

**Project Title:** Southend Central Area Action Plan (SCAAP)

**Date:** 4 May 2017

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**MATTER 2: SPATIAL STRATEGY, AND RELATIONSHIP TO OTHER AREAS, PLANS AND PROGRAMMES**

**RESPONSE BY THE STOCKVALE GROUP**

**2.1 Are there any differences of emphasis between the SCAAP and the adopted Southend Core Strategy, for example in relation to regeneration and sustainable growth? Does it also dovetail with the Council's Development Management Document?**

- 1 Paragraph 3 of the SCAAP states: "The SCAAP reflects the vision, strategic objectives and spatial strategy of the Southend Core Strategy (2007)." This suggests that the SCAAP does follow the principles of the Core Strategy ('CS2007'). However, in practice, this is not the case with a different emphasis on economic growth and tourism being evident.
- 2 The CS2007 sets out a number of objectives for Southend. Objective SO4 states that the Council will: "Secure sustainable regeneration and growth focused on the urban area." There was a clear commitment to growth, which is expressed in a number of areas, including jobs and housing.
- 3 Paragraph 2.3 of the CS2007 states that the spatial strategy "...represents the most appropriate way forward for Southend, seeking to maximise the town's strengths and opportunities by focusing the majority of growth and regeneration on key regeneration areas, in particularly the Town Centre, Seafront..."
- 4 One of the "key considerations" set out in Paragraph 2.5 is the "the safeguarding and enhancement of Southend's employment, town centre, retail and leisure facilities and opportunities." This suggests that a key aim of the CS2007 is to ensure that existing leisure provision (which would include the main attractions and supporting facilities on the seafront) are not compromised. This is very important when considering the issues raised under Matter 4.
- 5 The CS2007 signalled that there would be an Area Action Plan for the Town Centre and Seafront (para 2.7), stating: "Area Action Plans (AAP's) for Southend Town Centre, the Seafront and London Southend Airport will be prepared for these areas of opportunity and change to provide for employment-led regeneration and growth that can sustainably be accommodated in these areas."
- 6 Policy KP1 describes the seafront as a focus for growth: "Seafront – to enhance the Seafront's role as a successful leisure and tourist attraction and place to live..."

- 7 This clearly sets out a commitment to grow businesses on the seafront. It also clarifies that the Council is looking to achieve 750 new leisure and tourism jobs. Again, with reference to our concerns in our representations and set out elsewhere in relation to other matters, we do not consider that this can be achieved with the policies currently set out in the SCAAP, which will have the effect of managing decline<sup>1</sup>. We consider this to be the exact opposite of what was intended by the Council in the CS2007.
- 8 As set out in our representations, the Strategic Objectives of the SCAAP (particularly those in Paragraph 5 and 8) are generally supported. Indeed, we would argue that they do actually support the approach set out in the CS2007. The “differences of emphasis” in the SCAAP relate to the rest of the Plan, which unfortunately does not follow this through. This is really at the heart of the issue we have with the SCAAP. Strong objectives up front, which are in line with the CS2007, not followed through by policies and proposals that deliver on those objectives.
- 9 Note that there is a big focus in the CS2007 on means of travel by modes other than the private car, but this document pre-dates the NPPF, which now recognises that, in certain situations, it is not always possible to focus on non-car modes. The NPPF states (Paragraph 29): “The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.”
- 10 Whilst the SCAAP should be generally in accordance with the CS2007, it does need to take into account other, more up-to-date, policies as well as the unique conditions that apply to a seaside resort that relies heavily on families. We explained in our representations why there is a need to accommodate the private car (see Page 9 [Item G] of our representations and Paragraphs 48, 131 and 135 of the SCAAP, which explains why a different approach is needed here, in accordance with the NPPF).
- 11 We would therefore argue that in taking forward the CS2007, account needs to be taken of changes in national planning policy. These changes would not, however, provide a reason for abandoning economic growth in the local tourism economy, principles which have been strengthened in the NPPF, with its strong focus on economic development.

## **2.2 How robust are the proposed vision, including the ‘City by the Sea’ concept and strategic objectives (paragraphs 28 and 29)?**

- 12 We consider the vision and associated strategic objectives to be robust, and to be in line with the CS2007 and the NPPF. The ‘City by the Sea’ concept has been very successful at Brighton, the concept being that a successful City, where people want to live, with high quality public realm, will mean that it will be a great place to visit too. However, as we have set out in our representations, we need to ensure that the core reason for Southend’s success as popular location for day visits is not lost.
- 13 In our representations on Paragraph 30 of the SCAAP, we said that whilst it is commendable that the Council is attempting to increase overnight stays and support the provision of accommodation, it is a very dangerous strategy to ‘side-line’ the day trip market. This would not be in line with the Vision and Objectives.

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<sup>1</sup> We note that they do aim to achieve growth in overnight stays, but (as set out in our response to the next question), the SCAAP objectives are looking for a general growth in visitor numbers, not just as a result of increases in overnight stays.

- 14 The Strategic Objectives in Paragraph 29 are strongly supported, particularly Strategic Objective 5, which states the Council is looking to “attract greater visitor numbers and promote more overnight and longer stays”. This is clearly aiming to achieve two things: a greater number of people visiting the site and a greater proportion of those visitors staying overnight. Whilst we acknowledge that the Council is making an effort to increase overnight and longer stays, we have set out clearly in our representations why we consider that the SCAAP does not in any way follow through on the first part of this Objective. Indeed, we consider that it does the exact opposite of that by a series of policies and proposals that will undermine the day visitor economy, which will result in overall decline and will potentially undermine the ability to secure overnight stays as well. (Note that this decline has already started – see our comments under Matter 4). The quality of the evidence base also has an impact on the Council’s ability attract greater visitor numbers in line with Objective 5 – which we also return to under Matter 4.
- 15 Our clients are supportive of Strategic Objective 8, which promotes a “positive approach to public car parking provision that provides public car parking levels that support the vitality of the town centre and central seafront area, managing the balance of parking provision to address peak demand and capacity.” Again, unfortunately the SCAAP does not begin to follow through with this. Indeed, the policies appear to generally support a reduction in car parking spaces. This is because of a poor evidence base on existing supply and demand, no protection of existing spaces, redevelopment proposals that will probably not provide sufficient parking for their own needs, displacement from other car parks and no allowance at all for any growth in parking to support the growth in the number of people visiting that is sought in Strategic Objective 5. This is covered extensively in our representations and is returned to again in discussing Matter 4.
- 16 In short, therefore, the Vision appears to be robust, but our client’s issue is that it is not carried through to the rest of the Plan.

### **2.3 How does the SCAAP relate to the plans and strategies of the remainder of the Borough and other neighbouring local planning authorities?**

- 17 As set out in our representations (relating to DS5), there has been no recognition of the fact that the Local Transport Plan 3 (LTP3) forecasts a 25% increase in parking demand by 2021, which is ignored throughout the document. LTP3 also recognises a shortfall in seafront car parking in the summer.
- 18 In Topic Paper 1 (Parking and Access, March 2017), the Council appears to state that LTP3 is out of date, partly because it is based on reports produced by organisations that have been dissolved and partly because the SCAAP is aiming for less growth than LTP3. This does beg the question why the SCAAP refers to the LTP on several occasions as a linked document if the Council no longer proposes to rely on it or to be guided by it? The Council states that it prefers to use the SDG Parking Study instead. However, RPS has drawn attention to some significant shortcomings within that study (see our representations to Policy DS5 and our supporting Transport Technical Note that was submitted alongside our representations). Stockvale would be very concerned if reliance was placed on that document.
- 19 Putting aside the semantics of exactly what percentage of growth the Council is now supporting, the simple fact is that they are planning for growth in the number of tourists to Southend, as set out in Paragraph 29 of the SCAAP. Whether they should be planning for 25% growth (which seemed a reasonable rule of thumb as it was contained in the latest Local Transport Plan) or another figure, it is clear that the SCAAP does need to make a clear statement that it will provide for growth in visitors and then deliver on that with policies that will achieve growth.

- 20 We have set out in our representations (particularly to Paragraph 128) why day visitors to Southend seafront find it difficult to use public transport, mainly because such a large proportion are families. The survey of visitors to Adventure Island undertaken by The Stockvale Group demonstrated that 85% of visitors to Adventure Island use the car. This is due to the high level of car occupancy for the largely family visitors (the same survey showed that 60% of family visitors had three or more passengers in their cars). It is difficult and expensive for this type of family user to access public transport. Of course, with such a high proportion of seats being used it is actually a sustainable method of travel in its own right (in the same way that car sharing is a sustainable form of transport), with only 3% being single occupancy vehicles. The SCAAP needs to recognise therefore that the private car in the context of family visits is not an unsustainable mode of travel in the same way that single occupancy cars used for journeys to work are. It is therefore essential that policies in this Plan reflect this reliance on the private car, and the fact that for this type of visitor the use of a private car is not necessarily unsustainable. This presumably is a significant part of the Council's thinking in LTP3.
- 21 Therefore the only way for the SCAAP to achieve the growth that is sought in the CS2007, LTP3 and the objectives set out in Paragraph 29 of the SCAAP is to plan for no loss of car parking spaces measured against a robust evidence base, with new development on existing seafront car parks providing sufficient spaces for their own needs and to accommodate an element of growth in those car parks.

**2.4 How far has the SCAAP taken on board the plans and programmes of statutory providers and regulatory agencies, such as transport companies, the Environment Agency, the utility companies, the South East Local Enterprise Partnership (SELEP) and local businesses and community groups and agencies?**

- 22 We consider that it has not taken on board the views of local businesses, as can be seen in the representations of, for example, the Essex Chambers of Commerce (ECC) and the Seafront Traders Association (STA).
- 23 ECC considers that the SCAAP is likely to penalise one sector of Southend's economy, namely the tourism industry and predominantly the seafront traders. This appears to be primarily a result of Policy DS5, in their view (a view that we would agree with).
- 24 The STA represents 30 businesses along Southend seafront, which are apparently unanimous in their view that the SCAAP, if implemented as currently proposed, will be damaging to Southend's tourism industry. This is an important point because the SCAAP, if it follows its own objectives and those of the CS2007 and NPPF, should be planning for growth in the tourism industry.
- 25 It is clear to us that the SCAAP does not appear to have the confidence of businesses in the town. In that respect, it cannot be a sound document.