

Southend Central Area Action Plan (SCAAP) – Representations on Proposed Modifications

July – Sept 2017

Totals

Respondents - 12

Representations – 50

Of that

Support – 20

Object - 15

Comment - 15

Respondent	Rep No:	Modification Ref	Support/ Object/ Comment	Representation (Summary of Original Submission)
Tony Nathan	2907	General	Comment	Apart from the need to significantly simplify the wordiness of the document into a much simpler summary, it does seem a lot of work for little significant benefit.
Robert Deanwood National Grid	2908	General	Comment	National Grid has no comments to make in response to this consultation.
Natural England	2909	General	Support	Natural England supports the minor modifications to the SCAPP. We have no further comments to make.
Katie Parsons Historic England	2914	General	Support	We very much welcome many of the Proposed Modifications put forward by the Council particularly Main modifications 13, and Minor modifications 4, 17, 18, 42. These address many of our earlier concerns.
Katie Parsons Historic England	2918	General	Comment	We should like to stress that the above comments are based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.
Mary Power PowerHaus Consultancy on behalf of Southend United Football Club	2924	General	Object	In support of representations made on behalf of Stockvale Group and Turnstone, our letter of the 14 th July highlighted that policy CS1.2 was unsound as the delivery of a commercially viable cinema would not be able to achieve the policy requirement for no net loss in car parking provision. However, no modifications have been made regarding policy CS1.2. Therefore, I wish to re-emphasise that this policy should not be made as it is highly uncertain that a leisure focused development on the Seaways Car Park could be viably delivered during the SCAAP Plan period.

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Alison Osbourne Indigo Planning on behalf of Valad	2919	Main 1	Support	Valad welcomes the inclusion of the New Strategic Objective (6) which provides important protection for the town centre. Valad agrees that Southend town centre must be the first preference in the Borough for all forms of retail and leisure development, and other town centre uses attracting large numbers of people. It is essential that the policy framework creates an environment that encourages investment in the Central Area.
Alison Osbourne Indigo Planning on behalf of Valad ds	2920	Main 2	Support	Valad support the inclusion of the proposed text to Policy DS1.1, and agrees that the town centre must remain the first preference for all forms of retail and leisure development, and for other town centre uses attracting large numbers of people. This modification is an important amendment which conveys greater support for taking steps to ensure the town centre's vitality and viability, and to encourage investment.
Mary Power PowerHaus Consultancy on behalf of Southend United Football Club	2923	Main 2 and 3	Object	The proposed wording of DS1.1 in the Schedule of Modifications replicates the proposed wording of SBP and IP in its entirety and therefore, on behalf of SUFC I wish to re-emphasise that the wording is unsound and re-submit our proposed wording.
Nick Laister RPS Planning on behalf of The Stockvale Group and Seafrost Traders Association	2925	Main 4	Object	<p>We object to the reference that: "There are 3,142 publicly available paid for car parking spaces to the south of the Central Area..." This does not reflect the current supply of paid for car parking spaces south of the railway line. The difference is based on an inaccurate survey of car parking spaces, the use of significantly out of date figures for the Seaway Car Park, coupled with the exclusion of a number of paid for on street parking areas. The correct number is set out in our amended version of Appendix 9 (see our separate representations on that).</p> <p>A meeting was held with the Council on 21st June. At this meeting, Stockvale explained the differences between the Stockvale and Southend Borough Council (SBC) figures. The Stockvale figures are based on a December 2016 survey. Stockvale stated that it was willing to meet with the Council on any of the sites where there was disagreement and agree figures, but the Council was not willing to agree to this. The Council has given no explanation for the discrepancies in its figures, so Stockvale cannot accept that the figures shown in the Schedule of Modifications are correct. We would suggest that the Stockvale figures are used in favour of the SBC figures. Alternatively, Stockvale remains willing to meet with the Council on site and agree these figures, which should be a relatively straightforward exercise as this is a statement of fact. We also see no reason for the reference to only paid-for spaces, when free spaces are also available and should be recognised. There are an additional 132 free on-street spaces available for visitors (based on the conservative assumption that 75% of the on-street spaces are used by residents).</p> <p>The Proposed Modification also states: "2,562 of these spaces are located in publicly available key visitor car parks (Table 5)". This is based on the car parks that have been designated as such in Table 5. Stockvale strongly</p>

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				<p>objects to the exclusion of a number of key visitor car parks from this list, for which there is absolutely no explanation given. This artificially reduces the number of key car parking spaces significantly, and given the severe capacity issues in the seafront area, to be sound the discrepancy in our representations to Main 7. If our amended version of Table 5 is accepted, then the figure of 2,562 should be replaced with 3,207.</p> <p>We propose the following amended wording: “135 There are 3,142<u>3,536</u> publicly available paid for car parking spaces to the south of the central area within approximately 10 minutes’ walk from the shoreline (Appendix 9), serving both the seafront and southern parts of the Southend Central Area, <u>and an additional 132 free on-street spaces available for visitors. 3,162</u>2,562 of these spaces are located in publicly available key visitor car parks (Table 5). As a result of the peak capacity issues, as identified by the <u>Car Parking Study</u>, and to support the vitality and viability of the central seafront area, it is expected that there will be no net loss of key visitor car parking to the south of the Central Area.”</p> <p>Linked to this, we also consider the following Modifications to Paragraph 135 are essential to ensure that the Council’s approach to the protection of key parking spaces is clear: “Given the constraints and limited land availability of the Central Area, opportunities to increase car parking to the south will be limited, however where viable and feasible, the Council will seek further provision in association with development <u>to allow for planned growth in seafront businesses, and a proportion of these spaces will be reserved for that purpose (i.e. not used to accommodate parking demand from a specific development)</u>. One example of this is the New Southend Museum (Opportunity Site CS1.4), which has planning permission for approximately 220 public car parking spaces. <u>In addition, the Council will require the provision of appropriate levels of car parking spaces associated with development of the key car park themselves. This will involve no net loss of the existing car parking spaces, and sufficient additional spaces to accommodate the development, in line with the requirements of Policy DS5 below.</u></p>
David Burch Essex Chambers of Commerce	2891	Main 4	Object	<p>We object to the statement that "There are 3,142 publically available paid for car parking spaces to the south of the Central Area" and support Stockvale as to the correct number of parking spaces available which they set out in amended version of Appendix 9. We also agree that in considering parking provision free spaces should be included alongside paid for spaces.</p> <p>We would also support the proposed amended wording submitted by Stockvale in respect of Para 135 and that there should be no net loss of key visitor car parking to the south of the Central Area.</p>

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<p>Nick Laister RPS Planning on behalf of The Stockvale Group and Seafrost Traders Association</p>	<p>2926</p>	<p>Main 5</p>	<p>Object</p>	<p>We support the Modifications to the first bullet point, on the assumption that Table 5 is “corrected” to include all the key visitor car parks (see our objection to ‘Main 7’). However, these amendments do not go far enough as they do not also amend the second part of the bullet point, which currently states: “...and to maintain overall capacity at a level that supports the vitality and viability of the SCAAP area, and enables the delivery of relevant Opportunity Sites”. As currently worded, it states no net loss of key visitor car parks, but suggests that there is flexibility on “overall capacity” if it enables delivery of Opportunity Sites. This Modification does not, therefore, resolve our objection.</p> <p>To resolve our objection, the first bullet point should make reference to the overall level of parking and making it clear that development of Opportunity Sites retains existing levels as well as meeting its own needs. This issue was a key point made at the Examination, and as referred to in the RPS Response to Additional Document 13 (dated 14th July 2017), it is clear that the developer of the Seaway Site (Opportunity Site CS1.2) will potentially provide fewer spaces than are currently available without the development. This is extremely concerning and shows that the SCAAP as currently worded will not be effective. Our proposed modification for Paragraph 136 was simply aimed at clarifying the Council’s expectation that if there is to be a redevelopment of an Opportunity Site then the existing spaces should be protected, and the development’s own net needs should be additional to this, taking into account peak days for the seafrost. The following amendment would resolve this objection:</p> <p>“136 (first bullet point) ensure there is no net loss in key visitor car parking to the south of the Central Area (for the purposes of Policy DS5.2.b, these are the key visitor car parks (Table 5) located within 10 minutes’ walk of the shoreline (see Map 4), and to maintain overall capacity at a level that supports the vitality and viability of the SCAAP area, <u>generally aiming to retain the level of 3,668spaces as of June 2017, and enabling the delivery of relevant Opportunity Sites, whilst ensuring that these sites provide sufficient spaces to accommodate their own needs, in addition to protecting existing parking levels;</u></p>
<p>David Burch Essex Chambers of Commerce</p>	<p>2892</p>	<p>Main 5</p>	<p>Comment</p>	<p>We support the modifications to the first bullet point but are not convinced that it goes far enough in protecting parking provision. We are aware of the plans being developed for the Seaway site which suggest there may be fewer spaces after development than currently exist. We would like to see a commitment that any opportunity sites that are developed provide adequate parking for their own needs in addition to protecting existing levels of parking provision.</p>

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				<p>Table 5: Key Visitor Car Parks to the south of the Central Area within the area identified by Figure X*</p> <table border="1" data-bbox="831 280 1518 772"> <thead> <tr> <th>Key Visitor Car Park</th> <th>Number of Spaces*</th> <th>Key Visitor Car Park</th> <th>Number of Spaces*</th> </tr> </thead> <tbody> <tr><td>FAIRHEADS</td><td>211</td><td>FAIRHEADS</td><td>211</td></tr> <tr><td>SEAWAY***</td><td>478 661</td><td>SEAWAY***</td><td>810</td></tr> <tr><td>ROYALS**</td><td>426</td><td>ROYALS**</td><td>426</td></tr> <tr><td>SHOREFIELD</td><td>125</td><td>SHOREFIELD</td><td>125</td></tr> <tr><td>YORK ROAD</td><td>93</td><td>YORK</td><td>93</td></tr> <tr><td>TYLERS</td><td>249</td><td>TYLERS</td><td>249</td></tr> <tr><td>ALEXANDER ST</td><td>74</td><td>ALEXANDER ST</td><td>74</td></tr> <tr><td>CLARENCE</td><td>126</td><td>CLARENCE</td><td>126</td></tr> <tr><td>WESTERN ESPL. CENTRAL</td><td>585</td><td>WESTERN ESPL CENTRAL</td><td>585</td></tr> <tr><td>WESTERN ESPL. EAST</td><td>128</td><td>WESTERN ESPL. EAST</td><td>128</td></tr> <tr><td>EASTERN ESPL.</td><td>67</td><td>EASTERN ESPL.</td><td>67</td></tr> <tr><td>NCP**</td><td>138</td><td></td><td></td></tr> <tr><td>MARINE PLAZA****</td><td>67</td><td></td><td></td></tr> <tr><td>BEACH ROAD**</td><td>40</td><td></td><td></td></tr> <tr><td>PREMIER INN</td><td>68</td><td></td><td></td></tr> <tr><td>KURSAAL</td><td>104</td><td></td><td></td></tr> <tr><td>TOTAL</td><td>3,162</td><td></td><td></td></tr> </tbody> </table> <p>* As per Car Parking Study for the Central Area of Southend (base date May 2016) Base date June 2017 ** Private Car Park *** capacity for 810 spaces, but 661 marked bays **** Capacity for 200, but 67 spaces covered by lawful development certificate</p>	Key Visitor Car Park	Number of Spaces*	Key Visitor Car Park	Number of Spaces*	FAIRHEADS	211	FAIRHEADS	211	SEAWAY***	478 661	SEAWAY***	810	ROYALS**	426	ROYALS**	426	SHOREFIELD	125	SHOREFIELD	125	YORK ROAD	93	YORK	93	TYLERS	249	TYLERS	249	ALEXANDER ST	74	ALEXANDER ST	74	CLARENCE	126	CLARENCE	126	WESTERN ESPL. CENTRAL	585	WESTERN ESPL CENTRAL	585	WESTERN ESPL. EAST	128	WESTERN ESPL. EAST	128	EASTERN ESPL.	67	EASTERN ESPL.	67	NCP**	138			MARINE PLAZA****	67			BEACH ROAD**	40			PREMIER INN	68			KURSAAL	104			TOTAL	3,162		
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<p>Nick Laister RPS Planning on behalf of The Stockvale Group and Seafont Traders Association</p>	<p>2927</p>	<p>Main 6</p>	<p>Object</p>	<p>We object to the wording of Main 6. This will not be effective as it does not make it clear that at significant times of the year there is no capacity at all in the key visitor car parks. This lack of clarity has undoubtedly emerged because the Council has not undertaken car park surveys on any peak days (see RPS Response to Addendum to Additional Document 14, 11 August 2017), so it has not identified the extent of the problem. This issue was discussed at length at the Examination. This shortcoming with the evidence base is having a direct effect on the wording of policy and supporting text. It is essentially offering the developer a number of options for not providing the parking spaces that would be needed to support the proposed development. This would have the effect of eroding the availability of car parking spaces in the key visitor car parks, which could have a catastrophic effect on parking availability at peak times, causing significant queuing on key routes, illegal parking, poor visitor experience and ultimately a contraction in the visitor economy. This was all discussed at length at the Examination, and we are disappointed that the Council has not made this position clear in the SCAAP.</p> <p>(The attached newspaper report from 30th August 2017 (see Enclosure 2) shows the extent of the problem at peak periods, which would be exacerbated by the loss of capacity – refer to full submission).</p> <p>The reference to “availability of parking in other convenient locations” is imprecise and would potentially</p>																																																																								

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				<p>allow developers to rely on car parks that are not well located in relation to the seafront, again eroding the capacity of key visitor car parks.</p> <p>In addition, the reference to “opportunities for further mode shift through the travel plan process” is another potential route for developers to avoid providing car parking spaces which, if this does not result in the provision of sufficient additional car parking spaces, will again erode available spaces with very harmful results. Whilst of course travel plans are to be welcomed, this should not be worded as it is currently drafted, which uses travel plans as a reason for reducing supply. We support the final sentence as it requires a recognition of the need to accommodate peaks and troughs. However, the Council does not currently have data on the extent of peaks as it has undertaken no car park surveys on peak days. Whilst this is partly a development control issue, we would be reassured if the Council would state clearly that it will require Transport Assessments to consider the car parking requirements on peak days for the seafront area (as opposed to standard weekday network peaks) and ensure that there is no erosion of the resort’s ability to accommodate visitor trips at these times. Otherwise there is a strong likelihood that developers will (as is normally the case) say that they will only propose to assess traffic and car parking usage on standard network peaks (Monday to Friday AM and PM peaks). This Paragraph must be clear that, because of the importance of these car parks to the seafront businesses at peak times, transport assessments must also consider these peak days and that either the developer or the Council must undertake surveys on peak days to quantify the usage of these spaces.</p> <p>We would suggest that the Paragraph is reworded as follows to make it sound. Without this amendment the paragraph will not be effective in making it clear that developers must be able to understand how the development will protect the usage of these spaces by visitors to the seafront on peak days: “Development proposals that come forward on key visitor car parking areas to the south of the Central Area (as defined by Map 4) will need to ensure that there is no net loss within the key visitor car parks as identified in the SCAAP (policy DS5.2.b) and Table 5. Any planning application would need to be accompanied by a detailed transport assessment that would include an analysis of the impact of the additional parking demand generated by the proposed development on the identified key visitor car parks <u>during peak days for the seafront areas</u>, having regard to adopted parking standards, linked/combined existing trips, availability of parking in other convenient locations, and opportunities for further mode shift through the travel plan process. Any change in parking provision as a result of major redevelopment must not undermine the resort’s ability to accommodate visitor trips, recognising the peaks and troughs of demand for car parking. <u>The transport assessment must include an analysis of parking availability on resort peak days, using up-to-date survey data of the usage of key visitor car parks in peak holiday periods.</u>”</p>

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David Burch Essex Chambers of Commerce	2893	Main 6	Object	<p>We object to the wording of Main 6 as it does not address the issues of parking capacity in key visitor car parks despite acknowledging that there is a need to accommodate peaks and troughs in parking demand. We don't believe that the use of the phrase "availability of parking in other convenient locations" is precise enough. What is convenient to one person might be completely inconvenient to another so this needs to be spelt out better. We also remain unconvinced that the Council will be able to effect the modal shift it desires so would discount this option.</p>
Nick Laister RPS Planning on behalf of The Stockvale Group and Seafrost Traders Association	2928	Main 7	Object	<p>Table 5 includes one error and a number of exclusions. The error is with the Seaway car park, and this is a significant and material error. At the meeting on 21st June the Council acknowledged that there were now 661 marked bays at Seaway car park. To use the figure of 478 spaces, which is out of date, will seriously underestimate the capacity of the car park by not protecting all spaces, which means the policy will not be justified by the evidence base, nor will it be effective as it will allow for a net loss of a very large number of spaces (up to 183)1.</p> <p>1 The lease that the Council has entered into with Turnstone Southend Ltd only requires the provision of 480 spaces on this site. This perhaps explains why the Council is not acknowledging the current number of marked bays on this site, and emphasises the need for the SCAAP to get it right.</p> <p>In our response to the Statement of Common Ground, Stockvale suggested that the number of 478 should be amended to 810 spaces, which is our understanding of its capacity, based on work undertaken by SK Architects. However, we consider that, at the very least, there should be a recognition of the car park's current capacity of 661 in the Table and this would be sufficient to resolve Stockvale's objection.</p> <p>For the benefit of the Inspector, at the meeting on 21st June 2017, at which Stockvale and the Seafrost Traders Association were attempting to agree the factual basis for the existing car parking capacity on Seaway and other sites, RPS asked the Council why it was only proposing to recognise 478 of the 661 spaces that are currently marked out on the site. The reason given was because the spaces had been created by moving the coach parking to another location, and the Council needed the flexibility to reinstate the coach spaces on the Seaway site if these spaces were no longer available to the Council. RPS asked the Council how protecting only 478 of the spaces would allow the coach spaces to be reinstated after the redevelopment of the site has proceeded. It seemed to us that if the area previously used by the coach spaces was to be protected now and in the future, this could only be achieved by recognising the full 661 spaces. The Council chose to not respond to this question. It seemed to RPS that the reason given by the Council for only identifying 478 spaces in Table 5 was not sound, because if there was a risk that the coach spaces may need to be reinstated on the Seaway site in future, this risk would equally apply before and after the redevelopment. This is not a suitable or sound basis on which to build a policy. Quite the contrary, the policy appears to be achieving the exact opposite of the outcome that the Council and Stockvale are both seeking. The Council wants to ensure flexibility for the</p>

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				<p>reinstatement of coach parking spaces and Stockvale (and the Seafront Traders Association) want to protect existing car parking supply. Neither of those objectives would be served by reducing the number of spaces on the Seaway car park from 661 to 478.</p> <p>This complete lack of logic (and accuracy) resulted in RPS investigating this further on behalf of Stockvale, as our clients are extremely concerned about the damage this policy will inflict on the resort. We needed to understand the basis for this approach of protecting the figure of 478 spaces at all costs, regardless of justification. A redacted copy of the Heads of Terms on which the agreement between Southend Borough Council and Turnstone Southend Limited was made available to RPS – this is attached in the full submission (see Enclosure 3). Under ‘Proposed Development’ on Page 2, it states:</p> <p>“No less than 480 car parking spaces to serve the leisure element of the development”.</p> <p>So it appears to RPS that the Council’s position is not based on the number of spaces that exist on the site (661), nor does it appear to be based on the need to allow flexibility for the reinstatement of coach parking spaces (as suggested at the meeting on 21st June 2017), as this would also require 661 spaces. It appears to be based on setting a level of parking that corresponds approximately to an Agreement for Lease with a developer. In short, this is not a sound planning basis for arriving at the number of spaces on the Seaway site; it is simply an attempt to ensure that a private agreement between the Council and a developer is honoured. This is quite simply not sound, not backed up by any of the reasons given by the Council, and certainly not backed up by any of the evidence provided by Stockvale or the Seafront Traders Association at the Examination. It is essential that this figure is corrected in the SCAAP to ensure that this table, and the policies and paragraphs that refer to this table, are sound.</p> <p>(As an aside, RPS understands that, at more recent meetings, the Council has now amended its reasons for only identifying 478 of the 661 spaces on the site. It now states that the removal of coaches was permanent, but the additional spaces on Seaway that were created by the removal of coaches was “temporary”. This latest position, as with the original position, is backed up by no evidence.)</p> <p>A number of car parks have been excluded from this table: Marine Plaza: Although there is a lawful development certificate for the car park confirming the lawful use of 67 spaces, this does not represent the actual capacity of the car park, which is 200. However, given that any appeal of the LDC will not be resolved in time for the Inspector’s Report, Stockvale has accepted the figure of 67 spaces. It should, however, be identified as a Key Visitor Car Park, as it is arguably the most prominent car park on the seafront, being located at the junction between Southchurch Avenue and Marine Parade, and</p>

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				<p>noted in a footnote that there is capacity for 200 across the whole site. The fact that it has an extant planning permission (which expires in July 2018) is not relevant. It is appropriate for the SCAAP to include policies against which any future applications can be considered as the SCAAP needs to respond to the possibility that this permission will expire and a new planning application will be submitted. This is entirely appropriate as Marine Plaza is an Opportunity Site, so the SCAAP should be providing consistent policies against which to consider planning applications.</p> <p>Beach Road: We understand from the SOCG that the Council's reason for not including this car park is because it is not signed. In Stockvale's view, the designation of a key car park is not a function of whether it is signed, it is a function of the extent to which the car parks serve tourists visiting the town. As this site plays a key role, it should be included in the list of key car parks.</p> <p>NCP Southend Central: We understand from the SOCG that SBC has not included this car park because it is attached to the station and primarily for users of this facility. This car park operates exactly the same way as The Royals Car Park. On weekends and school holidays it serves a joint shoppers and tourist role. It falls within Map 4 walking distance of the seafront, so should be included.</p> <p>Premier Inn: In the SOCG it is made clear that the Council has excluded this car park because it is primarily used by customers of Premier Inn, albeit the car park is open to all. Stockvale is more flexible on this car park given its clear dual role, however in the daytime it operates as a visitor car park that serves day visitors. Although we can understand why it was excluded from the CPS, it would seem appropriate to at least identify it as a key visitor car park in the SCAAP.</p> <p>Kursaal: The 104 car parking spaces at The Kursaal were previously private spaces for use of Kursaal customers only. This has now switched to a pay and display system where the spaces are publicly available.</p> <p>Table 5 should be amended as follows to correct the error in relation to Seaway and to include the car parks that have been inexplicably excluded.</p> <p>Table 5: Key Visitor Car Parks to the south of the Central Area within the area identified by Figure X*</p>
Paul Thompson Seafront Traders Association	2940	Main 7	Object	The Seafront Traders Association agrees with the baseline figure of 3162 car parking spaces as Key Visitor parking spaces South of the railway line, as submitted by RPS on behalf of Stockvale Ltd. We agree that the Beach Rd car park, the NCP car park, the Kursaal car park and the Premier Inn car parks should be included as Key Visitor Car Parks due to their location and the fact they are

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				<p>'publically available'. Also we disagree with the council's figure of 478 spaces in the Seaway Car Park. There is a significant difference between the number of parking spaces that SBC are claiming are in Seaway car park (478 spaces) and the number of spaces the seafront traders/ RPS have counted to be in the car park (661 spaces). The STA believe the correct figure is 661 and strongly object to the council's use of an out of date figure of 478 spaces. There has been 661 spaces in Seaway for well over a year as outlined below. To use the figure of 478 spaces, which is out of date, will seriously underestimate the capacity of the car park by not protecting all spaces, which means the policy will not be justified by the evidence base, nor will it be effective as it will allow for a net loss of a very large number of spaces (183). The Plan will effectively be planning for protecting significantly fewer spaces than are available now. This will be very damaging to the resort's tourism economy and not in line with the objectives of the Plan.</p> <p>If the 478 figure is allowed to stand the loss of the 183 spaces will be devastating for seafront businesses. The area south of the railway line has a need for an increase in capacity to cope with excess demand on peak days. Congestion will increase and the importance of this strategically located car park will be negated, with increased congestion resulting.</p> <p>History</p> <p>In 2014 & 2015 the makeup of Seaway car park consisted of 489 car spaces and 36 coach bays. Due to the decline of coach trips to Southend the coach bays were rarely occupied and rarely full. From 2014 on busy days after 1pm SBC began to allow cars to park in vacant coach bays to meet the shortfall in supply of parking spaces. This worked well and in 2015 on busy days SBC employed car park attendants to manage this process. In 2016, SBC in cooperation with seafront businesses agreed to remove the coach bays from the car park and reline these as permanent car parking spaces. This created an additional 172 marked car bays, taking the total number of marked car parking bays to 661. In Spring 2017 SBC remodelled part of Southchurch Avenue to fit in 5 coach drop off bays to access the seafront. It also changed a loading bay to a permanent coach drop off bay on Marine Parade. Coaches now park at the Arriva bus garage where they have coach washing facilities etc.</p> <p>The seafront traders association worked in conjunction with SBC director of Tourism Scott Dolling, the highways portfolio holder from 2015, Cllr Martin Terry, and the current highways portfolio holder, Cllr Tony Cox to implement these changes.</p> <p>The annual revenue from coaches for 5 years prior to this in Seaway only averaged out at £14k. As there was a major shortage of car spaces on busy days and minimal coach revenue the business case to permanently remove the coaches and replace them with car spaces was justified. Further to this the 2016 gross revenue for Seaway car park with the additional car spaces reached £578k, up £129k from 2 years before.</p>

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				<p>At this point it is crucial to note that under the terms of the pre contract agreement SBC signed with Turnstone Estates in 2014, SBC is under a contractual obligation to permanently remove the coach bays out of Seaway car park so that vacant possession can be given. SBC is now stating that there are only 478 spaces in Seaway car park as 172 of the 661 spaces are temporary. This statement is incorrect, dishonest and I believe fairly embarrassing.</p> <p>For the benefit of the Inspector, at the meeting on 21st June 2017, at which Stockvale and the Seafront Traders Association were attempting to agree the factual basis for the existing car parking capacity on Seaway and other sites, RPS asked the Council why it was only proposing to recognise 478 of the 661 spaces that are currently marked out on the site. The reason given was because the spaces had been created by moving the coach parking to another location, and the Council needed the flexibility to reinstate the coach spaces on the Seaway site if these spaces were no longer available to the Council. RPS asked the Council how protecting only 478 of the spaces would allow the coach spaces to be reinstated after the redevelopment of the site has proceeded. It seemed to us that if the area previously used by the coach spaces was to be protected now and in the future, this could only be achieved by recognising the full 661 spaces. The Council chose to not respond to this question. It seemed to RPS that the reason given by the Council for only identifying 478 spaces in Table 5 was not sound, because if there was a risk that the coach spaces may need to be reinstated on the Seaway site in future, this risk would equally apply before and after the redevelopment. This is not a suitable or sound basis on which to build a policy. Quite the contrary, the policy appears to be achieving the exact opposite of the outcome that the Council and Stockvale are both seeking. The Council wants to ensure flexibility for the reinstatement of coach parking spaces and Stockvale (and the Seafront Traders Association) want to protect existing car parking supply. Neither of those objectives would be served by reducing the number of spaces on the Seaway car park from 661 to 478 In my opinion the reason SBC are stating the number of spaces as 478 is that they signed a precontract agreement with Turnstone estates in 2014, one of the terms in this contract was that the minimum number of spaces turnstone estates were required to provided in their development on Seaway car park is 480. (The heads of terms are being submitted by RPS on behalf of the Stockvale group). The council are not seeking to ensure the SCAAP is sound or based on reliable evidence. They are not ad hearing to the NPPF or any planning policy, they are simply tailoring the SCAAP document to tie in with the commercial agreement they signed 3 years ago with a developer.</p> <p>Both Highways portfolio holders have confirmed the removal of the coach bays and change to car bays was permanent. (See full submission documents for evidence that the removal of coach spaces from Seaway was permanent with permanent car parking spaces replacing them.)</p>

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David Burch Essex Chambers of Commerce	2894	Main 7	Object	We would concur with the representations made by Stockvale in respect of this section and in particular the suggested amendment to the number of spaces available in the Seaway car park.
Nick Laister RPS Planning on behalf of The Stockvale Group and Seafront Traders Association	2929	Main 8	Object	We support the inclusion of Map 4, and the use of isochrones. However, we object to the list of car parks identified as key visitor car parks and their capacities for the reasons set out in our Objection to Main 7. This should be amended to reflect the numbers set out in Main 7.

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				Publicly available Parking	Number of Spaces*	Within a 'Key Visitor Car Park
				FAIRHEADS	211	Yes
				SEAWAY***	478 <u>661</u>	Yes
				ROYALS**	426	Yes
				SHOREFIELD	125	Yes
				YORK	93	Yes
				TYLERS	249	Yes
				ALEXANDER ST	74	Yes
				CLARENCE	126	Yes
				WESTERN ESPL CENTRAL	585	Yes
				WESTERN ESPL. EAST ON ST	128	Yes
				EASTERN ESPL. ON ST	67	Yes
				SOUTHEND CENTRAL STATION NCP**	138	No Yes
				BEACH RD**	40	No Yes
				MARINE PLAZA****	67	No Yes
				PREMIER INN	<u>68</u>	Yes
				KURSAAL	<u>104</u>	Yes
				YORK ROAD. ON ST	22	No
				CLIFFTOWN RD. ON ST	11	No
				BALTIC AV. ON ST	6	No
				CLARENCE RD. ON ST	16 <u>17</u>	No
				CLARENCE ST. ON ST	11 <u>17</u>	No
				WESTON RD. ON ST	19 <u>26</u>	No
				NELSON ST. ON ST	18 <u>21</u>	No
				CAPEL TERRACE. ON ST	<u>6</u> <u>9</u>	No
				ALEXANDRA ST. ON ST	16 <u>23</u>	No
				CAMBRIDGE RD. ON ST	<u>24</u> <u>26</u>	No
				ALEXANDRA RD. ON ST	39 <u>40</u>	No
				CASHIOBURY TERRACE. ON ST	14 <u>13</u>	No
				RUNWELL TERRACE. ON ST	<u>6</u> <u>9</u>	No
				PRITTLEWELL SQ. ON ST	43	No
				ROYAL TERRACE. ON ST	19	No
				CLIFTON TER/ CLIFFTOWN PDE. ON ST	45 <u>53</u>	No
				DEVEREUX RD. ON ST	19	No

Respondent	Rep No:	Modification Ref	Support/ Object/ Comment	Representation (Summary of Original Submission)																																													
				<table border="1"> <tr><td>CLIFFTOWN PARADE</td><td>47</td><td>No</td></tr> <tr><td>ALEXANDRA ST</td><td>15</td><td>No</td></tr> <tr><td>CAMBRIDGE RD</td><td>8</td><td>No</td></tr> <tr><td>WILSON RD</td><td>8</td><td>No</td></tr> <tr><td>SCRATTON RD</td><td>5</td><td>No</td></tr> <tr><td>HEYGATE AV.</td><td>6</td><td>No</td></tr> <tr><td>HERBERT GROVE</td><td>4</td><td>No</td></tr> <tr><td>HARTINGTON RD</td><td>6</td><td>No</td></tr> <tr><td>ASH WALK</td><td>1</td><td>No</td></tr> <tr><td>PLEASANT RD</td><td>7</td><td>No</td></tr> <tr><td>HARTINGTON PLACE</td><td>3</td><td>No</td></tr> <tr><td>VICTORIA RD</td><td>9</td><td>No</td></tr> <tr><td>NORTHUMBERLAND AV</td><td>5</td><td>No</td></tr> <tr><td>ARNOLD AV</td><td>8</td><td>No</td></tr> <tr><td>TOTAL</td><td>3,668</td><td>N/A</td></tr> </table> <p>* Base date May 2016 Base date June 2017 ** Private Car Park *** Although Seaway Car Park currently has 661 marked bays, the car park has capacity for 810 spaces **** Capacity for 200, but 67 spaces covered by lawful development certificate.</p>	CLIFFTOWN PARADE	47	No	ALEXANDRA ST	15	No	CAMBRIDGE RD	8	No	WILSON RD	8	No	SCRATTON RD	5	No	HEYGATE AV.	6	No	HERBERT GROVE	4	No	HARTINGTON RD	6	No	ASH WALK	1	No	PLEASANT RD	7	No	HARTINGTON PLACE	3	No	VICTORIA RD	9	No	NORTHUMBERLAND AV	5	No	ARNOLD AV	8	No	TOTAL	3,668	N/A
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David Burch Essex Chambers of Commerce	2895	Main 8	Support	We support the inclusion of Map 4 provided that it reflects the comments made with respect to Main 7																																													
Cllr Brian Ayling	2910	Main 9	Comment	<i>It is hoped that plans can be developed to increase numbers of car parking spaces on the Seaway car park in excess of those required by the development consequently creating opportunities for development on other car parks where replacement car parking has not yet been identified.</i>																																													

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<p>Ron Woodley Borges Estates Residents Association</p>	<p>2913</p>	<p>Main 9</p>	<p>Comment</p>	<p>Policy DS5 discriminates between the public parking sites calling those car parks south of the railway line” key visitor spaces” and other car park spaces “public”. There is no clear explanation for this distinction indeed it is unclear whether we are talking about key visitors or key spaces. All car parks cater for visitors and there is no definition of what a key visitor is.</p> <p>As to the intention of ensuring no net loss of key visitor spaces consequent upon any development proposals coming forward, this strait-jacketed policy is a recipe for preventing or inhibiting potential growth/redevelopment. Moreover the inherent inflexibility would seem to preclude the potential for other car parks to be key. Say the park and ride experiment had been successful, would that car park not qualify for key status? Other opportunities might be also be available and succeed making nonsense of designating and distinguishing between car parks in policy terms.</p> <p>It is difficult to escape the conclusion that the sea front leisure and tourist industry is directing car park policy to the detriment of the town centre as a whole. There are good reasons to be supportive of that industry as an essential part of Southend’s economy and employment but the fact that it is a low skill, low pay, seasonal business should not be lost sight of.</p>
<p>Nick Laister RPS Planning on behalf of The Stockvale Group and Seafrost Traders Association</p>	<p>2930</p>	<p>Main 9</p>	<p>Object</p>	<p>Stockvale considers that this policy is now closer to being sound and acceptable. However, we do not consider that it makes it clear that the reference to analysis of the impact of additional parking demand on the key visitor car parks should be an analysis that is based on <u>peak days for the seafrost area</u>. As set out at length in the Examination, these are the days that matter for the tourism economy. As currently drafted it would not prevent a transport assessment from only assessing standard network peaks (weekday AM and PM peak) and not the resort peak. With a few minor modifications this can be resolved.</p> <p>We suggest the policy is reworded as follows: “Require any development proposals that come forward on key visitor car parking areas in the south of the Southend Central Area (as identified in Table 5 and Map 4) to ensure that there is no loss of key visitor car parking; any planning application in these areas would need to be accompanied by a detailed transport assessment that would include an analysis of the impact of the additional parking demand generated by the proposed development on the identified key visitor car parks <u>on peak days for the seafrost area</u>, having regard to:</p> <ul style="list-style-type: none"> (i) Adopted parking standards; (ii) Consideration of the extent to which linked/combined trips and opportunities for further mode shift through the travel plan process will reduce the need for additional publicly available car parking spaces; (iii) Availability of parking to the south of the Central Area within the area shown in Map 4; and (iv) The need for any replacement parking to be provided within the area shown in Map 4, where it should be

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				<p>secured through a planning condition or obligation as part of the overall development scheme or through another means acceptable to the Council. <u>The replacement spaces must be brought into use prior to commencement of development of the key car park.</u></p> <p>There also needs to be a paragraph that deals with the issue of temporary loss of spaces for development, noting the particular concern that emerged at the Examinations regarding developments that commence but do not complete, due to factors such as viability or developer going out of business. Given the importance of these spaces to the local economy, there needs to be a provision that ensures that protects as much as possible against this, as we suggested in the SOCG. This paragraph could be added to Policy DS5 2b: <u>“Where a development will result in a temporary net loss in publicly available car parking spaces on any of the key visitor car parks identified in Table 5, the developer will need to either provide temporary replacement provision for the duration of the construction project, or secure a bond in favour of the Council to ensure that in the event that the development is not completed the car parking can be reinstated.”</u></p> <p>There should also be a clause that recognises the potential for new car parks to be developed, where such an opportunity may arise (for example, the gasworks site which has recently been reported in the press). This should ensure that at least some of these spaces are protected in the Plan in future to support growth in the tourism economy:</p> <p><u>“Where an opportunity arises for the Council to develop a new car park in the area shown in Figure Map 4, the Council should identify a proportion of spaces (no less than 25%) that will be protected to allow for the predicted growth in visitor numbers to the seafront area.”</u></p>
David Burch Essex Chambers of Commerce	2896	Main 9	Comment	<p>We support the principle behind this policy but have concerns about when any analysis of the impact of additional parking demand on the key visitor car parks would take place. This could for example be undertaken in an off peak time and therefore not consider the impact of peak demand at other times of the year. Any such analysis must reflect demand throughout the year.</p> <p>We also have concerns about the potential loss of parking during any development period and what alternatives might be provided.</p>
Nick Laister RPS Planning on behalf of The Stockvale Group and Seafrost Traders Association	2931	Main 10	Support	<p>This Modification is supported as it clarifies that any replacement parking should be provided in the south of the Central Area, not the town centre as a whole because these car parking spaces play an important role in supporting the tourism economy.</p>
David Burch Essex Chambers of Commerce	2897	Main 10	Support	<p>We support this amendment</p>

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Nick Laister RPS Planning on behalf of The Stockvale Group and Seafront Traders Association	2932	Main 11	Support	This Modification is supported and the consideration of parking is welcomed.
David Burch Essex Chambers of Commerce	2898	Main 11	Support	We support this amendment
Katie Parsons Historic England	2917	Main 13	Comment	We note the SA supporting addendum identifies proposed modification Main 13 would provide strengthened protection to visual amenity and setting of heritage assets within policy CS1. The SA supporting addendum outlines no other significantly different effects as a result of the proposed modifications.
Mrs Sylvia Myers	2911	Main 19	Comment	<p>With regard to main modification 19 (PA8.4.ii(Opportunity Site PA8.2)) the Schedule of Modifications states that the following new second sentence will be added: ‘The tenure split and affordability of the proposed new accommodation will not preclude existing residents displaced by the redevelopment from being permanent occupiers in the new scheme’.</p> <p>I would be grateful if you could confirm that the sheltered housing accommodation that will replace Catherine Lodge in Baxter Avenue will house at least the same number of older residents that are currently housed in Catherine Lodge and that residents of Catherine Lodge will be offered flats in the new sheltered housing unit at least equal to the size of their existing flats and the same rental. Also please confirm that the security of tenure remains the same for older residents housed in Catherine Lodge that they currently enjoy.</p>
Nick Laister RPS Planning on behalf of The Stockvale Group and Seafront Traders Association	2933	Main 21	Comment	<p>We suggest the following amendments to ensure that the monitoring criteria reflects the correct number of spaces: “Providing the level of publicly available car parking provision to support the vitality and viability of the Central Area:-</p> <ul style="list-style-type: none"> - Keep car parking capacity, demand and traffic management provisions under review to ensure that this capacity remains at a level to support the vitality and viability of Southend Central Area. - Monitor the success in achieving no net loss of key visitor car parking (Table 5, 2,562 <u>3,162</u> spaces) to the south of the Central Area (Map 4). - Monitor any net change in overall paid for public parking within Central Area South (3,142 <u>3,668</u> spaces) as outlined in Appendix 9. <p>As Core Strategy policy CP3. As Development Management policy DM15.”</p>

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Nick Laister RPS Planning on behalf of The Stockvale Group and Seafrost Traders Association	2934	Main 22	Object	We support the addition of a new Appendix, as proposed in this Modification. However, the content of the Appendix needs to be amended to reflect the correct capacities, as it contains a number of errors. It will also need to be amended to reflect our proposed changes in Main 7. We have also added in a number of streets that have been excluded from the Table, as set out in our response to the Statement of Common Ground. Appendix 9 – Publically available Parking to the South of the Central Area (area defined by Figure X)*
David Burch Essex Chambers of Commerce	2899	Main 22	Comment	We support the addition of a new Appendix but believe that it needs to be amended to reflect the changes suggested by Stockvale in Main 7.
Nick Laister RPS Planning on behalf of The Stockvale Group and Seafrost Traders Association	2935	Minor 2	Support	We support this Minor Modification as it recognises that the resort's success as a day visitor destination should be built on, not replaced.
David Burch Essex Chambers of Commerce	2900	Minor 2	Support	We support this and the recognition it contains of Southend's importance as a destination for day visitors
Katie Parsons Historic England	2915	Minor 4	Comment	Minor 4: we would recommend the term " <i>historic environment</i> " is used rather than " <i>heritage assets</i> " in the modification " <i>whilst protecting and enhancing its heritage assets</i> ". As this is a more all-encompassing term which demonstrates consideration of non-designated heritage assets and intangible cultural heritage.
David Burch Essex Chambers of Commerce	2901	Minor 4	Support	We support this amendment and the recognition of the potential importance of Southend's heritage
Alison Osbourne Indigo Planning on behalf of Valad	2921	Minor 5	Comment	This paragraph would benefit from strengthening as follows: "There is consequently a need to upgrade, enhance and broaden its offer and function to possible further include other complimentary uses. The effective promotion and marketing of the town centre to potential new investors will be crucial to this process, <u>AS WILL THE EFFECTIVE APPLICATION OF STRATEGIC OBJECTIVE 6 AND POLICY DS1.1 IN THE CONSIDERATION OF PROPOSALS FOR RETAIL DEVELOPMENT</u> ".
David Burch Essex Chambers of Commerce	2902	Minor 5	Support	We support this amendment and welcome its commitment to promoting the town centre's potential for future investment

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Alison Osbourne Indigo Planning on behalf of Valad	2922	Minor 9	Comment	This paragraph would benefit from strengthening as follows: “New retail development should be well integrated and closely linked with the Town Centre Primary Shopping Area, as defined on the Policies Map, in terms of proximity, continuity of function and ease of access. The council will promote the town centre in seeking to upgrade and diversify its offer, <u>AND PROTECT IT AGAINST IMPACTS FROM NON-TOWN CENTRE RETAIL PROPOSALS</u> ”.
David Burch Essex Chambers of Commerce	2903	Minor 9	Support	We support this amendment.
Nick Laister RPS Planning on behalf of The Stockvale Group and Seafrost Traders Association	2936	Minor 12	Support	We support this Minor Modification as it recognises the potential for growth in tourism.
David Burch Essex Chambers of Commerce	2904	Minor 12	Support	We support the recognition of these sectors as being important to Southend's future growth along with the seafrost leisure sector.
Andy Atkinson Milton Conservation Society	2888	Minor 17	Comment	We are very pleased to see the expansion of the text with further details and relevance and this is in line with our earlier representations. We note in particular the change to exclude 'celebrate' heritage and include 'promote' heritage. We believe that this is more than a minor textual change for easy reading and replaces a nebulous term with a very distinct term that invites further action by the Council. This is very good and importantly connotes a sense that heritage has a valuable role to play in the future of the town - exactly how it should be.
Andy Atkinson Milton Conservation Society	2890	Minor 17	Comment	Heritage has to play a fundamental role in future town planning and this has not been the case in the past where it is viewed as a self contained aspect (often simply a quaint aspect) that merely requires protection. Use of 'promote' helps to overcome this although we would like to see terms like 'aggregate' and 'confer' also apply to heritage in the context of new development.
Andy Atkinson Milton Conservation Society	2889	Minor 18	Comment	As with page 28, para 84, the addition text is very welcome and adds meaning and relevance beyond the simple listing of the earlier draft. This helps to demonstrate the importance and values of conservation areas.
Katie Parsons Historic England	2916	Minor 21	Comment	Minor 21: this modification would provide policy support for an additional landmark building we would recommend that a bullet point d) is added to paragraph two of Policy DS3 stating: <u>“d. the proposals do not harm the setting of nearby heritage assets.”</u>

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Nick Laister RPS Planning on behalf of The Stockvale Group and Seafont Traders Association	2939	Minor 30 Map 5	Object	We object to the exclusion of a number of car parks that should be defined as Key Visitor Car Parks (see our objections to Main 7).
Nick Laister RPS Planning on behalf of The Stockvale Group and Seafont Traders Association	2937	Minor 48	Support	We support this Minor Modification as it recognises the importance of day visits to the economy and also recognises the need to enhance the resort function.
David Burch Essex Chambers of Commerce	2905	Minor 48	Support	We support this modification and welcome the need to enhance the resort function of Southend
Ron Woodley Burgess Estates Residents Association	2912	Minor 49	Object	Object to the deletion of the observations about the inward looking and isolated nature of Adventure Island. The wooden palisade of the perimeter to the west of the pier reinforces the fortress like nature of the area. No doubt security requirements are factor here but the observations are relevant and justified. It is very surprising that those initial views have been totally expunged.
Nick Laister RPS Planning on behalf of The Stockvale Group and Seafont Traders Association	2938	Minor 49	Support	We support this deletion as it recognises the work that Stockvale has carried out to create stronger links between the park and Esplanade/Marine Parade and create a more active frontage.
David Burch Essex Chambers of Commerce	2906	Minor 49	Support	We support this modification and welcome the recognition of the importance of Adventure Island as a major tourist asset