



southend central area action plan (scaap)  
consultation statement  
december 2015

local development framework  
delivering regeneration and growth



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## Section 1: Introduction

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- 1.1 In accordance with Southend Borough Council's Local Development Scheme timetable and the 'Strategic Objectives' and policies within the adopted Southend Core Strategy (2007), the Borough Council has prepared an Area Action Plan for the Central Area of the town, covering the town centre and central seafront, and associated policies map. It is a spatial plan that will provide:
- an up-to-date statutory basis for assessing planning applications within the Central Area; and
  - a local planning framework for guiding development within the Central Area, within which the Council, other agencies and key stakeholders can coordinate their investment programmes.
- 1.2 The process of producing the Southend Central Area Action Plan (SCAAP) has been informed by a number of public consultation events, namely:
- *Town Centre Area Action Plan Issues and Options version 2007*
  - *Seafront Area Action Plan Issues and Options version 2007*
  - *Central Area Masterplan 2007*
  - *SCAAP Issues and Options version June 2010,*
  - *(Superseded) Proposed Submission version September 2011, and*
- 1.3 This Consultation Statement provides a summary of the representations received on the (Superseded) Proposed Submission version of the SCAAP, published in September 2011.
- 1.4 A consultation statement was also produced at the time of the submission version of the Plan in 2011. For reference this can be viewed on the Council's website at: [http://www.southend.gov.uk/download/downloads/id/1577/scaap\\_consultation\\_statementpdf.pdf](http://www.southend.gov.uk/download/downloads/id/1577/scaap_consultation_statementpdf.pdf).



## Section 2      SCAAP Preparation and Consultation

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- 2.1 A 'Preferred Approach' version of the SCAAP has been prepared for public consultation commencing December 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.
- 2.2 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.

### Issues and Options Version (June 2010)

- 2.3 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.
- 2.4 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)

- 2.5 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'.
- 2.6 Further preparation of the SCAAP since the Proposed Submission version was 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

- 2.7 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 (December 2015) - Summary of Main Changes

2.8 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);
- All known development sites are being consulted on within the Plan. However the final version of the plan will only include sites that will be delivered by 2021.
- Major Planning Permissions are to be proposed as Site Allocations, with a rolling base date up to the time the SCAAP is submitted for examination.
- Updated approach to car parking management.

2.9 In addition there have been a number of changes to the boundaries of policy areas and opportunity sites. These are detailed in Table 1 below.

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

Policy Area	Proposed Modification	Reason for Proposed Modification
<b>High Street Policy Area</b>	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.
<b>Elmer Square Policy Area</b>	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.
<b>Queensway Policy Area</b>	<p>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 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>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> <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>
<b>Warrior Square Policy Area</b>	<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</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</p>

	<p>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>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>
<p><b>Victoria Gateway Neighbourhood Policy Area</b></p>	<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 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 reconfiguration of the former Central Library into the Hive and Beacroft Gallery.</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><b>Sutton Gateway Neighbourhood Policy Area</b></p>	<p>To remove Proposal Site PS10a: Former B&amp;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>

## Section 3 Consultation under Regulation 27 (Superseded) Proposed Submission Version 2011

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- 3.1 The SCAAP (Superseded) Proposed Submission version was published so that *representations could be made in relation to soundness and legal compliance* between 5<sup>th</sup> September and 17<sup>th</sup> October 2011. The purpose of the publication period was to publicise the draft plans contents and to establish whether it was soundly based and legally compliant. This was extremely valuable and provided the Council with a number of helpful suggestions that would then improve the plan and have been taken into account in the preparation of the Preferred Approach version (December 2015).
- 3.2 The Proposed Submission consultation was carried out in line with the councils adopted Statement of Community Involvement (2009) and relevant planning regulations. During the six week consultation the plan was publicised in the local press, the Council's web site and was available to view at the Council offices and all local libraries. Consultation response forms were also available.
- 3.3 The consultation methods adopted are set in **Table 2** whilst **Table 3** below lists the type of representations made as per the sections of the draft Proposed Submission Plan and its policies and proposal sites. **Table 4** provides a breakdown of representations made by organisations and individuals.
- 3.5 In total, 13 organisations and individuals made 126 representations on the draft Proposed Submission Plan. Of the 126 duly made representations, 12 considered the document or elements of it 'unsound', 56 considered the document or parts of it 'sound'. There were also 58 general comments that did not state if the document was either 'unsound' or 'sound'. There were no 'not duly made' representations received.
- 3.6 **Appendix 1** sets out details of the representations received on the Plan together with the Council's response.
- 3.7 Overall there was a general consensus and support for the plans provisions. In relation to the 12 elements considered 'unsound', the Preferred Approach (December 2015) has made amendments to the Plan to take into account the representations made.
- 3.8 **Appendix 2** set outs the list of consultees contacted and **Appendix 3** details the consultation material used during the Proposed Submission publication period.

Table 2: Consultation Methods (carried out during Proposed Submission Draft SCAAP Consultation)

Method	Action Taken
<p>Direct Consultation with Specific, General and Other Consultees including hardcopies/electronic copies of the consultation document where appropriate</p>	<p>Letter and email sent on 5<sup>th</sup> September 2011 to all contacts on the LDF database to inform them that the Southend Central Area Action Plan (SCAAP) Proposed Submission consultation document was published for consultation. The database contains 700 consultees representing Specific, General and Other Consultees.</p> <p>100 hard copies of the document were printed and made available on request.</p> <p>Letters and hard copies of the Southend Central Area Action Plan (SCAAP) consultation document were sent to all of the Southend-on-Sea Borough Councillors on 5<sup>th</sup> September 2011</p>
<p>Inspection copies were made available at all of the public libraries in the Borough and at the Civic Centre</p>	<p>Copies of the Southend Central Area Action Plan (SCAAP) consultation document with Representation Form and supporting documents were placed at all libraries and Council Offices on 5<sup>th</sup> September 2011.</p>
<p>Publish on the Southend-on-Sea Borough Council website</p>	<p>The Southend Central Area Action Plan (SCAAP) consultation document, Public Notice and supporting documents was published on the Southend-on-Sea Borough Council website and via a JDi on-line consultation facility, with ability to download the document, on 5<sup>th</sup> September 2011. Information was provided on how to obtain hard copies and/or view at deposit points.</p>
<p>Press Release + newspaper notice</p>	<p>Public Notice placed in weekly paper 5<sup>th</sup> September 2011 and 9<sup>th</sup> September 2011 [Evening Echo and Southend Standard].</p>
<p>Feedback form to assess effectiveness of engagement activity</p>	<p>Document placed on the Council's website (<a href="http://www.southend.gov.uk">www.southend.gov.uk</a>) for inspection and downloading. The Borough Council encourage comments online via our E-Consultation service in order to make commenting on documents easier and straightforward.</p>

Table 3: Breakdown of Representations (by section, policy, proposal site and proposal map)

Southend Central Area Action Plan DPD (SCAAP)	Number Sound	Number Unsound	Total Responses
Section 1 – Introduction	0	1	10
Section 2 – Strategic & Local Planning Context	0	0	1
Section 3 – Characteristics & Key Issues	5	1	13
Section 4 – Vision Objectives & Strategy	2	0	5
Section 5 – Development Strategy for Key Uses	0	0	2
Section 6 – Provision of facilities for culture, leisure, tourism and entertainment	3	0	4
Section 7 – The Historic Environment	3	0	6
Section 8 – Transport & Access Strategy	1	1	9
Section 9 – Infrastructure Provision & Flood Risk	0	0	0
Section 10 – Context	4	1	9
Section 11 – Implementation	0	0	2
Policy DS1: New & Enhanced Shopping Facilities	0	0	0
Policy DS2: Shopping Frontages & Use of Floor above shops	1	0	1
Policy DS3: Retail Markets	0	0	0
Policy DS4: Employment development within the central area	1	0	1
Policy DS5: Education and higher and further education	0	0	0
Policy DS6: Provision of facilities for culture, leisure, tourism and entertainment	3	0	3
Policy DS7: Social and community infrastructure	0	0	0
Policy DS8: Housing	1	1	2
Policy PR1: Open Space Provision and the Environment	2	0	3
Policy PR2: Public Realm Enhancements	3	0	3
Policy PR3: Visually Active Frontages	1	0	1
Policy PR4: Protection of Visually Important Views	1	0	1
Policy PR5: Landmark Building	1	0	1
Policy HE1: The Clifftown Quarter	1	0	1
Policy HE2: The Central Seafront Area	0	0	0
Policy HE3: Prittlewell Gateway	0	0	0
Policy HE4: The High Street	0	0	0
Policy HE5: Frontages of Townscape Merit in the Central Area	1	0	1
Policy HE6: Conversion of Heritage Assets in the Central Area	0	0	0
Policy HE7: Areas of Archaeological Potential in the Central Area	0	0	0

Policy TA1: Town Centre and Central Area Highway Network	0	0	1
Policy TA1a: 'The Victoria' Phases 2, 3 and 4 Traffic and Public Realm Scheme	0	0	0
Policy TA1b: 'City Beach' Phase 2 - Traffic and Public Realm Scheme	2	0	2
Policy TA2: Public Transport	1	0	2
Policy TA3: Walking and Cycling	0	0	1
Policy TA4: Town Centre Parking Management	0	0	0
Policy TA5: Other Measures to Improve Accessibility	0	0	0
Policy IF1: Central Area Infrastructure	0	1	1
Policy IF2: S106 Planning Obligations and Developer Contributions	0	0	0
Policy IF3: Flood Risk Management	1	1	2
Policy DP1: The High Street Development Principles	0	0	0
Policy DP2: Queensway and London Road / Broadway Development Principles	1	0	1
Policy DP3: Elmer Square Development Principles	1	0	1
Policy DP4: Queensway and Southchurch Avenue Development Principles	3	0	4
Policy DP5: Warrior Square Development Principles	0	0	0
Policy DP6: Clifftown Development Principles	1	0	1
Policy DP7: Tylers Avenue Development Principles	1	0	2
Policy CS1: Landmark Buildings and Key Spaces	0	0	0
Policy CS2: Central Seafront Strategy - Key Principles	2	0	2
Policy CS3: Flood Risk	1	1	2
Policy CS4: Nature Conservation and Biodiversity	1	1	2
Policy CS5: The Waterfront	1	0	2
Policy CS6: Central Seafront Development Principles	0	0	1
Policy CS7: Western Esplanade, The Cliffs and Shrubbery	0	1	2
Policy CS8: Eastern Esplanade and City Beach Gateway	1	0	2
Policy DP9: Victoria Gateway Neighbourhood Development Principles	1	0	1
Proposal Site Policy PS2a: Sainsbury's and adjacent Buildings, London Road Proposal	0	1	1
Proposal Site Policy PS3a: Elmer Square	0	0	0

Proposal Site			
Proposal Site Policy PS4a: Queensway House and adjacent Buildings	0	0	0
Proposal Site Policy PS5a: Warrior Square Car Park Proposal Site	0	0	0
Proposal Site Policy PS5b: Whitegate Road	0	0	0
Proposal Site Policy PS6a: Clarence Road Car Park	0	0	0
Proposal Site Policy PS6b: Alexandra Street Car Park	0	0	0
Proposal Site Policy PS7a: Tylers Avenue	0	0	0
Proposal Site Policy PS7b: Pitman's Close	0	0	0
Proposal Site Policy CS6a: Southend Pier	0	0	1
Proposal Site Policy CS6b: Seaway Car Park and Marine Parade	3	0	5
Proposal Site Policy CS7a: Cultural Centre and new Southend Museum	0	0	1
Proposal Site Policy CS8a: Woodgrange Drive (Kursaal) Estate	0	0	2
Proposal Site Policy PS9a: The Victoria Office Area Site	0	0	0
Proposal Site Policy PS9b: Former Essex and Suffolk Water Board Site	0	0	0
Proposal Site Policy PS9c: Roots Hall Football Ground and Environs	1	0	1
Proposal Site Policy PS10a: Former B&Q Site	0	1	2
Proposal Site Policy PS10b: Sutton Road	0	0	0
Proposal Site Policy PS10c: Coleman Street	0	0	0
Proposal Map	0	0	2
Appendix 1 - Glossary of Terms	0	0	0
Appendix 2 - Schedule of new/improved public space, public realm, landscape etc	0	0	0
Appendix 3 - Schedule of housing capacity within the scaap	0	0	0
Appendix 4 - Schedule of existing landmark buildings	0	0	0
Appendix 5 - Background documents & studies	0	0	0
<b>Total</b>	<b>56</b>	<b>12</b>	<b>126</b>

Table 4: Breakdown of Representations by organisation and individual

Organisation	Support	Object	General Comments	Total Responses
Anglia Water			1	1
Arriva	1		8	9
British Horse		1	7	8
English Heritage	10		3	13
Environment Agency	25	6	3	34
Herbert Grove Residents	5	1	23	29
Highways Agency	1		1	2
Natural England	6	2	7	15
Sainsburys	1	2		3
Southend Properties			1	1
Starges Nominees	5		3	8
Stock Woolstencroft	1			1
The Theatres Trust	1		1	2
<b>Total</b>	<b>56</b>	<b>12</b>	<b>58</b>	<b>126</b>

appendix 1  
detailed summary of responses -  
scaap september 2011



Appendix 1: SCAAP Proposed Submission Consultation Regulation 27 (September 2011) – Detailed Summary

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 the Local Plan is progressed 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 ve1y 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 fut1her 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>

Appendix 1: SCAAP Proposed Submission Consultation Regulation 27 (September 2011) – Detailed Summary

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
				<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.

Appendix 1: SCAAP Proposed Submission Consultation Regulation 27 (September 2011) – Detailed Summary

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
				<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	<b>Comment</b>	<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." (BHS 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"> <li>* 4.3m people - 7% of the British population - are horse riders.</li> <li>* Some 2.8m households contain at least one rider.</li> <li>* 43% of the British population have an interest in some aspect of equestrianism.</li> <li>* There are 1.35m horses in the UK.</li> <li>* £4 billion per year is spent on horses and riding.</li> <li>* In England horse riders have access to only 22% of the public rights of way network.</li> </ul>		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 Local Plan is progressed under the timetable outlined in the Local Development Scheme.

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Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
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 for 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, 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. <a href="http://www.ecotech.org.uk/education.html">http://www.ecotech.org.uk/education.html</a>		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, Â£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 to ensure that routes between major public transport interchanges are high quality and safe.

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Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
	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 realm 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. <a href="http://www.ecotech.org.uk/education.html">http://www.ecotech.org.uk/education.html</a>		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	<b>Comment</b>	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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Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's response
	[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.

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<p><b>PDS4</b></p>	<p>Stargas Nominees [279] (represented by BNP Paribas Real Estate (Miss Grace Sim) [246])</p>	<p>1387</p>	<p><b>Support</b></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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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.
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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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 policy aims.
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		

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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 DS2
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 work is also monitored and feedback by a conservation working party. These areas would be appraised on a regular basis however there is a need to allocate time with the available resources and this has only allowed 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.

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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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				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). 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 has taken on board and incorporated 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.

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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.	Noted.
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.

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					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 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 referenced 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 for 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.
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.
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 Local Plan to address these cross boundary matters.

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<b>Policy TA1</b>	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1360	<b>Comment</b>	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 focused on the A13 .....are progressed and effective'.	Noted
<b>Policy TA1b</b>	Environment Agency (Lindsay Black) [255]	1285	<b>Support</b>	TA1b City Beach Phase 2 – Traffic and Public Realm Scheme 1h any development along City Beach must not impact on the foreshore designations.		Noted. Policy on 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.
<b>Policy TA1b</b>	Natural England (Mr Gordon Wyatt) [264]	1325	<b>Support</b>	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.
<b>Policy TA2</b>	Natural England (Mr Gordon Wyatt) [264]	1326	<b>Support</b>	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. This policy approach sits alongside the approach in the Local Transport Plan to encourage greater use of public transport.
<b>Policy</b>	Arriva	1362	<b>Comment</b>	TA2: Public Transport		

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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 the 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.

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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 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.
Policy IF1	Environment Agency (Lindsay Black) [255]	1286	Object	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.  The policy must reflect this by saying that infrastructure improvements must be implemented prior to developments coming online.	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. 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	IF3: Flood Risk Management 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.	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. 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.	Noted. This has been incorporated into the revised policy on Flood Risk Management and Sustainable Drainage in the SCAAP which is Policy D4.
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

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	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 deliver 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		Noted. 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.

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				<ul style="list-style-type: none"> <li>* employment opportunities.</li> <li>* To provide new and improved residential accommodation.</li> <li>* To create an area where streets and public space reflect a vibrant and busy residential and shopping district".</li> </ul>		
<b>Policy DP4</b>	Stargas Nominees [279] (represented by BNP Paribas Real Estate (Miss Grace Sim) [246])	1391	<b>Comment</b>	<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"> <li>* seeking to make the most efficient and effective use of land;</li> <li>* prioritising previously developed land which is suitable for re-use;</li> <li>* [taking] a flexible, responsive supply of land;</li> <li>* considering whether sites that are currently allocated for industrial or commercial use could be more appropriately re- allocated for housing development.</li> </ul> <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>
<b>Policy DP4</b>	Environment Agency (Lindsay Black) [255]	1291	<b>Support</b>	DP4: Queensway and Southchurch Avenue Development Principles - Support the need to assess surface water flood risk to development site		Noted.
<b>Policy DP4</b>	Environment Agency (Lindsay Black) [255]	1292	<b>Support</b>	DP4: Queensway and Southchurch Avenue Development Principles - Support the need to assess surface water flood risk on the site in relation to the development proposals		Noted.
<b>Policy DP6</b>	Environment Agency (Lindsay Black) [255]	1293	<b>Support</b>	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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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.
Policy CS3	Environment Agency (Lindsay Black)	1299	Object	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	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	Noted. Policy has been revised to reflect the NPPF and Planning Policy Guidance.

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	[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.	
<b>Policy CS4</b>	Environment Agency (Lindsay Black) [255]	1300	<b>Support</b>	CS4: Nature Conservation and Biodiversity Development should not have an adverse impact on any protected sites. Support this policy		Noted. This Policy is now Policy CS2 Nature Conservation and Biodiversity in the revised SCAAP.
<b>Policy CS4</b>	Natural England (Mr Gordon Wyatt) [264]	1333	<b>Object</b>	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. This Policy is now Policy CS2 Nature Conservation and Biodiversity in the revised SCAAP.
<b>Policy CS5</b>	Environment Agency (Lindsay Black) [255]	1301	<b>Support</b>	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. This Policy is now Policy CS3 The Waterfront in the revised SCAAP.
<b>Policy CS5</b>	Natural England (Mr Gordon Wyatt) [264]	1334	<b>Comment</b>	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. This Policy is now Policy CS3 The Waterfront in the revised SCAAP.
<b>Policy CS6</b>	Natural England (Mr Gordon Wyatt) [264]	1335	<b>Comment</b>	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.
<b>Proposal Site CS6a</b>	Natural England (Mr Gordon Wyatt) [264]	1336	<b>Comment</b>	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.
<b>473</b>	Herbert Grove Residents (Mr Steve Tomlin) [115]	1353	<b>Comment</b>	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.

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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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<b>Proposal Site CS6b</b>	Herbert Grove Residents (Mr Steve Tomlin) [115]	1310	<b>Support</b>	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.
<b>Proposal Site CS6b</b>	Herbert Grove Residents (Mr Steve Tomlin) [115]	1311	<b>Support</b>	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
<b>Proposal Site CS6b</b>	Herbert Grove Residents (Mr Steve Tomlin) [115]	1312	<b>Comment</b>	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
<b>Proposal Site CS6b</b>	Herbert Grove Residents (Mr Steve Tomlin) [115]	1343	<b>Comment</b>	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
<b>Proposal Site CS6b</b>	Environment Agency (Lindsay Black) [255]	1302	<b>Support</b>	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.
<b>Policy CS7</b>	Environment Agency (Lindsay Black) [255]	1303	<b>Comment</b>	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.
<b>Policy CS7</b>	Natural England (Mr Gordon Wyatt) [264]	1337	<b>Object</b>	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 1: SCAAP Proposed Submission Consultation Regulation 27 (September 2011) – Detailed Summary

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<b>Proposal Site CS7a</b>	Natural England (Mr Gordon Wyatt)	1338	<b>Comment</b>	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 1: SCAAP Proposed Submission Consultation Regulation 27 (September 2011) – Detailed Summary

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.
<b>Policy CS8</b>	Environment Agency (Lindsay Black) [255]	1304	<b>Support</b>	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.
<b>Policy CS8</b>	Natural England (Mr Gordon Wyatt) [264]	1339	<b>Comment</b>	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 now been incorporated in the Central Seafront Policy Area Development Principles in the revised version of the SCAAP.
<b>Proposal Site CS8a</b>	Environment Agency (Lindsay Black) [255]	1305	<b>Comment</b>	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.
<b>Proposal Site CS8a</b>	Environment Agency (Lindsay Black) [255]	1442	<b>Comment</b>	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.
<b>515</b>	Stock Woolstencroft (Mr Owen O'Carroll) [272]	1368	<b>Support</b>	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.  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.		Noted. The Council will welcome engagement with the consortium during development of the SCAAP.
<b>Policy DP9</b>	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1365	<b>Support</b>	DP9: Victoria Gateway Neighbourhood Development Principles Para 8a: Support the priority route for sert. Schedule 1: Part B Policies:		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.
<b>Proposal Site PS9c</b>	Sainsbury's Supermarkets	1356	<b>Support</b>	Proposal Site Policy PS9c: Roots Hall Football Ground and Environs		Noted.

Appendix 1: SCAAP Proposed Submission Consultation Regulation 27 (September 2011) – Detailed Summary

Policy, para or section	Respondent Name [No]	Rep No	Object/Support	Summary of Rep	Respondents Suggested Changes to Plan	Council's Response
	LTD [268] (represented by Indigo Planning Ltd (Mr Sean McGarth) [185			support		
<b>Proposal Site PS10a</b>	Sainsbury's Supermarkets LTD [268] (represented by Indigo Planning Ltd (Mr Sean McGarth) [185	1357	<b>Object</b>	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.
<b>Proposal Site PS10a</b>	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1366	<b>Comment</b>	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.
<b>580</b>	Southend Properties (Guernsey) Ltd (Mr Ivan Walsh) [262]	1273	<b>Comment</b>	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.
<b>607</b>	Arriva Southern Counties (Mr Malcolm Spalding) [270]	1367	<b>Comment</b>	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.

Appendix 1: SCAAP Proposed Submission Consultation Regulation 27 (September 2011) – Detailed Summary

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<b>Proposal</b>	Arriva	1361	<b>Comment</b>	Proposals Map		
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Appendix 1: SCAAP Proposed Submission Consultation Regulation 27 (September 2011) – Detailed Summary

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>





**Appendix 2: Consultees (Superseded Proposed Submission  
Stage:September 2011)**

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## LDF - Specific Consultees

Barling Magna Parish Council  
Basildon District Council  
Braintree District Council  
Brentwood Borough Council  
British Waterways(Southern Region)  
British Wind Energy Association  
BT Payphones  
BUPA Wellesley Hospital  
CAA Safety Regulation Group  
Canewdon Parish Council  
Castle Point Borough Council  
Chelmsford Borough Council  
Colchester Borough Council  
Dartford Borough Council  
Defence Estate East  
East of England Ambulance Service  
East Of England Development Agency  
English Heritage East of England  
Environment Agency  
Essex County Council  
Essex Fire & Rescue Service HQ  
Essex Police (Southend Division)  
Essex Police Community Safety Dept  
Essex Police, Headquarters  
Foulness Parish Council  
Government Office for the East of England  
Great Wakering Parish Council  
H M Customs & Excise  
Harlow District Council  
Hawkehill Parish Council  
Highways Agency (Network Strategy)  
Hockley Parish Council

Hullbridge Parish Council  
Land and Development Group, National  
Grid Transco  
Leigh Town Council  
Maldon District Council  
Mobile Operators Association  
Natural England  
Paglesham Parish Council  
Peter Harris Associates  
Qinetiq  
Renaissance Southend Ltd  
Rochford Parish Council  
Stambridge Parish Council  
Steel & Company  
Sutton Parish Council  
Tendring District Council  
Thames Gateway South Essex Partnership Ltd  
Thurrock Unitary Council  
Uttlesford District Council, Planning  
Department  
Wind Farm Enquires 02-49,  
Ofcom

## LDF - General Consultees

Age Concern

Ancient Monuments Society

Anglian Water Services

Argyll House Flats Management Co.

Arriva Southern Counties Ltd

Asda Superstores

Association of Jewish Refugees

Bairstow Eves

Barclays Bank Plc

Belfairs Gardens Residents Association

BHS

Boots The Chemist

British Hardware Federation

British Horse Society

Burges Estate Residents Association (BERA)

c2c Rail

c2c Rail & National Express East Anglia

Campaign to Protect Rural Essex (CPREssex)

Chalkwell Ward Residents Association

Circles Project

COBRA (Coalition of Borough Residents Associations)

Conservation Association Westcliff Seaboard

Crime Prevention Panel (Leigh)

Cycling Touring Club (CTC)

Darby & Joan Organisation

DIAL Southend

East of England Local Government Association

Eastern Electricity

English Sports Council (East)

Essex & Suffolk Water

Essex Badger Protection Group

Essex Biodiversity Project

Essex Bridleways Association

Essex Chambers of Commerce - South Essex Office

Essex Churchyards Conservation Group

Essex Horse & Pony Protection Society

Essex Racial Equality Council

Essex Water Company

Essex Wildlife Trust

Essex Wildlife Trust - Southend and Rochford Group

Ethnic Minority Forum

Evening Echo

Federation of Small Businesses

First Essex Buses Ltd

Forty Plus Cycling Club

Futures Community College

General Aviation Awareness Council

GreenKeeper

Growing Together Project

Hamlet Court Road Business Association

Herbert Grove Residents Association

Hindu Association (Southend & District)

Home Builders Federation (HBF)

Horse Owners and Riders (SE Essex)

HSBC Card Service

InterChurch Caring for the Elderly & Disabled

IPECO

John Grooms Association

John Stacey and Sons

Kent County Council

Lambert Smith Hampton  
Leigh Cliff Association  
Leigh Seafront Action Group  
Leigh Society  
Leigh Traders Association  
Leigh-on-Sea Crime Prevention Panel  
Lidl UK Ltd  
Lloyds TSB Card Services  
London Southend Airport  
Love Southend  
Marine Avenue Residents Action Group  
Marks & Spencer  
Member of Parliament for Southend West  
Mendip Community Group  
Milton Community Partnership  
Milton Conservation Society  
National Express East Anglia  
National Federation for the Blind  
National Grid Company Plc  
National Power  
National Rivers Authority Anglian Region  
Network Rail  
NIBS  
North Crescent & Feeches Rd Residents Association  
Older Peoples Federation  
Olympus KeyMed  
Parklife  
Pipe of Port Wine Bar  
Powergen Plc  
Priory Park Preservation Society  
Prittlewell Residents  
Prospects College  
QinetiQ  
Railtrack Property  
Residents Association of Westborough (RAW)  
RIBA South East Chapter  
Right to Ride Cyclist Touring Group  
Rikard Keen  
Rochford & Southend East Constituency Labour Party  
Royal Association For Deaf People (RAD)  
Royal Bank of Scotland (RBS)  
Royal Mail Group Property  
Royal National Lifeboat Institution - Southend Branch  
RSPB Southend Local Group  
SAEN  
Sainsburys Supermarkets  
SEEVIC  
Shoebury Forum  
Shoebury Residents Association  
Shoebury Society  
Shoebury Traders Association  
Society for the Protection of Undercliff Gardens  
SOS Domestic Abuse Projects  
South East Essex College  
South East Essex Friends of the Earth  
South Essex Area Health Authority  
South Westcliff Community Group  
Southend & District Aid Society  
Southend & District Pensioners Campaign  
Southend & Essex Hotel & Catering Assoc  
Southend & Leigh Fishermans Association  
Southend & Surrounds Cycling Campaign  
Southend Adult Community College

Southend and Westcliff Hebrew  
Congregation

Southend Animal Aid

Southend Area Bus Users Group

Southend Association of Voluntary Services

Southend Blind Welfare Organisation

Southend Hospital NHS Trust

Southend Islamic Trust

Southend Mencap

Southend Mind

Southend NHS Trust

Southend on Sea Access Group

Southend on Sea Sports Partnership (West)

Southend Ornithological Group

Southend PCT

Southend Play Council

Southend Seafront Illumination & Business  
Association

Southend Sports Council & Southend  
Wheelers Cycling Club

Southend Stroke Club

Southend Taxi Drivers Association

Southend Tenants and Residents Federation

Southend United Football Club c/o Savills

Southend University Hospital

Southend West School Sport Partnership

Southend Wheelers

Southend YMCA

Southend Youth Council

Southend-on-Sea Arts Council

Southend-on-Sea Guild of Help and Citizens  
Advice Bureau

Southend-on-Sea Sports Council

Sport England East

St Luke's Community Partnership

St Lukes Partnership & Residents Disability  
Forum

St Marys Prittlewell C of E School

St. John's Ambulance

Stephensons of Essex

Stocklale Group of Companies

Tattersall Gardens Residents Group

Tenpin Ltd

Tesco Stores Ltd

Thames Water Property Services

The Rescuers Wildlife Sanctuary

The Royals Shopping Centre

The Southend Pier Museum Trust Ltd

The Southend Society

The Theatres Trust

The Victoria Shopping Centre

Tolhurst House Residents Association

Transport for London

University of Essex Southend

Victory Residents Assoc (Victoria in  
Partnership)

W.H.Smiths

Waitrose Ltd

West Leigh Residents Association

West Milton & Queens Residents Association  
Action Panel

Westcliff & Leigh Neighbourhood Watch

Youth Service

## LDF - Other Consultees

A W Squier Ltd  
ACS Designs  
Adams Holmes Associates  
Andrew Martin Associates  
Anthony Bowhill Planning & Development Consultants  
ATP Group  
Barratt Eastern Counties  
Barton Willmore Planning  
Batias Independent Advocacy Service  
Bidwells  
BNP Paribas Real Estate  
Bovis Homes  
British Hardware Federation  
Burnett Planning and Development Ltd  
Bus & Rail User Group  
Business Link Essex Hub  
Business Link for Essex  
Butterfly Conservation  
C & S Associates  
CABE  
Carpenter Planning Consultants  
Carter Jonas Property Consultants  
CgMs Consulting  
Chalkwell Lifeguard Club  
Charles Planning Associates  
Chelmsford Diocesan Board of Finance  
Chestergate Estates Ltd  
China Corp  
Churchills Café Bar  
Civic Trust  
Cluttons LLP  
Colliers CRE  
Council for British Archaeology  
County Hotel  
Crown Estate Office  
Crowstone St George's United Reformed Church  
Cushman & Wakefield  
David Walker Chartered Surveyors  
Disability Essex (EDPA)  
DLP Planning Ltd  
DPDS Consulting Group  
Drivas Jonas  
East of England Tourist Board  
Essex Amphibian & Reptile Group  
Essex Birdwatching Society  
Essex Garden Trust  
Essex No 1 Circuit of Jehovah's Witness  
Essex Prosperity Forum  
Essex Reptiles & Amphibians Society  
Essex Training & Enterprise Council  
Europcar  
Fenn Wright  
First Cycle Courier  
Firstplan  
Friends of Hadleigh Castle Country Park  
Fuller Perser  
Garden History Society  
George Wimpey East London  
Gerald Eve  
Gladedale Homes  
Greenpeace  
Grosvenor Consulting

GVA Grimley  
H.A.R.P  
Healey & Baker  
Heron Educational Trust  
Higgins Homes  
Hillier Parker May & Rowden Chartered Surveyors  
Homeless Action Resource Project  
Iceni Projects Ltd  
Indigo Planning Ltd  
INTERACT  
J.C Gibb Chartered Surveyors  
Januarys  
Jones Lang Lasalle  
King Sturge  
Knight Frank LLP  
Labour European Office  
Landmark Information Group Ltd  
Landsbury Holding Plc  
Level  
Livemore Partnership  
London Bus Theatre Company  
Marguerite Livingstone Associates  
Martineau  
Marwalk Developments  
Medway Council  
Moments  
MVA Ltd  
Nacro Community Enterprises Ltd  
Nathaniel Lichfield & Partners  
National Farmers Union (east)  
National Fox Welfare Society  
National Market Traders Federation  
National Tremor Foundation  
Norman Garon Trust  
P.S.G Southend  
Parentline Plus  
Peacock and Smith  
Peacock and Smith Chartered Town Planning Consultants  
Persimmon Homes (Essex) Ltd  
Post Office Property Holdings  
Redrow Homes (Eastern) Ltd  
Regional Cycling Development Team  
Cycling Development Co-Ordinator  
East Relate South Essex  
Rethink  
Roger Tym and Partners  
Royal Town Planning Institute  
RSPB Eastern England Office  
S S R Town Planners & Development Consultants  
SAFE  
Safeway Stores PLC  
Savills Commercial Limited  
Shire Consulting  
Shoebury & Thorpe Bay Baptist Church  
Smart Planning Ltd  
Smith Stuart Reynolds Town Planners & Development Consultants  
Society for the Protection of Ancient Buildings  
South East Essex Advocacy for Older People  
South East Essex Archaeological Society  
South East Essex Archaeological and Historical Society  
South East Essex Organic Gardens  
South Essex Action for Mammals  
South Essex Natural History Society

Southend Youth Bowling Club

Southend-on-Sea Association for the  
Physically Handicapped

St. Matthew's Christian Spiritualist Church  
(1999) Ltd.

Steer Davis Gleave

Stewart Ross Associates

Strutt and Parker

SUSTRANS Essex

Tarmac Southern Ltd

Terence O'Rourke

Tetlow King Planning

Thames Estuary Partnership

The Guinness Trust

The Lace Place

The National Trust

The Planning & Development Partnership

The Planning Bureau Ltd

The Salvation Army Leigh on Sea

Thurrock Thames Gateway Development  
Corporation

Trust Links

Turnabout Trust

UK Rainwater Harvesting Association  
(UKRHA)

Vitalise

Wakering & District Natural History Society

Weatherall Green & Smith

Woodland Trust





**Appendix 3: Copy of Proposed SCAAP Submission Consultation Material  
(Superseded Proposed Submission Stage: September 2011)**

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**Planning and Compulsory Purchase Act 2004  
The Town and Country Planning (Local Development) (England) Regulations 2004  
The Town and Country Planning (Local Development) (England) (Amendment)  
Regulations 2008**

**SOUTHEND ON SEA BOROUGH COUNCIL  
LOCAL DEVELOPMENT FRAMEWORK (LDF)  
NOTICE OF PUBLICATION OF THE SOUTHEND CENTRAL AREA ACTION PLAN  
(DPD) PROPOSED SUBMISSION AND INVITATION TO MAKE REPRESENTATIONS**

Southend on Sea Borough Council is preparing a Local Development Framework (LDF) which will replace the existing Borough Local Plan adopted in 1994.

In accordance with Regulation 27 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 , Southend-on-Sea Borough Council hereby gives notice that it has published the Proposed Submission version of the Southend Central Area Action Plan (DPD) for formal representations to be made prior to its submission for independent examination.

The Southend Central Area Action Plan DPD sets out the Borough Council's policies for positively managing development in Southend-on-Sea and delivering the vision, objectives and policies of the adopted Core Strategy. It will be used to assess and determine planning applications in association with other adopted Local Development Documents in the LDF.

The Southend Central Area Action DPD Proposed Submission is accompanied by a Proposed Submission Proposals Map, the Sustainability Appraisal Report and its non-technical summary, the Consultation Statement and relevant supporting background documents.

Following the consultation the Borough Council will submit the Proposed Submission documents, Proposals Map, accompanying documents and the representations received, to the Secretary of State for an independent examination. This examination will consider the 'soundness' of the DPD and whether or not it complies with legal requirements. The Response Form provides further detail about soundness.

**The consultation period for the document will run from Monday 5<sup>th</sup> September 2011 until Monday 17<sup>th</sup> October 2011.**

The Southend Central Area Action Plan DPD: Proposed Submission version, Proposals Map, accompanying documents, together with the Response Form can be viewed on the Council's website ([www.southend.gov.uk/scaap](http://www.southend.gov.uk/scaap)) and at the following locations.

- Southend Borough Council Contact Centre, Civic Centre, Victoria Avenue, Southend on Sea between 8.45am and 5.15pm (Monday to Friday); and
- All Southend Libraries during normal opening hours.

Hard copies can also be requested by contacting the Debee Skinner by telephone on 01702 215004 ext. 5408 or at the following address:

Department of Enterprise Tourism and the Environment, PO Box 5557, Civic Centre, Victoria Avenue, Southend-on-Sea, SS2 6ZF:

Representations should be made using the Council's online interactive consultation system, which can be found at [www.southend.gov.uk](http://www.southend.gov.uk). Alternatively, representations may be submitted using the Response Form by the following means:

- e-mail to [ldf@southend.gov.uk](mailto:ldf@southend.gov.uk), or
- In writing to the Director of Enterprise Tourism and the Environment, PO Box 5557, Civic Centre, Victoria Avenue, Southend-on-Sea, SS2 6ZF

Representations may be accompanied by a request to be notified at a specific address about the: submission of the Development Management DPD for examination; publication of the Inspector's Report; and adoption of the Development Management DPD.

Any person may make representations on the DPD using the response form only, to be received **no later than 5.00pm on Monday 17<sup>th</sup> October 2011**. **Late representations will not be considered.**

## Representation Form

### Southend Central Area Action Plan Proposed Submission

This form has two parts -

Part A - Personal Details

Part B - Your representation(s)

**Please fill in a separate sheet for each representation you wish to make.**

#### Part A

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

**Agent Details** (if applicable)

Title

First Name

Surname

Job Title\*

Organisation\*

Address line 1

Address line 2

Address line 3

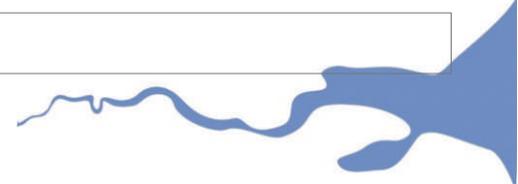
Address line 4

Postcode

Telephone No

Email Address\*

\* where relevant



## Part B - Please use a separate sheet for each representation

In order to ensure that the scope and content of your representations on the Development Management DPD Proposed Submission version is focused on issues of soundness and legal compliance, you are requested to make your representation on this official form that has been specifically designed to assist you in making your representation or alternatively an interactive version of the Southend Central Area Action Plan DPD Proposed Submission is available on the Council's consultation website [www.southend.gov.uk/ldf](http://www.southend.gov.uk/ldf).

The Planning Inspectorate has issued guidance 'Local Development Frameworks – A Brief Guide to Examining Development Plan Documents (September 2010)' [http://www.planningportal.gov.uk/uploads/pins/dpd\\_procedure\\_guide.pdf](http://www.planningportal.gov.uk/uploads/pins/dpd_procedure_guide.pdf).

Name or Organisation

### 1. To which part of the DPD does this representation relate?

Paragraph

Policy

Proposals Map

### 2. Do you consider the DPD is

2.1 Legally compliant

Yes

No

2.2 Sound\*\*

Yes

No

\*\*The considerations in relation to the DPD being 'Sound' are explained in Planning Policy Statement 12 in paragraphs 4.36 – 4.47, 4.51 and 5.52 and the boxed text. If you have entered No to 2.(2), please continue to Q3. In all other circumstances, please go to Q4.

### 3. Do you consider the DPD is unsound because it is **not**:

3.1 Justified

3.2 Effective

3.3 Consistent with national policy

**4. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.**

continue on a separate sheet if necessary

**5. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 3 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

**6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?**

**No**, I do not wish to participate at the oral examination.

**Yes**, I wish to participate at the oral examination.

**7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

continue on a separate sheet if necessary

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Signature

Date

**Andrew Meddle Head of Planning and Transport**

Our ref: TP/100/455/3/ds Telephone: 01702 215004 ext 5408  
Your ref: Fax:  
Date: 5 September 2011 E-mail: debeeskinner@southend.gov.uk  
Contact Name: Ms D Skinner DX 2812 Southend

Dear Consultee

**Planning and Compulsory Purchase Act 2004  
Southend-on-Sea Local Development Framework  
Development Management DPD: Proposed Submission**

I write on behalf of the Council to inform you that the Proposed Submission version of the Southend Central Area Action Plan (SCAAP) (DPD) and the Proposals Map have been published for a 6-week formal representation period. These documents are accompanied by a Sustainability Appraisal Report, a Consultation Statement and relevant supporting background documents.

The Southend Central Area Action Plan: Proposed Submission version and its Proposals Map together with the Response Form, the Sustainability Appraisal Report, Statement of Consultation and relevant supporting background documents can be viewed on the Council's website ([www.southend.gov.uk](http://www.southend.gov.uk)) and at the following locations:

- Southend Borough Council Contact Centre, Civic Centre, Victoria Avenue, Southend on Sea between 8.45am and 5.00pm (Monday to Friday) and
- all Southend Libraries during normal opening hours

The Southend Central Area Action Plan DPD will support the objectives set out in the adopted Southend-on-Sea Core Strategy (2007) and contains detailed policies that planning applications can be assessed against alongside other adopted LDF documents.

For the 6-week formal representation period, between **Monday 17<sup>th</sup> October 2011**, you will have an opportunity to submit formal representations that will be considered as part of an independent examination in public. This examination will consider the 'soundness' of the DPD and whether or not it complies with legal requirements.

In order to ensure that the scope and content of your representation, on the Southend Central Area Action Plan DPD: Proposed Submission version, is focused on issues of soundness and legal compliance, you are requested to make your representation on either the Council's online interactive consultation system, which can be found at [www.southend.gov.uk](http://www.southend.gov.uk) or by using the official Representation Form that has been specifically designed to assist you in making your representation. This form can be submitted by the following means:

- e-mail to [ldf@southend.gov.uk](mailto:ldf@southend.gov.uk), or
- In writing to the Director of Enterprise Tourism and the Environment, PO Box 5557, Civic Centre, Victoria Avenue, Southend-on-Sea, SS2 6ZF

Representations may be accompanied by a request to be notified at a specific address about the: submission of the Development Management DPD for examination; publication of the Inspector's Report; and adoption of the Development Management DPD.

Representations on the Development Management DPD: Proposed Submission version must be received by the Council **no later than 5.00pm on Monday 17<sup>th</sup> October 2011**. **Late representations may not be considered.**

In the meantime, if you require further information, please contact the Council on 01702 215004 ext. 5408.

Yours sincerely



Debee Skinner  
Planning Technician (Design & Consultation)

**Public Notices**

**Planning and Compulsory Purchase Act 2004**

**The Town and Country Planning (Local Development) (England) Regulations 2004**

**The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008**

**SOUTHEND ON SEA BOROUGH COUNCIL  
Local Development Framework (LDF)**

**NOTICE OF PUBLICATION OF THE SOUTHEND CENTRAL AREA ACTION PLAN (DPD) Proposed SUBMISSION AND INVITATION TO MAKE REPRESENTATIONS**

Southend on Sea Borough Council is preparing a Local Development Framework (LDF) which will replace the existing Borough Local Plan adopted in 1994.

In accordance with Regulation 27 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008, Southend-on-Sea Borough Council hereby gives notice that it has published the Proposed Submission version of the Southend Central Area Action Plan (DPD) for formal representations to be made prior to its submission for independent examination.

The Southend Central Area Action Plan DPD sets out the Borough Council's policies for positively managing development in Southend-on-Sea and delivering the vision, objectives and policies of the adopted Core Strategy. It will be used to assess and determine planning applications in association with other adopted Local Development Documents in the LDF.

The Southend Central Area Action DPD Proposed Submission is accompanied by a Proposed Submission Proposals Map, the Sustainability Appraisal Report and its non-technical summary, the Consultation Statement and relevant supporting background documents.

Following the consultation the Borough Council will submit the Proposed Submission documents, Proposals Map, accompanying documents and the representations received, to the Secretary of State for an independent examination. This examination will consider the 'soundness' of the DPD and whether or not it complies with legal requirements. The Response Form provides further detail about soundness.

**The consultation period for the document will run from Monday 5th September 2011 until Monday 17th October 2011.**

The Southend Central Area Action Plan DPD: Proposed Submission version, Proposals Map, accompanying documents, together with the Response Form can be viewed on the Council's website ([www.southend.gov.uk/scaap](http://www.southend.gov.uk/scaap)) and at the following locations.

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Any person may make representations on the DPD using the response form only, to be received **no later than 5.00pm on Monday 17th October 2011. Late representations will not be considered.**

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**Public Notices**

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**SOUTHEND ON SEA BOROUGH COUNCIL  
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Any person may make representations on the DPD using the response form only, to be received **no later than 5.00pm on Monday 17th October 2011. Late representations will not be considered.**

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26 Clifftown Road  
Southend-on-Sea Es

appendix 4  
summary of sustainability appraisal for the  
proposed submission scaap (2011)



## Appendix 4: Summary of the Sustainability Appraisal for the Proposed Submission SCAAP (2011) (Superseded Proposed Submission version)

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The following paragraphs provide a summary of the Sustainability Appraisal comments made to each policy in the SCAAP Proposed Submission consultation document (Sept 2011).

### Policy DS1: New and enhanced shopping facilities

The policy is positive in supporting new retail growth in the central area of Southend. The policy is clear that the anticipated level of growth will need to be matched with improvements to the transport infrastructure and this will have benefits related to reducing congestion and car use in the central area.

Retail development proposed in the policy will help in the regeneration of the built environment in some parts of the plan area. For example along Southchurch and London Roads and through re-use of the car park sites.

A new supermarket will help ensure residents of central Southend have good access to a range of healthy food, without needing to travel to the edge-of-centre and out-of-town foodstores.

New small and boutique shops in the Clifftown Quarter will help support establishing Southend as a cultural destination with a range of shops possibly linked with other cultural offer.

Recommendation - This policy is likely to have a positive impact on achieving sustainable development. This is as long as the retail offer remains appropriate to the size of the town and other built environment improvements are achieved.

The difference between aspects of part (i) and (ii) of the policy is not clear with both addressing the need to develop the Tyler's Road, Clarence Road and Alexandra Road car parks, and the two could be combined.

To achieve the most sustainable retail development this will need to be matched by a reduction in car use in the central area. Improvements to public transport interchanges and pedestrian links across Queensway will help link up different parts of the town centre.

### Policy DS2: Shopping frontages and use of floors above shops

The policy should help protect those areas of primary importance for shopping from alternative uses. Focused retail development may be required to protect the viability of shopping areas. In more peripheral locations other uses, such as financial services, restaurants and bars can complement shopping uses.

The policy makes provision for active frontages to be retained. This will help enhance the walking environment and help to join-up different parts of the centre and retail circuits, removing blank frontages or spaces can create perceived barriers. Making walking more attractive is also an essential part of helping reduce car use.

Following this policy and other policies on active frontages and the design of storefronts can help improve the quality of the built environment.

Allowing other uses above shops, such as flat, will help make best use of available land.

Recommendation - This policy is likely to have a positive impact on achieving sustainable development.

There is some repetition of this policy with Development Management policy on store

fronts and shopping areas. For a simpler plan and to avoid potential conflict policy criteria should not be repeated, especially as the development management policy is referenced in this policy.

The policy also repeats elements of PR3 'visually active frontages'. Duplication could be removed.

### **Policy DS3: Retail markets**

This policy should help to control the development of markets in unsuitable locations. The policy could recognise the potential for permanent and temporary (although regular) markets sites.

Recommendation - This policy is compatible with sustainable development.

### **Policy DS4: Employment development within the central area**

This policy should help in supporting the role of the town centre as the major employment location in the Borough. This is compatible with objectives of reducing car use as these locations are likely to be most accessible by a variety of modes of transport.

Existing Industrial Estate areas are to be retained, as set out in the policy. This is essential in keeping a mix of employment in the town centre and Gateway Neighbourhood areas. Protecting existing employment is also essential in Southend due to the limited land resources and the need to maintain the economy of the whole Borough.

Recommendation - The policy is compatible with achieving sustainable development objectives.

The retail policy includes a clause to ensure retail development comes forward in association with public transport improvements. This requirement could be included for employment growth. Transport access will be important both as part of the overall strategy to ensure a move away from car use and to make sure this volume of workers can easily access the town centre at peak times.

It may be difficult to apply criteria 3(ii) as many applications may be able to prove that they meet some of the aspects of the other AAP objectives. This may result in the loss of employment land.

### **Policy DS5: Education and higher and further education**

This policy is compatible with the aims for sustainable development. The policy identifies sites that may be suitable for a new primary school or new higher education facilities. However, the policy can do little but control the implementation of these uses, and their delivery will be reliant on the strategies and funding plans.

Keeping higher and further education facilities focused in the town centre is important to secure their accessibility to students. Current campus sites are very near the train station and therefore accessible to students from within and outside the Borough.

Recommendation - The policy is compatible with sustainable development objectives. However, its delivery will be dependent on other strategies of the education authority and university

### **Policy DS6: Provision of facilities for culture, leisure, tourism and entertainment**

The policy sets out what the expectations are for this type of development. Listing the development opportunities or initiatives helps clarify what the potential is for cultural, leisure and recreational improvements in the central area, and which schemes the Council are already be supportive of. However, for many of these other implementation plans will need to be put in place and funding sources found.

New, high quality hotels will have benefits for the economy. This will be through

encouraging a greater range of tourism in the town and also be important for business travellers and to support Southend as a location for conventions.

Care will need to be taken to ensure that use of the foreshore does not harm the nature conservation value of these areas, as set out in the policy.

Recommendation - This policy is compatible with achieving objectives for sustainable development.

However, the implementation of the schemes listed in this policy will be dependent on funding and decisions for development from other sources, these cannot be directly controlled by the AAP.

### **Policy DS7: Social and community infrastructure**

This policy simply supports the development of new facilities to meet social and community infrastructure needs. It will be important to deliver these facilities to match the growth in housing in the central area and ensure everyone has access to local healthcare services. In addition, space for community halls or gathering places is important for communities. Much focus is on the wider role of the central area for leisure and recreation. However, the needs of people living in the area should be considered through providing local facilities.

Recommendation - The policy is compatible with social sustainability objectives.

The policy could set out locations where a new primary care centre should be located, so that it can be incorporated into development briefs or masterplans for the area, as is the case for the school.

### **Policy DS8: Housing**

The town centre is to be focus of a large proportion of new homes needed in the Borough. The policy sets the general principles for delivering this housing, identifying the sites that will be the focus of much of the growth.

To ensure that the town centre housing helps create new communities it is important that a range of housing types are provided that really meet the needs of residents. Efforts will need to be made to ensure that new homes are not simply bought for the rental market, as this can have adverse impact on the vibrancy of residential areas. The visual appearance of residential areas of high rental turnover can also become quickly degraded and can also make places feel unsafe. Affordable housing will also need to be provided in locations and of a quality comparable to market housing.

Recommendation - Policies of the LDF that promote a mix of dwelling types will need to be enforced in the central area. It may be suitable for specific policies or development criteria to be created to ensure a mix on specific development sites.

Affordable housing policies will also need to be implemented.

Community uses will need to be provided to meet the needs of residents and to ensure that new residents can access local services.

### **Policy PR1: Open Space Provision and the environment**

There will be many benefits of implementing this policy for sustainable development. Benefits will include helping people choose healthy lifestyles, protecting and enhancing biodiversity, helping reduce car use and congestion.

Planting of locally appropriate species may help in create habitats to support greater local biodiversity. Planting can help mitigate against the heat impacts of climate change, species will need to chosen so that can withstand periods of drought.

The policy does include the need to for these spaces to be well lit at night. This could be contrary to some aspects of biodiversity protection, as lit areas can create barriers to

nocturnal foraging of many species. Lighting can also adversely impact on the night sky and patches of darkness. It will also require additional energy demands.

Recommendation - This policy is likely to have a positive impact on achieving sustainable development.

New open space is expected to help provide an alternative for recreation to the foreshore, to help reduce visitor pressure in the designated area. However, to successfully achieve this there is a need for more information and policy the AAP on how the 'green grid' and new open space will support this. Currently the policies on open space in the AAP are not very joined up and do not present an overall picture of how the green grid will work to relieve pressure.

Lighting of open spaces should be planned and implemented to ensure it will not have adverse impacts on biodiversity, energy efficiency or the night sky.

New event space can have benefits for the communities and economy of the Borough. Spaces for occasional or regular events can be important to the character of the area and attractiveness as a visitor destination. These spaces should be of a type of support different types of events, such as open air music, food festivals and community events.

### **Policy PR2: Public realm enhancements**

The policy should have positive benefits for sustainable development. Public art should be integrated into development and serve a clear purpose, this can be aesthetic, but also could be signage, street furniture or have a community connection. Poorly conceived public art, can have an adverse impact on the relationship of people with the place where they live.

Public realm improvements can have a range of benefits for the central area, not only in visual quality but also in encourage sustainable travel, tourism and community identity.

The public realm also has a part to play in improving the connectivity between places. Currently busy or dual carriageway roads, such as Queensway, can physically separate areas, especially for those on foot. Improving links will help spread regeneration potential up the High Street and to areas such the 'Sutton Gateway', it will also further help encourage people from their cars.

Recommendation - This policy is likely to have a positive impact on achieving sustainable development.

To create a succinct set of DPD policies should avoid repetition of criteria that appear in this document or higher tier plans or matters better addressed on a site specific level.

### **Policy PR3: Visually active frontages**

The policy could set an expectation for all new development to have active ground floor uses, rather than simply encourage this. Good quality ground floor appearance is essential on all main routes from public transport interchanges and also on the anticipated retail circuits to encourage walking and support the retail economy. Active frontages in areas identified as important for tourism will also be essential, to maintain the feel of a vibrant holiday town.

Recommendation - The policy is likely to have a positive impact on sustainable development.

The policy could encourage active frontage in all new development.

### **Policy PR4: Protection of Visually Important Views**

The policy should help in protecting the character of the area. However, every application should be judged on its merit, particularly where new development makes innovative use of views or provide other sustainability benefits.

Recommendation - The policy is likely to have a positive impact on sustainable development.

### **Policy PR5: Landmark buildings**

The policy is compatible with achieving sustainable development. However, it should not be applied in an overly restrictive way that prevents needed development coming forward, for instance objectors to any new tall buildings. The policy title could also reflect that it is not only buildings that can be (or are) landmarks, and can include built or natural features.

Recommendation - The policy is likely to have a positive impact on sustainable development.

### **Policy HE1: The Clifftown Quarter; Policy HE2: The Central Seafront Area; Policy HE3: Prittlewell Gateway; Policy HE4: The High Street**

The policy should help make sure the character of these four areas is respected in any new development proposals. The particular characteristics and development needs of each area is identified. There is the potential for a range of benefits, such as improving the local visitor and retail economy, protecting the built environment and open space. Protecting views to the sea and historic buildings can also help retain the unique qualities of Southend, including its heritage as a tourism destination and fishing port. Benefits will also come from making a more attractive place for walking. Encouraging more people to walk in the town centre may play a part in reducing car use.

Recommendation - These policies are likely to have a positive impact on sustainable development.

One of the greatest impacts on most of these areas will be from car use. Busy and congested streets, road signs and parked cars, can all detract from historic character. Implementation of parking and transport strategies for the town centre will help reduce these impacts, as will promoting walking and public transport access.

Policies will need to be implemented through development management decisions, but other strategies to reduce visual clutter, such as changes in road signs, will also be necessary.

The criteria of the policies are supported by the Heritage for Southend Central Evidence Base, which can be used to help inform developers on decision makers on the suitability of new development.

### **Policy HE5: Frontages of Townscape Merit**

This policy should help in enhancing the historic quality of central Southend. There should be social and economic benefits for the central areas as the wider perception of Southend as an attractive place to visit.

Recommendation - The policy is likely to have a positive impact on sustainable development.

The policy could clarify if it is all shopfronts and signage that would have to be appropriate to the building, or only in 'Frontages of Townscape Merit' areas.

### **Policy HE6: Conversion of Heritage Assets in the Central Area**

The policy appears to be suitable in protecting heritage assets from inappropriate re-use. The policy allows conversion where buildings are in need of repair.

Recommendation - The policy is compatible with achieving sustainable development objectives.

To further help the loss of heritage assets that are at risk or in a poor state of repair the

policy could allow conservation without the need to demonstrate existing use cannot be retained. Decisions could be made simply on the quality of the proposal. The policy wording could include clarification that plans for re-use must respect internal as well as external appearance of these buildings.

### **Policy HE7: Areas of Archaeological Potential in the Central Area**

This policy should help protect buried archaeological from loss before it is properly recorded/excavated. The policy sets out where archaeological evaluation will be needed making it clear to developers from the outset what will be expected from them, so these considerations can be included in financial viability considerations. This can help prevent against development being stalled and not coming forward as anticipated as well as protecting archaeology.

Recommendation - This policy should have positive impacts on sustainable development.

### **Policy TA1: Town centre and central area Highway Network**

The policy shows a clear intention to improve the choice of modes of transport in the town centre. There will be a focus on improvements for all visitors to the town centre, as the majority of people visiting will spend at least part of their trip on foot. Improved links to public transport interchanges and edge of centre car parks will improve the walking environment.

Reducing congestion in the central area is essential. Schemes to achieve this include having fewer people travel through the centre to reach car parks. Measures such as the delivery of new car parks off the 'feeder' highway network will help achieve this.

The policy will have various benefits in increased travel safety, including for pedestrians and cyclists through new routes and management of servicing of retail units.

Allowing cycling within pedestrianised areas can help encourage this mode of transport. Careful use of shared surfaces and dedicated routes can improve safety, protecting pedestrians from illegal cyclists. It will also give cyclists an advantage over car users of being able to get quickly right to their destination.

Built environment improvements can be achieved through improved signage, removing the clutter from roadsides created by vehicle signage.

Recommendation - The policy is compatible with sustainable development objectives and the majority of criteria will have a positive impact on achieving sustainable development.

The intention of the first criteria of the policy is not entirely clear. It may be better to specify here that the intention is to reduce overall car use in and around the town centre, not only to seek a balance with the needs of other users.

Specific schemes for the design of new roads, including how pedestrian and cyclists will be catered for, plans for signage and street furniture or planting could be developed by the Council. These plans would help provide a cohesive vision for the main access routes and gateways to the central area, helping to improve the image of the area.

### **Policy TA1a: 'The Victorias' Phases 2, 3, and 4 Traffic and Public Realm Scheme**

The policy sets out in the clear way what will be expected from transport improvements to this part of the central area. The policy should help encourage walking and cycling and could widen the economic benefits of the central area to more peripheral locations.

Public realm and built environment improvements will help enhance this area, which

currently experiences a lack of distinct character and a clear 'gateway' to Central Southend.

Recommendation - This policy should help in delivering more sustainable transport access and built environmental improvements to central Southend.

The policy will need to be taken forward through development proposals and public improvement schemes, as alone the AAP can do little to achieve these outcomes.

### **Policy TA1b: 'City Beach' Phase 2: Traffic and Public Realm Scheme**

The policy sets quite ambitious targets for road and public realm improvements on the seafront. The aims of the policy could result in a diverse range of sustainable development benefits. These benefits especially relate to improving the tourism economy, helping to provide more space for leisure and visitor activity, providing better links to the seafront from the central area and making the seafront more attractive. There is also the potential that this could help encourage improvements to parts of the town behind the Eastern Esplanade.

Recommendation - The policy should have positive impacts on achieving sustainable development.

Developing a unified approach to the appearance of this part of the seafront will help in delivering the scheme. Also, this scheme could be used to help encourage improvements in the existing built-up area to the east of the town centre.

Phase 2 will require funding from outside sources, with the AAP having a limited role in its implementation.

Care will need to be taken to ensure any changes to the seafront area do not have an adverse impact on the nature conservation assets in the area.

### **Policy TA2: Public transport**

There is real potential to achieve a modal shift in the way people access central Southend. As the destination point for many buses and a local train network in the Borough it should be possible for the majority of people who work, shop or spend their leisure time in the centre to travel by public transport.

The policy contains very little that can be directly achieved through the AAP. However, it does set out the aspirations for public transport improvements in the central area and indicate what all development will need to help work towards.

Recommendation - The policy is compatible with objectives for sustainable development. Many of the aims of the policy will be reliant on the delivery of other strategies and plans for implementation. These include the plans of the Punctuality Improvement Partnership and the Advanced Vehicle Location system. Funding for improvements will need to be secured.

Improvements in public transport technology can improve access and usability, including integrated ticketing and mobile real-time timetables.

Many people would choose to make trips less than 3 miles by bus or train, the policy on increasing use of public transport should cater for these groups too.

### **Policy TA3: Walking and cycling**

The policy contains much that will help in bring improvements to the walking and cycling environments of central Southend. Of particular importance in getting more people to choose to walk or cycle will be removing actual and perceived barriers. This includes the need to provide better crossing places from residential areas to the town centre, such as

across Queensway in several different locations. Cycle routes also need to be suitably segregated or on clearly marked shared surfaces for the safety of all road users. Existing routes into the town centre/High Street area have very little provision for cyclists and on-road clutter, parked cars and one-way systems will make cycling unsafe and indirect.

To encourage people making medium length trips (1-5km) to use cycles more instead of their cars, it needs to be clearly demonstrated that their needs have been taken into account. This includes safe routes as well as secure parking.

Better links across Queensway can also help to make the communities of Southend feel more connected. There is the potential for this to have positive impacts related to urban renewal, encouraging regeneration. For instance the development of Chichester Road to make it more attractive to pedestrians will improve the overall appearance of this area.

Recommendation - The policy should have positive sustainability impacts.

Much of the policy will be reliant on the delivery of other strategies and plans for implementation. However, setting out the priorities for walking and cycling will help make sure that these considerations are integrated into development proposals for central Southend.

#### **Policy TA4: Town Centre Parking Management**

The policy should help keep parking on the periphery of the town centre, reducing the quantity of vehicles that have to cross the central area to park. There will be benefits from reduce congestion in the town centre. Benefits will include lower air pollution impacts and reducing the adverse amenity impacts of traffic and cars. This will also help in implementing other schemes, such as further pedestrianisation of the central area and allow space for bike and bus lanes.

The reorganisation of car parks also makes the better use of land, replacing surface level parking with multi-storey or basement parking. New multi-storey car parks need to be carefully designed to play a role in enhancing and respecting local character, for example through the use of green walls or other planting.

Management of signage and reduction in on-street parking will all help improve the visual appearance of the central area. These measures may also increase safety for cyclists and pedestrians by removing hazards and increasing visibility. Less on-street parking will also free space for bus and cycle lanes.

Recommendation - The policy is compatible with many sustainable development objectives.

Some elements of the policy could be removed to avoid repetition between policies.

Keeping the car parking under review is essential, as it is hoped in the medium to long term the overall level of people accessing the town centre by car will be reduced, therefore less parking will be needed.

The policy is not clear on whether there is a strategy to reduce the overall level of parking in the central area. As part of integrated traffic and transport management it will be important to make other forms of travel to the centre an attractive option. This will be through meeting maximum parking standards and through appropriate pricing. However, it will be important to make sure other travel choices are in place so as not to push people to out-of-town shopping facilities, where parking can often be free and plentiful.

New car parking signage needs to be controlled to manage visual clutter, especially in areas of high heritage value.

The policy makes no reference to private car parking. It should be ensured that all new development in the town centre sticks to maximum car parking standards, reducing office parking is one of the best ways to reduce car commuting and town centre congestion at peak times.

### **Policy TA5: Other measure to improve accessibility**

These schemes are all part of helping to reduce car use in central Southend by making alternatives attractive and easy to use.

Recommendation - This policy is compatible with sustainable development objectives. The measures set out in the policy are unlikely to be implemented through delivering development as part of the AAP, and may be presented better as part of the supporting text. There is little set out in the policy that is enforceable through development decisions. Greater emphasis could be put on what may be a requirement for new development. For instance, specific residential development schemes in the central area could be required to provide a car club car.

### **Policy IF1: Central area infrastructure**

The policy simply sets out that needs will be monitored and infrastructure must be delivered accordingly.

Recommendation - The policy is compatible with sustainable development objectives.

### **Policy IF2: s106 planning obligations and developer contributions**

As this policy does not necessarily guarantee the delivery of any particular obligations or contributions the certainty of sustainability impacts can not be defined. However, the policy is likely to help play a role in creating sustainable places.

Recommendation - The policy should help support the delivery of sustainable development.

The policy may not be required and instead by supporting text, cross-referencing other relevant policies and guidance.

Consideration may need to be given to the evolution of contributions as part of a Community Infrastructure Levy.

### **Policy IF3: Flood Risk Management**

The policy is clear that all new development with impermeable surfaces includes SUDS measures. This will help prevent fluvial flooding in times of intense rainfall. The policy also makes clear who will be responsible for the long-term maintenance of SuDS on different types of development.

Requiring Flood Risk Assessments should help make sure that new development fully takes into account the potential impact of flooding. Development will need to be designed to ensure it does not increase flood risk on or off-site, protecting people and property from harm.

Recommendation - The policy may have positive impacts on meeting sustainability objectives relating to safety and the water environment.

The policy may need to clarify what types of development the SuDS requirements apply to, to ensure it is required for all new built development and not only housing. Also, it is not clear if Flood Risk Assessments will be needed for all new development in the central area, or only certain types or locations of development.

### **Policy DP1: The High Street Development Principles**

The High Street is the core of the central area, providing a range of shopping and leisure uses. This policy should help to make sure the High Street is an attractive place to visit. The policy sets out how public realm improvements and protection of heritage can be used to improve the quality of the area.

There is also a strong emphasis on increased pedestrianisation will also bring

improvements to the quality of the area and can play a role in encouraging non-car travel. Cycling improvements are also essential to encourage this form of travel, which can easily replace car trips for medium length journeys.

The policy contains a requirement to include new planting in the High Street. Trees and shrubs amongst the hard surfaces and landscapes of the High Street will bring visual diversity and can help cool these areas during hot spells.

Better use of the currently under-utilised Victoria Circus and other public spaces can have many benefits, including for community events and for the tourism economy.

Recommendation - The policy is likely to help deliver sustainable development in this area. Parts of the policy that repeat other policy requirements, such as loss of A1 retail uses or protection of Frontages of Townscape Merit should be removed from the policy to make for a clearer and more succinct plan.

## **Policy DP2: Queensway and London Road / Broadway Development**

### **Proposal Site Policy PS2a: Sainsbury's and adjacent buildings, London Road Proposal Site**

The policy should help improve the character of the area, while retaining some of the existing uses such as car parking. Much of the improvements relate to better links across the site and to other parts of the central area for cyclists and pedestrians. This will help make the site more accessible including links across Queensway to Victoria Rail Station.

The principles for development also contain some other positive aspects, such as promoting urban greening, the potential for a street market, potential for higher/further education use, permitting a mix of uses including residential.

If the site is redeveloped the proposals sets out the criteria that should be met in its redevelopment. Redevelopment would see the better use of land as a mixed use area incorporating offices, residential on upper floors and shops/bars/restaurants at ground level.

A large part of the proposal would also be access improvements through the site providing better links for pedestrians from Queensway. The current building is of a poor quality and presents a blank face to main 'gateway' routes into the centre. Redevelopment is expected to make substantial improvements to the built quality and the new building should be a gateway landmark. Public realm will be further improved through use of public art and new signage.

If the site is not redeveloped there remains an expectation for improvements to the area, including partial redevelopment to make better use of the land at this site.

Recommendation - The policy should help deliver more sustainable development in this area.

As with all the redevelopment sites consideration could be given to the potential of the site to deliver lower carbon energy.

Parts of the policy that repeat other policy requirements, such as requirements for active frontages.

A map of mixed mode, cycle and pedestrian improvement routes should be given in the AAP. A single policy on new mixed mode – shared priority' routes may be suitable, instead of repeating proposals in different policies, such as the 'mixed mode – pedestrian and cycle priority' for Queensway to Luker Road.

### **Policy DP3: Elmer Square Development Principles**

#### **Proposal Site Policy PS3a: Elmer Square Proposal Site**

The policy clearly sets out the anticipated improvements to the area through the redevelopment of the Farringdon Road car park and the surrounding area. There is the potential for benefits to the built environment that will have a positive impact on the image of the central area. The resultant improvements are likely to have economic benefits for Southend through improvements to the image and attractiveness of the central area, and links to a modern university.

Access upgrades will help encourage walking and cycling access, this will be part of securing a mode shift away from car use, with benefits for the wider central area.

New community uses and meeting spaces will have positive impacts on related sustainability objectives.

The policy also identifies the particular importance of addressing flooding issues in the design of new development.

The specific development proposals are quite specific and relate to the future use of the development site. Development will include education space, community space and a new public square. There are also proposals for changes to the highways that relate primarily to enhancing connectivity for pedestrians as well as detailed considerations of rear servicing.

Recommendation - The policy should help deliver more sustainable development in this area.

The preparation of a Development Brief or adoption of the masterplan as SPD will help deliver the regeneration of the area in a unified way.

The development proposals site policy could include more information on the use of planting and landscaping to create an attractive space or 'refuge' from the busy High Street area.

A map of mixed mode, cycle and pedestrian improvement routes should be given in the AAP. A single policy on new mixed mode – shared priority' routes may be suitable, instead of repeating proposals in different policies.

As with all the redevelopment sites consideration could be given to the potential of the site to deliver lower carbon energy.

### **Policy DP4: Queensway and Southchurch Avenue Development Principles**

#### **Proposal Site Policy PS4a: Queensway House and adjacent buildings**

This area is to be partially redeveloped to provide new and housing, office and secondary retail space. This will help meet objectives for the central area of providing development to meet the needs of existing and future residents, as well as encouraging economic growth in the area.

Changes in access are promoted through the policy. This should help overcome the barrier created by Queensway. There is also potential for new mixed mode – shared priority access from this area to other parts of the central area.

The 'urban forest' scheme could have many benefits for sustainable development from bringing nature into a heavily built-up area. Benefits will not only be for wildlife but also the well-being of residents.

The policy recognises the surface water flood potential in this area.

The proposal site is to be the location of new housing and commercial development. The way that this new space is provided is not dictated by policy and it could include refurbishing the existing residential tower. In terms of seeking more sustainable

development it may be suitable to prioritise refurbishment over demolition and redevelopment as this can help reduce the use of primary materials.

The site may need to include some public parking as the location on Queensway makes parking access more straightforward and reduce congestion. Parking should be managed to make the best use of land, for instance basement of multi-storey. Parking should only be provided where there is an identified shortfall, and public parking over the whole central area should aim for a reduction against current levels.

New open space provision will have benefits for residents, providing space for outdoor leisure and relaxation. Design of these spaces should make them useable by residents, visitors and local workers and not simply be grassed areas as the setting for buildings. Well landscaped areas should also enhance the character of this area. New open space should have 'soft' landscaping wherever possible as this can have greater sustainability benefits than hard landscaped areas, for instance for wildlife and to help absorb water and heat.

Recommendation - The policy should help deliver more sustainable development in this area.

The preparation of a Development Brief or adoption of the masterplan as SPD will help deliver the regeneration of the area in a unified way.

A map of mixed mode, cycle and pedestrian improvement routes should be given in the AAP. A single policy on new mixed mode – shared priority' routes may be suitable, instead of repeating proposals in different policies.

This area was the site of a health centre. It should be made clear if this use should be replaced in this location, as other parts of the AAP make clear a new primary healthcare facility is required in the central area.

The policy criteria should avoid repeating issues that are covered through other policies. A particular example in this case is both policies unnecessarily repeat the text on flooding. As with all the redevelopment sites consideration could be given to the potential of the site to deliver lower carbon energy.

## **Policy DP5: Warrior Square Development Principles**

### **Proposal Site Policy PS5a: Warrior Square Car Park**

### **Proposal Site Policy PS5b: Whitegate Road**

The policy sets the principles for delivering development in this location. The policy does set out a wide range of uses that the site could be redeveloped for. This includes higher and further education facilities. However, any uses will need to ensure they do not result in a loss of housing land to meet identified requirements and needs, and space to provide new offices. The Council may need to decide the priorities for the space to ensure delivery of needed development and set this out in a development brief.

The principles of the policy are compatible with more sustainable transport access and also are likely to help deliver nature conservation benefits through implementation of the 'urban forest' scheme.

The policy should give greater emphasis to other aspects of 'greening' the environment, particularly given the location of the site adjacent to the Warrior Square park. The site could be used to link the 'urban forest' with the park and the railway line embankments, creating routes for wildlife movement.

This policy sets out what is expected development on the Warrior Square allocation. The first criteria sets the mix of uses that should be delivered. Some changes in wording could help make it clear what the mix of uses need to be in this location, and what uses should be a priority. At present it appears that the main use will be a new car park that integrates

the other development types.

From other sections of the AAP it appears that residential development is supposed to be a major component of development in this location, however, there is little information on how this should be delivered to meet needs. The policy should give an indication of the quantity of new homes to be provided, as well as the mix of uses. For instance family homes may be suitable on this site due to the existing type of development nearby. Also, information on yields would also allow an understanding of the development of this site would help in meeting affordable housing needs.

The plans for the site could include the provision of additional open space to complement the existing open space on Warrior Square.

The policy requires access and exits from the car park to avoid local streets, helping to reduce town centre congestion and large amounts of cars on local roads. The car park will need to be designed and located on the allocation site so as to respect the character of the conservation area. It may be possible to use vertical planting to reduce the visual impact on the car park and complement its setting next to the Warrior Square open space. Pedestrian links to the High Street and other parts of the centre are required from this site to help provide safe access and make the area a pleasant place to visit.

Other policies of on proposals site contain greater detail on the appearance of new development, for instance use of public art, design features or urban greening. To ensure a clear vision for this development area these requirements could be include in the policies.

This policy contains little information on the future use of this site. However, its development will need to be in keeping with the development principles for this area. This site will be wholly delivered by the private sector.

Recommendation - The policy should help deliver more sustainable development in this area.

The preparation of a Development Brief or adoption of the masterplan as SPD will help deliver the regeneration of the area in a unified way.

A map of mixed mode, cycle and pedestrian improvement routes should be given in the AAP. A single policy on new mixed mode – shared priority' routes may be suitable, instead of repeating proposals in different policies.

The supporting text raises the potential for a new health centre in this location. This requirement could be included in policy to help secure its delivery.

The policy criteria should avoid repeating issues that are covered through other policies of the AAP or of the section. A particular example in this case is both policies unnecessarily the design of the car park.

Due to the limited amount of open space in the central area it may be suitable to require additional open space to be provided as part of the development proposals. For instance, as new open space on the southern side of Warrior Square.

Hard landscaping of any existing or new open space must be avoided in this location.

As with all the redevelopment sites consideration could be given to the potential of the site to deliver lower carbon energy.

**Policy DP6: Clifftown Development Principles**  
**Proposal Site Policy PS6a: Clarence Road Car Park**  
**Proposal Site Policy PS6b: Alexandra Street Car Park**

The policy supports the future role of Clifftown as an area of strong cultural identity. The policy includes criteria to make sure that the historic and heritage character of the area is taken into account in new development. There is also the need to restore areas that have become degraded.

Access improvements are promoted. This includes changes to car access to a single new car park on one of the development sites, so that less traffic is created on streets of the area. Other improvements are to the retail circuits in the area, linking to the Central Station, Cliff Gardens and Pier Hill. This will help support the economy through tourism and visitor spend. Shops in this area are more likely to be independent and therefore these retail circuits will aid the local economy especially.

Regenerating the Empire Theatre will also add to the cultural character of the area. Other cultural uses should be promoted such as galleries and performance spaces.

The policy identifies the importance of taking surface water flooding into account in new development, and the need to incorporate sustainability drainage measures.

Central House is identified for redevelopment, for more information it could be included as a separate allocation, especially as this is identified as the site of a possible tall building.

(NB there appears to be something missing from point (g))

Proposals for this site are to see it enhanced as a space that will encourage the role of this area as a cultural quarter and a place that will attract visitors. This will help add to the unique character of the area. The policy also would require part of this site to be retained as a car park, this could make better use of the space available, for instance basement parking. Design of new car parks should help better integrate them with the surrounding area. This could be through use of boundary treatments and planting, removing the uncharacteristic feeling of 'openness' created by existing car parks.

The visual appearance of the site and relationship with the surroundings is highlighted in the policy. The policy includes criteria to help create new views from the site and ensure that signage is controlled so it does not adversely impact on the character and reinforces the quality built environment feel of the area.

This policy sets out the principles for the renewal of this site. Future uses could include new small retail/food/drink unit and some residential use. This could incorporate features to encourage outdoor dining, helping to meet aims for the area.

The policy also allows for the site to be used for extension to High Street units. This use would be less positive in terms of reinforcing the cultural quarter role of this area, and could be detrimental to the urban character. Extensions would have to demonstrate design that would complement the character of the area and not create unattractive 'service' parts of larger stores. However, allowing this use could encourage larger retailers to this part of the High Street.

Recommendation - The policy should help deliver more sustainable development in this area.

The preparation of a Development Brief or adoption of the masterplan as SPD will help deliver the regeneration of the area in a unified way.

The policy criteria should avoid repeating issues that are covered through other policies of the AAP or of the section.

The policies do not mention any 'greening' of the urban environment. As with other parts

of the Central Area it is important to integrate new planting to soften the impact of new development and create more visually and physically attractive urban spaces. Central House could be identified as a site specific proposal as policy DS6 identifies this as the possible location of a new tall landmark building.

### **Policy DP7: Tylers Avenue Development Principles**

#### **Proposal Site Policy PS7a: Tylers Avenue**

#### **Proposal Site Policy PS7b: Pitman's Close**

The policy sets out the desired changes to the area that would help enhance the built environment quality and non-car access. There is not a specific re-use for the area, although it could be used for education purposes, given its location near the existing college campus.

Of particular importance will be bringing built environment and road safety enhancements to Chichester Avenue that currently provides an unattractive link route to the east of the High Street. Also, improved crossing points over Queensway will help improve the connectivity of the area to the wider residential areas to the east.

Open space and natural environment changes are also proposed, enhancing the quality of space at St. John's Church and as part of the greening of Queensway. The policy sets out a number of road improvement schemes that may be dependent on the car park being redeveloped, such as creation of 'home-zones' or mixed-mode routes. The delivery of these schemes, or similar, should be considered even if the car park is to stay. This will help make the area more attractive for visitors and residents.

Specific schemes have the potential to deliver economic benefits of to the area, including expansion of retail units at the south of the High Street. Design will need to be of a high quality to complement the existing area and the importance of the location for attracting visitors and tourists.

The intention is to see the area made much more permeable to the public. This change will help enhance connectivity in the area, providing clearer links to the seafront and development proposals as part of the 'Central Seafront' quarter.

There is an intention to secure the re-use of the Tylers car park site. However, this is dependent on securing suitable alternative car park sites in the Central Area, and redevelopment is not a certainty. The policy could be clearer on what will determine the need for the site to be released and its phasing into wider parking proposals for the central area.

The policy may have benefits for the economy not only from improved built environment quality but also from the provision of new office and retail development. The anticipated housing yield on this site could be included in the AAP, to help demonstrate how this site is supposed to contribute to the overall housing requirement for the central area.

The principles policy DP7 mentions the importance of improving access routes to the site, these changes could be referred to in this site specific policy.

This is a small site could be redeveloped to improve the attractiveness of Chichester Road. If the public toilets are lost at this site they should be replaced nearby.

Recommendation - The policy should help deliver more sustainable development in this area. Creating a more permeable area attractive to all visitors and residents.

The supporting text of the policy needs to focus on the specific quarter. Much of the text here relates to the seafront area. Although making connections between the two is important overemphasis on characteristics of other areas confuses the aims for this area. Supporting text for this area needs could draw out the aims for the area in a more succinct

way.

How the redevelopment of this area will be phased into wider development proposals for the central area is not clear. Two aspects of the policy, the loss of car parking and the creation of a street market, will be reliant development coming forward or not coming forward in other locations. This may mean that development of the area can not occur until late in the plan period and is effected by issues beyond its control.

Even if parking remains a requirement in this area the redevelopment of Tylers Avenue car park could still take place, for example development of a multi-storey car park on a smaller footprint. Also, regardless of if parking remains or not improvements could be made to surrounding streets to make them more friendly for other road uses, including walkers, cyclists and residents.

A map of mixed mode, cycle and pedestrian improvement routes should be given in the AAP. A single policy on new mixed mode – shared priority' routes may be suitable, instead of repeating proposals in different policies.

The preparation of a Development Brief or adoption of the masterplan as SPD will help deliver the regeneration of the area in a unified way.

As with all the redevelopment sites consideration could be given to the potential of the site to deliver lower carbon energy.

### **Policy CS1: Landmark Buildings and Key Spaces**

Landmark buildings and open spaces make the Seafront what it is and give the Southend seafront a unique character. Protecting and enhancing these features will help in the long-term maintenance of this character and their importance for the tourism economy and community identity.

Recommendation - This policy has a positive relationship with sustainable development.

The policy could be integrated into other policies. It is unlikely that this policy would any greater protection than relying on other AAP or LDF policies.

### **Policy CS2: Central Seafront Strategy – Key Principles**

#### **Policy CS6: Central Seafront Development Principles**

The policies address many issues of importance to delivering sustainable development. This includes improving the quality of the built environment, protection heritage and biodiversity, improving non-car access and enhancing the potential for the tourism economy.

The policies set out what is anticipated from development in the Central Seafront area. The principles set general aspirations for development, with some generic statements of what is desired from development in the area, and some more specific criteria – such as where new access routes are required and the names of development sites.

However, there may be an advantage in combining the two policies to allow for more simple statements of what the vision for the area will be, avoiding both internal repetition within and between policies. There may also be elements of the policies that are already sufficiently covered elsewhere in the AAP and do not need repeating here, such as on flooding and nature conservation.

Some criteria of policy CS2 set positive steps for the future of the area that need to be implemented by the Council or other public / community groups. This includes an Urban Green Strategy, Art Trail, and Creative Lighting Scheme. However, there are other parts of the policy that set useful criteria for the policy to meet. This includes required all development proposals to prepare a 'visual impact assessment'. This will help to make sure development takes into account its context and views to and from the site.

Recommendation - The policy is compatible with delivering more sustainable

development.

The policies for the Central Seafront are very detailed. To make clear the main principles to be followed in developing the Seafront area policies CS2 and CS6 could be combined. Other repetition could be removed where elements of this policy are already addressed by others.

Some elements of the policy will be difficult to directly implement and simply set out objectives for the area.

Preparation of a design code or other unified scheme for the whole seafront and in particular the Central Seafront could help make sure that development is delivered in a joined-up way. This would cover issues such as colour-schemes, materials and other design element. Such an approach would help the visual quality at the end of the High Street/Pier Hill that can be overly cluttered with visual elements. Public art as part of the cohesive scheme could also help integrate 'seaside' elements higher-up the High Street.

Redevelopment will need to be guided through a masterplan, development brief or SPD.

A map of mixed mode, cycle and pedestrian improvement routes should be given in the AAP. A single policy on new mixed mode – shared priority' routes may be suitable, instead of repeating proposals in different policies.

As with all the redevelopment sites consideration could be given to the potential of the site to deliver lower carbon energy.

### **Policy CS3: Flood Risk**

Protecting property and people from undue risk of flood is essential, with benefits for safety, wellbeing, communities and the economy. However, preventing development coming forward in some locations simply because of flood risk may have harmful effects on meeting sustainable development needs. This policy follows the advice of the Southend Strategic Flood Risk Assessment, and advice of the Environment Agency and the government.

The policy sets out the specific flood management measures for the Central Seafront area, as it is recognised that regeneration must happen in this location. Some policy criteria repeat national policy and may not need to be repeated here. However for development in Flood Risk Zone 3a and 2 specific guidance is given on the design of new development to ensure it is resistant and resilient to flood if it does occur. This includes making sure future residents are safe from the risks of flood, and should help reduce the costs and time taken for buildings to be useable following a flood event.

Recommendation - This policy is compatible with achieving sustainable development. The policy should help ensuring land is used efficiently while protecting people and property from flood risk.

Parts of the policy that repeat national and LDF policy may not need to be repeated here.

### **CS4: Nature conservation and biodiversity**

The policy should help in protecting the high quality nature conservation assets in this area. More information could be given to where new open space as part of the 'green grid' will be provided in the Central Seafront area.

It is not clear if all new development proposals will need an appropriate assessment and this may need to be determined through site-by-site screening.

A new visitor interpretation site to help people be aware of the value of the foreshore. Improved understanding can help in protecting the area and aid visitors' recognition of how they can help avoid adverse impacts.

Recommendation - The policy is compatible with sustainable development and the need to protect the high quality nature conservation assets of the area.

The policy repeats some aspects of national policy and elements of other policies of the AAP. This repetition is unnecessary and may lead to an overly long plan. An overarching policy for the whole AAP area may be suitable, as it is not only sites within the central area that may have an impact on the internationally and nationally designated nature conservation sites on the foreshore and / or require appropriate assessment.

The policy could also contain more on the landscaping and other provisions new development could make to help enhance biodiversity in this area.

The policy could also recognise the potential for conflict of uses to have an impact on the nature conservation value of the area.

### **CS5: The Waterfront**

The waterfront area is a community and economic asset for Southend. Enhancing the quality of the public realm and peoples' enjoyment of the area can have substantial sustainability benefits for the town. There is much in this policy that should help improve the area, including development of allocated sites and other programmes that will need to be implemented alongside development.

Development must ensure it does not harm the biodiversity assets of the foreshore. Especially where development gives rise to an increase in visitor pressure in this area, for example new jetties and slipways.

Recommendation - This policy is comparable with achieving more sustainable development in the waterfront area.

To simplify the AAP and its policy intentions this policy could be made more succinct, removing parts that are already covered by other AAP or LDF policies.

There is a need to recognise the potential conflicts between different waterfront uses and the need to identify a strategy to manage this.

Much of this policy will be reliant on the plans and strategies of other parts of the Council and other groups and organisations. For instance through new tourism strategies for the area and investment by private businesses.

### **Central Seafront Proposal Sites**

#### **CS6b: Seaway Car Park and Marine Parade**

This site links well with The Royals, High Street and Tylers Avenue area to the north. There is significant potential for redevelopment of this site to make better use of the available land and contribute to improved connects between the seafront and the rest of the central area.

The car park is higher than the rest of the seafront so the design of development will have to be innovative to encourage people to walk upwards to the town centre. However, there are also advantages in the elevation as it allows views over the estuary.

Supporting text identifies that redevelopment here may contain residential development, however, the policy only makes passing reference to this use. Some indication should be given on the anticipated contribution this site would make to meeting the residential needs of the central area.

New buildings on the site, especially new tall buildings, will be highly visible and therefore it essential that they are delivered of a high visual quality and to provide a legacy building for the future.

The measures proposed in the policy are likely to increase pedestrian movements in this area. This will have benefits as part of a strategy to reduce car use and also is an important part of encouraging more healthy lifestyles.

Development here has the opportunity to open up the historic heritage of St John's Church.

New open space will also benefit the area especially if it has good access to the residential neighbourhoods to the north.

This policy is the only one that specifically refers to the need to use sustainable construction techniques, implying this will only be a requirement here. Singling out areas to deliver this type of development should be avoided and all new development should be encouraged to use high standards of sustainable construction.

#### CS6b: Seaway Car Park and Marine Parade

This site has the potential to offer a high grade cultural resource for the Borough. This site is proposed to be the location of a new museum related to Southend's archaeological heritage that could be a significant tourism attraction for the town. This can be associated with new routes through the Cliff Gardens to encourage access to the park and green spaces.

New development will need to be a high quality design as it will be associated with the Clifftown conservation area, which in this location is characterised by large Victorian villas. There is potential to bring about improvements to this area without losing its intrinsic characteristics of area as a quiet area of calm along the seafront.

Development in this location can rationalise car parking, and new car parking should replace existing on-street car parking to enhance the built character. New car parking should also not increase the overall level of parking in the area, no new road traffic should be encouraged to this part of the Esplanade in order to maintain the character.

Cliff stabilisation will mean that this land can be bought back into good use.

New development will need to retain the open feel of this area and ensure that new planting is a high quality, making use of species that are appropriate for the location. The biodiversity potential of all of the open space at Cliff Gardens should be considered, moving away from the more formal planting and mowed grass character in some areas.

This site allocated for the cultural centre contains less heavily managed areas of open space than elsewhere on the cliff gardens. This area is likely to support greater biodiversity than the more manicured parkland of other parts of the cliffs. Losing this more 'wild' habitat will be detrimental to local nature conservation.

Opportunities for low carbon energy could be considered at this location, as could the design of the new cultural facilities to incorporate best practice in design and environmental performance.

#### Policy CS8: Eastern Esplanade and City Beach Gateway

##### Policy CS8a: Woodgrange Drive (Kursaal) Estate

The Eastern Esplanade is a vibrant area, although where it meets Marine Parade the road and complicated junction dominate the area. Other parts of the area lack a cohesive character with buildings and frontages of many different styles, including the Sealife Centre and colourful retail/amusement frontages. The seafront car park also dominates the area. However, there are parts of the area that are of a high quality, including the Kursaal and Eastern Esplanade conservation areas. There is also the potential for City Beach improvements to be extended to the east to reduce car dominance.

The policy for the whole area would see more active frontages encouraged, moving away from some of the past development that has been isolated and inward looking. Improvements of a similar type to the City Beach are favoured, including better management of pedestrian routes and flows. Some of the policy criteria are quite aspirational with little detail on how they will be achieved, for example the development of a lido.

There is potential for new high quality development to improve parts of this area. On the

seafront there is a need to fill the large redundant site left by the removal of the gasworks. This currently significantly detracts from the quality of the area but has the potential to bring substantial benefits subject to suitable new use being found. To deliver sustainability benefits it is essential that the design of a new building at this site is of a very high quality, to create a new seafront landmark that respects the conservation areas, seaside location and becomes part of Southend's future heritage.

There is one redevelopment site identified in the area and the Woodgrange Drive (Kursaal) Estate. This is a general policy that seeks the improvement of the area, which could have benefits for the community, built environment and sustainable use of resources. However, there is no implementation plan yet in place so at the present time achieving these objectives may be a longer term aspiration.

Recommendation - Some allocations include the need to deliver residential development. Quantifying the anticipated yield of new housing on the site would give greater clarity on the expected contribution different sites to meeting the housing need in the area.

New areas of public open space should help to deliver multiple benefits for sustainability. For this reason it is suggested site specific and other policies make clear that green landscaping will be favoured over hard landscaping. This can have benefits, for health, communities, nature conservation, flood control and managing the impacts of climate change. Green landscaping should also incorporate a mix of habitat types, for instance areas of shrubs or wildflower meadows, avoiding homogenous areas of short grass with sporadic trees.

All development in the Central Seafront will need to ensure that there is no adverse impact on the internationally designated nature conservation assets.

Design Briefs for the each major development area, or group of development area, should be prepared to give design guidance as part of creating a unified character to the Central Seafront. Design Briefs for specific areas, including the gas site and Kursaal Estate would also be beneficial.

As with all the redevelopment sites consideration could be given to the potential for sites to deliver lower carbon energy, especially large development areas.

Singling out areas where new buildings should make use of sustainable construction techniques should be avoided. All new development should be encouraged to use high standards of sustainable construction.

### **Policy DP9: 'Victoria' Gateway Neighbourhood**

Proposal site policy PS9a: The Victoria Office Area Site

This is an area allocated for comprehensive renewal. An SPD for the site is to be prepared and this will help make sure development is delivered in a unified way and a way that promotes sustainability. The policy also requires that if development does come forward in a piecemeal way, developers demonstrate how their scheme will aid the delivery of adjacent sites. This requirement is essential in creating a cohesive area, of linked development. The SPD will help to manage delivery as a whole.

There are many aspects of the delivery of the site that are compatible with sustainable development. Redevelopment will see this area of under-occupied land in central Southend bought back into use. In Southend making the most of available land is essential as the urbanised area almost reaches Borough boundaries in all directions. The main aim is to create a more sustainable community in this area, integrating residential, offices, community facilities and open space.

New development should be developed to a high sustainable construction standard. This could include considering how the site can make more efficient use of energy or generate low carbon power. Connection to district heat/power network could be a requirement of

new development in this location.

There is a need to ensure that any lost office space is replaced in to meet needs either in this area or in another central area location. Office development should be located in the central area where there is the greatest potential for non-car access. Peripheral office development and business parks are likely to increase car use and congestion on local roads.

Proposal site policy PS9b: Former Essex and Suffolk Water Board

This is a small development site that is allocated for cultural facilities and creative uses. This type of reuse of the site will have economic benefits for the area and provide a community resource. The policy requires that development capitalises on merits of the existing building that will protect this heritage resource.

Proposal site policy PS9c: Roots Hall Football Ground and Environs

Development proposals for this site are reliant on a new site being secured for the football ground, although there is an intention for this to happen. New uses for the site area likely to include housing and associated open space, new foodstore (possible to the relocation of Sainsbury's from London Road), changed access and landscaping.

Redevelopment has the potential to help meet the Borough's housing needs as well as changed road access to help pedestrian safety. However, a supermarket on the site is likely to increase car trips in the area, these will need to be managed to avoid adverse amenity and environmental impacts.

The supporting text refers the need for low carbon and sustainable construction, this is not repeated in the policy.

Recommendation - The policy should help deliver more sustainable development in this area.

The supporting and policy text needs to ensure any repetition is minimised to create a usable and succinct plan.

Residential development is to be a major component of development in this area. The policies should contain details on the anticipated yield of housing development site. Some direction could also be given on the mix of homes anticipated for the entire site to give an understanding on what type of housing is required in this location. An indication of the suitability of the site for affordable housing could also be set in policy.

A map of mixed mode, cycle and pedestrian improvement routes should be given in the AAP. A single policy on new mixed mode – shared priority' routes or other pedestrian/cycle links may be suitable, instead of repeating proposals in different policies.

The preparation of a Development Brief or masterplan for the proposal sites would help deliver the regeneration of the areas in a unified way. An SPD is being prepared for the Victoria Avenue site.

As with all the redevelopment sites consideration could be given to the potential of the site to deliver lower carbon energy. The Victoria Avenue redevelopment may present a particular opportunity due to its size.

### **Policy DP10: 'Sutton Gateway Neighbourhood**

The policy sets out succinctly the principles that will guide the redevelopment of the area. The majority of changes related to the three allocated sites as well that need to improve access through the area, including changes to Sutton Road and safe walking and cycling routes along Short Street to Queensway.

The site will also need to accommodate some addition open space and this is likely to be in the north of the area at the Sutton Road proposal site.

As with many of the quarters this area could accommodate new higher and further education facilities if required.

Planning briefs are to be prepared for the two employment areas and this should help their renewal over time in a coordinated way.

#### Proposal site policy PS10a: Former B&Q site

There is a risk that a new supermarket at this site will draw business from the nearby High Street. Therefore, the scale of the supermarket should be suitable to its setting, for instance not containing large clothing, hardware or homeware sections.

Part of delivering this site will need to be improving access by foot and cycle. From the north and east these improvements should be relatively easy to achieve. However, there is also the need to provide better crossings over Queensway and from the west there needs to be safe and direct routes avoiding the busy Queensway round-a-bout.

A building in this location will need to be of a high quality design as the area is already suffers a low quality built character that is in need of enhancing.

The replacement of the youth facilities will need to be of a better quality and a suitable floor area to compensate for their loss. Temporary premises will also need to be secured.

#### Proposal site policy PS10b – Sutton Road

This is a linear allocation that covers the business and industrial units facing onto Sutton Road. Many of these units are dilapidated and several are empty. The units face onto a largely residential neighbourhood and many of the buildings on the opposite side of the road contain shops.

The policy promotes redevelopment of this area for housing. It will be necessary to make sure that loss of employment units in this location does not mean loss of accessible employment for Southend residents. In addition, some of the units may provide local services that need to be kept in the immediate area. Therefore, loss of existing use should not occur until it is shown that there is surplus employment land. New development could also incorporate small workshop or live-work units to replace some the loss.

New housing should respect the context of the area and actively engage with properties on the opposite side of the road. However, new development could be of a higher quality than some of the more recent nearby development as a way of enhancing the built environment character.

New open space in this location could make up for a general shortfall in this quarter of the town. The role of new open space as part of the Southend 'green grid' could be recognised in policy or supporting text.

#### Proposal site policy PS10c: Coleman Street

This is an allocated site bordering on Queensway in the south of this gateway area. This site consists of poor quality social housing predominantly arranged in large tower blocks, in a similar style to that of site PS4a. This site is in need of regeneration to provide a higher quality living environment and better open space for residents.

Refurbishment of one or all of the tower blocks may be possible to improve their quality and retain the landmark features. Re-use may also be preferable in terms of making best use of available resources than demolition and re-building.

As part of seeking greater equity in housing offer it may be that some of the social housing could be moved to other redevelopment sites, avoiding large areas only characterised by social housing. These concentrated areas of social housing can be detrimental to wellbeing of some communities. However, the overall quantity of affordable housing must remain in the central area in order to meet the housing needs of new and future residents.

Renewal of the site will need to be achieved in partnership with other funding streams and regeneration projects.

Recommendation - The policy should help deliver more sustainable development in this area.

A map of mixed mode, cycle and pedestrian improvement routes should be given in the AAP. A single policy on new mixed mode – shared priority' routes may be suitable, instead of repeating proposals in different policies.

Any loss of existing employment land should ensure that this will not result in a loss of locally accessible jobs for the resident workforce of the Borough. Similarly, prior to development any economic uses that need a central location should have had suitable new premises secured. The Sutton Road site could include development of new small scale business premises.

Hard landscape of any of the existing open space must be avoided in this location. New open space should consider its role in reducing visitor pressure impacts on the foreshore as part of the 'green grid'.

As with all the redevelopment sites consideration could be given to the potential of the site to deliver lower carbon energy.

Development Briefs will help to ensure development at each of these locations is developed in a co-coordinated and cohesive way, making the most of opportunities for sustainable development.

