

southend central area action plan
(scaap)

consultation statement
preferred approach 2015

draft

Consultation Statement

Introduction

In accordance with Southend Borough Council's Local Development Scheme timetable and the 'Strategic Objectives' and policies within the adopted Southend Core Strategy, the Borough Council has prepared an Area Action Plan for the Central Area of the town and associated policies map. It is a spatial plan that will provide:

- An up-to-date statutory basis for assessing planning applications within the Town Centre and Central Area; and
- A local planning framework for guiding development within the Town Centre and Central Area, within which the Council, other agencies and key stakeholders can coordinate their investment programmes.

SCAAP Preparation and Consultation

It is proposed to consult on a 'Preferred Approach' version of the SCAAP in November 2015 under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This will provide an opportunity for stakeholders, members of the public and interested parties to respond to the preferred approach as set out in the Plan, including specific site boundaries and policies within the SCAAP area.

The Preferred Approach builds on the 'Proposed Submission' version of the SCAAP (referred to hereafter as the Superseded Proposed Submission version), published in September 2011, and the 'Issues and Options' version, published in June 2010. It has also been informed by representations made to the Issues and Options versions of the Seafront Area Action Plan and Town Centre Action Plan, which preceded the SCAAP, consulted on in 2007, and the Central Area Masterplan (CAM), adopted by the Council in 2008 as corporate policy.

In summary, the main consultation stages completed and proposed are:

- Issues and Options version (June 2010)
- (Superseded) Proposed Submission version (September 2011)
- Preferred Approach version (November 2015)

Issues and Options Version (June 2010)

The purpose of the Issues and Options stage (Consultation – 21st June 2010 to 9th August 2010) was to explore the spatial options for Southend Central Area and how detailed policies and proposals could guide regeneration in a sustainable manner. The Council wanted to gather stakeholder's views about the general direction of proposed policy to meet Southend specific issues.

The Borough Council put forward a suggested approach where development areas were referred to as 'Quarters', 'Gateway Neighbourhoods', and 'Proposal Sites', as part of the consultation alongside alternative options. The process provided the public with the opportunity to shape the look and feel of Southend Central Area and its communities,

including consideration of environmental and social interests. The responses received at this stage informed the production of the Proposed Submission version.

Proposed Submission Version (September 2011)

The previous key stage in the preparation of the SCAAP was the (Superseded) Proposed Submission Version. Consultation took place between 5th September 2011 and 17th October 2011. The purpose of this consultation was to allow representations to be made in relation to 'soundness' and 'legal compliance'.

Further preparation of the SCAAP since the Proposed Submission version has been delayed owing to significant changes to national planning policy and guidance, the need to produce further supporting evidence in addition to dedication of resources to deliver the London Southend Airport and Environs Joint Area Action Plan (JAAP) and Development Management Document, which have both been successfully examined and now adopted.

Key Developments and Schemes in SCAAP Area since September 2011

Following public consultation of the (Superseded) Proposed Submission Version of the SCAAP (2011) there has been progress on a number of sites, including:

- Delivery of Phase 1 of Elmer Square through the delivery of The Forum, a state of the art integrated municipal and academic public library;
- Relocation of Beecroft Art Gallery into the former Central Library building on Victoria Avenue, following the development of The Forum;
- Completion of Phase 1 of the City Beach public realm scheme within the central seafront area;
- Completion of Phase 1 of the Victoria Gateway public realm scheme;
- Delivery of The Royal Pavilion cultural centre at Southend Pier;
- Planning permission has been granted in 2012 for the new Southend Museum within Cliff Gardens, above Western Esplanade;
- The demolition of Queensway House, and the erection of a temporary public car park on the site;
- The demolition of Portcullis House, Victoria Avenue, and the erection of temporary car park on the site;
- The demolition of Focus Youth Centre on Short Street;

SCAAP Preferred Approach (November 2015) - Summary of Main Changes

In summary, main revisions to the SCAAP since the previous version [(Superseded) Proposed Submission Version September 2011] are:

- A number of the criteria based policies presented in the SCAAP have been rationalised in order to make the document my concise and avoid duplication. These changes are summarised in the 'Rationale Box' that follow each topic in the SCAAP;

- 'Quarters' are now referred to as 'Policy Areas' and 'Proposals Sites' are now referred to as 'Opportunity Sites' on the Policies Map and within the main SCAAP document;
- Opportunity Sites (formerly proposals sites) have been updated to reflect the Council's aims and objectives for the central area, planning permissions, current land use and previous consultation responses (See **Table 1** and **Appendix A** below);
- Updated approach to car parking management;

Table 1 - Changes to location and boundary of SCAAP Policy Areas and Opportunity Sites

Policy Area	Proposed Modification	Reason for Proposed Modification
High Street Policy Area	Re-define Policy Area boundary to include The Victoria's (previously included in Queensway Southchurch Road Quarter) and The Royals shopping centre (previously included in Tylers Quarter).	To provide a consistent approach and incorporate these two main 'retail anchors' into the boundary of the High Street Policy Area, the primary focus for retail development within Southend Central Area.
London Road Policy Area	Removal of Proposal Site PS2a: Sainsbury's and adjacent buildings from the Plan, incorporate general principles for the site within the supporting text and general development principles for the Policy Area, including highlighting opportunities for public realm enhancements, links with the Victoria Gateway improvement scheme and Victoria Circus, promoting 'active' building frontages (with particular reference to the Odeon building).	The plan should include sites that can be demonstrated to be deliverable. Removing the specific proposal site policy from the plan whilst maintaining commentary on regeneration/future uses of the site within the general development principles and supporting text for the Policy Area allows increased flexibility, until such a time that there are identified plans for redevelopment.
Elmer Square Policy Area	Proposal Site PS3a: Elmer Square, update text to include reference to Phase 2 of Elmer Square, reflecting the principles of the development brief for the site (including provision of educational facilities) and amend proposal site boundary to reflect Phase 2.	In recognition that Phase 1 of the Elmer Square redevelopment, as set out in the previous iteration of the SCAAP, has been completed.
Queensway Policy Area	Proposal Site PS4a: Queensway House. Amend site boundary, update proposal site policy and supporting text, to recognise and reflect the ambitions of the Queensway regeneration project. Boundary to include: Queensway	In recognition of on-going work on the Queensway regeneration project, to reflect the boundary of the area being considered as part of this project and to reflect those development principles.

	<p>House site, Coleman Street site (formerly PS10c) and Short Street (not previously allocated within the plan), together with properties on Southchurch Road.</p> <p>Amend boundary to remove The Victoria's shopping centre (moved to High Street Policy Area) and include surrounding Queensway environs.</p>	<p>To provide a consistent approach and incorporate the main 'retail anchors' into the boundary of the High Street Policy Area. To also reflect revised boundary of the Queensway scheme.</p>
Warrior Square Policy Area	<p>Proposal Site PS5a: Warrior Square Car Park amend boundary to remove properties owned by Regis group.</p> <p>Remove specific reference to development of the site for a multi storey car park (MSCP). Updating the approach to public car parking provision within the SCAAP accordingly (which was previously set out in the Transport and Access Strategy of the SCAAP 2011 on the basis of the Warrior Square Car Park Capacity Study 2011, setting out a preferred approach based on re-provision of car parks in the south west, north west, north east and south east quadrants of the town centre, although allowing for flexibility).</p>	<p>To ensure the site boundary includes property/land within SBC ownership only, ensuring deliverability.</p> <p>Reference to the MSCP to be removed following evidence base work that highlights an issue of viability delivering a MSCP on this site; to remove reference to the Warrior Square Car Park Capacity Study from the plan. The approach to public parking provision (within an updated Transport and Access strategy) is proposed to maintain existing levels of public car parking, allowing flexibility in terms of parking solutions, and for any redevelopment of the site to explore opportunities for parking provision.</p>
Clifftown Policy Area	<p>Proposal Site PS6a: Clarence Road car park and PS6b: Alexandra Street car park to be removed from the Plan and to include general development principles and supporting text relating to these sites retained within the Clifftown Policy Area recognising these as future 'opportunity sites'.</p>	<p>To retain these surface level car parks within the Central Area, whilst providing general development principles to guide any future redevelopment proposals.</p>
Victoria Gateway Neighbourhood Policy Area	<p>Proposal Site PS9a: Victoria Avenue Office Area – retain within the Neighbourhood and remove reference to site specific allocation for a primary school (at the former</p>	<p>To reflect the reconfiguration of the former Central Library into the Hive and Beacroft Gallery.</p>

	<p>library).</p> <p>Proposal Site PS9c: Roots Hall – retain proposal site within the Gateway Neighbourhood Policy Area and general amendments made to refine potential uses on the site.</p>	<p>To reflect the vision and intention of Southend United Football Club to relocate to a new stadium at Fossetts Farm, nevertheless allowing for a flexible approach to the redevelopment of the Roots Hall.</p>
<p>Sutton Gateway Neighbourhood Policy Area</p>	<p>To remove Proposal Site PS10a: Former B&Q site.</p> <p>To amend the boundary of the neighbourhood so that Short Street Youth Centre and PS10c: Coleman Street are included within the Queensway</p>	<p>To reflect progress on the site following the previous iteration of the plan (2011), whereby the building is now occupied with a long-term lease and the Tesco redevelopment has not been progressed. Include general principles within the plan, should the redevelopment of the site come forward in the long term.</p> <p>In recognition of on-going work on the Queensway regeneration project, to reflect the boundary of the area being considered as part of this project and to reflect these development principles.</p>

Responses to the Superseded Proposed Submission Version September 2011

Responses received to the consultation comments on the previous iteration of the SCAAP are presented in **Appendix 1**. The representations have been taken into account in the preparation of the Preferred Approach version (November 2015). The Council's also has provided a response to the comments received by the respondents.

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council Response
3	Stargas Nominees [279]	1383	Comment	<p>We consider the AAP to be, in the most part, 'sound' in its current format, on the basis that the document broadly complies with National Policy. Notwithstanding this, we submit a formal request for our client's site to be included in the document as a proposal site for residential development or mixed-use residential development. This is especially relevant as the Council has introduced new zoning within the Central Area, which places the site in the Queensway and Southchurch Road, Area where the priority is to provide new and improved residential accommodation.</p> <p>In this regard, we consider that the Council has failed to appropriately consider previous representations and zone the site for residential or residential-led mixed-use development, which fails to meet the advice of National Policy.</p>		<p>It should also be noted that not all potential development sites in the SCAAP area are allocated, but this does not prevent development coming forward and be considered against the development principles set out within each Policy Area.</p> <p>The development principles support a net increase in dwellings above existing or new commercial development as well as mixed use development with active ground floor frontages.</p>
3	The British Horse Society (Mrs Marlene Curtis) [275]	1395	Object	<p>Because of the existing paucity of Southend Bridleways and off-road opportunity for equestrians to travel, the BHS objects strongly to Southend Borough Council's DPD for completely omitting consideration of safe equestrian routes to travel east/west and north/south through the Borough to get where they want to go.</p>	<p>BHS requests that equestrians are given parity of treatment in off-road access provision as provided for walkers and cyclists.</p> <p>Public money should be for all users. In addition adequate and equitable on-road provision (including road crossings) should include all vulnerable NMUs, not facilities singled out and provided for pedestrians and cyclists alone.</p>	<p>This planning document only includes planning policies and proposals for Southend Central Area, which includes the central seafront area and the town centre. It is not considered that there will be opportunity for the inclusion of bridleways and off road opportunities for equestrians within this area. Nevertheless, these needs will be taken into account as the Core Strategy is reviewed under the timetable outlined in the Local Development Scheme.</p>
3	The British Horse Society (Mrs Marlene Curtis) [275]	1396	Comment	<p>1. Rights of Way Improvement Plan (ROWIP): SBC has ignored the Countryside and Rights of Way Act 2000 (CROW Act) stated duty for Highway Authorities to prepare, publish, assess and review a ROWIP prepared to secure an improved and accessible network of local rights of way, and to assess the extent to which they meet the present and future needs of the public, to fulfil opportunities for exercise (including cross boundary links) open-air recreation and enjoyment of the Authority's area. Preparation of the ROWIPs were due within 5 years (2005), with Plan approval by 2007. SBC's ROWLP should also have formed an integral part of the LTP2 from 2010 onwards superseding the "Milestones Statement" 2001/2 to 2005/6 policy document. Further, in 2001 DEFRA promised, under the ROWIP, that horse riders, carriage drivers and cyclists plus those with mobility problems would benefit from greater accessibility to the ROW network.</p> <p>SBC, however, has so far only prepared a draft ROWJP in 2009 (4 years late) in which the bridleway (BR) network was recognised as being very minimal with only 3 BRs recorded (one just 2 metres long and the other two BRs relating to just one path). However, despite this inadequate figure comparing to 236 (96%) Footpaths recorded to date, no further action has been taken to implement the plan. The fact, too, that the</p>		<p>Comments noted and this will be referred to the relevant officers at Southend Borough Council, however, this is not an issue that may be addressed by the SCAAP or is relevant to it.</p>

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				<p>2009 total of public rights of way remains exactly the same as the number recorded in the 1999 Milestones Statement illustrates the non-action of SBC to address the improvements promised under the CROW ACT 2000.</p> <p>In addition, the entire draft ROWIP is so heavily weighted in favour of cycleway provision that at times it is difficult to believe equestrians exist at all. Relevant to the provision of cross boundary links, this prevailing omission was particularly highlighted in 2009 when 83 equestrian respondents (covering 143 users) requested S13C to include a safe equestrian crossing over the busy and restrictive A 127 within the "A 127/Progress Road Improvement Works". This was followed by the presentation of a 1623 Petition requesting this facility but where, in the event, 6-7 new "hi spec" A127 crossings were provided singularly for walkers and cyclists within the Works, while not one crossing facility materialised for the safety of equestrians.</p>		
3	The British Horse Society (Mrs Marlene Curtis) [275]	1399	Comment	<p>2. Local Transport Plans: The CROW Act also requires ROWIPs to be incorporated into Local Transport Plans with the aim of ensuring that 'as public highways, rights of way are embraced by the LTP process and recognised in LTPs as a key ingredient in the development of an integrated transport network that provides a variety of transport modes'. So far, however, again SBC has omitted to carry out this legal requirement with past LTPs 1 and 2, and also seemingly with LTP3 (BHS ltr. No 1 refers. No reply received). The omission not only ignores the law but also ignores a specific request for implementation by the BHS.</p>		Comments noted and this will be referred to the relevant officers at Southend Borough Council, however, this is not an issue that may be addressed by the SCAAP or is relevant to it.
3	The British Horse Society (Mrs Marlene Curtis) [275]	1400	Comment	<p>Horse Riding Strategy: While both walking and cycling strategies are already in force within the draft ROWIP, a strategy for horse riding is singularly Lacking. On 17th April 2010, the BHS requested the immediate preparation of a "horse riding" strategy with its inclusion within the ROWTP. BHS reminders were sent on the 21st June 10 the 16 July 10 and the 18 November 10 but, to date, a strategy for horse riding has not materialised. We do not accept SBC's 2011 reason of lacking financial resources for non-provision and feel it is yet further proof that SBC is determined to ignore the interests of their horse riding residents.</p> <p>The inclusion of equestrians in access facilities is strongly supported by Richard Benyon MP, Minister for Natural Environment and Fisheries, in his letter sent this year to Anne Main MP concerning Alban Way. He strongly advised that local authorities should ensure that off-road routes include horse riders as well as other users. The Minister stated:-</p> <p>"Unless there are good and specific reasons not to expressly allow horse riders to use such routes, local authorities should take steps to accommodate them. Local authorities should be making the most of</p>		Comments noted and this will be referred to the relevant officers at Southend Borough Council, however, this is not an issue that may be addressed by the SCAAP or is relevant to it.

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				<p>their off-road networks through integration of use. Multi user routes have been shown to be readily adopted and well appreciated by local people. Where they are done well they bolster community cohesion and create a better understanding between users". Also:- "Horse riders are particularly vulnerable road users, and cycle routes can provide appropriate and important opportunities to avoid busy roads. There is potential for conflict in any situation where people *share a public space, but the possibility of conflict is not reason enough to disregard ridden access; actual conflict could be resolved am/ any misplaced Concerns reduced over time."</p>		
3	The British Horse Society (Mrs Marlene Curtis) [275]	1402	Comment	<p>4. Greenways: "Greenways" were a concept of the Countryside Commission (now Natural England) with equestrians included as a fundamental part of the Greenways Strategy, along with walkers and cyclists. It is therefore a travesty of natural justice that the draft ROWIP completely omits the inclusion of equestrians on Greenways, with this policy already actioned by SBC excluding vulnerable equestrians from the off-road Prittle Brook Greenway providing approximately 3.5 miles of safe, off-road and attractive travel through Southend's built-up area. The draft ROWIP "Walking and Cycling Strategies" (pg. 16 BHS No.2) then confirms that SBC relies on the support of The Greengrid Strategy (Thames Gateway South Essex - see also pg. 17 BHS No. 3) identifying Greenways" to provide corridors of pleasant environments across the Borough between green spaces and urban areas singularly for pedestrians and cyclists. However, this statement is inaccurate and is in complete opposition to the Thames Gateway South Essex - Greengrid Strategy (4.0 Strategic Frameworks and Guidance) which states:-</p> <p>"Greenways: Greenways are national, regional and sub~regional footpaths, cyclepaths and bridlepaths that connect to and through towns and the rest of the Strategy Area, and where they are not directly associated with parkways, railways and riverways. In addition to their role as leisure and recreational routes they will also provide alternative transport options." (BHS No.4) Thames Gateway Greengrid Strategy continues:-</p> <p>"Greenways Vision: To create a continuous network of safe, clean, attractive, well sign-posted, well promoted and accessible footpaths, cycle paths and bridleways that connect attractive, culturally and visually diverse towns, villages, parks and open spaces by preparing and promoting a Strategic Greenway Plan with design codes as a key element of the Greengrid Strategy." (BBS No.5)</p> <p>The BHS, therefore, strongly feels to omit equestrians and to alter this key Thames Gateway Greengrid Strategy simply underlines the fact that</p>		<p>Comments noted and this will be referred to the relevant officers at Southend Borough Council, however, this is not an issue that may be addressed by the SCAAP or is relevant to it.</p>

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				Southend Council is acting in opposition to national policies. The additional fact that Southend's Consultation Draft Action Plan DPD (Pg. 61 BHS No. 6) includes the objective "To enhance the Green Grid and interconnection of spaces and attractions by attractive "green" corridors that have the ability to provide good quality cycling and walking routes in and around the town " once more confirms SBC's equestrian exclusion policy so should be amended to read provision of " ... good quality cycling walking and horse riding routes in and around the town .		
3	The British Horse Society (Mrs Marlene Curtis) [275]	1405	Comment	5. "The Three Rivers Trail: SBC recently issued a media release on this European Urban Habitats Initiative to create a network of green trails across Southend and Rochford's urban and rural areas to ensure green spaces are there for all to enjoy. To form the green trails it was intended to link public rights of way, bridleways and cycle routes enclosed by the Thames, Roach and Crouch rivers, enabling people to access the area's parks, natural green spaces, heritage sites, quiet estuary areas and seafronts in a more sustainable way. (So far, so good - equestrian access inclusion!) However, SBC then revert to their "equestrian exclusion policy" by stating they felt the Trail had the potential to be a major tourist attraction solely for walkers and cyclists wanting to explore the many historic and environmental sites in the area. "Horseriders" need to be included.		Comments noted and this will be referred to the relevant officers at Southend Borough Council, however, this is not an issue that may be addressed by the SCAAP or is relevant to it.
3	The British Horse Society (Mrs Marlene Curtis) [275]	1406	Comment	6. New development (Pg. 55 OPD BHS No. 7): With the expected minimum of 2,000 new homes for the Town Centre over the 2001-2021 period the Central Area Master Plan identifying a capacity within its boundary of 3,160 additional dwellings and SHLAA identifying another 4,000 new dwelling capacity, we feel the likely additional equestrians, based on British Equestrian Trade Association (BETA) 2005/6 national survey figures, warrant very close consideration:- <ul style="list-style-type: none"> * 4.3m people - 7% of the British population - are horse riders. * Some 2.8m households contain at least one rider. * 43% of the British population have an interest in some aspect of equestrianism. * There are 1.35m horses in the UK. * £4 billion per year is spent on horses and riding. * In England horse riders have access to only 22% of the public rights of way network. 		Comments noted.
3	The British Horse Society (Mrs Marlene Curtis) [275]	1407	Comment	We feel the DPD is unsound in its present form and in considering these objections. The BHS requests that equestrians are given parity of treatment in off-road access provision as provided for walkers and cyclists. Public money should be for all users. In addition, adequate and equitable on-road provision (including road crossings) should include all vulnerable NMUs, not facilities singled out and provided for pedestrians and cyclists alone.		Comments noted and this will be referred to the relevant officers at Southend Borough Council, however, this is not an issue that may be addressed by the SCAAP or is relevant to it. Nevertheless, these needs will be taken into account as the Core Strategy is reviewed under the timetable outlined in the Local Development Scheme.

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8	Anglian Water (Mrs Sue Bull) [37]	1307	Comment	I have no issues or concerns to raise		Comment noted.
33	Herbert Grove Residents (Mr Steve Tomlin) [115]	1306	Comment	There is no provision for mobility scooters. As the population ages provision should be made for this relatively new type of transport.		Comments noted. Accessibility is considered to be a fundamental concept within the SCAAP and to ensure that all members of the public have legible and connected environments and public realm. The transport strategy highlights the need for mobility management measures and vulnerable road users. These principles will be addressed in schemes and projects which are developed in the SCAAP area to ensure that they meet the needs of vulnerable road users and those with mobility needs. In addition, it will also be addressed through the Local Transport Plan which sits alongside the Core Strategy, Development Management Document and the SCAAP.
47	Herbert Grove Residents (Mr Steve Tomlin) [115]	1313	Support	Many large houses which have been turned into poor apartments could be zoned as office space and gradually allowed to change from residential to office use. Chancellor Road and Herbert Grove may be suitable.		The planning authority will balance the need for provision of residential accommodation and retention of office space for current and future need. The development principles in the Policy Area in the SCAAP are intended to ensure that this balance is maintained and quality development is achieved. In addition the Development Management Document, recently adopted, includes policies to ensure that good quality and sustainable development throughout the Borough, including the central area. It has not been considered necessary to include this type of zoning in the SCAAP.
49	Herbert Grove Residents (Mr Steve Tomlin) [115]	1314	Comment	New building should not be detrimental to the environment of the present residents.		Comments noted. A key objective of the SCAAP is to create a high quality public realm as well as high quality, sustainable new development. It is intended that the Council's planning policies in combination will ensure that development is not to the detriment of existing residents.

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53	Environment Agency (Lindsay Black) [255]	1274	Support	We are pleased to see that the impact on the Ramsar site has been recognised in relation to any redevelopment on the pier.		Noted
53	Herbert Grove Residents (Mr Steve Tomlin) [115]	1316	Comment	The pier needs to be an attraction! It could be an ecology centre with examples of wind power, tide power and solar power. See this example of a site in rural Norfolk that has transformed their area with such an attraction. http://www.ecotech.org.uk/education.html		The Pier is included in the SCAAP as an Opportunity Site. The approach is to allow for further rejuvenation of the Pier as a landmark and destination, building on the success of recent developments such as the Royal Pavilion.
62	Environment Agency (Lindsay Black) [255]	1275	Support	We support the need to ensure minimal impact on the protected foreshore and creation of new habitats.		Noted.
66	Herbert Grove Residents (Mr Steve Tomlin) [115]	1317	Comment	Many possible pedestrian routes are unattractive. Houses that were proposed for demolition in the previous town plans have been allowed to run down and now some are almost derelict. A grant of, say, £300 to paint the front of houses from a Council chosen palate of colours could create rows of 'candy striped' property on route to the beach enhancing the 'seaside' feel of Southend.		Comments noted. The SCAAP seeks to improve the public realm and overall attractiveness of the environment of the area.
69	Environment Agency (Lindsay Black) [255]	1276	Support	Comment in relation to 'Climate change and Flood risk' box below para 69: This box is essential to this document. Due to the physical location of the town centre, in close proximity to the sea front, flood risk and climate change is a key theme running through out this AAP and must not be overlooked.		Noted.
3.2.3	Herbert Grove Residents (Mr	1318	Comment	3. Railway Station Enhancement There is no public transport route between these mainline stations.		The SCAAP seeks to address along with the Local Transport Plan legibility and accessibility within the town centre and central seafront area to ensure that routes between major public transport interchanges are high quality and safe.

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	Steve Tomlin) [115]					
3.2.6	Herbert Grove Residents (Mr Steve Tomlin) [115]	1319	Support	6. Opportunities for Improved Pedestrian Links A glass canopy over the middle of chosen pedestrian routes could help extend the holiday season and direct tourists on preferred routes.		Noted. Public realms improvements are set out within the SCAAP.
3.2.12	Herbert Grove Residents (Mr Steve Tomlin) [115]	1320	Comment	12. Widening the Town Centre: The Seaway car park can have direct access from the Queensway roundabout. It provides parking for both High Street and Seafront visitors. Replacement car parks should be underground and the space above them used for development.		Seaway is included in the SCAAP as an Opportunity Site and development for mixed use is planned for the site, including car parking provision. The configuration of parking will be taken into account at the design stage.
3.2.17	Herbert Grove Residents (Mr Steve Tomlin) [115]	1321	Comment	17. Pier The pier needs to be an attraction! It could be an ecology centre with examples of wind power, tide power and solar power. See this example of a site in rural Norfolk that has transformed their area with such an attraction. http://www.ecotech.org.uk/education.html		The Pier is included in the SCAAP as an Opportunity Site. The approach is to allow for further rejuvenation of the Pier as a landmark and destination, building on the success of recent developments such as the Royal Pavilion.
3.2.18	Environment Agency (Lindsay Black) [255]		Object	18. Foreshore Designations Flood risk should also be mentioned in section 3.2 as a constraint to the development within the AAP.	Include 20: Flood Risk: There are a number of areas along the seafront falling within the Flood zones. Flood Risk must be avoided where possible or mitigated to minimise the risk.	Noted. Provision will be made within the policy to ensure that flood risk is considered when development takes place.
3.2.19	Herbert Grove Residents (Mr Steve Tomlin) [115]	1327	Comment	19. Gateway neighbourhoods In previous Council plans many houses close to the centre were listed for demolition and consequently the owners have left them to decline. The Council should now make amends by offering grants to residents (not developers) to bring them back to the best condition.		Noted.
70	Herbert Grove Residents (Mr Steve Tomlin) [115]	1330	Support	We support this ambition (for it to be a prosperous and thriving regional centre that is vibrant, safe and hospitable and rich in commerce, learning and culture).		Noted.
70	Stargas Nominees (279)	1385	Support	We support the Council's overall ambitions for the Southend Central Area to become a "prosperous and thriving regional centre that is vibrant, safe and hospitable and rich in commerce, learning and culture". We also support the eight objectives set out by the Council to deliver the vision and the concept of establishing eight urban Quarters to which development is appropriate to the local context.		Noted.

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72	Herbert Grove Residents (Mr Steve Tomlin)	1332	Comment	These objectives are laudable but should not be pursued to the detriment of current residents.		Noted. The SCAAP will ensure that there is high quality, sustainable development and a good quality public realm that will be to the benefit of existing residents as well as additional population.
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	[115]					
79	Herbert Grove Residents (Mr Steve Tomlin) [115]	1340	Comment	Map 4 - Vision - Key Diagram shows a proposed Pedestrian/Cycle Link between the Royals and the Seaway Car Park. This is impractical because it passes through St John's Church. If the Royals car park were made underground then the link could easily go under the Church as part of the rebuild.		Noted. There may be significant cost implications involved in this proposal and it would require the co-operation of the owners of the Royals. A cost benefit analysis would need to be satisfied.
81	Herbert Grove Residents (Mr Steve Tomlin) [115]	1341	Comment	The High Street could be enlivened by placing the Bandstand in Victoria Plaza or on a site in the redeveloped Seaway Car Park.		The cultural and leisure offer within the central seafront and town centre will be extended by the SCAAP. A new location for the bandstand has been agreed. However, event space is required and this will be considered as part of developments within the Policy Area and opportunity sites.
146	Herbert Grove Residents (Mr Steve Tomlin) [115]	1344	Comment	If you bring 6500 additional workers into the central area you will need at least 2000 car parking spaces and decent access.		The SCAAP includes a transport and access strategy and this has been informed by the Council's car park strategy and this has taken into account the transport requirements of additional workers, who will be encouraged to use public transport as a realistic alternative to the car with good transport connections in the town centre.
Policy DS2	Stargas Nominees [279] (represented by BNP Paribas Real Estate (Miss Grace Sim) [246])	1386	Support	Policy DS2: Shopping frontages and use of floors above shops Our client supports the principle of this policy and in particular the Council's encouragement to "safeguard and enhance the vitality and viability of the Town Centre". Further, we recognise and support the Council's policy approach, which states "Planning permission will be granted for the change of use of upper floors above shops to residential, appropriate service or community uses, which maintain or enhance the character and vitality of the centre and broaden the range of services".		Noted.

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

<p>Policy DS4</p>	<p>Stargas Nominees [279] (represented by BNP Paribas Real Estate (Miss Grace Sim) [246])</p>	<p>1387</p>	<p>Support</p>	<p>Policy DS4: Employment development within the central area We note and support the Council's ambition to provide a diverse and balanced economy which is both healthy and sustainable. Further, we note that the Town Centre will be the primary location for major economic growth, particularly for Class B1 office provision. Further, we support the flexibility provided in paragraph 3 of the policy which states: "Within the core Town Centre, development proposals resulting in a loss of B1 office floorspace will only be acceptable if: a. office floorspace is re-provided as part of a mixed-use development of the site, or b. the loss of office floorspace is outweighed by the achievement of other AAP objectives through the proposed development".</p> <p>We consider that this policy meets with the requirements of National Policy.</p>		<p>Noted. Policy removed as this is covered by the Development Management DPD, Core Strategy and the Policy Area development principles and each opportunity site. This approach makes navigation of policy easier for those using the document.</p>
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Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
Policy DS6	The Theatres Trust (Mrs Rose Freeman) [67] -	1308	Support	Policy DS6: Provision of facilities for culture, leisure, tourism and entertainment We support the document with regard to Policy DS6 but have not read any other part of the document.	We suggest the addition of an extra paragraph to Policy DS6 for clarity - 1.c. To protect and enhance existing leisure and cultural facilities throughout the Borough.	Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
Policy DS6	Natural England (Mr Gordon Wyatt) [264]	1322	Support	Southend Central Area Action Plan & Proposals Map - Proposed Submission: Policy DS6: Provision of facilities for culture, leisure, tourism and entertainment Natural England welcomes the recognition of the environmental importance of the foreshore, as expressed in the wording of point 2.ii		Noted.
Policy DS6	Environment Agency (Lindsay Black) [255]	1278	Support	Southend Central Area Action Plan & Proposals Map - Proposed Submission: Policy DS6: Provision of facilities for culture, leisure, tourism and entertainment 2 b) important to ensure that the foreshore designations are recognised, protected and not compromised.	b. promote the beach, foreshore and Estuary for appropriate cultural, leisure and tourism activities provided that environmental designations are respected, protected and not compromised.	Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
165	The Theatres Trust (Mrs Rose Freeman) [67]	1309	Comment	Paragraph 165 deals with concerns about the evening economy and we are surprised that the document does not have a policy for this important topic. Evening and night-time activities are a fundamental part of urban renaissance because they ensure the vitality of an area beyond normal working hours.		Noted. The evening economy is addressed in other Council plans and strategies although it should be noted that the SCAAP encourages the provision of tourism and cultural and leisure facilities which will include activities that will relate to the nighttime economy. The key aim is to ensure the vitality and viability of the SCAAP area.
Policy DS8	Environment Agency (Lindsay Black) [255]	1279	Object	Policy DS8: Housing Object to Policy DS8: Housing (no comment box available online) 2b) site CS8a is partially within Flood Zone 3. There is no recognition of this within the policy. 4b) Reference should also be made to the Flood risk policies of the CS and DM DPD. KP1 & 2 and DM6	Reference needs to be made to environmental constraints and , Flood Risk Sequential test needs to be applied and mitigation proposed where necessary. 4b) Reference should also be made to the Flood risk policies of the CS and DM DPD. KP1 & 2 and DM6	Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
Policy DS8	Stargas Nominees [279] (represented by BNP Paribas Real Estate (Miss Grace Sim) [246])	1388	Support	Policy DS8: Housing We support the principle of Policy DS8 which seeks to provide 2,000 new homes in the Town Centre and central area over the plan period. Further, we particularly support the Council's policy approach to housing development on Proposals Sites. We note the Council will: "...work with private sector partners and land and property owners to deliver... an appropriate level and type of housing development on other Proposals Sites, as part of well designed Mixed Use Schemes in line with associated policy requirements for that site".		Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

192	Environment Agency (Lindsay Black) [255]	1280	Support	Creation of a network of green spaces is important in aiding biodiversity and habitat gain, but also in reducing impacts of climate change in the urban environment. Providing urban cooling, space for water, and biodiversity.		Noted.
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Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
199	Environment Agency (Lindsay Black) [255]	1281	Support	Support the objectives for open space, green space and urban greening within the CAAP.		Noted. These have now been incorporated into the 'vision' for the policy areas.
Policy PR1	Environment Agency (Lindsay Black) [255]	1282	Support	PR1: Open Space Provision and the Environment Support the provision of an integrated network of open spaces to provide positive biodiversity benefits. An enhanced network of green spaces may aid in surface water management and therefore contribute to reducing flood risk.		Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
Policy PR1	Natural England (Mr Gordon Wyatt) [264]	1323	Comment	PR1: Open Space Provision and the Environment Natural England welcomes this policy.	We would, however, recommend that: under point 2 the reference to the Ramsar site should be amended to also refer to the SPA, as this is the more relevant designation in terms of the strict legal applicability of the EU Habitats Directive. In relation to point 3.b, whilst we recognise the legitimate safety concerns of users, we would recommend that any such lighting should be so designed as to minimise its impacts upon wildlife (eg by use of 'orange' low-pressure sodium lighting, rather than 'pink' high-pressure sodium or 'white' lighting).	Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
Policy PR1	English Heritage (Ms Katherine Fletcher) [109]	1371	Support	PR1: Open Space Provision and the Environment Open Space and the environment. We welcome the discussion of green and civic spaces and their identification in the preceding 6.3.1. A number of these spaces are within conservation areas, however another important feature are the street trees, which survive especially in Cliff Town.	We suggest that a positive strategy for their protection, regeneration and where appropriate reinstatement should be part of Policy PR1.	Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
204	Environment Agency (Lindsay Black) [255]	1283	Support	Encourage the use of green walls, roofs and roof gardens. These will add biodiversity benefit and they can contribute to increasing the energy efficiency of buildings and assist in attenuating rain water flow. Section 4.9 of the Sustainability Appraisal supports this.		Noted.
Policy PR2	Environment Agency (Lindsay Black) [255]	1284	Support	PR2: Public Realm Enhancements Encourage the use of green walls, roofs and roof gardens. These will add biodiversity benefit and they can contribute to increasing the energy efficiency of buildings and assist in attenuating rain water flow. Section 4.9 of the Sustainability Appraisal supports this.		Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
Policy PR2	Natural England (Mr Gordon Wyatt) [264]	1324	Support	PR2: Public Realm Enhancements Natural England welcomes this policy and, in particular, the references to urban greening in point 1.e, street tree planting in point 1.f, and promotion of sustainable access in point 2.		Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
Policy	English	1372	Support	PR2: Public Realm Enhancements		

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
PR2	Heritage (Ms Katherine Fletcher) [109]			We support the principles of the Public Realm Enhancements, especially the reduction of clutter. The sea front is an area that would benefit greatly, but its function as a busy traffic route requires imaginative thinking if the pedestrian is to be able to reclaim priority. Historic precedents could inform the materials and street furniture where evidence survives (as an example, the finial street name signs that were once a feature of the town). Areas of surviving original paving should be retained and augmented.		Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. In addition, this is covered by overarching policy in the Core Strategy.
213	Herbert Grove Residents (Mr Steve Tomlin) [115]	1345	Comment	Views of the sea and historic buildings enjoyed by current residents should also not be compromised.		Noted. This is addressed in Policy DS2: Key Views.
Policy PR3	English Heritage (Ms Katherine Fletcher) [109]	1373	Support	PR3: Visually Active Frontages English Heritage supports the protection of visually active frontages and introduction of new elements especially from the Royals Centre onto Pier Hill.		Noted.
Policy PR4	English Heritage (Ms Katherine Fletcher) [109]	1374	Support	PR4: Protection of Visually Important Views We are pleased to see the emphasis on protection of visually important views.		Noted. Policy removed as covered within the Policy Area development principles and the policy for each opportunity site where applicable. It is also addressed in Policy
Policy PR5	English Heritage (Ms Katherine Fletcher) [109]	1375	Support	PR5: Landmark Buildings English Heritage supports the Landmark Buildings policy with the important caveats relating to protection of existing landmarks as included in the schedule in Appendix 4. We are pleased to see inclusion of the Pier in the schedule, although, presumably by oversight this has been omitted on the Proposals Map.	As a matter of clarity and consistency, we recommend that the Proposals Map is amended to identify the Pier as a landmark building.	Noted. The Pier has been included on the Proposals Map as a landmark building. Appendix will remain part of the SCAAP but the numbering may have changed with the rationalisation of the document.
226	English Heritage (Ms Katherine Fletcher) [109]	1376	Comment	In discussing conservation areas, we are disappointed that there is no commitment to appraise these areas on a regular basis and to review some of the boundary anomalies, such as the east boundary of Cliff Town. This reiterates previous advice that English Heritage included in our letter of 5 August 2010, when in commenting on the Issues and Options consultation for the Central Area Action Plan we commented "that in order to fully understand and address change in this area more investigative work needs to be carried out. Our Conservation Principles, Policy and Guidance emphasises (para 62 onwards) the need to understand the fabric and evolution of a place and to identify who values the place and why they do so. Paragraph 89 underlines the value of specific investigation into understanding the impacts, or consequences, of proposed change".		Noted. The conservation area appraisals are on on-going piece of work for the planning department. There is a schedule of appraisals to be carried out and this works is also monitored and feedback by a conservation working party. Ideally we would as you have mentioned appraise these area on a regular basis however we need to allocated time with the available resources and this has only allowed us to work in line with the current schedule. If there is any assistance that English Heritage may be able to provide to assist with this process it would be most welcomed.

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

226	English Heritage (Ms Katherine Fletcher) [109]	1377	Support	Nonetheless English Heritage welcomes your document's strong emphasis on the role of heritage in the distinctive character of the town centre. We are pleased to see that it has become a strong theme in specific policies especially those relating to High Street and Central Sea Front where the value of heritage-led regeneration has not always been		Noted. The revised version of the SCAAP continues to ensure that all the heritage assets and historic buildings within the SCAAP area are carefully considered when and if any development takes place. This strong emphasis is carried through in the development principles for each policy area. In addition, design and conservation matters are addressed in the Core Strategy, Development Management Document and the Design and Townscape Guide.
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Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
				acknowledged in the recent past. We would support all the policies.		
Policy HE1	English Heritage (Ms Katherine Fletcher) [109]	1378	Support	HE1: The Clifftown Quarter Clifftown. We support these proposals but recommend a stronger heritage strategy to include assessment of buildings for local listing and extension of the conservation area designation.		Noted. These matters are dealt with through the Council's Conservation Working Party which meets every two months to consider nominations for local listings and review the conservation areas and appraisals. The consideration of heritage assets in the Clifftown area is now considered in the development principles for that policy area in the revised SCAAP (2015). This is also supplemented by conservation policy in the Core Strategy, Development Management Document and the Design and Townscape Guide.
Policy HE5	English Heritage (Ms Katherine Fletcher) [109]	1379	Support	HE5: Frontages of Townscape Merit in the Central Area Frontages of Townscape Merit. We commend this concept, especially in streets outside the conservation areas, notably High Street. This responds to our previous concerns on undesignated assets such as the former Keddies Store. We welcome the emphasis on shop fronts but would add that we consider it essential to acknowledge the importance of roofscape as part of the overall building frontage.		Noted. This policy approach has now been incorporated in the policy areas area where it is relevant to consider and protect locations of townscape merit. This is also supplemented by conservation policy in the Core Strategy, Development Management Document and the Design and Townscape Guide.
244	English Heritage (Ms Katherine Fletcher) [109]	1370	Comment	As a general point, we are pleased to see that heritage has been integrated into the plan throughout the various chapters. We do not have any over-riding concerns in relation to the plan that would raise questions of soundness.		Noted. It is intended that the heritage themes is imbedded within the specific policy area and opportunity sites where appropriate as well as being acknowledged in the development strategy section of the SCAAP. Heritage is also a key part of other planning documents and so this approach is supplemented by conservation policy in the Core Strategy, Development Management Document and the Design and Townscape Guide.
244	English Heritage (Ms Katherine Fletcher) [109]	1382	Comment	For clarity, none of the comments should be taken as formal objections to the soundness of the Area Action Plan. We would, however, hope that you may be able to give the recommended changes, highlighted above, your consideration as minor amendments to the plan.		Noted. The Council welcomes the comments and hopes that it has taken on board and incorporate the approach supported by English Heritage in the revised SCAAP.
250	English Heritage (Ms Katherine Fletcher) [109]	1380	Support	While we welcome the consideration given to archaeology we consider following minor amendments would be appropriate:	A slightly tighter summary would be helpful - for instance, Prittlewell is not technically the historic centre of Southend as the seaside town is itself quite distinct. There is a typographical error in the final sentence.	Noted.

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

252	English Heritage (Ms Katherine Fletcher) [109]	1381	Support	While we welcome the consideration given to archaeology we consider following minor amendments would be appropriate:	provides explanatory text accompanying policy HE7. Since there remains a possibility that other sites of archaeological potential could be discovered in the central area, beyond those referred to specifically, we consider that the words 'These sites are:' (bottom page 78) should be replaced with 'in particular, these sites are likely to include:'. This would ensure that any additional sites within this area, which are subsequently identified as having archaeological potential, are also bound by this policy. The wording following points 1 to 4 might conclude with: 'Any additional areas, which are subsequently considered to exhibit significant archaeological potential, should be similarly treated in line with national guidance.'	
255	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1358	Comment	SCAAP Objectives seems to have something missing as states objectives 2, 3 and (blank). First bullet point does not make sense.	Amend first bullet point of the Objective Box in Transport and Access Strategy section as follows: To improve the buildings and public realm, including accessible green space, within the Central Area, to manage traffic and improve cycling and walking facilities so that	Noted. The document has been rationalized that the objectives are included in the front section of the document. Your comments have been taken into account in the updated transport section.

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
					Southend becomes a place that is more pleasant to experience and move around in;	
261	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1359	Comment	3rd bullet point: Might be helpful to define what 'further improve public transport' means. This could be improving journey times, predictability, frequency, fares levels, number of routes etc.		Noted. The Council will ensure that these measures are more explicit and it is hoped that the transport strategy included in the revised version provides further emphasis about what is intended. In addition the SCAAP should be read in conjunction with the Local Transport Plan, which is reference within the document, and this provides detailed information about what the Council is planning to do in relation to public transport improvements within the town centre.
261	Herbert Grove Residents (Mr Steve Tomlin) [115]	1346	Comment	The use of mobility scooters by an aging population has been ignored and forgotten		Comments noted. Accessibility is considered to be a fundamental concept within the SCAAP and to ensure that all members of the public have legible and connected environments and public realm. The transport Strategy highlights the need for mobility management measures and vulnerable road users. These principles will be addressed in schemes and projects which are development in the SCAAP area to ensure that they meet the needs of vulnerable road users and those with mobility needs. In addition, it will also be addressed through the Local Transport Plan which sits alongside the Core Strategy, Development Management Document and the SCAAP.
261	Highways Agency Mr Mark Norman (273)	1440	Support	In broad terms, the emerging options are supported by the Highways Agency as at this early stage of development they appear to be consistent with the government policy of managing transport through sustainable methods, particularly with the encouragement of people to take appropriate journeys by appropriate means.		Noted.

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

262	Highways Agency Mr Mark Norman (273)	1369	Comment	The only aspect I would like to comment on, on which there appears to be no specific reference, is the need for a holistic approach to the Central Area Action Plan DPD. The Highways Agency is keen that there is joined up thinking with all the highway authorities along the A 13 corridor, to ensure there is consistency in approach in managing the route and that any unnecessary trips are managed down. There is little point in developing effective plans when there is a mismatch with those being developed in adjacent areas. Indeed in some situations, there may be a need for solutions which are jointly funded and developed.		The Council works alongside its neighbouring authorities in respect of strategic issues and transport is one of those. Under the Thames Gateway South Essex Partnership and under the duty to co-operate the Council is obliged to consider holistically the strategic highway network. The 6 authorities who are affected by the A13 and A127 strategic highway network have produced a Transport and Planning Strategy which outlines these issues and seeks to address them in co-operation. Please note also that it will be for strategic documents i.e. the Core Strategy to address these cross boundary matters.
Policy TA1	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1360	Comment	Southend Central Area Action Plan & Proposals Map - Proposed Submission: TA1: Town Centre and Central Area Highway Network Suggested amendment to point 3 of Policy TA1:	Amend point 3 of Policy TA1 as follows: Suggest this should read 'Ensure that the bus priority measures focussed on the A13are progressed and effective'.	
Policy TA1b	Environment Agency (Lindsay Black) [255]	1285	Support	TA1b City Beach Phase 2 – Traffic and Public Realm Scheme 1h any development along City Beach must not impact on the foreshore designations.		Noted. CS4 Policy Nature Conservation and Biodiversity addresses the need to ensure that foreshore designations are not impacted upon. It raises the need for a habitats regulations scoping report for development that may have an effect. The SCAAP is also accompanied by an HRA scoping report.
Policy TA1b	Natural England (Mr Gordon Wyatt) [264]	1325	Support	TA1b City Beach Phase 2 – Traffic and Public Realm Scheme Natural England is generally supportive of this policy provided that any extension of the tourist season as referred to in point 1e, and in particular any new lighting as referred to in point 1f, are so designed as to fully comply with point 1h.		Noted. This policy has now been incorporated in the development principles and opportunity sites where appropriate for the Central Seafront Area and the revised Transport and Public realm Policy.
Policy TA2	Natural England (Mr Gordon Wyatt) [264]	1326	Support	TA2 Public Transport Natural England welcomes measures to encourage increased usage of public transport.		Noted. These principles are now incorporated into the revised transport section and Policy TA 1. This policy approach sits alongside the approach in the Local Transport Plan to encourage greater use of public transport.
Policy	Arriva	1362	Comment	TA2: Public Transport		

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
TA2	Southern Counties (Mr Malcolm Spalding) [270]			Support the content of this policy but, particularly in para 3, it is very broad and lacks definition of what improvements to public transport might be considered.		Noted. It is intended that the Policy in the SCAAP which has been revised and consolidated takes into account your comments. Nevertheless the SCAAP should be read in conjunction with the Local Transport Plan which provides detailed information on public transport improvements. Any development or schemes within the central area will include consultation with the relevant transport policy officers.
280	Herbert Grove Residents (Mr Steve Tomlin) [115]	1347	Comment	No provision has been proposed for mobility scooters		Comments noted. Accessibility is considered to be a fundamental concept within the SCAAP and to ensure that all members of the public have legible and connected environments and public realm. The transport Strategy highlights the need for mobility management measures and vulnerable road users. These principles will be addressed in schemes and projects which are development in the SCAAP area to ensure that they meet the needs of vulnerable road users and those with mobility needs. In addition, it will also be addressed through the Local Transport Plan which sits alongside the Core Strategy, Development Management Document and the SCAAP.
287	Herbert Grove Residents (Mr Steve Tomlin) [115]	1348	Comment	This is not enforced, many people cycle in the High Street and are ignored by community police.		Noted. The Council will be seeking to increase the cycle network throughout Southend and central area to encourage more cycling with additional routes that may help alleviate this particular issue raised.
Policy TA3	Natural England (Mr Gordon Wyatt) [264]	1328	Comment	TA3: Walking & Cycling Natural England welcomes measures to encourage increased walking and cycling.		Noted.
295	Herbert Grove Residents (Mr Steve Tomlin) [115]	1349	Object	The provision of only 650 car spaces is woefully inadequate if an additional 6500 workers are to be accommodated in addition the increase in shoppers and tourists.	Provision for 2000 car spaces should be planned.	The SCAAP includes a transport and access strategy and this has been informed by the Council's car park strategy and this has taken into account the transport requirements of additional workers, who will be encouraged to use public transport as a realistic alternative to the car with good transport connections in the town centre.

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

298	Herbert Grove Residents (Mr Steve Tomlin) [115]	1350	Comment	No provision has been proposed for mobility scooters		Comments noted. Accessibility is considered to be a fundamental concept within the SCAAP and to ensure that all members of the public have legible and connected environments and public realm. The transport Strategy highlights the need for mobility management measures and vulnerable road users. These principles will be addressed in schemes and projects which are development in the SCAAP area to ensure that they meet the needs of vulnerable road users and those with mobility needs. In addition, it will also be addressed through the Local Transport Plan which sits alongside the Core Strategy, Development Management Document and the SCAAP.
Policy IF1	Environment Agency (Lindsay Black) [255]	1286	Object	<p>IF1: Central Area Infrastructure Southend WCS scoping 2009, indicates that Southend WWTW cannot treat further effluent as it is already at capacity. There is a constraint on development in the Southend WWTW catchment until the quality and capacity issues are addressed.</p> <p>The policy must reflect this by saying that infrastructure improvements must be implemented prior to developments coming online.</p>	The policy needs to be stronger to recognise that infrastructure, particularly waste water collection and treatment facilities, must be provided ahead of Development where needed.	Comments noted. This approach will be taken on board in the wording of the Policy of infrastructure provision. Please note that this policy has now been revised and is covered in the Infrastructure section in the revised SCAAP with reference to the Core Strategy and CIL. This is also covered in the Core Strategy and Development Management Documents.
Policy IF3	Environment Agency (Lindsay Black) [255]	1287	Object	<p>IF3: Flood Risk Management</p> <p>The policy only refers to areas of Local Flood risk and surface water drainage principles. This policy should also require Flood Risk Assessments in areas of Flood Zone 2 and 3, as shown in the SFRA maps and Environment Agency maps.</p>	<p>Include the need for FRAs in flood zones 2/3 to manage and migrate flood risk impacts arising from tidal and fluvial flooding as well as surface water.</p> <p>Flood risk mitigation measures can also influence the design and layout of the development so flood risk from all sources should be considered at the earliest stage of planning possible.</p>	Noted. This has been incorporated into the revised policy on Flood Risk Management and Sustainable Drainage in the SCAAP which is Policy DS4.
Policy IF3	Natural England (Mr Gordon Wyatt) [264]	1329	Support	IF3: Flood Risk Management Natural England welcomes this policy requiring Flood Risk Assessments and the widespread adoption of SuDS techniques.		Noted.
329	Environment	1288	Object	Southend Central Area Action Plan & Proposals Map - Proposed	Add a new bullet point requiring 'energy and resource	Noted. There is reference to local energy

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
	Agency (Lindsay Black) [255]			Submission: 329 development proposals should also include an energy and resource efficiency statement to detail sustainable construction methods and how the development will achieve a Code for Sustainable Homes level 3 as a minimum as required by policy DM2. The Sustainability appraisal conclusions supports this (ref para 19.28)	efficiency statement'	
344	Herbert Grove Residents (Mr Steve Tomlin) [115]	1351	Comment	Unlike the 'Ramblas' in Barcelona, Southend High Street is a fair weather shopping destination whereas the competition in places like Lakeside and Blue Water shopping malls offer any weather shopping. The provision of a glass canopy along the centre of the High Street and along preferred pedestrian routes would help the retail offering be perceived as an all weather environment.		Noted. There would need to be a cost benefit analysis of any approach that would incorporate this. It has not been considered as part of the approach to date.
Policy DP2	Environment Agency (Lindsay Black) [255]	1289	Support	DP2: Queensway and London Road / Broadway Development Principles - We support the encouragement of urban greening projects. We encourage the use of green walls, roofs and roof gardens. These will add biodiversity benefit and they can contribute to increasing the energy efficiency of buildings and assist in attenuating rain water flow. Section 4.9 of the Sustainability Appraisal supports this.		Noted. These are key elements to the approach in the SCAAP to delivery sustainable development.
Proposal Site PS2a	Sainsbury's Supermarkets LTD [268] (represented by Indigo Planning Ltd (Mr Sean McGarth) [185]	1355	Object	PS2a: Sainsbury's and adjacent Buildings, London Road Proposal We consider that proposal site policy ps2a is unsound as it is currently drafted as it is not justified nor effective. the policy does not take account of Sainsbury's obligation to prepare a joint development brief should they relocate from the site, nor is there any justification provided as to why uses not usually found in town centres are being promoted on a site which is predominantly located in the primary shopping area of Southend town centre.	In order to make proposal site policy ps2a sound we consider that a greater degree of flexibility should be offered in the range of uses that could provide on site in the event of Sainsbury's relocation. Sainsbury's is obliged to work with the council to prepare a joint development brief redevelopment of London Road and consider that as the majority of the site is within the primary shopping area the site would be best suited to be revised for town centre uses.	The Opportunity Site related to Sainsbury's has been taken out of the SCAAP. The potential for redevelopment is acknowledged within the policy area. However it is acknowledged that the development of this site is particularly related to the redevelopment of the Roots Hall Site. For the site to be included in the Policy Area as an Opportunity site the Council would require evidence that can be presented to a Planning Inspector that there is a deliverable and viable scheme to be included in this version of the Plan.
Policy DP3	Environment Agency (Lindsay Black) [255]	1290	Support	DP3: Elmer Square Development Principles - Support the need to assess the surface water flood risk to the development site.		Noted. The Flood Risk Policy allows for this to take place.
Policy DP4	Stargas Nominees [279] (represented by BNP Paribas Real Estate (Miss Grace Sim) [246])	1390	Support	DP4: Queensway and Southchurch Avenue Development Principles - Principles We note that the proposals plan for the CAAP has been amended since our last representations. Subsequently, our client's site now falls within the Queensway and Southchurch Road Area, opposed to the High Street area, as it was previously. We note and support the Council's intentions for the Queensway and Southchurch Road Area as follows: * "To play a role in reinforcing the northern primary retail circuit with the High Street * and the Victoria Shopping Centre at its heart. * Reinforce Shouthchurch Road as a secondary shopping area and provide new		Note. The SCAAP has been revised and the site is now in the High Street Policy Area. The development principles support a net increase in dwellings above existing or new commercial development as well as mixed use development with active ground floor frontages.

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
				<ul style="list-style-type: none"> * employment opportunities. * To provide new and improved residential accommodation. * To create an area where streets and public space reflect a vibrant and busy residential and shopping district". 		
Policy DP4	Stargas Nominees [279] (represented by BNP Paribas Real Estate (Miss Grace Sim) [246])	1391	Comment	<p>DP4: Queensway and Southchurch Avenue Development Principles -</p> <p>With regards to the Council's objectives for this area, we particularly support Council's intentions to provide new and improved residential accommodation in the Quarter, given that Chartwell House is located here, and has the potential for residential use, within a residential-led mixed-use development.</p> <p>In this regard we propose the site is identified as a site allocation for residential-led mixed use development. We are unclear why the Council has not progressed the previous proposal for this site, and as the site will come forward in the short-term, and there are clear market signals that the site will not attract major ongoing employment occupiers, we consider the Council needs to act positively with regard to this site and allocate it as promoted. By not doing so, the Council is failing to accord with national policy, by not:</p> <ul style="list-style-type: none"> * seeking to make the most efficient and effective use of land; * prioritising previously developed land which is suitable for re-use; * [taking] a flexible, responsive supply of land; * considering whether sites that are currently allocated for industrial or commercial use could be more appropriately re- allocated for housing development. <p>The CAAP could address these points and ensure consistency with National Policy by allocating this site as proposed.</p>		<p>It is noted that planning reference 14/00917/PA3COU has under the Town And Country Planning (General Permitted Development) (Amendment) (England) Order 2013 been granted prior approval of change of use of the existing building from office use class B1(a) to dwelling houses use class C3 under Class J.</p> <p>The Policy area have also been updated since the last version of the SCAAP and the Policy Area within which the site, Chartwell House, is now located is the High Street Policy Area, which recognizes the function of the Victorias as part of the Primary Shopping Area. The development principles of this Policy Area will apply when applications are considered. The development principles support a net increase in dwellings above existing or new commercial development as well as mixed use development with active ground floor frontages.</p> <p>It should also be noted that not all potential development sites in the SCAAP area are allocated, but this does not prevent development coming forward and be considered against the principles set out within each Policy Area.</p>
Policy DP4	Environment Agency (Lindsay Black) [255]	1291	Support	<p>DP4: Queensway and Southchurch Avenue Development Principles -</p> <p>Support the need to assess surface water flood risk to development site</p>		Noted.
Policy DP4	Environment Agency (Lindsay Black) [255]	1292	Support	<p>DP4: Queensway and Southchurch Avenue Development Principles -</p> <p>Support the need to assess surface water flood risk on the site in relation to the development proposals</p>		Noted.

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Policy DP6	Environment Agency (Lindsay Black) [255]	1293	Support	DP6: Clifftown Development Principles – We support the need to assess the surface flood risk on the site in relation to development proposals.		Noted.
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Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
Policy DP7	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1363	Comment	DP7: Tylers Avenue Development Principles Objectives for Tylers Avenue Quarter: Para vii: It is important there is one public transport interchange where all central bus services call. Other interchanges can be developed but need to be accessed without a tortuous diversion away from the principal public transport corridors. Fourth bullet point: Is this a reference to the second stage of the Travel Centre? If so then it is vital the Travel Centre is all in one cohesive location.		Noted. This is addressed within the SCAAP which provides flexibility to consider this. It will also be addressed in the Local Transport Plan. Any development in relation to the Travel Centre would be done in conjunction with service providers.
Policy DP7	Environment Agency (Lindsay Black) [255]	1294	Support	DP7: Tylers Avenue Development Principles – We support the need to assess surface water flood risk on the site in relation to development proposals		Noted.
415	Environment Agency (Lindsay Black) [255]	1295	Support	We support the objectives for the Central Seafront Area.		Noted.
430	Herbert Grove Residents (Mr Steve Tomlin) [115]	1352	Comment	The tasteful development of Seaway Car Park could enhance the area but must not be over developed to the detriment of the current environment.		The development principles are detailed in the Central Seafront Area Policy. This seeks high quality design with good public realm. This approach is also outlined more generally in the Development Management Document and Core Strategy and Design and Townscape Guide
Policy CS2	Environment Agency (Lindsay Black) [255]	1296	Support	CS2: Central Seafront Strategy Key Principles 1b, (ii & iii) support the need to consider these aspects at the outset of all schemes. 4) agree: Development must not be permitted south of the sea.		Noted. This approach is taken forward in the revised SCAAP although the Policy layout is slightly revised although the Waterfront Policy remains from the previous version, and specifically addresses this.
Policy CS2	Natural England (Mr Gordon Wyatt) [264]	1331	Support	CS2: Central Seafront Strategy Key Principles – Natural England supports this policy and, in particular, points 1a.vi, 1b, iii, 2b and 4.		Noted. This approach is incorporated into Policy CS1 Central Seafront Policy Area Development Principles and other supporting policies within that section.
437	Environment Agency (Lindsay Black) [255]	1297	Support	We support this paragraph as this covers the need for sequential and exception tests in order to justify any development in flood risk areas within the central seafront regeneration areas.		Noted. This is now incorporated into the Flood Risk Management and Sustainable Drainage Policy.
440	Environment Agency (Lindsay Black) [255]	1298	Support	We support this paragraph and the requirements of a flood risk assessment are as stated.		Noted. This is now incorporated into the Flood Risk Management and Sustainable Drainage Policy.
Policy CS3	Environment Agency (Lindsay Black) [255]	1441	Support	CS3: Flood Risk – Support paragraphs 3 and 4		Noted. This Policy is now in the Flood Risk Management and Sustainable Drainage Policy and referred in the Central Seafront Area Development Principles Policy.

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

<p>Policy CS3</p>	<p>Environment Agency (Lindsay Black)</p>	<p>1299</p>	<p>Object</p>	<p>CS3: Flood Risk This plan is likely to be adopted after the publication of the NPPF which will render PPS25 invalid. The principles of development in flood risk</p>	<p>Suggest rewording to remove references to PPS25 where not necessary. This plan is likely to be adopted after the publication of the NPPF which will render PPS25 invalid. The</p>	<p>Noted. Policy has been revised to reflect the NPPF and Planning Policy Guidance.</p>
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Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
	[255]			areas are likely to remain the same. To future proof the policy specific reference to PPS25 could be removed in places.	principles of development in flood risk areas are likely to remain the same. PPS25 could be replaced with 'relevant national policy' where appropriate or 'as shown in the SFRA or Environment Agency flood maps'. Point 2: Flood Zone 3b is not actually mapped in the SFRA along the seafront. I suggest this sub-paragraph is removed.	
Policy CS4	Environment Agency (Lindsay Black) [255]	1300	Support	CS4: Nature Conservation and Biodiversity Development should not have an adverse impact on any protected sites. Support this policy		Noted.
Policy CS4	Natural England (Mr Gordon Wyatt) [264]	1333	Object	CS4: Nature Conservation and Biodiversity Natural England is strongly supportive of this policy. However, in point 1, the words "appropriate assessment" should be replaced by "Habitats Regulations Assessment" in order to more accurately reflect the requirements of The Conservation of Habitats and Species Regulations 2010 (HRA is a two-stage process in which 'appropriate assessment' is the second stage and is only required if the first stage indicates that the proposed development is likely to have a significant effect).	In point 1, the words "appropriate assessment" should be replaced by "Habitats Regulations Assessment" in order to more accurately reflect the requirements of The Conservation of Habitats and Species Regulations	Noted. SCAAP updated to reflect wording.
Policy CS5	Environment Agency (Lindsay Black) [255]	1301	Support	CS5: The Waterfront – the final paragraph of the policy is important to ensure protection of the natural environment.		Noted. This remains in the Policy in the revised version of the SCAAP.
Policy CS5	Natural England (Mr Gordon Wyatt) [264]	1334	Comment	CS5: The Waterfront – Natural England is generally supportive of this policy. However, any new or enhanced marine facilities as referred to in point 1b may potentially need to be restricted to seasonal usage if they are to comply with the final sentence of the policy.		Noted.
Policy CS6	Natural England (Mr Gordon Wyatt) [264]	1335	Comment	CS6 Central Seafront Development Principles - Natural England is generally supportive of this policy subject to any new lighting as referred to in point 1e, iii being so arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore.		Noted. This would be addressed as part of the development of any lighting schemes. This will ensure that it doesn't have a detrimental effect on the environmental designations. This Policy is now Policy CS1 Central Seafront Area Development Principles in the revised SCAAP.
Proposal Site CS6a	Natural England (Mr Gordon Wyatt) [264]	1336	Comment	CS6a Southend Pier – Natural England is generally supportive of this policy; subject to any new lighting as referred to in point 1d being so arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore.		Noted. This would be addressed as part of the development of any lighting schemes. This will ensure that it doesn't have a detrimental effect on the environmental designations. The Pier is now an Opportunity Site within the Central Seafront Development Principles Policy.
473	Herbert Grove Residents (Mr Steve Tomlin) [115]	1353	Comment	The Seaway car park provides a buffer between the main entertainment areas of Southend and the Retail and Living spaces. Provision late night movement between the various areas must take the condition of pedestrians into account.		Noted. The SCAAP includes policy related to accessibility and legibility in the public realm in each Policy Area and will be considered as part of development within the Opportunity Sites including Seaway.

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

474	Herbert Grove Residents (Mr Steve Tomlin) [115]	1354	Comment	The access between St. Johns Church and The Palace Hotel is only a yard wide. There is no room for increased access without damage to one of these important buildings.		The buildings in this locality would be considered as part of any scheme that was put forward – this would take into account the heritage assets and their preservation.
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Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
Proposal Site CS6b	Herbert Grove Residents (Mr Steve Tomlin) [115]	1310	Support	Proposal Site Policy CS6b: Seaway Car Park and Marine Parade In Milton Ward the site of the Rossi Factory already owned by the Council is an ideal site. Also if the Royals Car park was put under ground then an exhibition hall and a tall residential tower could go onto the site.		Noted. This site is now included in the Central Seafront Area Development Principles Policy. This would be a consideration for the owners of the Royals and would need to be subject to cost benefit analysis. Any development would need to adhere to the principles in the SCAAP for that area.
Proposal Site CS6b	Herbert Grove Residents (Mr Steve Tomlin) [115]	1311	Support	Proposal Site Policy CS6b: Seaway Car Park and Marine Parade Some space in the Seaway car park should be left open to allow views on the sea from the Queensway. The bandstand currently in Priory Park could be put there bringing it back as an attraction to central Southend.		Noted. This would be considered as part of any development proposals and brief. The site would need to adhere to the development principles in the SCAAP policy for the Seafront Policy Area and associated Opportunity Site which included Seaway. This site is now included in the Central Seafront Area Development Principles Policy
Proposal Site CS6b	Herbert Grove Residents (Mr Steve Tomlin) [115]	1312	Comment	Proposal Site Policy CS6b: Seaway Car Park and Marine Parade The Seaway Car Park is on a hill which makes it unsuitable for retail. People do not like to shop on hills, no body walks up hill when a lift is available at the pier.		Noted. This would depend on the accessibility and legibility of the site. Nevertheless the primary focus for retail development is in the town centre and in particular the High Street Policy Area. This site is now included in the Central Seafront Area Development Principles Policy
Proposal Site CS6b	Herbert Grove Residents (Mr Steve Tomlin) [115]	1343	Comment	Proposal Site Policy CS6b: Seaway Car Park and Marine Parade When looking at development area CS6b on a map it appears to have many attractions, however it should be emphasised that the entire site is on a hill and retail developers prefer level sites with adjacent ground level car parks. The drop from the High Street to Marine Parade through the Seaway Car Park is over 40 feet.		Noted. This would depend on the accessibility and legibility of the site. Nevertheless the primary focus for retail development is in the town centre and in particular the High Street Policy Area. This site is now included in the Central Seafront Area Development Principles Policy
Proposal Site CS6b	Environment Agency (Lindsay Black) [255]	1302	Support	CS6b: Seaway Car Park and Marine Parade support the wording 'All development will be required to demonstrate how flood risk has been taken into account and the measures which have been taken to mitigate against it if required.' This should be done through the provision of an adequate Flood risk assessment.		Noted.
Policy CS7	Environment Agency (Lindsay Black) [255]	1303	Comment	CS7: Western Esplanade, The Cliffs and Shrubbery – 4b native species planting should be encouraged		Noted. This will be encouraged as part of landscaping and public realm improvements.
Policy CS7	Natural England (Mr Gordon Wyatt) [264]	1337	Object	CS7: Western Esplanade, The Cliffs and Shrubbery Natural England is generally supportive of this policy; subject to any new lighting being so arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore. c (HRA is a two-stage process in which 'appropriate assessment' is the second stage and is only required if the first stage indicates that the proposed development is likely to have a significant effect).	Natural England is generally supportive of this policy; subject to any new lighting as referred to in point 4.e being so arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore. The reference to "appropriate assessment" in point 2.b should be replaced by "Habitats Regulations Assessment" in order to more accurately reflect the requirements of The Conservation of Habitats and Species Regulations 2010 (HRA is a two-stage process in which 'appropriate assessment' is the second stage and is only required if the first stage indicates that the proposed development is likely to have a significant effect).	Noted. Wording has been revised appropriately. This would be addressed as part of the development of any lighting schemes. This will ensure that it doesn't have a detrimental effect on the environmental designations. The Policy has been now been incorporated in the Central Seafront Policy Area Development Principles in the revised version of the SCAAP.

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Proposal Site CS7a	Natural England (Mr Gordon Wyatt)	1338	Comment	CS7a Cultural Centre and New Southend Museum – Natural England is generally supportive of the proposals for a Cultural Centre and New Southend Museum. Every effort should be made to minimise the		
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Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
	[264]			severance of green infrastructure		Noted.
Policy CS8	Environment Agency (Lindsay Black) [255]	1304	Support	CS8 Eastern Esplanade and City Beach Gateway – support the paragraph 'Proposals for Seafront development along Eastern Esplanade will need to demonstrate that there will be no unacceptable impact upon navigation, biodiversity, flood risk or the special character and designations		Noted. This is now incorporated in the revised SCAAP in Policy CS1 Central Seafront Area Development Principles and Policy CS2 which addressed biodiversity. In addition Flood Risk Management is addressed in Policy DS4.
Policy CS8	Natural England (Mr Gordon Wyatt) [264]	1339	Comment	CS8: Eastern Esplanade and City Beach Gateway – Natural England is generally supportive of this policy – subject to any new lighting as referred to in point 8b being so arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore.		Noted. Wording has been revised appropriately. This would be addressed as part of the development of any lighting schemes. This will ensure that it doesn't have a detrimental effect on the environmental designations. The Policy has been now been incorporated in the Central Seafront Policy Area Development Principles in the revised version of the SCAAP.
Proposal Site CS8a	Environment Agency (Lindsay Black) [255]	1305	Comment	Proposal Site Policy CS8a: Woodgrange Drive (Kursaal) Estate Support point 2) Flood risk must be managed appropriately through an adequate FRA.		Noted. This will be address within the development principles of the Central Seafront Policy Area and the Opportunity Site. In addition it will be addressed through the Flood Risk Management and Sustainable Drainage Policy.
Proposal Site CS8a	Environment Agency (Lindsay Black) [255]	1442	Comment	Proposal Site Policy CS8a: Woodgrange Drive (Kursaal) Estate Point 3) Water efficiency measures should also be included alongside energy efficiency. Achieving a minimum of level 3 of the code for sustainable homes should be referred to, in line with Core Strategy		Note. This Policy has been revised to reflect the changes to Building Regulations. Water efficiency is addressed in the Development Management Document.
515	Stock Woolstencroft (Mr Owen O'Carroll) [272]	1368	Support	<p>Landowners at Victoria Avenue are in the process of joining together as a consortium to promote the comprehensive regeneration and redevelopment of their properties. The consortium supports the overall objectives of the Southend Central Area Action Plan (AAP) and the identification of the Victoria Gateway Neighbourhood as a key area for regeneration.</p> <p>In relation to the proposed AAP policies, the consortium has not had the opportunity, within the Proposed Submission consultation period, to provide a joint response . The consortium intends to actively contribute to the production of the AAP and will provide further comments in due course. We would request that the Council considers our consortium as a key stakeholder within the town centre and we would certainly wish to engage with the Council at all future stages of development of the AAP.</p>		Noted. The Council will welcome engagement with the consortium during development of the SCAAP.
Policy DP9	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1365	Support	<p>DP9: Victoria Gateway Neighbourhood Development Principles</p> <p>Para 8a: Support the priority route for sert.</p> <p>Schedule 1: Part B Policies:</p>		Noted. Unfortunately the Council has not been able to continue with SERT as funding has not been allocated. Nevertheless the Council will explore other options for public transport as part of planning policy document and the Local Transport Plan.

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Proposal Site PS9c	Sainsbury's Supermarkets	1356	Support	Proposal Site Policy PS9c: Roots Hall Football Ground and Environs		Noted.
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Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

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	LTD [268] (represented by Indigo Planning Ltd (Mr Sean McGarth) [185			support		
Proposal Site PS10a	Sainsbury's Supermarkets LTD [268] (represented by Indigo Planning Ltd (Mr Sean McGarth) [185	1357	Object	Policy PS10a: Former B&Q Site We consider that proposal site policy ps10a is unsound as the allocation is not effective nor justified and it would compromise the deliverability of the AAP as a whole by using up all the network capacity for the medium/long term and preventing schemes such as the redevelopment of roots hall which has outline consent and relocation of Sainsbury's from London round coming forward.	We consider that in order to make the central area action plan sound then Proposal Site Policy PS10a should be removed, as its present allocation comprises the deliverability of the rest of the Central Area Action Plan.	The Opportunity Site has been removed as there is a long term lease on the site for a business known as The Range. There has been no indication that the site will be built out for convenience retail in the short to medium term.
Proposal Site PS10a	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1366	Comment	Policy PS10a: Former B&Q Site Former B&Q site: Vital the effects of any redevelopment of this site and any subsequent junction works can be accommodated within the capacity of the highway network on Queensway. Recent experience in this area has seen significant levels of congestion.		Opportunity Site has been removed from the Plan. There is a long term lease on the site for a business known as The Range. There has been no indication that the site will be built out for convenience retail in the short to medium term.
580	Southend Properties (Guernsey) Ltd (Mr Ivan Walsh) [262]	1273	Comment	Whilst we continue to support the redevelopment of Southend and in particular the Victoria Avenue corridor, following our receipt of the document we write to raise our objection to the following inclusion. PAGE 163, Para 2 reads "Project Heath & Carby, investment required £3.78m, description Purchase and enabling works of redundant office buildings at northern end of Victoria Avenue in order to kick start the provision of new housing, Outputs delivered 250 units total comprising 50 social rented and 50 intermediate units." This statement gives the impression that the council; is looking to the compulsory purchase of Heath House and Carby House for a sum not in line with our expectations with an end goal of delivering a reduced residential mix. Given our current planning permission for 280 residential units, current project expenditure and current committed works, we find the statement misleading. If the Council has a serious interest in purchasing these two development sites we request that you contact us first in writing with a suitable purchase offer. We therefore ask that the statement on page 163 be removed from the SCAAP.		Noted. These references have been removed from the revised SCAAP.
607	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1367	Comment	Schedule 1: Part B Policies: Page 190: Modal Split: Suggest in Target and Dates column this should include completion of priority measures on the A13 mentioned in Bus reliability section on page 189.		Noted. Targets will be developed in line with stakeholders during preparation of the SCAAP.
Proposal	Arriva	1361	Comment	Proposals Map		

Appendix A – Summary of Representations on the (Superseded) Proposed Submission Version of the SCAAP (2011)

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
Map	Southern Counties (Mr Malcolm Spalding) [270]			Suggest the SERT route should be on the Proposals Map.		SERT has not been included as funding has not been allocated for it.
Proposal Map	Stargas Nominees [279] (represented by BNP Paribas Real Estate (Miss Grace Sim) [246])	1389	Comment	<p>Proposals Map Proposal Site Policies</p> <p>As per our previous representations, we remain of the opinion that Chartwell House is suited to residential led mixed-use development.</p> <p>We note that the AAP includes a number of Proposals Sites and Policies, such as Proposals Site 'PS4a: Queensway House and adjacent buildings', which is located immediately to the west of Chartwell House in the Queensway and Southchurch Road Area. This proposal site is designated for additional housing and a new commercial development, including office and secondary retail uses together with community facilities. We consider that Chartwell House has the potential for more efficient and effective uses on its site. However, without an allocation, the certainty that comes with an allocation and opportunity to secure the alternative uses proposed are reduced.</p>	In this regard, we request that the site is included within the AAP as a proposals site for a high-density residential and/or residential-led mixed use redevelopment.	<p>It is noted that planning reference 14/00917/PA3COU has under the Town And Country Planning (General Permitted Development) (Amendment) (England) Order 2013 been granted prior approval of change of use of the existing building from office use class B1(a) to dwelling houses use class C3 under Class J.</p> <p>The Policy area have also been updated since the last version of the SCAAP and the Policy Area within which the site, Chartwell House, is now located is the High Street Policy Area, which recognizes the function of the Victorias as part of the Primary Shopping Area. The development principles of this Policy Area will apply when applications are considered. The development principles support a net increase in dwellings above existing or new commercial development as well as mixed use development with active ground floor frontages.</p> <p>It should also be noted that not all potential development sites in the SCAAP area are allocated, but this does not prevent development coming forward and be considered against the principles set out within each Policy Area.</p> <p>As such the site has not been included on the Proposals Map.</p>

