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, has gone into administration and is threatened with closure.

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.

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.

Please specify the changes needed to be made:

"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."

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)

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

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.

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Marc"/>
Surname	<input type="text" value="Miller"/>
Job Title*	<input type="text" value="Managing Director"/>
Organisation*	<input type="text" value="The Stockvale Group"/>
Address line 1	<input type="text"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Address line 4	<input type="text"/>
Postcode	<input type="text"/>
Telephone No	<input type="text"/>
Email Address	<input type="text"/>

Agent Details (if applicable)

<input type="text" value="Mr"/>
<input type="text" value="Nick"/>
<input type="text" value="Laister"/>
<input type="text" value="Senior Director"/>
<input type="text" value="RPS Planning & Development"/>



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) <input type="text"/>	Paragraph <input type="text" value="Para 77"/>	Policies Map <input type="text"/>
---------------------------------------	--	-----------------------------------

2. Do you?	Support <input checked="" type="checkbox"/>	Object <input type="text"/>
-------------------	---	-----------------------------

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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>
---	-----------------------------

3(2) Sound
(If it is the actual content on which you wish to object/ support. See guidance notes for further assistance)

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
---	-----------------------------

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

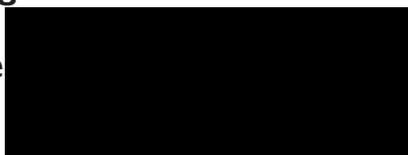
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.



REPRESENTATIONS

Policy/Para: Para 77

Enter your full representation here:

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.

Please specify the changes needed to be made:

No change

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

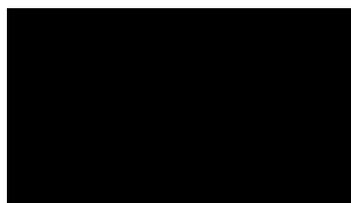
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.

Policy/Para: Para 124

Enter your full representation here:

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. This would also ensure that the loss of existing car parking was properly considered in accordance with proposed Policy DS5 (2).

Please specify the changes needed to be made:

Map 5 to be amended so that the Marine Plaza/Dizzyland site is included in the category 'Off Street Payment Parking'.

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)

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

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.

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Marc"/>
Surname	<input type="text" value="Miller"/>
Job Title*	<input type="text" value="Managing Director"/>
Organisation*	<input type="text" value="The Stockvale Group"/>
Address line 1	<input type="text"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Address line 4	<input type="text"/>
Postcode	<input type="text"/>
Telephone No	<input type="text"/>
Email Address	<input type="text"/>

Agent Details (if applicable)

<input type="text" value="Mr"/>
<input type="text" value="Nick"/>
<input type="text" value="Laister"/>
<input type="text" value="Senior Director"/>
<input type="text" value="RPS Planning & Development"/>



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) <input type="text"/>	Paragraph <input type="text" value="Para 128"/>	Policies Map <input type="text"/>
---------------------------------------	---	-----------------------------------

2. Do you?	Support <input type="text"/>	Object <input checked="" type="checkbox"/>
-------------------	------------------------------	--

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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>
---	-----------------------------

3(2) Sound

(If it is the actual content on which you wish to object/ support. See guidance notes for further assistance)

Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
------------------------------	--

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

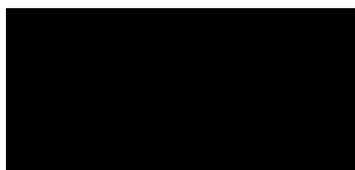
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.

Policy/Para: Para 128

Enter your full representation here:

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 inked improvements to the public realm.

We would like to make two points in relation to this paragraph.

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.

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).

Please specify the changes needed to be made:

“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.”

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

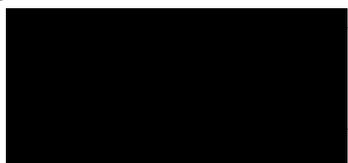
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.



REPRESENTATIONS

Policy/Para: Para 129

Enter your full representation here:

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 carparks 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.

Please specify the changes needed to be made:

No specific change, but please ensure that the comments above are noted.

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

***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

15th December 2016

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.



REPRESENTATIONS

Policy/Para: Para 130

Enter your full representation here:

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 and should be read alongside them.

The key conclusions are set out in our representations to Policy DS5.

Please specify the changes needed to be made:

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 an 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.

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

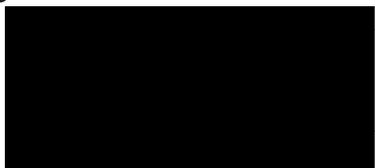
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.

Policy/Para: Para 131

Enter your full representation here:

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.

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.

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 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.

Please specify the changes needed to be made:

"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."

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)

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

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.

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Marc"/>
Surname	<input type="text" value="Miller"/>
Job Title*	<input type="text" value="Managing Director"/>
Organisation*	<input type="text" value="The Stockvale Group"/>
Address line 1	<input type="text"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Address line 4	<input type="text"/>
Postcode	<input type="text"/>
Telephone No	<input type="text"/>
Email Address	<input type="text"/>

Agent Details (if applicable)

<input type="text" value="Mr"/>
<input type="text" value="Nick"/>
<input type="text" value="Laister"/>
<input type="text" value="Senior Director"/>
<input type="text" value="RPS Planning & Development"/>



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) <input type="text"/>	Paragraph <input type="text" value="Para 132"/>	Policies Map <input type="text"/>
---------------------------------------	---	-----------------------------------

2. Do you?	Support <input type="text"/>	Object <input checked="" type="checkbox"/>
------------	------------------------------	--

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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>
---	-----------------------------

3(2) Sound

(If it is the actual content on which you wish to object/ support. See guidance notes for further assistance)

Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
------------------------------	--

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

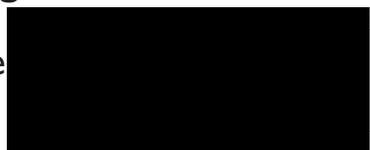
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.

Policy/Para: Para 132

Enter your full representation here:

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).

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.

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.

Please specify the changes needed to be made:

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.

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

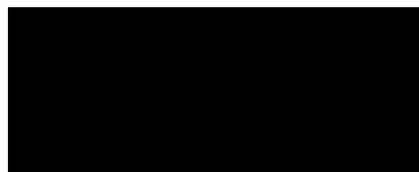
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.

Policy/Para: Para 133

Enter your full representation here:

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 amazing 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:

“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.”

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/Dizzyland, Seaways and reduction of parking in the town centre);
- 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.

The SCAAP should be proposing increasing the spaces to allow for business growth, not reducing the number of spaces.

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.

Please specify the changes needed to be made:

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:

“However, this is indicative only and 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. Until this work is undertaken, no development on an existing car park serving the seafront area shall proceed pending a review of car parking space supply, peak summer demand, the quality of spaces and the routes from car parks to the main seafront attractions. There will then be an early review of the SCAAP to incorporate these results.”

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

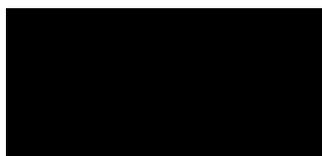
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.

Policy/Para: Para 134

Enter your full representation here:

This 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.

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 visitor. 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.

Please specify the changes needed to be made:

“134 It is considered, ~~therefore,~~ that there is some potential for ~~collectively~~ 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.”

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

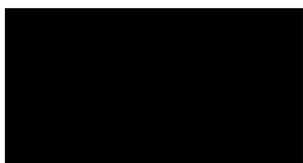
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.

Policy/Para: Para 135

Enter your full representation here:

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.”

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”.

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:

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.

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 spaces now and in the future.

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.

Please specify the changes needed to be made:

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.

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]."

This will enable Policy DS5 to be effective when the Council is determining planning applications.

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.

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

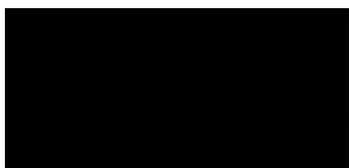
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.



REPRESENTATIONS

Policy/Para: Para 136

Enter your full representation here:

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:

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.

Please specify the changes needed to be made:

The paragraph needs to be clarified.

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

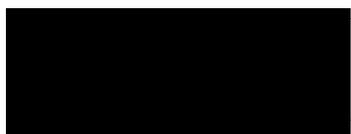
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.

Policy/Para: Policy DS5

Enter your full representation here:

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.

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.
- 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).
- 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).
- 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).
- The busiest days for the seafront are not assessed (Paragraph 98).
- 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.
- 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.
- 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.

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.

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.

We support 1a, the provision of strategic junction improvements, which is important to improve vehicle circulation and to accommodate growth.

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.

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.

We object to 2a, as this only proposes to “maintain parking capacity”.

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.

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.

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.

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.

Please specify the changes needed to be made:

2b should be changed as follows:

“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.”

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.

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

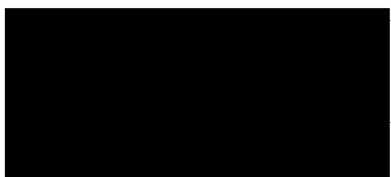
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.



REPRESENTATIONS

Policy/Para: Paragraph 155

Enter your full representation here:

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.

Please specify the changes needed to be made:

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.

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)

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

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

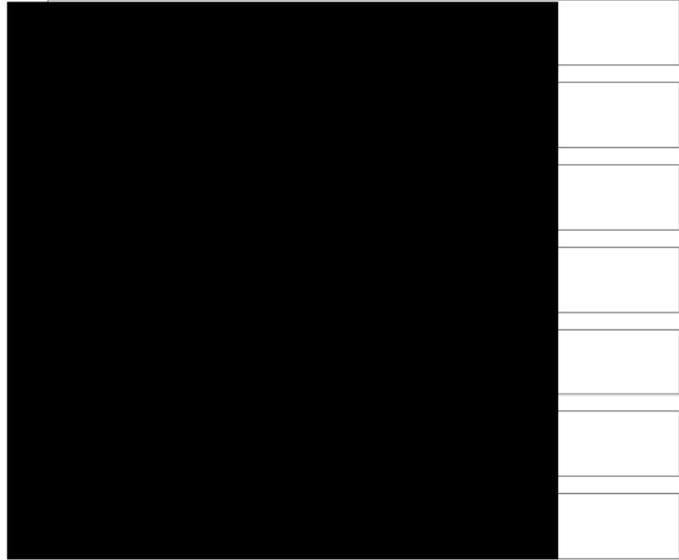
Part A

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

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Marc"/>
Surname	<input type="text" value="Miller"/>
Job Title*	<input type="text" value="Managing Director"/>
Organisation*	<input type="text" value="The Stockvale Group"/>
Address line 1	<input type="text"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Address line 4	<input type="text"/>
Postcode	<input type="text"/>
Telephone No	<input type="text"/>
Email Address	<input type="text"/>

Agent Details (if applicable)

<input type="text" value="Mr"/>
<input type="text" value="Nick"/>
<input type="text" value="Laister"/>
<input type="text" value="Senior Director"/>
<input type="text" value="RPS Planning & Development"/>



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)	<input type="text" value="Policy PA1"/>	Paragraph	<input type="text"/>	Policies Map	<input type="text"/>
------------------	---	-----------	----------------------	--------------	----------------------

2. Do you?	Support	<input type="text"/>	Object	<input checked="" type="checkbox"/>
-------------------	---------	----------------------	--------	-------------------------------------

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	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------

3(2) Sound

(If it is the actual content on which you wish to object/ support. See guidance notes for further assistance)

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
-----	--------------------------	----	-------------------------------------

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

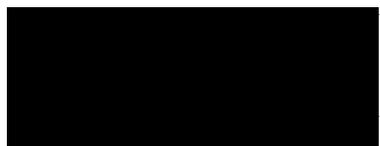
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.



REPRESENTATIONS

Policy/Para: Policy PA1

Enter your full representation here:

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).

Please specify the changes needed to be made:

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."

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

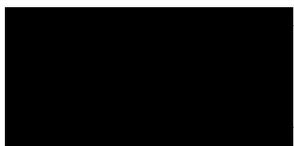
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.

Policy/Para: 5.8 Tylers Policy Area, Aims (Page 69)

Enter your full representation here:

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.

Please specify the changes needed to be made:

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.”

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

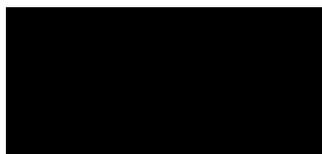
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.

Policy/Para: Policy PA7

Enter your full representation here:

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.

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.

Please specify the changes needed to be made:

“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;”

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

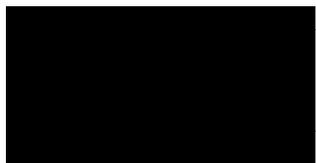
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.



REPRESENTATIONS

Policy/Para: 5.9 Central Seafront Policy Area: Aims (Page 72)

Enter your full representation here:

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 long-standing and worsening problem, that is having a serious impact on seafront traders, is something that should be identified up front.

Please specify the changes needed to be made:

Add the following:

“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.

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

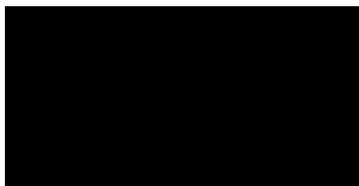
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.

Policy/Para: Paragraph 195

Enter your full representation here:

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 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).

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.

Please specify the changes needed to be made:

“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.”

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

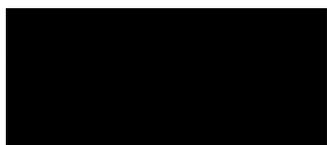
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.

Policy/Para: Policy CS1

Enter your full representation here:

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.

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.

We consider that this is not planning positively for the very growth in the tourism offer that the early sections of the SCAAP proposes 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.

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 contribution of this important and well-located site has been ignored.

It is essential that any redevelopment of this site, which has operated as a seafront car park for well over 10 years, incorporates at least the same number of publicly-accessible spaces as it currently does, as well as an allowance for growth.

Whilst we acknowledge that planning permission already exists for the redevelopment of this site, we understand that it has not commenced and may not be viable. There remains an opportunity for the Council to ensure the site still retains a significant role in providing car parking capacity for the seafront areas in any future development proposals that come forward. This Plan is the appropriate place in which to control this redevelopment.

In terms of 4.iv, we support the development of the New Southend Museum, which will add to the offer of Southend's seafront and should assist in increasing visitors to the Town. It is essential that it provides sufficient car parking to cater for its visitors and to contribute towards the existing under-supply. But this development cannot be relied on as it is at a very early stage.

Please specify the changes needed to be made:

Amend 1a as follows:

“consider favourably proposals which enhance or diversify the range of arts, culture, entertainment, tourism, leisure and recreational facilities, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and environmental designations, including protected green space and car parking capacity, where the Council will normally expect to see an increase in provision as part of any proposal in the Central Seafront Policy Area”.

We support 3i, which seeks provision for new/improved pedestrian/cycle priority links.

Amend 4ii as follows:

“ii. Opportunity Site (CS1.2): Seaways, the Council will pursue with private sector partners, landowners and developers the enhancement of this important site that supports the seafront tourism offer. a high quality, mixed use development including the provision of leisure, cultural and tourism attractions, which may include: restaurants, cinema, gallery, hotel. The development will be

centred on the continuation of the site as the most important car park serving the seafront, but it can also include public and private open spaces. The potential for some limited redevelopment can be explored, to potentially include restaurants, cinema, gallery, hotel and residential development, but any development must be able to demonstrate that it can deliver an increase in car parking spaces (the Council is seeking a 25% increase) and will support the Town's seafront tourism offer. The potential for residential development may also be explored. Design and layout solutions should allow for:

- a. remodelling of the urban form to create a north-south axis on the Seaway site, providing a clear sight-line from Queensway dual carriageway to the sea;
- b. a stronger relationship with the Town Centre through the provision of safe and legible pedestrian and cycle routes;
- c. opportunities for a new link to Marine Parade from the Seaway site designed around 'Spanish Steps' and in doing so ensure that development does not prejudice its future delivery as a new link between the seafront and town centre;
- d. addressing the need for replacement an increase in the existing capacity of car parking provision on the site in line with Policy DS5: Transport, Access and Public Realm;
- e. active frontages to all new and existing streets and spaces;
- f. a palette of good quality materials to reflect the vibrancy and colour of the seaside;
- 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 or the ability of coach users to safely and conveniently access the seafront area;
- h. urban greening projects, including the creation of new public and private green space within new development;
- i. innovative design which allows the site to take advantage of the elevation and creates a legible environment with views of the estuary, respecting the amenity of neighbouring residential uses;
- j. the provision of appropriate seating, signage and way-finding aids to improve connectivity to the Town Centre, Seafront and Opportunity Site CS1.3: Marine Plaza.”

Amend 4iii as follows:

“iii. Opportunity Site (CS1.3): Marine Plaza, ~~the~~ Council will support the comprehensive redevelopment of the site for high quality/ iconic residential development with complimentary leisure and supporting uses that create activity at ground floor fronting Marine Parade, incorporating areas of public open space into the site which take advantage of views of the seafront and estuary. The development must increase the level of publicly available parking above existing

levels (200), as well as provide appropriate parking for its residents. The provision of appropriate seating, signage and way-finding aids to improve connectivity to the seafront and town centre, including links to Opportunity Site CS1.2: Seaways, will also be promoted.”

Amend 4iv as follows:

“iv. Opportunity Site (CS1.4): New Southend Museum, the Council will promote the development of an exemplary, sustainable building that includes the new Southend Museum, gallery space, planetarium, conference/events spaces, and associated café/restaurant, together with public car and cycle parking and the creation of high quality green space, including amphitheatre within the cliffs, seating and good signage, linked to the High Street and Central Seafront via Cliff Gardens, Prittlewell Square and the wider Clifftown Policy Area. The design of new development will need to retain the open feel of this area and ensure that new planting includes native species and increases biodiversity in the area. 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. The proposed car park shall not be included as part of the existing car park capacity when assessing displacement of car parking from other Opportunity Sites in the Central Seafront Area.”

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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

15th December 2016

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.

Policy/Para: Implementation and Monitoring (Page 94)

Enter your full representation here:

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:

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.

Please specify the changes needed to be made:

“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.”

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)

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

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

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

See Accompanying RPS Report

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.

See Accompanying RPS Report

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:

To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.

Our client operates the largest and most successful tourism businesses in Southend (The Stockvale Group is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.

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:

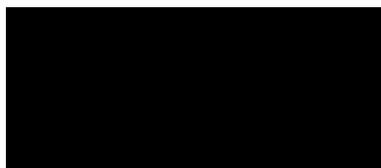
Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature



Date

15th December 2016

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.

Policy/Para: Consultation

Enter your full representation here:

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.

The letter to Adventure Island is attached for information.

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:

- "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).

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.

Please specify the changes needed to be made:

No specific change required.



JNY9057-01A: TECHNICAL NOTE

Project Title: Southend Central Area Action Plan
Project No: JNY9057-01
Date: 14 December 2016

APPRAISAL OF CAR PARKING EVIDENCE BASE

Introduction

- 1 This Technical Note has been prepared by RPS Planning and Development Ltd on behalf of The Stockvale Group (the owners of Adventure Island), who are working with the Southend-on-Sea seafront traders, to review and provide a critique of the technical evidence base to the Draft Southend Central Area Action Plan (SCAAP), dated November 2016.
- 2 This review focuses on the transport evidence base and draws on the local knowledge and experience of the seafront traders as well as transport related data that they currently hold.
- 3 Specifically, this Technical Note concentrates on the Car Parking Study (CPS), undertaken by Steer Davis Gleave, Reference 22958604, dated November 2016.
- 4 This review follows the same structure as the CPS and identifies paragraphs and Tables etc where a critique is undertaken or comment made.

Context

- 5 Paragraph 2.1 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 (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.”

- 6 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.
- 7 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.”

- 8 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.

- 9 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 LTP highlights a seasonal shortfall of parking capacity in certain car parks in summer and in December.”

- 10 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.

Current Parking Provision in Southend Central Area

- 11 Table 2.2 in the CPS sets out the main off-street car parks in the Southend Central Area. It recognises that there are some other large privately operated car parks and lists these in Table 2.3. Paragraph 2.14 sets out that the car parks listed in Table 2.3 have not been surveyed and have not informed this report.
- 12 It is not made clear why the car parks listed in Table 2.3 do not inform the CPS as they are all publically available. These are replicated in Table 1.

Table 1: Additional Privately Operated Off-Street Car Parks in Southend Central Area

Car Park	Capacity	Operator
Portcullis House	160 (approx.)	Pay & Display
Sainsbury’s	340	Pay & Display
The Range (shopping outlet)	128	Unknown
Southend Central Station	138	Pay & Display
Total	766	

- 13 Portcullis House car park is located near to Southend Victoria Railway Station, is publically available, has comparable charges to other car parks and is advertised and being ideal for Victoria Shopping Centre and Railway Station. There does not appear to be an overriding reason why this car park has not been included within the CPS. 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 underestimate the total car parking demand created by tourists and visitors within the Southend Central Area.
- 14 Southend Central Station car park is operated by NCP and located near to Southend Victoria Railway Station. It is publically available and has comparable charges to other car parks. There does not appear to be an overriding reason why this car park has not been included within the CPS. 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 underestimate the total car parking demand created by tourists and visitors within the Southend Central Area.

- 15 The Sainsbury's and The Range car parks are provided to cater for customers to each and although they may be available on a short stay basis, on balance, it is considered correct to exclude these car parks from the CPS.
- 16 In addition to the car parks set out in Tables 2.2 and 2.3, there are other publically available off-street car parks within the Southend Central Area to the south of the railway line that have not been identified and have not been included within the CPS. These are set out in Table 2.

Table 2: Other Publically Available Off-Street Car Parks in Southend Central Area

Car Park	Capacity	Operator
Marine Plaza	200	Pay & Display
Beach Road	40	Pay & Display
Premier Inn	68	Pay & Display
Total	308	

- 17 The Marine Plaza car park is located on Southchurch Avenue, adjacent to Marine Parade. It is publically available, forms an important part of the seafront car parking stock and has comparable charges to other car parks. Tourists readily use this car park and it is unknown why this car park has not been identified, nor included, within the CPS.
- 18 There does not appear to be an overriding reason why this car park has not been included within the CPS. 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.
- 19 The Beach Road car park is located on Beach Road, adjacent to Eastern Esplanade. It is publically available and has comparable charges to other car parks. It is unknown why this car park has not been identified, nor included, within the CPS.
- 20 There does not appear to be an overriding reason why this car park has not been included within the CPS. 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 underestimate the total car parking demand created by tourists and visitors within the Southend Central Area.
- 21 The Premier Inn car park is located directly on the Eastern Esplanade and is publically available for tourists. Parking demand created by tourists during the daytime period would complement the demand created by hotel guests during the evening and night time. Although this car park is available on a short stay basis and it is likely to be utilised by tourists, on balance, it is perhaps correct to exclude this car park from the CPS. However, it is an omission from Table 2.3 of the CPS.
- 22 The Portcullis House car park, Southend Central Station car park, Marine Plaza car park and Beach Road car park all combine to provide a total of 538 off-street car parking spaces to the south of the railway line which have not been included within the CPS.
- 23 By not including these off-street car parks within the CPS, it is considered that the total car parking stock for tourists and visitors within the Southend Central Area has been underestimated whilst the total

car parking demand created by tourists and visitors within the Southend Central Area has also been underestimated, as they have presumably not been counted.

- 24 In addition to off-street car parking, there are several key pay and display on-street parking locations in the Southend Central Area which are listed in Table 2.4 of the CPS.
- 25 However, there are a number of other on-street parking locations in the Southend Central Area to the south of the railway line that are publically available but have not been identified within the CPS. These are listed in Table 3.

Table 3: Other Publically Available On-Street Car Parking in Southend Central Area South of the Railway Line

Car Park	Capacity	Restrictions
Baltic Avenue	6	Pay & Display
Clarence Road	17	Pay & Display
Clarence Street	17	Pay & Display
Weston Road	26	Pay & Display
Nelson Street	21	Pay & Display
Capel Terrace	9	Pay & Display
Alexandra Street	23	Pay & Display
Cambridge Road	26	Pay & Display
Alexandra Road	40	Pay & Display
Cashiobury Terrace	13	Pay & Display
Runwell Terrace	9	Pay & Display
Prittlewell Square	43	Pay & Display
Royal Terrace	19	Pay & Display
Clifton Terrace / Cliff Parade	53	Pay & Display
Devereux Road	18	Pay & Display
Clifftown Parade	187	Unrestricted
Alexandra Street	58	Unrestricted
Cambridge Road	30	Unrestricted
Wilson Road	30	Unrestricted
Scratton Road	18	Unrestricted
Heygate Avenue	25	Unrestricted
Herbert Grove	17	Unrestricted
Hartington Road	25	Unrestricted
Ash Walk	5	Unrestricted
Pleasant Road	27	Unrestricted

Hartington Place	11	Unrestricted
Victoria Road	36	Unrestricted
Northumberland Avenue	18	Unrestricted
Arnold Avenue	30	Unrestricted
Total	857	

- 26 These car parking spaces are generally located in residential areas, however, they are generally located within walking distance of tourist and visitor attractions. There is similar potential for tourists and visitors to park in these streets than there is to those identified in Table 2.4 of the CPS.
- 27 Table 2.4 is titled Key On-Street Parking Locations which in itself suggests there are other on-street car parking locations available. These other on-street car parking locations to the south of the railway line are set out in Table 3, above, where it is identified that there is a total stock of 857 car parking spaces that have not been included within the CPS.
- 28 It is recognised that some of these spaces will be utilised by residents, however, given their locations, and particularly given some of the spaces are unrestricted without charge (free to park), it has to be assumed that a proportion of tourists and visitors would also utilise these spaces, particularly on days of peak demand.
- 29 It is recognised that there are difficulties in determining whether car parking demand is created by tourists and visitors or residents in locations such as these. However, there are parking methodologies that would identify short-stay, long-stay, return-stay parking etc that would inform a judgement to be made on the demand created by tourists, visitors and residents.
- 30 This can be validated against Census data to provide confidence in the conclusions made and thus the total car parking stock for tourists and visitors and the total car parking demand created by tourists and visitors.
- 31 This, or any other form of judgement or consideration, has not been undertaken within the CPS. It therefore has to be concluded that the total car parking stock for tourists and visitors within the Southend Central Area has been underestimated whilst the total car parking demand created by tourists and visitors within the Southend Central Area has also been underestimated.

Existing Supply and Demand

Existing Supply

- 32 Although the CPS sets out that there are some publicly available car parking spaces that have not been included in the analysis (as detailed above), paragraph 3.1 of the CPS sets out that there is a network of approximately 5,500 spaces within the Southend Central Area. It is noted that Tables 2.2 and 2.4 of the CPS actually amount to approximately 5,000 spaces rather than 5,500 spaces. It has been assumed that 5,500 is an error and 5,000 is correct, since this appears to be referred to elsewhere in the document. Based on the parking identified in Tables 2.2 and 2.4, this Technical Note bases the following on the assumption that 5,000 is the figure the CPS intended to rely upon.

- 33 The above identified publically available off-street car parks that have not been included within the CPS but are available for tourists and visitors. If these were included, then there would be a network of approximately 5,500 spaces within the Southend Central Area.
- 34 The above also identified publically available on-street car parking that have not been included within the CPS but are available for tourists and visitors. Some of the capacity would be utilised by residents but some would also be used by tourists and visitors, particularly during peak days. The CPS does not attempt to distinguish between these and does not include them.
- 35 In the absence of any such data within the CPS, this Technical Note has considered that, during the daytime periods, when residents may not be at home and do not require to park in their street, approximately 25% of all car parking spaces would be available and utilised by tourists and visitors. This is a robust consideration and could easily be up to 50% or more. This equates to approximately 200 on-street car parking spaces.
- 36 If these are included, then there would be a network of approximately 5,800 spaces within the Southend Central Area.

Existing Demand – Survey Methodology

- 37 Paragraph 3.2 of the CPS sets out that parking surveys were undertaken by video camera at some 3,000 spaces on Thursday 13th and Saturday 15th August 2015, some 1,600 spaces on Wednesday 23rd, Friday 25th and Saturday 26th March 2015 and some 5,000 spaces on Monday 30th May 2016.
- 38 Given that 5,000 spaces were identified within the CPS, this only represents some 60% of the total parking stock during the August 2015 surveys. Of the remainder, parking occupancy at some 1,500 spaces (30%) were calculated using data collected via the Variable Messaging System (VMS) during this period.
- 39 Paragraph 3.5 sets out that there were some inconsistencies within the VMS datasets with some unusual results on some days. The comment appears to come across strongly, however, there are no further details provided. Given the number and the proportion of the overall parking stock that relies upon this data to determine their occupancies, it is unusual that the CPS does not set out more details on this to give more confidence in the results and subsequent conclusions.
- 40 A note is added after paragraph 3.5 to say that these anomalies are rare and that the VMS data on the whole is accurate giving the authors a high level of confidence in the datasets. This being the case, the strength of the wording in paragraph 3.5 should not be necessary.
- 41 Notwithstanding the above, it is clear that there are anomalies in the VMS datasets, which means that some car parking occupancies are incorrect. What is not clear is which car parks these relate to, what periods they relate to and to what extent they are incorrect.
- 42 The note sets out that on the whole they are accurate, however, there is a significant amount of data within this dataset and those elements that are inaccurate may be small in the context of the entire dataset, but may be significant in the context of a particular car park or area during a particular time period. For example, it may be significant in the context of a sea front car park on a peak day, but in the context of an entire car parking stock of 5,000 spaces (as set out in Tables 2.2 and 2.4 of the CPS) over 6 survey days, represents only a small anomaly.

- 43 The extent of these anomalies is not stated and so it is not possible to determine how they affect the results and conclusions of the report. What is clear is that the most recent period to be surveyed on the May Day Bank Holiday 2016, all 5,000 spaces (100%) were surveyed via video camera.
- 44 This is very telling and suggests more reliance was considered necessary on video surveys rather than the VMS data. Indeed, under normal circumstances the same surveys would be carried out so the data on the different days could be compared on a like-for-like basis. This leads to questioning the accuracy of the VMS data. In turn, it leads to questioning the entire survey data for periods when VMS was relied upon, in particular the August 2015 surveys.
- 45 It is suggested that the extent of these anomalies should be published to enable the results and the conclusions to be verified.
- 46 Further, Table 2.2 sets out the capacity of the off-street car parks and contains a footnote which states:
- ‘There is a difference between the number of spaces produced by the Variable Message System reports and the actual numbers. This is due to the VMS being adjusted to take account of narrow bays and system resets at 6am each morning with some cars parked overnight. Capacities in the VMS reports may vary (typically by no more than 5%). Some of the analysis in this report is based on occupancy of car parks using VMS system capacity data’.**
- 47 This footnote raises a number of points:
- Some of the car parks have narrow parking bays which cars may be unable to access on occasion. Thus, there is a lower theoretical number of car parking spaces than are physically provided;
 - The VMS appears to account for this and bases its capacity calculations on available spaces and decision to allow a car to enter the car park on this. However, this is theoretical and may not be experienced in practice. Cars could be circulating within the car park waiting for an accessible space to become available, whilst the VMS thinks there remains available spaces. This would underestimate occupancy;
 - The system is reset at 6am every morning. Therefore, if cars are parked overnight, then the system would start the day with all spaces being available, whereas in reality they are not. This would therefore underestimate occupancy;
 - These two factors combined will result in a general underestimation of occupancy;
 - The footnote sets out the variance would typically be no more than 5%. It does not set out what the maximum variance is. Nor does it set out which car parks this relates to.
- 48 On the basis of the above, it is not possible to determine how significant the variance of car park occupancy caused by the VMS is. It is therefore not possible to determine how this affects the results and the conclusions.
- 49 It is suggested that the extent of these variances should be published to enable the results and the conclusions to be verified.
- 50 Paragraph 3.4 sets out that video cameras were also used to count the number of cars parked on-street. Although this methodology can be accurate in determining parked cars, it may not be accurate in identifying spaces between parked cars and thus their practical availability. If cars are parked on-street in such a way that there is insufficient space between them for another to park, then this may not be obvious from a high level video camera that may be located some distance away. This could therefore overestimate the number of available car parking spaces.

- 51 When undertaking car parking occupancy surveys, it is normal to commence these with an initial survey of car park occupancy. This then allows the true occupancy to be determined throughout the day. It is not set out in the CPS that such a survey was undertaken, particularly for the off-street car parks. Such surveys would assist with the above issues.
- 52 It is suggested that information on initial car park surveys and occupancies are published to assist with the validation of the results and the conclusions.
- 53 Paragraph 3.9 of the CPS identifies 13th and 15th August 2015, as surveyed in the CPS, as peak days of demand. It is stated in paragraph 3.8 of the CPS that the weather on these days was dry and sunny with peaks of 22C and 20C respectively.
- 54 However, inspection of the recorded weather in Southend from the Woodham Mortimer weather station, it was cloudy and there were thunderstorms all day on Thursday 13th August 2015. On Saturday 15th August 2015, it was cloudy until approximately 14:00. This weather is not conducive for ad-hoc tourists to visit the area and will result in a lower level of visitors than would otherwise has visited if the weather was hot and sunny.
- 55 On this basis, it is considered that Thursday 13th August and Saturday 15th August 2015 are not representative of a true peak August day.
- 56 This is verified by takings on the seafront. The Stockvale Group have provided details of takings at three of their facilities for which data can be made available; Adventure Island, Sealife Adventure and Three Shells. The information has been provided on a percentage basis with the peak day of the entire year representing 100% and other days being proportionate to that, as set out in Table 4.

Table 4: Summary of Takings

Day	Adventure Island	Sealife Adventure	Three Shells
07/03/2015	-	82.98%	-
04/04/2015	-	81.12%	-
06/04/2015	74.97%	-	-
04/05/2015	-	88.00%	-
25/05/2015	78.15%	89.06%	-
27/05/2015	75.26%	-	-
29/05/2015	-	78.04%	-
04/07/2015	71.45%	86.50%	-
05/07/2015	-	73.21%	-
01/08/2015	75.98%	-	-
02/08/2015	73.46%	-	-
08/08/2015	86.19%	-	-
09/08/2015	84.39%	90.00%	-
13/08/2015	24.28%	64.69%	10.12%

15/08/2015	68.79%	57.98%	39.12%
22/08/2015	100.00%	100.00%	100.00%
28/08/2015	73.52%	-	-
31/08/2015	-	86.13%	-
23/03/2016	2.67%	18.82%	-
25/03/2016	66.45%	71.59%	-
26/03/2016	20.97%	67.69%	-
30/05/2016	52.52%	63.45%	-

- 57 This sets out that takings on Thursday 13th August 2015 were only 10.12% to 64.69% of the busiest day of the year. Takings on Saturday 15th August 2015 were only 39.12% to 68.79% of the busiest day of the year.
- 58 Table 3.1 of the CPS sets out a summary of surveys and data being available for each survey. It is noted from this that there are some car parking locations that have no car parking data available on some days. Those relating to 13th and 15th August 2015 are summarised in Table 5.

Table 5: Summary of Car Parking Locations with no Survey Data on 13th and 15th August 2015

Car Parking Location	Capacity
Civic Centre Overground	83
Civic Centre Underground	115
Library (Beecroft)	168
Short Street	73
Clifftown Road	11
Elmer Avenue	14
Queens Road	31
Queens Road (short stay)	10
Victoria Avenue	43
Total	546

- 59 Table 5 sets out that there are 546 car parking spaces analysed within the CPS that have no survey data on 13th and 15th August 2015. This represents over 10% of the total stock being considered within the CPS.
- 60 To assist with the survey analysis, paragraph 3.13 sets out that the Southend Central Area has been separated into the Central Area North and the Central Area South, divided by the railway line and based broadly upon a 10 minute walking distance from the shoreline. For the purposes of assessment, this appears reasonable.

- 61 After separating the Southend Central Area into northern and southern areas, Table 3.3 of the CPS then sets out that there are 2,500 total car parking spaces in the Central Area South.
- 62 As above, there are car parking spaces that have been omitted from the CPS. These can be considered in greater detail in the context of the Central Area South.
- 63 The car parking spaces that are identified in this Technical Note as being omitted from the CPS are all located in the Central Area South. With an allowance for residents parking, the above estimated they amount to some 800 car parking spaces.
- 64 If this is added to the 2,500 set out in Table 3.3 of the CPS, then there would be 3,300 total car parking spaces available for tourists and visitors in the Central Area South on peak days.
- 65 The CPS therefore clearly underestimates the total stock of car parking spaces in the Central Area South and it accounts for only 75% of the total supply.
- 66 In doing so, it also therefore underestimates the car parking demand created by tourists and visitors in the Central Area South.
- 67 This is considered to be a serious omission. There is no confidence in a car parking study that only considers 75% of the total stock to give sufficient evidence on which to draw the correct conclusions. When undertaking a parking study, it is normal to identify and survey all available parking spaces in a manner that is robust and from which the correct conclusions can be made.
- 68 The CPS does not do this and there is therefore no confidence that the correct conclusions have been made.

Existing Demand – Survey Analysis

- 69 A comment is made after paragraph 3.10 of the CPS which sets out that 85% occupancy of car parks has been adopted as an optimum maximum capacity to account for vehicle circulation, queuing and perception. This is reasonable.
- 70 The analyses of the parking data does not assess total parking demand against total parking stock. Instead, the analyses totals the number of parking spaces for which there is survey data and then assesses this against the number of vehicles within the car park based on entry and exit counts.
- 71 This is simply a count of car park occupancy. During periods when there is available capacity in all car parks, then this can be considered to be the parking demand. However, during peak periods, there are significant numbers of vehicles in the town travelling between car parking locations having been unable to park in the location they initially intended. These vehicles form part of the overall parking demand.
- 72 These vehicles have not been considered within the CPS. These vehicles will inevitably find a car parking space, however, this may be after a short period of time circulating. This can have the effect of such vehicles entering car parks in the periods after they first intended. If such vehicles entered Southend during the peak time of the day but were unable to enter a car park initially then there is a risk that such vehicles could be classified in periods after the peak time of the day. Within the CPS, this has the effect of suppressing the peak demand.
- 73 Therefore, on busy days, a comparison of car parking capacity against occupancy will be lower than the true parking demand at the peak time of the day.

- 74 Observations on-site during busy days will identify this issue. From these observations, an appropriate methodology could be devised on which to make an allowance for such occurrences. For example, vehicles queueing to get into car parks can be identified and added to the entry to create a better understanding of parking demand for that car park.
- 75 This would not establish the true demand, however. Comparisons of traffic flows at key locations on busy days against non-busy days can provide an idea of increased movement. This could be related to demand and could be validated against the car parking occupancies (with appropriate consideration that the occupancy on the busy day may not be representative of the true demand).
- 76 It is recognised that estimating the true demand would be difficult, however, the CPS makes no attempt to do so. As a result, the CPS underestimates car parking demand during the peak times of busy days.
- 77 Furthermore, the CPS only includes the car parking locations for which survey data was available. The calculation of occupancy therefore only relates to some of the car parks. There may be significant exceedances of capacity at other locations, however, since the CPS does not have data at all locations, this is not known.
- 78 As a result the CPS does not consider the complete parking situation in the Southend Central Area and there is less reliance placed on the results and the conclusions drawn from these. Furthermore, given that there are other locations (as set out above) that were not identified at all, this places an even lesser reliance on the results of the Central Area South (and North).
- 79 For each day of survey, the analyses identify the individual car parks that exceed their optimum maximum capacity (85% occupancy). For those that are identified, the occupancy of adjacent car parks are reviewed to determine if surplus capacity could be accommodated within these and then the walking distance between the two are considered to form a view if this is feasible.
- 80 The CPS does not explicitly set out that if the walking distance between car parks was considered to be feasible then the excess capacity could be absorbed by these other car parks. However, by making these analyses, the CPS is inferring that this would be the case.
- 81 Although transferring to other car parks sounds reasonable in theory, the evidence does not validate this.
- 82 Paragraph 3.22 of the CPS analyses the surveys on 13th August 2015 and states:
- ‘Aside from the five most popular parking areas, there is significant availability of spaces in alternative parking areas’.**
- 83 This means that tourists and visitors are currently choosing to park in these car parks despite them being in excess of their optimum maximum capacity. They currently have the option to park in alternative car parks but they are not. This suggests that they are not willing to travel to another car park and walk the additional distance.
- 84 Later on in this Technical Note, there is a summary of a travel survey undertaken by the seafront traders and this demonstrates that 54% of all tourists visit more than 5 times per year. A large majority of tourists are therefore return visitors who are already aware of the location of car parks and road layout. These tourists choose their car park based on the convenience to them. They will already be aware of the other car parks but they choose the popular car parks.
- 85 This evidence is acknowledged in the CPS, where paragraph 3.22 goes on to state:

'It can be assumed that the high level of demand for the five most popular parking areas means that users wish to park in the locations that are close to the main shopping and tourism destinations of Southend Central Area.'

- 86 On this basis, there is no evidence that tourists and visitors would transfer to alternative car parks. The evidence suggests that tourists and visitors would utilise the most convenient car parks, despite them already exceeding their optimum maximum capacity.
- 87 Furthermore, an analysis of walking provisions and ambience between car parks needs to be made to establish the likelihood of vehicles transferring. If there is poor and congested footway provision with no crossing points, then this will not be very attractive irrespective of the distance.
- 88 The CPS does not consider this and it is therefore not possible to form a view on the ability for vehicles to transfer to alternative car parks.
- 89 The surveys demonstrate that parking in the Central Area South has a far higher demand than parking in the Central Area North. This is most noticeable on Saturday 15th August 2015. Paragraph 3.25 of the CPS states:

'Occupancy across the entire network peaked at 79% between 14:00 and 16:00. Central Area South occupancy reached a higher peak (97%) than Central Area North occupancy (54%).'

- 90 Paragraph 3.29 of the CPS goes on to state:

'Table 3.7 shows the peak period of occupancy and the percentage of spaces occupied in that period for each parking area. It shows that those eleven most popular car parks, all in the Central Area South area, are heavily over-subscribed at peak periods of demand, typically in mid to late afternoon.'

- 91 There were 12 car parks surveyed in the Central Area South on Saturday 15th August 2015 and the CPS identifies that 11 of these were all in excess of their optimum maximum capacity.
- 92 There is therefore clearly a distinct difference in parking demand between the Central Area South and the Central Area North. Users choose to park in the Central Area South for convenience and despite there being available spaces elsewhere they choose not to.
- 93 Paragraph 3.25 of the CPS identifies that the Central Area South occupancy reached 97% on Saturday 15th August 2015. As set out in Table 4, this equates to up to only 68.79% of the peak day of the year.
- 94 97% relates to the entire stock, which the above calculates at 3,300 spaces. Later on, this Technical Note sets out that the car has a mode share of 84.7% for tourists to the Central Area South. Thus, if the additional takings on the peak day is equated to car parking demand, this amounts to an additional 641 cars seeking a space in the Central Area South (3,941 total car parking demand). This equates to 119% occupancy in the Central Area South.
- 95 It is clear that demand for parking in the Central Area South on peak days already exceeds capacity.

Existing Demand – Survey Analysis – Busiest Day of the Year

- 96 The CPS has used the VMS data to identify the busiest day for parking within the Southend Central Area between May 2015 and May 2016 and identified Saturday 22nd August 2015.

97 Figure 3.6 of the CPS sets out that the Central Area South was in excess of its optimum maximum capacity from 12:00 to beyond 19:00 (the survey data ceases at 19:00) on this day.

98 Paragraph 3.42 of the CPS goes on to state:

'For the Central Area South parking areas as a whole, the number of days on which occupancy exceeded 85% was 38 between May 2015 and 2016.'

99 Figure 3.7 of the CPS then shows the temporal distribution of these 38 days. This demonstrates that, excluding the winter months of November to March, there was at least 3 days in every month when the optimum maximum capacity of the combined car parks in the Central Area South for which data was available was exceeded.

100 During August 2015, there were 17 days when the optimum maximum capacity of the combined car parks in the Central Area South for which data was available was exceeded.

101 This Technical Note, and the CPS, has identified that there is a significantly different parking demand and occupancy between the Central Area South and the Central Area North. Significantly greater pressure on parking has been identified for the Central Area South.

102 Despite this, the CPS does not identify the busiest day of the year for the Central Area South. The CPS does not therefore analyse in detail the busiest day of the year for the Central Area South.

103 This is a serious omission. The above sets out how 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.

104 Therefore, to have not analysed the Central Area South, which is the main attraction area for tourists, on its busiest day of the year is a serious omission from the CPS.

Benchmarking

105 The CPS undertakes a series of comparisons for Southend against Blackpool, Brighton and Bournemouth.

106 The aim of this appears to be to identify how each of these manage their peak demand and to consider whether this is transferrable to Southend.

107 Table 3.10 of the CPS sets out that Southend has a significantly greater number of seafront car parking spaces per 1,000 annual visitors in comparison to the other three (0.56 for Southend versus 0.10, 0.04 and 0.02).

108 In part, this suggests that Southend caters for a larger proportion of day visitors in comparison to the others, since a day visitor arriving by car needs public parking whilst visitors for more than one day (i.e. staying overnight) and arriving by car can park at their accommodation.

109 Despite having more car parking per visitor, the CPS demonstrates that the seafront car parking spaces in Southend exceed their optimum maximum capacity on a number of occasions.

110 Table 3.11 sets out that Southend has a greater number of central area car parking spaces per 1,000 annual visitors in comparison to the other three (2.1 for Southend versus 0.6, 1.0 and 0.5). This also

suggests that Southend caters for a larger proportion of day visitors in comparison to the others. Indeed, Blackpool, Brighton and Bournemouth have a very large amount of hotels, and a much greater proportion of visitors stay overnight than at Southend.

- 111 The needs and management measures to cater for visitors vary depending upon their length of stay and day visitors are different to those who stay overnight. With a higher proportion of day visitors at Southend in comparison to the others, the needs of visitors may be very different to those at the others.
- 112 The measures which the others use to manage peak demand must therefore be considered very carefully in identifying if they are transferable to Southend.
- 113 It should also be borne in mind that the measures used to manage peak demand at the others will be dependent upon their unique circumstances and what works at one location may not work at another. This is evident from paragraph 3.88 of the CPS which sets out that the examples at all three provide different approaches to dealing with peak demand.
- 114 Paragraph 3.93 of the CPS sets out that, of the three others, the approaches in Brighton are more transferable to Southend, which includes the provision of a one-stop shop for local travel information, provision of a park and ride service and provision of underground car parks.
- 115 The third bullet point of paragraph 3.93 suggests the ruling out of underground car parking in advance of giving it any further consideration by immediately stating it is a more expensive option and quoting likely costs. Brighton have adopted underground car parking and so there is no need to rule such provision out at this stage of the report based on cost.

Future Demand and Supply

- 116 The CPS considers the additional parking demand created by future uses in the Southend Central Area. It assumes that all new residential, business and hotels etc would be developed with their own off-street parking which is not available for public use. It also assumes that all new shops, restaurants, cinema and museum would have parking that is available to the public. These are reasonable assumptions.
- 117 The trip generation and parking demand created by the museum has been taken from its planning application. The trip generation and parking demand created by the other uses have been estimated using industry standard techniques. These methodologies are reasonable.
- 118 Two parking approaches have been considered; one that provides new parking for the new uses based upon maximum parking standards, and one that uses judgement to provide a reduced level of parking provision.
- 119 The principle of this methodology is reasonable, however, no evidence is provided to set out how much parking has been provided for / reduced by for the latter approach. These assumptions should be set out to give more confidence in the results and subsequent conclusions.
- 120 Table 4.1 of the CPS sets out the scenarios that have been created and these are reasonable, subject to the above assumptions being reasonable and the assumptions on the likely development itself being reasonable.
- 121 Based upon these, Tables 4.2 and 4.3 of the CPS set out the effect on the total parking stock in both the Central Area South and the Central Area North as a result of the approved planning applications and the Opportunity Sites.

- 122 It is firstly noted that Opportunity Site CS1.3 is Marine Plaza. As set out above, this is currently used as a publically available car park, however, has been excluded from the CPS. There are 200 publically available car parking spaces on Marine Plaza, therefore, these should be treated as being lost as part of the net change calculation as a result of the redevelopment.
- 123 Given the Marine Plaza car park has not been included within the CPS, these spaces do not appear to be included in the net change calculation. Therefore, on this basis alone, Tables 4.2 and 4.3 will overestimate the net change in car parking by 200 spaces.
- 124 In addition, spaces gained appears to be the total spaces gained for each of the approved planning applications and the Opportunity Sites. It does not appear to deduct the parking for uses that will not be publically available i.e. residential. On this basis, Tables 4.2 and 4.3 will further overestimate the net change in car parking.
- 125 In the Central Area South, there are 432 residential units proposed on Opportunity Sites PA7.1 and CS1.3. Assuming maximum car parking standards of one space per dwelling equates to 432 spaces that would not be publically available. Assuming a conservative approach for the reduced parking scenario of 0.2 spaces per dwelling, equates to approximately 100 spaces (for ease of reference and calculation) that would not be publically available.
- 126 These calculations have been applied to Tables 4.2 and 4.3 of the CPS and they are recreated in Tables 6 and 7 respectively for the Central Area South.

Table 6: Future Parking Supply: Based on Central Area Precedents (Central Area South)

Scenario	Spaces Lost	Spaces Gained	Net Change
Scenario 1: pre-2021 planning applications	0	200 to 250	+200 to +250
Scenario 2: pre-2021 planning applications and pre-2021 Opportunity Sites	1,050 to 1,100	1,000 to 1,100	-100 to +50
Scenario 3: post-2021	1,200 to 1,300	1,000 to 1,100	-300 to -100

Table 7: Future Parking Supply: Application of Maximum Parking Standards (Central Area South)

Scenario	Spaces Lost	Spaces Gained	Net Change
Scenario 2: pre-2021 planning applications and pre-2021 Opportunity Sites	1,050 to 1,100	868 to 968	-185 to -82
Scenario 3: post-2021	1,200 to 1,300	1,068 to 1,168	-232 to -32

- 127 As can be seen, Tables 6 and 7 present a very different case to Tables 4.2 and 4.3 of the CPS. The above predicts that the Opportunity Sites would result in a net loss of parking in the Central Area South.
- 128 Given that the CPS identifies that there is already significant pressure on the car parks in the Central Area South (and the LTP predicts a 25% increase in demand), this is unwelcome and would impact upon trade in this area.
- 129 Notwithstanding the above, Figure 4.4 of the CPS estimates car parking occupancy in the Central Area South using its calculations in Tables 4.2 and 4.3. Figure 4.4 of the CPS shows that the optimum maximum capacity of the Central Area South would remain exceeded in all scenarios.

130 As shown above, the Opportunity Sites will actually result in a loss of publically available parking in the Central Area South, therefore the effect shown on Figure 4.4 of the CPS would in fact be far worse.

131 Paragraph 4.29 of the CPS then states:

'It should be noted that the scenarios were tested for demand in August, representing the peak season of demand, so are not representative of typical demand which, as described earlier, is notably lower than the existing supply.'

132 This is a wholly inappropriate statement. The above sets out how 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. Without this car parking the business models of tourism businesses will have to change, potentially to the detriment of the local economy.

133 To base parking provision on periods of typical demand would result in significant loss of the very fabric of this area.

Visitor and Shopper Spend Survey

134 This section of the CPS gathers information from tourists and visitors in the Southend Central Area which can inform a judgement on how changes may affect parking patterns in Southend.

135 It is firstly noted that only 29% of interviews were conducted on the seafront. This is despite the CPS identifying that parking is under most pressure in this location.

136 There is very limited disaggregation of results to only the seafront or only the town centre. Therefore, the results of the interviews are balanced in favour of the town centre. They are not therefore considered wholly relevant to tackle the issues that the CPS has identified, namely that there is significant pressure on parking in the Central Area South.

137 In particular, the tourists that visit the sea front and the Central Area South are mostly families visiting the area. Those visiting the town centre are mostly shoppers etc. There is some overlap between the two as some tourists and visitors will visit both. However, in the whole, the visitors are different with different needs and requirements.

138 Families will typically be less inclined to walk further distances than shoppers. Families will also be more inclined to travel by car for ease of travel and convenience rather than use sustainable modes of transport such as bus or the train. That said, families travelling by car is sustainable travel as it is a form of car sharing and typically have approximately 4 occupants, as is set out below.

139 This differentiation is not fully considered from the interview surveys.

140 Paragraph 5.32 of the CPS states:

'Measures to increase the number of vehicles accessing and parking in the Central Area and at the seafront are likely to impact negatively on all visitors through increased congestion, worse air quality and reduced ambience, and this needs to be taken into account when planning car parking provision.'

141 This statement does not appear to be evidenced by the preceding text and appears to be a point of view. With careful management, an increased number of vehicles and parking in the Southend Central Area may not impact negatively, as is suggested.

142 Furthermore, a significant proportion of vehicle movements parking in the Central Area and at the seafront on busy days are vehicles circulating looking for a space. If there was sufficient parking to cater for these busy days then the number of vehicle movements in these areas would reduce. This in itself would reduce congestion, improve air quality and improve ambience. Reducing vehicle movements is not the only solution for this.

143 The statement appears to lead into the following paragraphs (5.33 and 5.34) which state:

'This study has shown that there is significant pressure on the seafront parking areas at times of peak demand but there is spare capacity elsewhere in the Central Area parking network. Survey data appears to suggest that price of parking is prioritised by visitors, yet there is little differentiation in the pricing of parking between the seafront car parks which are at or over capacity at peak times and the Central Area car parks which have plenty of spare capacity.'

144 and

'Making better use of available spare capacity within a reasonable walking distance of key destinations should be a key priority in any parking strategy for Southend Central Area.'

145 There is insufficient evidence presented to make this statement. In addition to cost, convenience was the joint top priority from the interview surveys. This is evidenced from the results of the parking surveys in the CPS which demonstrate that car parks in the Central Area South exceed their optimum maximum capacity but car parks nearby (within a 5 minute walking distance) remain available.

146 The August car parking surveys demonstrated that during peak demand there was insufficient availability within car parks within a reasonable walking distance. It is these days that need to be catered for to secure the long term business for the sea front and therefore, a key priority for the parking strategy should not just be to cater for this, but to exceed it to enable growth.

147 Growth is a key strategy in the LTP3 and predicts an increase in car parking demand of 25% by 2021 in the Central Area. The CPS demonstrates that this could not be catered for.

The Stockvale Group Travel Survey

148 Before reviewing the recommendations set out within the CPS, this Technical Note sets out the details of a travel survey undertaken by The Stockvale Group of Adventure Island visitors. This is an open online survey which has been running since 3rd February 2016.

149 The results of the survey were extracted on 6th December 2016 when there were 1,538 respondents. Key answers are set out in Tables 8 to 13.

Table 8: Question 3 – What Mode of Transport Did You Use to Get Here?

Mode	Respondents	Proportion
Car	1,295	84.7%
Bus	28	1.83%
Train	143	9.35%
Other	63	4.12%

Table 9: Question 4 – If You Came by Car How Many Passengers Came With You?

Number	Respondents	Proportion
1	43	3.02%
2	183	12.85%
3	406	28.51%
4	437	30.69%
5	193	13.55%
6	76	5.34%
7	33	2.32%
8	24	1.69%
9	13	0.91%
10	16	1.12%

Table 10: Question 6 – Are You a Frequent Visitor to Southend (have you been here more than five times in the last 12 months)?

	Respondents	Proportion
Yes	798	53.88%
No	683	46.12%

Table 11: Question 8 – From 1 to 10 (10 highest) How is Parking and your Journey to Southend, Important to your Decision, as to Whether You Will Come Back Again?

Importance	Respondents	Proportion
1	57	3.84%
2	37	2.49%
3	49	3.30%
4	36	2.43%
5	112	7.55%
6	91	6.13%
7	137	9.23%
8	309	20.82%
9	161	10.85%
10	495	33.36%

Table 12: Question 9 – Did you Find it Easy to Find a Car Parking Space Near to the Seafront?

	Respondents	Proportion
Yes	836	58.96%
No	582	41.04%

Table 13: Question 10 – What is Most Important to you When Choosing Where to Park from the List Below? (Please Number in Priority, 1 is Highest Priority and 4 is Lowest)

Mode	Weighted Average
Quality	2.84
Convenience	1.82
Cost	2.18
Security / Safety	2.13

- 150 The surveys undertaken by The Stockvale Group are similar to those undertaken as part of the CPS. However, they relate solely to the seafront area and the Central Area South.
- 151 The most striking difference between the two surveys is the mode of travel. The CPS survey was weighted towards visitors of the town centre and saw a mode share for cars of 29%. The Stockvale Group survey for the Central Area South saw a mode share for cars of 85%.
- 152 The CPS survey did not gather the number of occupants per car, whereas The Stockvale Group survey identified that 28.51% of respondents travelled as a party of 3 and 30.69% of respondents travelled as a party of 4.

- 153 This validates the above in that the tourists and visitors to the Central Area South are very different to those for the Southend Central Area as a whole.
- 154 Furthermore, The Stockvale Group survey identified convenience as the key priority for choosing a car parking location, followed by Security / Safety, then cost and quality. The CPS survey covering the whole Southend Central Area identified convenience and cost as equal top priorities.
- 155 The Stockvale Group survey helps to identify reasoning why there is significant pressure on car parks in the Central Area South whilst, those in the North have availability. Clearly cost is a factor, but it is outweighed by convenience, likely to be because of the number of families that visit the Central Area South.
- 156 The Stockvale Group survey also introduces the fact that a majority of visitors (54%) are regulars who visit more than five times a year. These visitors will be aware of the parking and locations and choose their parking primarily, according to the survey, based on convenience.
- 157 It is these respondents who park in the Central Area South and which create the pressure on the car parking within it. The recommendations of the CPS should reflect this.

Recommendations

- 158 The CPS sets out 4 themes on which to base a parking strategy for a short, medium and long term basis. These are:
- Travel Information: Provide better travel information to influence mode and choice of travel;
 - Sustainable Access: limit the number of vehicles accessing the Southend Central Area by encouraging alternative modes and car sharing;
 - Parking Management: Make better use of parking availability by displacing excess demand in the south to the north through price structuring; and
 - Parking Supply: Provide a park and ride facility for visitors to the seafront area to reduce the pressure on parking in this location.
- 159 The CPS considers these themes for the Southend Central Area as a whole. It is clear that the parking demand in the Central Area South is very different to that in the Central Area North.
- 160 The Travel Information theme would provide a good means of influencing mode and choice of travel and those who are capable of and want to change may well do, which in turn would reduce the pressure on parking.
- 161 However, it is clear from The Stockvale Group survey that a vast majority of tourists to the Central Area South travel by car as they are families with 3 to 4 occupants per car. It is unlikely that such tourists would alter their mode of travel. Given the frequency of visits, it is likely that such tourists are already aware of the various car parks and they choose their car parking location based on convenience.
- 162 It is considered that this theme would assist the Southend Central Area as a whole but would have only a limited effect upon the Central Area South, where there is most pressure on parking.
- 163 A similar conclusion is drawn for the Sustainable Access and the Parking Management themes. These themes may assist the Southend Central Area as a whole by travelling by more sustainable modes and by making better use of car parks in the Central Area North; however, it is considered that they would have only a limited effect on the Central Area South.

- 164 Families visiting the Central Area South do so by private car (85%) due to convenience. They will have difficulty in shifting to a mode away from the private car and they are unlikely to utilise car parks in the Central Area North primarily due to inconvenience. As above, families travelling in a group of 3 or 4 per car is a sustainable mode of travel in any event.
- 165 In a similar vein, families would be unlikely to switch to park and ride due to the convenience of the private car. Such a scheme may assist the Southend Central Area as a whole but is unlikely to have any profound effect on the Central Area South.
- 166 Although the recommendations may work well in some locations, they are not considered suitable for Southend on Sea. The evidence base that has been gathered for the CPS masks what the true effect may be.
- 167 The parking surveys identified significant pressure in the Central Area South, however, the interview survey for the CPS is not detailed enough to enable specific consideration to this area. Instead, the interview survey is weighted towards visitors of the town centre, who have been identified to be very different to those in the Central Area South.

Summary and Conclusions

- 168 This Technical Note reviews and provides a critique of the technical evidence base to the Draft Southend Central Area Action Plan, dated November 2016, concentrating on the Car Parking Study, dated November 2016
- 169 The review focuses on the transport evidence base and draws on the local knowledge and experience of the seafront traders as well as transport related data that they currently hold.
- 170 The following key points have been identified:
- The CPS identifies early that the LTP3 notes Central Area car parking demand is forecast to grow by 25% by 2021, however, this has not been allowed for. Indeed, the parking stock is predicted to reduce.
 - The CPS does not identify all publically available car parking and thus does not identify the total car parking stock, nor does it identify the total car parking demand.
 - In the Central Area South the CPS identifies 2,500 publically available car parking spaces, however, this Technical Note has estimated there are actually approximately 3,300 publically available car parking spaces.
 - Of the car parking spaces that the CPS does identify, only 60% of these have been surveyed using reliable survey methodologies.
 - The remaining 40% have been surveyed using VMS data, which was found to have errors.
 - The surveys in August did not consider the total car parking stock and only obtained data for a proportion of the total car parking stock.
 - The CPS assesses car parking occupancy rather than car parking demand.
 - The CPS suggests that when car parks are full, then visitors should use other nearby spaces, however, the evidence does not support this.
 - As a result, the CPS considers the Central Area as a whole, however, there is significantly different car parking demand between the Central Area North and South and there is an over-demand for car parking in the Central Area South.
 - The CPS does not assess the peak day robustly and considers this using limited data for the Central Area as a whole. However, there is significant over-demand in the Central Area South which is not fully analysed.
 - The Opportunity Sites would result in a net loss of car parking in the Central Area South, which the CPS does not identify.
 - The interview survey within the CPS is balanced in favour of the town centre whereas it is the in the Central Area South that experiences the greatest demand for parking. As a result, the

conclusions of the interview survey are not relevant to the key parking matters in the Central Area,

- Surveys undertaken by The Stockvale Group have identified very different results to the surveys in the CPS which reflects the differing natures of the Central Area North and South.
- The recommendations set out the CPS are not considered to be appropriate to the Central Area South because they have been developed by considering the Central Area as a whole.
- Overall, the CPS fails to properly consider the parking situation in the Central Area South and therefore fails to adequately develop a strategy for developing the AAP.

It's been a pleasure (and a struggle)

UK park goes dark

The English amusement park Pleasure Island in Cleethorpes closed for good on October 29. Guests were able to enjoy a firework finale as they paid a tearful farewell to the east coast attraction, which has traded since 1993.

Originally operated as a sister park to Flamingo Land in North Yorkshire, Pleasure Island has been run as an independent concern since 2010 by Melanie Wood, sister of Flamingo Land boss Gordon Gibb.



JOIN THE SPLASH PARK REVOLUTION!



www.watertoys.com
 info@watertoys.com
 1 866 833 8580 | 905 649 5047
 IAAPA BEST NEW PRODUCT & IMPACT AWARD | WWA INNOVATION AWARD



"For the past seven seasons we, as a team, have tried very hard indeed to keep the business going but unfortunately there have been too many hurdles," Wood told *The Grimsby News*. "Despite heavy investment over the years the visitor numbers continue to fall and the good August weather this year sadly was not enough to sustain the business. In truth it has been a massive struggle from day one but I lived in the hope that with the support of such a loyal and dedicated team and some good weather we would get through. The team never let me down but over the years the weather, amongst other things, certainly has."

Wood adds that the future of the site, once a zoo and stock car racing track, is unknown, but she will continue to operate the park's McCormack's bar and restaurant after a refurbishment this winter.

"Cleethorpes as a resort is still growing and going places," insists chairman of the local Visitor Economy Service Retail Group, Lawrence Brown. "It is a fantastic resort. There are lots of other things to do. Just look at the investment in The Pier and the fantastic regeneration on the back of that."

Dreamland's nightmares continue

The former owners of Dreamland say they have made an offer to the local Thanet District Council (TDC) to take back the site of the English amusement park in the town of Margate, Kent, and put houses on it, similar to their original plans when it closed in 2005.

Margate Town Centre Regeneration Company (MTCRC) eventually surrendered the site in 2014 following a compulsory purchase order served in 2011, but has been in dispute with the council over the compensation it feels it should be paid. Spokesman Toby Hunter says MTCRC has now asked to council to cough up £1 million (\$1.22m/€1.1m) to cover costs and "draw a line" under situation, rather than holding for the £15 million he claims is due.

TDC, which handed the site over to the charitable Dreamland Trust to transform into a heritage theme park, is reported to have paid approximately £750,000 to MTCRC until now.

The park is in a vulnerable position due to poor financial performance and various problems behind-the-scenes in the season-and-a-half it has been open in its current "vintage" incarnation. Dreamland reopened last year with Sands Heritage as operator, which has accrued millions of pounds of debts.

"Dreamland is not going to rescue itself," says Hunter. "It had £16 million of public money invested and then went bust. "We have a clear view of what we want to put on the site, including houses and gardens."

Thanet District Council leader Chris Wells has dismissed MTCRC's opportunistic attempt to take back the site.

Although Hunter has stressed that "we are happy to make sure the menagerie and the Scenic [rollercoaster] are looked after and all is fine with the HLF [Heritage Lottery Fund]," these two attractions alone would not an amusement park make. The challenge for Dreamland in the coming months will be to prove that the existing park is a viable concern.

RIGHT: Dreamland's *Screamland* Halloween season, produced by AtmosFear! Scare Entertainment, has been highly praised



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

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_areas_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



Attend a public workshop

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.**

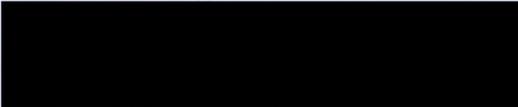
Other ways to have your say

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:
 - 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


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

