

SCAAP – Representations for Proposed Submission – December 2016

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
Respondent	Mrs Lise Hodgson					
Full Submission	A cinema that close to the beach is a waste of valuable public land. Nobody books a hotel because there is a cinema nearby and those that do go to the cinema don't spend money in the town while they are there. Point 2b. It is not enough to ensure there remains the same number of car parking spaces. There should be more spaces in this area. The Council cannot just expect people to park further in town and walk down to the seafront. If that happens they will stay away. If they were willing to walk they would not sit for ages in queues waiting to get into the Royal car park and Seaway.					
EIP	Written					
Reps	OS CS1.2: Seaways	2472	Object	A cinema that close to the beach is a waste of valuable public land. Nobody books a hotel because there is a cinema nearby and those that do go to the cinema don't spend money in the town while they are there.	A hotel might be reasonable, although why the Royal in the High Street has not long ago been refurbished as a modern hotel is strange if there is a need. However, restaurants, cafes etc. and more parking would improve the area	
	Policy DS5 Transport, Access and Public Realm	2473	Object	Point 2b. It is not enough to ensure there remains the same number of car parking spaces. There should be more spaces in this area. The Council cannot just expect people to park further in town and walk down to the seafront. If that happens they will stay away. If they were willing to walk they would not sit for ages in queues waiting to get into the Royal car park and Seaway.	Proper arrangements for coaches should be made close to the sea front. The Council are in danger of losing day trippers in their endeavour to get people to stay overnight.	
Respondent	Mr Daryl Peagram					
Full Submission	<p>The plan is not positively prepared as it does not seek to meet parking development needs - rather it brushes them under the carpet. The plan is not justified as it is not based on appropriate strategy as it is not based on evidence - it just hopes that cars will vanish as fast as people arrive. The plan is not effective because it is not deliverable until the parking conundrum is solved.</p> <p>The plan is for extra dwellings, schools and workers and tourists and a 'noteable increase in population', with 1,732 extra homes and 41,000 square metres of non-residential space. One of its purposes was 'transport improvement'. Yet it ignored parking until the submission version thus circumventing consultation yet with the last minute car parking study we now know that parking will max out in 2021 by possibly the time the first brick is layed, and the solution is assumed to be a modal shift with no evidence of when how why for whom this will happen.</p> <p>It glibly relies on the fact that town centre dwellers are less likely to drive, forgetting that the plan is to increase the number of town centre dwellers by thousands and to draw outsiders to the town centre. The plan says it is a 'catalyst for investment' and for 'growth'. The plan admits that it must provide parking at a level which 'supports the vitality' it</p>					

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				<p>seeks, which is for the town to become a 'destination'. Strategic objectives include to 'increase the number of people living' in the town and to 'attract greater visitor numbers'. The plan even alleges a goal of a 'step change in the economy' and claims the extremely ambitious target of Southend becoming the 'cultural and leisure capital of the east of England'.</p> <p>Para 133 admits that 'further work will be needed' as the car parking study only takes us up to 2021 - which is the delivery deadline for the council's half of the plan and the firing gun for the developer's half which comes afterwards starting in 2021. Para 153 appears to me worded to admit, without it being apparent, that south town centre parking will reduce by 15%, but hopefully I have misunderstood the use of the term 'peak capacity'. Para 136 seeks to skip the lack of car parking consideration by just saying it will be 'kept under review'. But the idea of the plan is to avoid salami review annually - this is the big scheme to last decades. Once car parks are built on, a review that recommends we should have kept the car parks will be useless, and we are already saying goodbye to Queensway and Seaway car parks, and councillors are calling for lessons to be learned from the town centre plans of the 1970s.</p> <p>At p45 the plan admits to 'discrepancies in parking supply' but dismisses them on the basis that drivers are choosing the wrong car parks, when in fact usage survey shows that the parking capacity in the wrong place. Drivers don't and won't park at the 'wrong' end of the High Street. Section 5.8 continues the delusion by palming off parking concerns with the assurance that car parking 'will be addressed' - missing the point that the plan is the place to address it before it is too late.</p> <p>Para 230 confirms that the 2021 deadline might not even be the beginning as it assumes the plan as an 'investment tool' will attract funding. The council has no idea whether it will be able to sign off 50% of the plan's cost as a prudent budget when it already faces a council tax increase cap and has borrowing of hundreds of millions with a constant deficit so no way to clear it. At pg5 the council at least realises that even if it planned extra car parks it has nobody offering to build them. At p107 the council reveals its method of coping with the obvious extra pressure from cars is to encourage car sharing and park n ride, without any evidence that has ever worked or where the car parks would go for the buses to pick up families and their shopping. It is most unlikely that Southend residents will suddenly sell their car and share their neighbour's car. Similarly, without the relief road across Rochford, nobody knows how all these investors, flat dwellers and workers will get here in the first place, let alone park.</p> <p>The plan is thus revealed as a detailed ambitious well-meaning work of fantasy relying on magical thinking that we can flood the town with tourists, new flat dwellers and workers and build on car parks, but many will suddenly scrap their cars if they move to Southend, or abandon their cars on the A127 or A13 and walk or cycle from the borough boundary if they are visiting, or make do with walking cycling or bussing to the shops when the trigger for the plan in the first place was to allow Southend to compete with the car-friendly shopping centres further west and north in Essex.</p> <p>The plan is written as if by a non-drivers, although it is the result of work approved by more than one administration doubtless including many drivers. In my view the lack of consultation and unreasonability of ignoring the lack of car parking render this plan unlawful for procedural defect by way of missing consultation and Wednesbury unreasonableness in its unreal assumptions on traffic. It is not as the cabinet claims a defence to term it an 'enabling document' or to play it down as 'consideration, not policy' - the plan is the policy, or to say to vote for it is 'not to pass it' as there an inspector who could veto it. It is a decision which must stack up as it is now, not with unknown amendments from a parking review in the future that again we will not be consulted on as part of the SCAAP.</p> <p>The nonsensical parking plan, such as it is, is a judicial review waiting to happen. It will also have incidental effects of bringing the council, the administration into disrepute, especially as they were specifically warned at full council that the plan is not finished until there is a real plan for parking, and that whilst cabinet 'does not think it is a question of credibility', the public do, and do not believe for example that 'only 25% of visitors come by car'. The council debate included allegations of corrupted consultations and fake VMS data, so we need to put on a show of an unimpeachable consultation. Other respondents such as Stockvale may have similar points to make on tourism which is said to be the other missing plan, but either way, having policies on parking and tourism does not make a plan missing tourism and parking a reasonable plan.</p> <p>Whilst the plan has been six years in the making, the failure to build tourism and parking into it is not acceptable just because various administrations or oppositions are to blame for that. It is not half baked but missing a couple of essential ingredients. Planning and parking are the most widely contentious issues for officers and councillors to</p>		

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	confront and the plan represents massive good work. However the council's duty is to consider everything relevant and make a sane decision and it is impossible to call it a sane decision until it has been made on all relevant factors.					
EIP	Written					
Reps	123	2474	Object	<p>The SCAAP won't work as it has ignored parking considerations until after the initial consultation on the content of the plan, and even then has only given inadequate consideration, meaning the plan was not properly consulted on and so is neither compliance nor sound. It does not seek to meet requirements, it is based otherwise than on evidence and is undeliverable.</p> <p>The second consultation is only on the legality meaning residents have no chance to help the council remedy the defect other than by asking the inspector to refuse the SCAAP</p>	The SCAAP must include a parking plan addressing the admitted conflicts between its intended growth and reduced car parks to the extent that it is rendered reasonable enough to be lawful.	Document is not Legal Document is not Sound
Respondent	Mr Paul Lowe					
Full Submission	<p>Re: Policy PA9 Sutton Gateway(3.i.a): 'The Council will require the building design, form and massing to:</p> <p>a. have regard to residential buildings on the opposite side of Sutton Road...'</p> <p>This should be updated to: 'a. have regard to all residential buildings bordering the development.'</p> <p>It is not just residents on the opposite side of Sutton Road that are potentially affected. In fact, properties to the rear of the Opportunity Site are clearly affected most by any development to the western side of Sutton Road. e.g. residents of Glenhurst Road (to the rear of part of the proposal area) have been in a long-running dispute with the poorly-planned proposal to build 3 and 4-storey flats on the vacant Crown College site (part of Opportunity Site g). The potential effects of overlooking and loss of light to the properties to the rear of this site must be included in the development considerations.</p>					
EIP						
Reps	Policy PA9: Sutton Gateway Neighbourhood Policy Area Development Principles. PA3.i.a	2475	Comment	Policy PA9 Sutton Gateway(3.i.a) should be updated to have regard to all residential buildings bordering the development.	Re: Policy PA9 Sutton Gateway (3.i.a): 'The Council will require the building design, form and massing to:	
					a. have regard to residential buildings on the opposite side of Sutton Road...' This should be updated to: 'a. have regard to all residential buildings bordering the development...'	

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					It is not just residents on the opposite side of Sutton Road that are potentially affected. In fact, properties to the rear of the Opportunity Site are clearly affected most by any development to the western side of Sutton Road.	
Respondent	Milton Conservation Society (Mr Andy Atkinson)					
Full Submission	We understand that the desire for a 'City by the Sea' has been a long standing strategy but there appears to no strategic recognition of the historic settlement of central Southend and importance of C18, C19 & early C20 architecture. Instead historic aspects appear only to be recognised in isolation as buildings/areas to be conserved and enhanced and not used as important references for future development. This has been a longstanding problem in Southend. We would like to see the historic environment and settlement brought forward as far more significant to the future of Southend to help avoid the systemic repeat of the past projects of isolation such as the Victoria Shopping Centre, The Royals, the Sainsbury site and most recently, the University student housing. This of course is a very big issue which we cannot go further into here but requires comprehensive discussion and investigation over time with key stakeholders and public representatives.					
EIP	Written					
Reps	30	2477	Comment	There is an absence of strategic recognition of the importance of the local historic environment and settlement in terms of its ability to influence future development.		
	84	2478	Object	The term 'celebrate heritage' is abstract and meaningless and heritage assets are not only important for the 'tourist economy' and 'identity-making'. DM5 is only written in terms of 'conserving and enhancing' historic assets and the requirements for development proposals. These are the most basic requirements derived from the NPPF and the Planning (Listed Building and Conservation Area Act) 1990 and not descriptive of Southend-on-Sea.	The historic settlement of Southend's town centre and the importance of the route from Prittlewell, the remaining historic buildings should be strategically highlighted and protected as reference points for future development that respects the history of the town. Named building/sites outside the SCAAP area should be listed as elsewhere in policy.	Document is not Legal Document is not Sound Soundness Test(s): i. Positively prepared ii. Justified
	87	2479	Object	This is just a basic line of text stating that conservation areas exist and that they must be 'conserved and enhanced', a minimal threshold based upon the Planning (Listed Building and Conservation Areas) Act 1990 and not Southend-on-Sea.	Conservation areas should not only be protected but should influence the urban design at their borders and in the zones between closely sited conservation areas, as present within the SCAAP area.	Document is not Legal Document is not Sound Soundness Test(s): i. Positively prepared ii. Justified

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	88	2480	Object	The same comments as made for conservation areas apply.	The plan should reference these buildings and the particular importance they have for the future of the town, not least the pier.	Document is not Legal Document is not Sound Soundness Test(s): i. Positively prepared ii. Justified
	89	2481	Object	'Material consideration' with planning application affecting Frontages of Townscape Merit and other non-designated heritage assets is a minimal threshold, again only based upon the NPPF.	Beyond 'material consideration' with planning applications these assets should be described as important to the urban history of Southend and where retained should be used as important reference points for adjacent urban design.	Document is not Legal Document is not Sound Soundness Test(s): i. Positively prepared ii. Justified
Respondent	Mr Philip Barnard					
Full Submission						
EIP						
Reps	Map 5	2483	Comment	Parking I note one of the paid parking areas on Victoria Avenue is to build on as a hotel. It has been full each day I've gone past on the bus to the hospital. Where are these people going to park. Why is there generally no provision for parking in any of your plans?		
Respondent	Southend & District Pensioners Campaign (Mr Robert Howes)					
Full Submission	We regard the parking provision inadequate at present, and are alarmed at the lack of detail and emphasis on this issue within this plan. Surely, parking should have featured much more strongly in the document, as we have such limited land available, particularly close to the seafront. During peak times, the congestion is appalling in the town. It also backs-up traffic on the A127 and A13 for long distances, which frustrates visitors and encourages road-rage. The Council must understand that we need more multi-storey or underground car parking provision. Our older and disabled residents rely on their cars to visit the town centre. Some of them cannot manage to access a bus if their is one available. Seaside businesses are desperate now for more car parks near the coast, and to attract more trippers will require more spaces. The fact that you promise not to reduce south/central area, shows that you have not grasped the seriousness of the problem in our view. We do not see Southend as having any chance of being recognised as a cultural or tourist capital of the East of England Region. We have excelled at attracting day-trippers, but cannot expect many visitors to stay overnight. The Prittlewell Priory and the Pier are our greatest attractions for tourists, and can be seen in a day. The beaches also appeal to large numbers for a day. We are like London-on- Sea, and need to develop the Priory site with the Saxon relics preserved near the grave site. This could encourage history and archaeological tourist who may stay over for a night. This Action Plan does not say enough about tourism in our view, as there are major challenges involved. The bus service is dreadful in the evening, and the High Street needs restaurants and a hotel. It is					

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	dead after the shops close. C2C is now Southend's greatest economic driver, and we remain a famous down-market seaside resort, ideal for day-trippers. The public toilet facilities are often appalling.					
EIP	Written					
Reps	80	2482	Object	Not going to be a Regional Capital of culture or tourism. Town is ideal for day-trippers. We cannot expect large numbers of visitors to stay overnight. We are surprised the tourism is not a bigger part of this document, given it's importance to the central area. Any planning inspector would be amazed we believe. This is embarrassing to our residents we feel. We should be bold and imaginative in developing our Pier's potential, with new trains/ monorail and something at the head to excite visitors. The Priory could attract many people if the Saxon remains were housed nearby.	This Action Plan does not say enough about tourism in our view, as there are major challenges involved. The high street needs more interesting and less down-market shops, restaurants and maybe a busy hotel and toilet facilities. A concert hall would be welcome, and we do have to find a way to develop our world famous pier. The Plan is incomplete.	Document is not Sound Soundness Test(s): ii. Justified iv. Consistent with national policy
	136	2484	Object	Car parking deserves to have more emphasis in this action plan. The situation now is difficult and produces major congestion. Some local residents struggle to park near the centre of Southend. Disabled people often have no easy access to buses, and some cannot access a bus anyway. Our seafront businesses are already upset over the lack of car park provision near the coast, and most new trippers will arrive here by car. Already people are parking illegally on grass banks in Kursaal Ward in the summer. Essex Police have other priorities. This plan appears to be incomplete.	Please think carefully about retaining the space needed for additional car parking spaces in the central Southend and seafront areas, as it will be key to the success of the whole plan in our view. This is a change needed. Also, consider the need for multi-storey parking, or underground provision. We believe this project is a great opportunity to transform our town centre which could be successful if a parking and tourism strategy with tactics were incorporated into this document. As it stands, this plan looks incomplete.	Document is not Sound Soundness Test(s): ii. Justified iv. Consistent with national policy
	124	2485	Object	The plan talks of inclusive access for walking. It fails to mention safe access. As pensioners we feel that important routes around Victoria rail station and on the "Golden Mile" are not safe "Shared-Space" areas for the elderly, frail or	The Council need to either scrap these Shared Space areas, or provide proper level crossings and kerbs. For the blind and partially sighted, we need audio controls at the crossings. Shared Space areas can and do work across Europe in suitable	Document is not Sound Soundness Test(s): i. Positively prepared iii. Effective

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				disabled pedestrian. Or for the very young. Badly conceived in inappropriate sites, we think.	locations. We feel generally that this plan majors on physical structures like buildings, and needs to take account of the needs of people more.	
Respondent	Miss Laura Cowell					
Full Submission	The proposals for London Road are long overdue, there is such a opportunity to pedestrianise the area currently used for a taxi rank in order to create outside seating for the many restaurants in summer time and a proper location for the market. The pavement in this location is very narrow for such a busy section and heading towards the high street there is a bottle neck caused by the current bicycle parking provisions, forcing you to walk into the road if you wish to head south down the high street. This area is crying out to be pedestrianised and create better links between Sainsburys/College Way and the High Street.					
EIP						
Reps	161	2486	Support	The market would be suitably placed here too, drawing people off the main 'drag' and encouraging them to use Queen's Road etc. The market in its current location causes the High St to feel pretty claustrophobic at times. The area in front of the Odeon cinema feels like a huge waste of space too		
	Proposals Map	2487	Support	With regard to new or improved pedestrian links between PA.1 and PA.2, it is not clear how the new developments currently in construction in Vic Ave play into any development brief for this area. Will there be a lack of cohesion or continuity for the different sites. How can you propose new/improved open spaces in Vic Ave when all the sites are already being developed by different developers in mismatched styles and with not much evidence of green spaces?		
	Proposals Map	2488	Support	The pedestrianisation of Warrior Square including up to the High Street is long overdue and would help draw people into this area from the High Street. The area outside Maitland House feels like a back street, choked up with cars and Warrior Square is blocked from view if you are in the High Street.		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	Policy PA1: High Street Policy Area Development Principles	2489	Support	There needs to be consideration given to improving the condition of the building facades above the retail units in the High Street, there is a great opportunity to drastically improve the appearance of the High Street if money was spent on improving these buildings, some of these should be added to the Landmark Buildings - i.e. the building on the corner of Warrior Square and the High Street, above Dorothy Perkins currently. This is in an awful state but we should be proud of buildings like this that we have.		
	Policy PA1: High Street Policy Area Development Principles	2558	Support	The pedestrianisation of Warrior Square including up to the High Street is long overdue and would help draw people into this area from the High Street. The area outside Maitland House feels like a back street, choked up with cars and Warrior Square is blocked from view if you are in the High Street.		
	Policy PA2	2559	Support	The proposals for London Road are long overdue, there is such a opportunity to pedestrianise the area currently used for a taxi rank in order to create outside seating for the many restaurants in summer time and a proper location for the market.		
Respondent	Mr David Batley					
Full Submission						
EIP						
Reps	145	2490	Support	I fully approve of bus priority. Introducing bus lanes is the best way to improve frequency and reliability, and reduce the cost of fares. I also support pro-cycling measures. Removing through-traffic from residential roads can create		

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				an excellent cycle route and improve the environment for residents.		
	145	2491	Comment	The council can be robust when discussing bus priority schemes with bus operators. As an estimate for the lower bound of bus company savings, a 5 minute saving during rush hour (2 hours per day in each direction) for 9 buses per hour along London Road would save a company GBP 17,000 per year on staff wages alone. (Plus capital costs and other employee costs),		
Respondent	Mr Stephen Kennedy					
Full Submission						
EIP	Written					
Reps	195	2492	Object	Does Southend need a second cinema	No need for any development in this area	Document is not Legal Document is not Sound Soundness Test(s): ii. Justified
Respondent	Gleneagles Guest House (Penny Lowen)					
Full Submission						
EIP	n/a					
Reps	123	2493	Comment	I think we need to be bold and change travel behaviour to encourage use of trains etc, Need VMS on A127 at Basildon for example to say use stations as car parks when others are full .Also need to integrate bus and train and consider trams light rail . I do not want to see a town full of car parks empty for 75% of the year		
	197	2494	Support	The Clifftown area is a jewel in the crown for Southend yet is unseen by millions of visitors and remarkably local citizens who do not know of its		

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				existence . The museum offers the opportunity to showcase the clifftown area		
	163	2495	Comment	Can we be bold here and use the forum as one side of the grid of a town square and have admin buildings above shops and restaurants on other sides and open the square onto the high street		
Respondent	Mr Philip Donovan (Choice Discount Stores)					
Full Submission	<p>Whilst visiting Southend to celebrate the 5th birthday of my daughter earlier in the year, I experienced first-hand the shocking level of inadequate parking facilities at the seafront.</p> <p>We had booked her birthday party at Adventure Island. It was May and the weather was nice, but not scorching. I had given myself plenty of time in which to get there. I was not, however, expecting to spend over an hour driving around trying to find somewhere to park! Neither did the majority of the parents whose children were also attending my daughter's birthday party.</p> <p>Needless to say, we all arrived at Adventure Island later than expected. Everyone was late for my daughter's birthday party, as a direct consequence of not being able to park. Having lived, and worked, in the area all my life, experiencing the difficulties of trying to park at Southend seafront is nothing new. I quote my daughter's birthday party because we actually had a timeframe in which to be at the venue.</p> <p>I can appreciate the enormous difficulty this must present to local businesses; the lack of parking facilities must affect their trade, with potential customers possibly driving out of the area because they are unable to park. As a local business owner, employing over 500 staff, we rely on our customers being able to park when visiting our stores. I think you should concentrate on making Southend seafront more accessible to visitors, because obviously without visitors, there is no trade. Everyone would benefit from this, including our own business - as potential visitors would pass four of our stores alone to get into Southend, i.e. Basildon, Grays, Hadleigh, our Rayleigh Home Store etc. The only fortunate side of this is that, had the weather been really scorching, it probably would have taken me between 2-3 hours to get parked.</p> <p>If it hadn't been for my daughter's birthday party, I would have abandoned the trip and gone to another area.</p> <p>Is this really what Southend Council want from visitors to the area? I believe the parking concerns need to be addressed as a matter of urgency, as it is totally inadequate at the present time, and is sufficiently concerning to make one consider going elsewhere for that very reason.</p>					
EIP	Written					
Reps	187	2496	Object	I disagree with further development in Southend because the parking facilities are already inadequate for the needs of the town.	More parking availability	
Respondent	Ms Celia Newton					
Full Submission	<p>I am concerned that it is proposed that this area be pedestrianised. I don't think full pedestrianised works. Yes, in Covent Garden where there are plenty of tourists and attractions, however, Southend is never going to be very busy at night. I believe the full High Street should be open to taxis and public transport again. Traffic makes you feel safe. To pedestrianise the London Road area would restrict traffic and continue to make visitors feel unsafe after the restaurants close.</p>					
EIP						

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Reps	161	2497	Comment	I am concerned that it is proposed that this area be pedestrianised. I don't think full pedestrianised works. Yes, in Covent Garden where there are plenty of tourists and attractions, however, Southend is never going to be very busy at night. I believe the full High Street should be open to taxis and public transport again. Traffic makes you feel safe. To pedestrianise the London Road area would restrict traffic and continue to make visitors feel unsafe after the restaurants close.		
Respondent	Havens (Mr Nigel Havens)					
Full Submission	<p>At a recent SBTP executive meeting I heard issues raised and responses from the Town Planning department on the critical issues concerning the Scaap. As a company we have traded in the Southend Borough since 1901 and have seen many changes not just physical and social in Southend but in Business terms too. Let me give you my own personal thoughts on the town of which we are all very proud. Over the last 5/10 years Southend Council, supported by many agencies has managed to attract more funding than many other areas and some great developments have taken place.</p> <p>I believe the strength of Southend is in our Tourism, Leisure, Culture, Arts and Education. Sadly as a retailer, it is not a retail destination and given Chelmsford's recent Bond Street development I think you will find it hard to knock them off the perch as the counties top town centre shopping destination. John Lewis are the anchor and with that other adjacencies like Jo Malone, The White Company and other luxury/ mid market retailers have the confidence to support the development.</p> <p>What retailers need is footfall and there is no magic wand to achieve this apart from having the Shops and business that people want to visit. I therefore firmly believe that Tourism which is the art of bringing in non resident visitors is the key to the success and regeneration of our town.</p> <p>People clearly will visit our seafront and the more we do to enhance that with Restaurants, Cafes, Attractions, Music, Fireworks, Car Shows, Street Food Markets, Craft Beer, Museum, the more they will come for the day.</p> <p>Once they are here you then have half a chance of them percolating around the rest of the Borough. This tourist pound then revitalises our local economy and in turn local businesses and particularly retailers will see the benefits.</p> <p>The other key is keeping Adventure Island on board. I know Philip Miller and I recognise that his direct approach can be challenging for committee orientated Council decision making, but at the end of the day he has invested significant amounts of money at great risk to his company in the Tourism market which I do not reckon anyone else would have had the resources, capability nor tenacity to do.</p> <p>Adventure Island is the focal point and if I were the Council I would have someone directly consulting with him and facilitate where reasonably possible his future investment. At the SBTP executive meeting he publically intimated that he was going to stop investing in the town which is potentially disastrous for the key driver going forward. My understanding is that his main gripe is car parking and road infrastructure. As a business man I have to tell you that car parking is critical to the success or failure of any project and investment when you want to attract consumers. It is the oxygen. Rather than be car unfriendly we need to look at practical solutions of recognising that the car is vital to the success of the projects - it brings the footfall to us.</p>					

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	<p>Bond Street in Chelmsford created an additional 288 car parking spaces underground. Look at Bluewater and Lakeside built around car parks. Free to boot! That is what potential visitors and customers expect and if it is not available they will go elsewhere. Sadly we only have to look at our own travel and parking habits. Far from reducing car parking space, consideration must be given to how much extra parking might be required given a lift in visitor numbers and the location is also critical - Lazy UK Adult will not want to have to walk too far.</p> <p>It is unrealistic to think we can change people's travelling habits, it is reasonable to hope that some might use the trains and by all means this should be encouraged. It is very difficult to compare Southend's connectivity with many other towns or Cities. Few have just one direction of entry in our case from the West.</p> <p>Another major issue is sign posting. We should have sign posting on the A127 and the A13. Large brown signs directing people to our magnificent facilities should start at the boundary and follow on consistently along those two roads. It will serve both as a directional aid and importantly market the attractions to the visitor.</p> <p>Please listen to the local businesses, it is us who know what potentially will and will not work commercially in the town and the requirements to facilitate this. Working in partnership will lead to the successful regeneration of our town. The start has been positive let's carry on the good work together.</p>					
EIP						
Reps	Policy Cs1	2498	Comment	<p>The success of the Seafront development is dependent on the provision and planning for Car Parking. Increase visitors means increase Car parking.</p> <p>Signage for the towns facilities should be consistently featured on A13 and A127. Not just for directional but promoting what we have for the visitor to see.</p>		
Respondent	Mr Ed Lee					
Full Submission						
EiP	Written					
Reps	128	2499	Object	<p>The rate of car ownership should be considered by density of dwellings as well as percentage of population. Traffic is terrible and very likely to get worse. Public transport will not improve unless supported practically.</p>	<p>There should be a park and ride scheme starting close to the west borough border with connections to the Airport, Central Southend and the seafront.</p>	<p>The document is unsound because it is not: i. Positively prepared</p>
	131	2500	Object	<p>Car users visit less often in part due to the disproportionately high parking fees. Even for those living in the borough it is cheaper to travel outside the area for shopping. This undermines the High Street and creates a self justifying</p>	<p>Recognise that car transport is a significant factor in local business. You might not want it to be but that is to not accept the reality.</p>	<p>The document is unsound because it is not: i. Positively prepared ii. Justified</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				situation where the causes and symptoms are mixed.		
	134	2501	Object	The 10 minutes walk criteria does not recognise that there is a significant height difference between the central area and the seafront. For anyone of limited mobility it is not a practical walk. With the average age increasing this is likely to be an increasing percentage of visitors. This constitutes disability discrimination.	Recognise that the claimed 10 minute walk criteria is inappropriate.	The document is unsound because it is not: <ul style="list-style-type: none"> i. Positively prepared ii. Justified iii. Effective iv. Consistent with national policy
Respondent	Mr Brian Cook					
Full Submission						
EiP	Written					
Reps	Policy CS1: OS (CS1.2) Seaways	2502	Object	Southend has gradually been strangled to people outside the central area by the narrowing of access roads and restrictions to parking	The proposal to develop the Seaway car-park is misjudged unless part of the development were to be a multi storey car park of similar capacity. I personally used to shop in Southend on Sea centre weekly but know only visit about once a year as I can drive to Chelmsford, Lakeside or even Bluewater quicker than Southend.	The document is unsound because it is not: <ul style="list-style-type: none"> i. Positively prepared
Respondent	Mr Steven Lawrence					
Full Submission						
EiP	Written					
Reps	Policy CS1: OS (CS1.2) Seaways	2503	Comment	I think the development of Seaway & Tylers car parks is a mistake. These are critical car parking areas for day visitors and local residents. We are local residents and have young children. using public transport is a totally impractical option. We will just avoid Southend entirely if		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				there is nowhere to park. We'll end up going to Chelmsford or Lakeside shopping instead.		
	Policy PA7 OS (PA7.1) Tylers Avenue	2560	Comment	I think the development of Seaway & Tylers car parks is a mistake. These are critical car parking areas for day visitors and local residents. We are local residents and have young children. using public transport is a totally impractical option. We will just avoid Southend entirely if there is nowhere to park. We'll end up going to Chelmsford or Lakeside shopping instead.		
Respondent	Mr Richard Carpenter					
Full Submission						
EiP	Written					
Reps	Policy DS5	2504	Object	Have not read report, just received an email from adventure island asking customers to respond to proposal to cut car parking from seafront. If this is the case I do think out of town visitors will be put off from coming to visit the seafront	keep parking along seafront	The document is unsound because it is not: iv. Consistent with national policy
Respondent	James Gibbs					
Full Submission						
EiP						
Reps	Map 4	2505	Comment	This Policy on car parking will not be effective and will only cause issues. the roads are already congested and ear marking current parking for development will only create further congestion. in reality double the parking we currently have is what is required. by increasing the parking and not taking away then it would take cars of the road quicker on busy days and clear the roads a		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				lot quicker. I feel this is derogatory to local businesses and future visitors as all that will happen is it will put people of.		
Respondent	Mrs Ros Sanders					
Full Submission						
EiP						
Reps	134	2506	Object	Parking on the seafront has become more difficult every year. I do not believe that encouraging tourists to use car parks 10 minutes walk away from the seafront will achieve anything other than encourage motorists to arrive earlier and park in residential areas on, and adjoining the seafront and Southchurch Park.	-Identify yellow lines that can be removed to create more spaces -add floors to additional car parks - reject all new building applications that do not include 1.5 accessible parking spaces per dwelling in the seafront area.	
Respondent	Ms Stephanie DiChiara					
Full Submission						
EiP						
Reps	DS5	2507	Object	While your document is difficult to understand - I think you underestimate the importance of parking near the shoreline. Apart from Adventure Island, and the beach there is little that sets Southend apart from other towns. With two small children, if parking becomes difficult we will cease to visit Southend. Trains from London are convenient, but with 2 children and beach gear they aren't a feasible transport. We will go to Margate or Brighton instead.	Ensure there is sufficient, convenient and affordable long stay parking close to the shore. Lots could be improved (paved, lined) and the ones not directly on the shoreline built up / multi-storey if you are trying to free up land. But walking down from the central shopping area is not an attractive option.	The document is unsound because it is not: iii. Effective
Respondent	Mrs Pauline Angell					
Full Submission	The Tylers ave carpark is always full or nearly full so shows how popular it is. I always use it when shopping in southend. It is used by court users for Tylers House and shoppers including elderly that don't want a long walk to M & S and the High St. Not everyone likes to use multi storey carparks especially in the winter when it gets dark so early. There					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	does not need to be any more cafes or restaurants built on the carpark as there are plenty in the High St and vacant premises there, if any traders want to set up new ones. As for small workshops, couldn't they use the empty BHS property if converted? I am against and new residential properties being built in the middle of the town. This will cause more congestion. The Council should continue to convert the office blocks in Victoria Ave for habitation which is a sensible option. Quite frankly, if I could not park in Tylers Ave carpark, it would put me off travelling to Southend and I suspect many, like me, who shop there every week. It would drive many shoppers to out of town shopping centres which do provide adequate outside parking near the shops. To build on this carpark is utter lunacy if the Council wants to encourage customers to the High St.					
EiP	Written					
Reps	Policy PA7	2509	Object	The Tylers Ave carpark is very popular. The fact that it is there encourages shoppers to Southend High St. It is used by shoppers, workers in the office buildings in Tylers Ave and Court users. The elderly need carparks near to the shops which Tylers Ave is. The Council shouldn't be trying to drive the less mobile out of Southend. More residential properties should not be built in the middle of the town. This will cause more congestion because of lack of parking. Artisan workshops could be set up in the old BHS store.	Drop the idea for building on Tylers Ave carpark which is so popular and leave it as it is. The carpark being there, so near to the shops is the reason many, including elderly people that are not that mobile, visit Southend shopping centre.	The document is unsound because it is not: ii. Justified
Respondent	Mr Mark Williams (Choice Insurance Agency Ltd)					
Full Submission	I have run an insurance brokerage in Southend for 13 years and have worked in the town for 25 years. We are a growing business, employing staff from the local area including 2 apprentices per year via the government scheme. I was recently shocked to hear that the council were planning to close Southend car parks which are, in my opinion, the life blood of the town. We receive visitors regularly, many of whom drive and already struggle to park in the limited spaces available, especially in the holidays. Our visitors are often delayed by poor road access to the town as it is. Our staff have the same problem and often resort to parking over half a mile away resulting in lateness to work. I currently ensure I get into work early to ensure a space but am then loathe to arrange meetings during the day for fear of being unable to park on my return and ultimately affecting business. I dread to think what things would be like if the seafront parking were to be removed, pushing visitors to the already overflowing town car parks. I live locally (as do many of my staff) and will avoid the Seafront during busy times as it is. Replacing busy car parks with a cinema would only prove to exacerbate the current parking problem. We do not need a new cinema with nowhere to park when the one we have is rarely even half full. My main concern is that this is only the start of it. Are more car parks to follow? I love running my business from Southend as to many of my clients and friends but if this plan is allowed, I will have no choice but to relocate my business like so many businesses have already.					
EiP	Written					
Reps	Policy DS5	2510	Object	We struggle to park in the town as it is, less parking will drive away businesses and visitors to the town.	I do not believe that this policy will be effective but will instead drive visitors and businesses from the	The document is unsound because it is not: i. Positively prepared

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
					area. Car parking is the lifeblood of the town and should be expanded, lot limited.	ii. Justified iii. Effective
Respondent	Cllr Brian Ayling (Southend Borough Council)					
Full Submission						
EiP	Appearance					
Rep	21	2511	Object	The Scaap document does not include the Tourism and Parking policy (not yet available) and it is nonsense to have a plan without considering its effect on a forthcoming policy.	The Scaap plan will be modified when a Tourism and Parking policy is agreed and this policy should provide parking for visitors by car / bus in proportion to any increase in visitors to the town.	The document is unsound because it is not: i. Positively prepared ii. Justified iv. Consistent with national policy
Respondent	Mr James Anderson (Bandai Namco Amusement Europe Ltd)					
Full Submission						
EiP	Written					
Rep	Policy Ds5	2512	Object	I object to this policy (DS5) and believe it will not be effective and infact will be detrimental to the development of the town. Southend thrives on tourism and is a leading tourist destination in the UK. If anything the council should be looking at ways to nourish the business to help it thrive not to limit the business and therefore the local economy.	I believe there should be additional car parking facilities provided in the town and especially on the sea front area of the town.	The document is unsound because it is not: iii. Effective
Respondent	Cllr Martin Terry (Southend Borough Council)					
Full Submission						
EiP	Appearance					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
Rep	Policy CS1.2	2513	Object	Ref CS1.2 The redevelopment of Seaway car park is based upon very unsound figures that will leave central Southend in gridlock which is not sustainable development.	Do not develop this car park unless real and genuine alternative additional capacity is identified and delivered. The current figures are inaccurate and are flawed as I pointed out when I was Portfolio Holder, The corrections were not made to my satisfaction.	The document is unsound because it is not: i. Positively prepared
	Policy CS1	2514	Object	The Council has failed to deliver promised direct linkage of Spanish Steps to seafront which is essential if this scheme is to work.	Do what is promised and deliver linkage.	The document is unsound because it is not: i. Positively prepared
Respondent	Mr Ian Ross (NHS Southend CCG)					
Full Submission	<p>It is not clear if the inclusion of new health facilities is on the basis of discussions with NHS England or the NHS Southend CCG, or indeed based on health need analysis. Any new infrastructure will need to form part of commissioning plans and go through appropriate governance process. All proposals for new primary care facilities are subject to NHS England prioritisation and approval process.</p> <p>Through its operational plans and general practice forward view plan and the STP (Sustainability & Transformation Plan), NHS Southend CCG has set out its vision for local health service in the future.</p> <p>These changes need to be factored into any potential development plans Southend Borough Council has especially when it relates to new estate and the delivery of primary and community care. There are a number of initiatives planned and being implemented which should be considered before the council finalises any development plans as they will potentially have a major impact on services and how patients access those services, some of which will include;</p> <ul style="list-style-type: none"> • Our integrated health and social services including the new complex care coordination service, which will improve the care of people with frailty in the community and at home. • The development of our four localities in Southend, with the long term vision being an integrated approach to the delivery of health and social care needs of the population. This includes more services being delivered in the community and the development of primary care at scale, where populations of 40,000 to 60,000 residents can be served. • It should also be noted that Southend is part of the 'Mid and South Essex Success Regime' footprint; this project will have an impact on how health services are delivered in the future and will include the three acute hospitals in this footprint working closely in partnership. <p>In addition, there are also a number of Public Health considerations including the impact the high number of fast food restaurants can have on the general health of the population where over 23% of adults are already classified as obese.</p>					
EiP						
Rep	15	2515	Comment	Any planned changes need to be discussed with both NHS Southend CCG and NHS England especially when it relates to new estate and the delivery of primary and community care. There are a number of initiatives planned and being		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				implemented which should be considered before the council finalises any development plans as they will potentially have a major impact on services and how patients access those services.		
Respondent	Mr JC Gibb					
Full Submission						
EiP						
Rep	DS1	2516	Comment	<p>Para 7 Street Markets - The current street market at the top of the High Street needs to be removed. This is extremely detrimental to attracting high quality retailers to the High Street. Currently access to shops and views of windows is severely obstructed. From a professional point of view I could not recommend taking up a unit under these circumstances and I believe that the market is contributing to decline. If the market is to be moved the new location MUST NOT blight another area. I do NOT oppose a market BUT it must be sited where it does not lead to negative results.</p> <p>SUMMARY Remove street market from High Street avoid blight elsewhere</p>		
	128	2517	Comment	<p>The use of cycle lanes will never deal with more than a small minority of users. These should not be allowed to inhibit car movement within the town which at times is snarled up. Use of these lanes where they exist should be compulsory. There are often more cyclists blocking up the road or footway than in the cycle lane!!</p>		
	134	2518	Comment	<p>In the light of 133 this conclusion should not be made as further work is required. One only has to</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				look at the car queue stretching from Chalkwell Avenue to the Pier and beyond to note that with EXISTING Provision there is a severe problem. If we grow the town economically we need to INCREASE provision substantially.		
	Policy DS5	2519	Comment	An increase in parking provision is required. If the town is to compete it needs to reduce parking charges and provide more space.		
	Policy DS5	2520	Comment	The roads are already clogged up and any further moves to favour cyclists and pedestrians would be detrimental. The Shared space on the seafront is confusing and unsafe. Whilst a restriction in peak times may be appropriate for the 90%+ of the time when the area is quiet the free flow of traffic at 30mph should be restored to reduce congestion and pollution not only on the sea front but in the rest of the town. Consideration should be given to allowing free flow of traffic in pedestrianized areas at night to make them less undesirable.		
	Policy DS5	2521	Comment	Car parking in the central area should be increased to deal with the planned increased activity. Pricing should be lowered to encourage use		
	158	2522	Comment	Street Market provision should not be allowed to adversely affect shops as the current one clearly does		
	Policy PA1	2523	Comment	Tree planting is essential - noted that the last High Street Makeover appears to have left the road tree free! Further pedestrianisation will lead to a loss of parking, access and a sense of isolation at night		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	Policy PA2	2524	Comment	I am concerned about a loss of parking from further pedestrianisation.		
	Policy PA4	2525	Comment	I am concerned that traffic flow on Queensway which in peak times can be diabolical is not worsened. Any changes to Queensway need to ensure smooth traffic flow.		
	Policy PA7	2526	Comment	Having spent a great deal on money on the existing Travel Centre any proposition to repeat this seems wasteful.		
	191	2527	Comment	Adventure Island is one of the most successful businesses in the town in terms of attracting visitors and employment. It seems perverse to single it out for criticism.		
	196	2528	Comment	Given the need for car parking and the number of empty units in the town this area should be preserved for its current use. More restaurants etc. will reduce the viability of the existing ones.		
	197	2529	Comment	Preservation of the cliffs as public open space is preferable to creating new buildings within them. It is somewhat ironic that the area was acquired by compulsory purchase to preserve it just after the war.		
	Policy CS1	2530	Comment	<p>There should be no extension of the "Shared Space" concept and the current provision should be removed and replaced by a more conventional approach.</p> <p>The current scheme is confusing and impedes traffic flow in off peak times.</p> <p>Again the singling out of the Sea Life Centre appears inappropriate. It is an attraction provided at no cost to the town which adds to what the town offers.</p> <p>I hope the policy refers only to the disused part of the Crazy Golf site.</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	Appendix 5	2532	Comment	<p>Appendix 5</p> <p>I note that the council is encouraging a borough wide travel card.</p> <p>I also note that the system for bus season tickets is so inflexible as to be comical. You can only by a daily, weekly, four weekly or annual card. On the railway you can by any length of season at the price of the stage to which it applies e.g. 6 weeks and a day at the monthly rate.</p> <p>You can also purchase your season at train stations. Why can this not be done for buses. At the moment you cannot buy a season to correspond with a school term. You have to buy your ticket on the bus or at the travel centre. The latter is inconvenient and the former clearly delays everybody on the bus. Not to mention the logistics of paying £56 on a bus for a four week ticket! At present we spend a fortune on bus lanes etc. but we cannot get a simple season into the twentieth century let alone the twenty first!</p> <p>I am not sure who would even consider cycling from Southend Central to the travel centre. Can you take the bicycle on the bus?</p> <p>If you are traveling by train Westfield is accessible from both Southend's main lines. What has Southend to offer in the way of shopping that Westfield does not? We have to compete by providing a better or equal offer and the only way we are likely to achieve that is by making more cheap parking available. I like traveling by train but with the best will in the world it is not compatible with carrying lots of shopping.</p>		
	Appendix 8	2533	Comment	Appendix 8		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				Sadly I feel that this policy needs a little more bite. The fact that a property is being "Marketed" does not necessarily mean that there is any active effort going into letting it. This may be the case if the agent concerned or his clients stand to make far more money from a redevelopment. Some property on the other hand will clearly be unlettable however long it is marketed for and that may be obvious in a far shorter period.		
	Policy CS1	2561	Object	The singling out of the Sea Life Centre appears inappropriate. It is an attraction provided at no cost to the town which adds to what the town offers. I hope the policy refers only to the disused part of the Crazy Golf site.		
Respondent	City Electrical Factors (Mr Steven Bennett)					
Full Submission						
EiP						
Rep	Policy DS5	2531	Object	As a resident and representative of a local branch of a national company, My feelings are that this will NOT be effective. The town desperately needs more parking, not less and if when visitors/residents arrive they could get parked swiftly, it would stop the town becoming gridlocked and reduce pollution as the cars would quickly be off the road.	Prepare, Propose solution for increased parking areas, to facilitate the growing popularity of the town, this will reduce traffic on roads, pollution and overall function of the traffic flow within Southend On Sea.	The document is unsound because it is not: i. Positively prepared ii. Justified iv. Consistent with national policy
Respondent	Mr Michael Thwaites					
Full Submission						
EiP	Written					
Rep	CS1/Ds5	2534	Object	There is no recognition throughout the plan that Southend as a seaside resort attracts visitors	I do not feel the SCAAP is sound or positively prepared because of the clearly flawed data it relies	The document is unsound because it is not:

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>from London, across the county of Essex and from the region. The profile of visitors is extensively families and their preferred mode of transport to access the seafront is by car. The SCAAP does not positively recognise that the economy of the town is very much built on day visitors and majors on longer stay visitors which in its self is commendable but not at the expense of the day visitors. We do not have the propensity of accommodation etc like many other seaside towns and because of this and proximity out day visitors have been the backbone of the local economy. If Southend Council aspires to build on the already thriving economy, its is a high risk strategy simply to ignore our very important day trippers. The plan also completely neglects the fact that the peak days (when the sun shines) is essential to each and every businesses survival for the rest of the year. It is a fact that our geographical location and difficulty in accessing the seafront is also completely lost in this document. It we want the town to thrive and prosper there needs to be an increase in parking and the SCAAP reliance on no net loss is totally unacceptable.</p> <p>SUMMARY</p> <p>The SCAAP fails to recognise the importance of day visitors and the use of the car, sufficiently accessible, convenient quality parking to the seafront to cater for primarily family visitors and importance of peak days to businesses. It also has glaring omissions in terms of a parking strategy and tourist strategy which are fundamental to the unique character of Southend and its huge</p>	<p>on and a total lack of understanding of the tourist economy and the needs of businesses. It needs to be re written and contain clear objectives to increase accessibility to convenient parking(and more not just 'no net loss') near to the seafront to support day visitors/families. It also needs to acknowledge the importance of peak days to local businesses.</p>	<p>i. Positively prepared ii. Justified iii. Effective</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				potential to grow, expand and encourage businesses to invest.		
Respondent	CPF Leisure Ltd (Liam Finch)					
Full Submission						
EiP	Written					
Rep	DS5	2536	Object	<p>As a managing director that deals with several business based on Southend seafront. I know first hand how bad the parking situation and traffic circulation is during the summer months. I fully believe the policy will not be effective on the basis of a few points.</p> <p>1) You cannot rely on family's with young children to use public transport to visit the attractions we have on our seafront. It just won't work. Parents especially with young children need to carry plenty of belongings with them and you cannot expect to drag heavy bags onto the train and then walk down Southend high street with the bags to get to the seafront.</p> <p>2. The town desperately needs more parking. To take part of the seaway parking site away for development would be a catastrophic move for the businesses I deal with. Therefore having a negative effect on me and my business. Implementing this would further frustrate tourists who are already struggling to find car parking spaces during the summer months. If their day at the seaside starts with parking problems I would highly doubt they would come</p>		The document is unsound because it is not: i. Positively prepared

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>back to visit Southend and therefore eliminating repeat business for my customers and myself.</p> <p>3. Delivering to my customers on the seafront is already a logistical nightmare. My delivery drivers can never find loading bays close to the business they are delivering to so they have to result in manually carrying the box's to there destination. This results in the job taking much longer then it should. As a consequence of this I have had plenty of parking tickets issued to my drivers as they have been in the loading bay for more then 30 mins. This is all a result of the bad traffic circulation in the town. To implement further restirctions on loading bays stated in DS5 would have a negative effect on my business. I delivery to various seaside towns in the Uk and my home town is by far the most difficult.</p> <p>I fully believe this policy will not be effective</p>		
Respondent	Anthony Belyavin					
Full Submission						
EiP	Appearance					
Rep	102	2537	Object	Your failure to ensure the 'gateway' approach to Southend at Prittlewell corner, is attractive, shows how ineffective all this is. Buildings on the right, immediately after Prittlewell Park Corner, heading South up Victoria Avenue needs to be addressed.	These buildings should be refurbished and relet as original, and not allowed to decay as a monument to some laughable redevelopment of roots hall.	The document is unsound because it is not: iii. Effective
	128	2538	Object	This is madness, arterial routes into central Southend, are already close to paralysis at normal commuting times, and SHOULD NOT have cycle lanes or others, added.		The document is unsound because it is not: iii. Effective

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	Map 4	2540	Object	This plan is ill conceived, and fails to take into account the views and experience of local businesses.	Undertake serious discussions with town centre local business owners, to understand how car parking is the lifeblood of getting customers to them.	The document is unsound because it is not: iii. Effective
	DS5	2541	Object	This Policy fails to listen to local Town Centre Small Businesses, and can only exacerbate the decline of Southend High Street.	Consult fully in more detail with Small business owners within the Town Centre and retail centres. Councillors must listen and Understand how important Car Parking is to consumers being attracted to Southend retail Town and retail centres.	The document is unsound because it is not: iii. Effective
Respondent	P Tomassi & Sons Ltd (Antony Tomassi)					
Full Submission						
EiP	Appearance					
Rep	37	2539	Comment	We agree upon this definition of the established linear High Street. However, as we will later point out on paragraph 50, the southern part of the High Street, opposite The Royals main entrance, is a crucial part of this well established linear High Street as defined in this section, and thus should be considered primary shopping frontage.		
	50	2542	Object	The south section of the High Street opposite the main entrance to the Royals has been designated secondary frontage, despite being on the main linear high street (as per paragraph 37) and serving as a vital link between seafront and the town. We think that this is not only a contradiction of the above paragraph 50 (as this area is indeed on the main high street) but are concerned that this omission will detract from quality retail stores being developed and	To include the entire linear high street in the primary shopping frontage, including the southern area of the high street opposite the main entrance to The Royals.	The document is unsound because it is not: ii. Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				maintained in this large and important area of the high street.		
	135	2543	Object	<p>We are concerned by the assertion that there will be 'no *net* loss of public car parking to the south of the Central Area'. Given the plans to build 200+ spaces at Southend Museum, this could allow for spaces to be lost in the southern part of the town centre, which this plan acknowledges as the busiest parking area. Parking spaces on the seafront and parking spaces in the southern town centre do not have an interchangeable use, and any loss of parking in the southern part of the town centre could result in the High Street being less competitive versus other town centres/out of town locations. Furthermore, museum parking should be primarily for those visiting the museum, and it is unlikely that people will park on the seafront and then walk up to the town centre & carry shopping back etc.</p> <p>SUMMARY Car parking at the seafront and car parking in the southern town centre are not interchangeable in use, thus we should not look to maintain *net* numbers here by building a new car park at Southend museum, potentially allowing town centre car parks to be re-developed.</p>	Current car parking in the southern town centre needs to be maintained, and any additional parking e.g. the museum, should be developed incrementally to this, rather than to maintain a net number of spaces.	The document is unsound because it is not: ii. Justified iii. Effective
	PA6	2544	Comment	Regarding point 3a, more information is required here as to what the impact of this would be on traffic flow around the town centre and what the specifics of this plan would be. Where would this traffic be sent instead?		
Respondent	Mrs Carolyn Hutcheon					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
Full Submission						
EiP						
Rep	124	2545	Comment	Encouraging more cycle access to the high street is very welcome. Reduce short car journeys into the town centre by providing an alternative by means of secure cycle parking and a welcoming spirit to cyclists will help reduce unnecessary traffic and congestion into the town. Secure cycle parking is a huge issue, and by secure not just a metal stand that requires a lock but somewhere you know you can leave and lock your bike, even if a small charge was applicable. Additional safe cycle paths/shared space required into the town centre and/or allocated along the high street.		
Respondent	Mrs Collette Kemp					
Full Submission						
EiP						
Rep	DS5	2546	Support	Southend really needs to improve the facilities for pedestrians and cyclists so I and my family are in full support of these proposals. It should be very expensive to park as it is in places such as Cambridge to discourage people from using their car or the town will come to a complete standstill. I would like to see an improvement in air quality, more greenery and less noise. We currently avoid coming into central Southend or bringing visitors there as it is just embarrassing.		
Respondent	Mr Carson Peter					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
Full Submission						
EiP	Written					
Rep	102	2547	Object	Adventure Island should not be considered a landmark. Its just a business on the seafront and not a landmark.	Remove Adventure Island from the category of Landmark	
	125	2548	Object	Visual attractiveness of buildings is "the fashion of the moment". I believe what appears to be a current visually blank building should be remain as it is as it because it represents what was considered fashionable in its time. Any alterations to a building façade should certainly not include decorative lighting as this adds to the energy consumption of the nation causing additional greenhouse gas emissions and additional light pollution.	Leave visually blank building facades as existing.	
	136	2550	Support	I agree		
Respondent	Essex Chambers of Commerce (David Burch)					
Full Submission						
EiP	Appearance					
Rep	DS5	2549	Object	Essex Chambers of Commerce are the main business organisation in the county and have several hundred members based in and around Southend. We generally support Southend Borough Council's aspirations for the development of the town and welcome their desire to broaden the economic base of Southend through the development of Southend Airport, the Airport Business Park, and to improve the town centre, including Victoria Avenue. However, we have concerns that an important, and long standing,		The document is unsound because it is not: ii. Justified iii. Effective

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>sector of Southend's economy is likely to be penalised by one key policy proposal, namely the tourism industry and predominantly the seafront traders, and on this basis we would question whether the plan can genuinely be regarded as sound. The policy in question is DS5 – Transport, Access and Public Realm.</p> <p>We note that the Car Parking Study for the Central Area of Southend (CPS) produced by Steer Davies Gleave, Reference 22958601 November 2016, for the Borough Council identified that <i>there is a clear imbalance in the Southend Central Area parking network at periods of peak demand with car parking to the south of the central area experiencing overcapacity issues, while car parking to the north has available spare capacity. Overall the Study shows that parking areas to the south of Southend Central Area were busiest and exceeded 85% occupancy on one in every ten days between May 2015 and April 2016. (Southend Central Area Action Plan DPD (SCAAP) Revised Proposed Submission – November 2016)</i> Looking to the future paragraph 2.1 of the CPS states that the <i>"The Southend Local Transport Plan 3 (LTP3): Strategy Document outlines key considerations related to Central Area parking provision. It notes that Central Area parking demand is forecast to grow by 25% by 2021"</i> However despite the early recognition of this forecast in the CPS no further account of this projected growth appears to be taken of it in the overall analysis and the predicted increase in future demand for parking is not accounted for within the strategy.</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>Paragraph 2.1 of the CPS also states that <i>"The document notes that Southend Central Area has a high level of car parking, which can encourage people to drive to the Central Area rather than using other more sustainable modes"</i></p> <p>We believe that for some business operations using "more sustainable modes" is a viable option but would question whether that applies to the tourism and leisure sectors. For them high levels of car parking provision are necessary if not essential. They rely on generating sufficient income in the busiest periods of the year to subsidise those periods when they are not so busy. As such the car parking demand for these busy periods must be met to maximise their customer attraction and if it isn't then it jeopardises their viability for the rest of the year. Because of the nature of the tourism sector there will of course be days when they are not so busy and consequently the levels of car parking availability appear to be high but in reality these spaces are necessary. This again is recognised in paragraph 2.1 of the CPS which states <i>"The LTP highlights a seasonal shortfall of parking capacity in certain car parks in summer and in December"</i></p> <p>Any shortfall in parking obviously has the capacity to affect the success or otherwise of businesses in Southend even without the predicted 25% increase in demand that has been predicted.</p> <p>We are aware that the Stockvale Group have undertaken surveys of their visitors between February 2016 and December 2016. These identified that the majority came by car (84.7%)</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>with three to four occupants and had visited Southend more than five times in the last twelve months. These results in our opinion clearly show there is a demand for adequate car parking provision within the Central Area South which is where the majority of the tourism related businesses are located.</p> <p>On this basis we feel that the car parking measures set out in the SCAAP do not meet the future demands of a key sector of the Southend economy, despite the fact that there is a recognition of a growth in parking demand in the future. Such an omission potentially puts at risk the long term viability of this sector. Given that the SCAAP is supposed to be taking a holistic view of the future of the central area we feel this is not reflected in its' parking policy and on this basis is not a sound document for the future development of the town.</p> <p>Finally we would like to highlight the modifications recommended to the Blackpool Local Plan by the planning inspector who considered it. They were of the view that <i>"Any change in parking provision as a result of major redevelopment must not undermine the resort's ability to accommodate visitor trips"</i> With several existing car parks in Southend identified as potential redevelopment sites, especially the major site at Seaways, we would like to see the same policy applied to the SCAAP.</p>		
Respondent	Mr Steve Kearney (SK Architects) on behalf of Stockvale					
Full Submission						

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
EiP	Written					
	132	2552	Object	<p>SKArchitects provide architectural and planning consultancy to the Stockvale Group the main seafront business together with a number of other seafront and town centre businesses.</p> <p>CS1/DS5</p> <p>It is apparent from the manner in which the SCAAP has been compiled that there is a lack of understanding of the demographics of visitors to Southend on Sea and indeed the social economics of the wider catchment area of South Essex and East London.</p> <p>Clearly Southend is a strong day visitor attraction which mainly caters for families from South Essex and East London. The majority of these visitors travel to the town by car and experience great difficulty in travelling into the town and indeed finding a parking space within proximity to the Central Seafront.</p> <p>It is also clear that whilst tourism is a key strength the fragility of the tourist economy is dependent upon easy vehicular access into the town and parking arrangements once in the Central Seafront area. We believe that the Local Authority through the SCAAP have dramatically under represented the value of the tourist economy to the SCAAP area.</p> <p>The SCAAP fails completely to have regard for the necessity of the Seafront businesses to operate to maximum capacity on the sunny days. Without maximizing the income on such days, there is a challenge to the very sustainability of the Seafront as an attraction and the associated Seafront businesses.</p>	<p>We believe that the SCAAP has not been positively prepared and is flawed in relation to the Council's understanding of the tourist economy and the difference between tourism and leisure. As a result there is lack of engagement with needs of Seafront businesses. The SCAAP needs to be comprehensively reconsidered in relation to the importance of easily accessible and convenient parking for the Seafront. This in particular needs to factor the number of very busy days when the sun is shining as opposed to a global approach of parking provision within the wider Central Area. Through the SCAAP parking provision needs to focus on periods of peak demand to reduce and improve upon the existing over capacity issues. As has been clear with other plan making processes in seaside towns the importance of being able to cater for these peak days has been acknowledged. This is what seafront businesses in other seaside towns and the tourist economy rely upon to ensure their future sustainability.</p> <ul style="list-style-type: none"> • We believe that the document is unsound as it has not been positively prepared. The SCAAP has not engaged appropriately with the key economic driver of tourism within the Central Area. There has been a complete lack of understanding of tourism and the differences between tourism and leisure. • The SCAAP has not been justified in relation to its previous consultation responses and the Council's complete 	<p>The document is unsound because it is not:</p> <ol style="list-style-type: none"> Positively prepared Justified Effective

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>Whilst the Council would like to see the tourist economy increase and include longer stay visits, this to some extent negates the success of the day visits and the importance of those day visits to the local economy. The Local Authority's encouragement of staycation as opposed to day visits will potentially be to the detriment of the existing seaside offer. This is likely to see a decline of the family orientated day visits that Stockvale in the main have promoted and extensively invested in. Through the continued reinvestment by the Stockvale Group and other Seafront businesses Southend as a seaside town has seen significant regeneration and is now a safe, clean, high quality family destination of choice.</p> <p>The SCAAP is primarily based on the residential intensification of the central area with development opportunities identified on existing public car parks. Through the SCAAP the Council want to see and encourage alternative modes of transport within the Central Area. This should be an aspiration for the new residents in the Town Centre and not day visitors. However in reality there will be a parking demand as a result of the proposed residential re-use and regeneration of the Central Area and this will be at further detriment to the already strained public car parking provision and in particular the southern part of the SCAAP area.</p> <p>Whilst the Council have indicated no net loss, this is not an aspiration for growth! Indeed it has been made very clear to the Council through various consultations that their position of no net loss will</p>	<p>dismissal of the concerns that have been raised by the primary economy.</p> <ul style="list-style-type: none"> The SCAAP is not effective as it will not deliver growth within the tourist economy and completely neglects the importance of the tourist economy to the Central Area. Clearly the primary economy of tourism has a secondary impact on the High Street retail and associated offer. 	

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>see no further growth or investment from the seafront businesses. The seafront economy is already declining due to the constrained access and parking arrangements and the SCAAP does not encourage or indicate any improvement. It is also apparent that the Council's approach towards consultation, has seen a total lack of any acceptance or awareness of the importance of the tourist economy to the Central Area and indeed the difference between tourism and leisure. The Seafront businesses have gone to lengths to explain this difference to the Council through their consultation responses to-date which have been completely discarded. This has currently removed any confidence in those businesses to further invest and will, as suggested see a decline in the Seafront and tourist economy of Southend unless the Local Authority dramatically review the proposed SCAAP.</p> <p>As part of the car parking study in the local transport plan 3 the Central Area parking demand is forecast to grow by 25% by 2021. The car park study undertaken by Steer Davies Gleave as part of the SCAAP takes no account of this projected growth and the Councils position in no net loss against their own local transport plan indicates a clear flaw in the SCAAP analysis of Public Car Parking Provision.</p> <p>Summary Through the SCAAP Southend on Sea Borough Council have failed to recognise the difference between tourism and leisure and indeed the importance of access and easy parking in close</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>proximity to the Central Seafront for the tourist economy day visitor customer base.</p> <p>The Council have identified a number of the surface car parks for redevelopment with a principle of no net loss of car parking spaces, however, this has been made clear through consultation that this a standstill position which will not encourage any further re-investment and growth in the tourist economy.</p> <p>Southend is in a unique position in terms of the success of its tourist economy and Central Seafront. This relies heavily on its catchment area of South Essex and East London and the unique social economics and demographics of its geography and its proximity to London.</p> <p>The Seafront economy is absolutely reliant on day visits. The day visits market is being and will further be discouraged by the sheer frustration of visitors' inability to easily access the town and to find convenient car parking facilities in close proximity to the Seafront.</p> <p>If the Council do not engage in the concerns that have been raised by the Seafront businesses it is inevitable that the renewal and regeneration that has occurred over the last two decades will start to recede and the Seafront will decline like many other seaside around Britain.</p>		
Respondent	Ms Louise McDermott					
Full Submission						
EIP						
Reps	136	2553	Comment	The parking situation in Southend on warm/sunny days is horrendous, many days being		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				total gridlock down the seafront. This is not sustainable for the town and contributes to environmental pollution which has health effects. The move should be away from parking in the congested areas - encourage people to park and ride, use the numerous train stations, etc, on peak days.		
	81	2554	Object	Although tourism is important for Southend there are residents here who are affected by it. In order for the area to thrive with happy communities there should be a healthy and balanced mix however it appears that the tourist pound is valued above all else	There is more to Southend than the Central Seafront - the plan should look at other areas instead of turning this area into a tacky and over saturated nightmare. The plan mentions sustainability but it is not so.	The document is unsound because it is not: i. Positively prepared
	73	2555	Object	The development of so many properties may meet one target but what about the effects on the infrastructure? No thought seems to have been given to the extra provision that will be required for services such as doctors, green space, car parking. This mentality is incredibly short sighted and does not bode well for cohesive communities.	Where housing is implemented there must be the associated services available that are not saturated, parking for the new residents, extra green space so that people do not go stir crazy and feel the need to drive to the seafront, which is already over saturated with visitors. It is not sustainable.	The document is unsound because it is not: i. Positively prepared
	120	2556	Object	Green fields wherever possible? Where are the green fields in this area? There are none. We have seen the shambles of the developed shared space seafront and the flooding the occurs there when it rains heavily. The newly proposed accommodation will put even more strain on this area and increase the risk of flooding unless a concrete plan is put in place to prevent it. The development should not be allowed until the drainage is guaranteed to be failsafe.	"Where possible" is not acceptable in these circumstance. Unless the drainage is failsafe then development should not occur. It is not sustainable.	The document is unsound because it is not: i. Positively prepared
	15	2557	Object	I object to sustainability being used as a buzz word when the plan itself does not make enough	Sustainable needs to be implemented in a meaningful way. Incentivise people to avoid	The document is unsound because it is not:

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				effort to deal with the current issues of traffic gridlock and over saturation of the seafront along with building numerous flats with no regard for the additional infrastructure required	driving. Where housing developments are planned provide green space, additional facilities and show how the infrastructure is good enough to support the additional residents. All this strategy does is pay lip service to the idea of sustainability.	i. Positively prepared
Respondent	Tracy Abbott					
Full Submission	<p>Myself and my partner live at 111 Baxter avenue and received your letter regarding town developments. We do support the policies and plans in the document, but wish to make a few comments.</p> <p>The Baxter avenue area is very dark at night and does not feel safe to walk around, there are often groups of people gathering in the car parks by the office buildings and being quite destructive at times. It is also a place where cars are often abandoned, as well as old furniture left outside homes.</p> <p>As residents we purchased our house on a leasehold with a property management company called gateway. They were ineffective and charged obscene amounts for maintenance they weren't carrying out. We managed to take over the management of our building going through legal proceedings. This wasn't easy to do and if the council or property developers could avoid using them in the future I would recommend this. Where possible residents should be supported to maintain and improve their properties. We desperately want to improve the inside and outside of our property and some sort of help or loan service to do this would also improve the appearance of the area. We are only able to even begin doing this now we have escaped gateway property management, and it is a slow process due to the funds needed to make old houses safe, warm and presentable.</p> <p>I definitely agree that more stable and consistent alternative education is needed in Southend. Particularly due to the high rate of exclusions in mainstream schools, meaning vulnerable children are not in full time education and are likely to turn to more dangerous pursuits. There are some existing tutoring services that could be extended and although more specialist provision is costly, it should reduce the long term costs of children being out of education and not gaining employment. I also believe more reasonable parking for visitors would encourage tourism, as well as a focus on maintaining the seafront amenities and managing high levels of litter. More programmes to encourage people to look after their local area would be great. Such as anyone who posts a certain amount of selfies improving the town gets a reward of some kind. This could also be a great opportunity to develop the skills of youngsters who aren't engaging in the classroom.</p> <p>There are lots of great places to eat in Southend and a food festival with local businesses would be a great way of helping them spread the word. I think the local offer needs to be easier to access and there should be a larger social media presence to advertise all the great businesses, services and residents we have. I think a lot of the green spaces and churches we have are great and am also pleased to hear that improvements are being made to the area. If resident numbers and housing are increasing then parking, healthcare, education and other public services will need to be expanded. The hospital will also need to be able to cope with this increase in residents.</p>					
EIP						
Reps	210	2562	Comment	Need to improve and maintain the Baxter Avenue area.		
	142	2563	Support	Support the need for educational facilities in the town.		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	210	2564	Comment	Area needs to be accessible and marketed effectively. Increasing housing should be matched by increases in parking.		
	97	2565	Support	The green spaces we have are great and am also pleased to hear that improvements are being made to the area.		
Respondent	Ian Goodchild					
Full Submission	<p>Much has been said over the past about traffic /parking /development re the central seafront with comments to the council from say the operators of all the entertainments and now a new museum in place of slip cliffs and loss of a band stage , I would ask the council to look at the possibility of creating from the old swimming pool from a reclaimed sea area say 200 yards out eastwards towards the pier a raised area for parking and other seasonal events with a sand beach area at the eastern end out of the outgoing tidal flow this would preserve the sand and safety of swimmers creating a small bay ,decrease the flood tides which each year invade the carriage way, cost from the moaning(about lack of parking) playground operators and others /museum/seaway developer. it would also be good to see a band stage at roof level on the museum and some parking at that level. Back to sea level why not include a green area c/w trees some shade(keep tree fellers off) and a channel for your ne. Roads and access from the east of town, not much has changed from 1940,s the A127 became dual carriage way a new single road adjacent to the airport and the sea front has been down graded very much Shoeburyness was with population say 8K and garrison now pop increased to 20K Thorpe Bay was 3k now 9k. so many minor improvements to roads and the dual roads all go back into single original roads Sutton road is now over used as is A127 and suffer any accident/blockage we all know other routes ie Prittlewell chase and London roadA13 .To assist with blockages how about considering another link from Sutton rd/ industrial site/Journeymans ways and north of the sports ground in to an improved Warner's bridge close/improved bridge crossing at least this would relieve and offer alternate road way also if the proposed football stadium ever materialised foot access from the airport station.</p>					
EIP						
Reps	Policy CS1	2566	Comment	Should look at the possibility of creating from the old swimming pool from a reclaimed sea area say 200 yards out eastwards towards the pier a raised area for parking and other seasonal events with a sand beach area at the eastern end out of the outgoing tidal flow this would preserve the sand and safety of swimmers creating a small bay ,decrease the flood tides which each year invade the carriage way,		
	Policy CS1 – OS CS1.4	2567	Comment	Like to see band stage at roof level on the museum and some parking at that level		
	123	2568	Comment	Roads heavily congested. To assist with blockages how about considering another link		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				from Sutton rd/ industrial site/Journeymans ways and north of the sports ground in to an improved Warner's bridge close/improved bridge crossing at least this would relieve and offer alternate road way also if the proposed football stadium ever materialised foot access from the airport station.		
Respondent	Mr Ron Woodley (BERA)					
Full Submission	<p>Car parking and development overview</p> <p>Having read the consultation document please see BERA's comments below regarding the Southend Central Area Action Plan (SCAAP). It appears to me that there needs to be some clarification concerning parking. It has to be borne in mind that the more car parking spaces there are along Southend seafront, the more chance there is of substantial traffic flow problems throughout the town in high seasonal periods, including the seafront. It is on this basis that officers should be instructed to consider a number of options. These options should include having zone parking charges in individual car parks, depending whether they are north or south of the railway line, to encourage footfall along the High Street.</p> <p>To try and alleviate problems in relation to the re-development of Queensway, Seaway car park, Marine Plaza and the town centre, proposals should be considered to multi-storey Tylers Avenue car park as a first stage, before developing the car parks in Clarence and Alexandra Street and of course Warrior Square. The aim should also include relocation of the bus station from its current position, to that of the rebuilt Tylers Avenue car park, to encourage greater use of the bus service. This could also boost the chances of Southend-on-Sea becoming a City in the future. Another phase to be considered would be the compulsory purchase of the old gas works site to enable car parking to take place while the Seaway car park and the town centre were being developed. Also we should be expediting the plans to build the 200 space car park for the new museum as a first stage of that development, replacing the unofficial car park on the Marine Plaza site, opposite the Kursaal.</p> <p>Finally, the Council should be encouraging more use of the car parks in the eastern and western parts of town, a free of charge land train during the peak summer periods has to be considered, with the car parking ticket being used as the free ticket to ride. The planning and phasing of this would be in conjunction with whatever development proposals come through first. It is BERA's opinion that no matter how many car parking places are provided, there will, at some point during the year, be a potential for lack of capacity. What we cannot do, is have empty parking spaces for the majority of the year, which will have no financial benefit to the town at all. The plans should also consider maximising the use of public transport, with serious consideration especially given in encouraging people to use the Southend-bound trains. One thing is for certain, the Council should never contemplate putting a decked car park on the beach side of the sea front, as this would restrict sea views and create a narrowing effect on the promenade between any proposed decked car park and the beach.</p> <p>Southend-on-Sea, over the next 10-15 years, has a fantastic opportunity to develop and be financially and economically stable, mainly because of the proposals of the growing business projects coming forward. The planning of all these opportunities will, instead of restricting our tourism industry, be crucial in creating opportunities in education, skills, jobs and infrastructure improvements. I will now go into detail on the SCAAP document itself.</p> <p>Below are the revised proposed amendments from the original consultation process.</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>As part of the local planning framework it would be useful to have an indication of likely timescales of the forthcoming aspects of the plan process. Specifically the new Local Plan will set out new long term growth targets which will include a review of SCAAP proposals but there is no indication of timescales. We have no idea at this stage of when SCAAP is expected to be adopted and therefore how long it may be valid.</p> <p>The introduction also makes reference (1.2 para 7) to a joint assessment of needs for the housing market but, and this was asked at the consultation draft stage, no indication as to who the joint assessment will be with.</p> <p>Context and Issues</p> <p>Page 8 Housing</p> <p>There seems to be a preoccupation with footfall to the extent that this supposed increase in footfall is the sole argument for providing more housing in the plan area. But the validity of this point is dubious. Residential areas are devoid of on street activity in the evening. The justification for more housing in the SCAAP area needs to be more robustly made. If greater footfall is required then leisure activities and housing are required, not solely housing.</p> <p>Page 9 Access and car parking</p> <p>The policy on accessibility appears to be skewed towards satisfying the demands of the residents of the Central area whereas additionally accessibility improvements must satisfy those wishing to access the area from outside. You appear to ignore the fact that a significant factor in determining car park usage overall and in particular the town centre and between individual car parks is the cost of parking, eg zoning.</p> <p>Page 18 para 48/49</p> <p>The reality is that the High Street no longer provides any unique shopping experiences. The lack of investment shows that there is little sign the retailers have any interest in boosting Southend. Already most disposable income of Southend residents for non-food shopping finds its way to the regional centres including Chelmsford because the quality of merchandise on offer in our high street is so poor.</p> <p>Para 52</p> <p>One way of encouraging a temporary uplift to empty units is to provide an example by dealing with the council's own property, and although it is not on the primary shopping frontage it is in a prime location. We are talking about the unit at the foot of the pier lift which has been empty since it was built. Perhaps the local college could be encouraged to join with businesses to provide visual displays.</p> <p>Page 20 Policy DS1</p> <p>Are you able to define in a planning context how a particular café/restaurant would contribute to the vitality of the town centre .Because Southend at present probably has as many restaurants/cafes/fast food outlets as anywhere in the country but the overwhelming majority are of poor quality. The prospect of more of the same potentially making up 40% of the High Street is an appalling prospect not a unique and diverse visitor/shopper experience you are seeking.</p> <p>Map 3</p> <p>It is difficult to see why the western side of the High street south of Alexandra Road has been downgraded to a secondary shopping frontage when a) the eastern side is primary and b) it is immediately at the meeting between the high street and the sea front. It seems to offer no less potential than the eastern side and is important in setting the scene for visitors from the sea side activities into the town. It should remain primary shopping frontage.</p>		
EIP						
Reps	Policy Cs1	2569	Comment	The more car parking spaces there are along Southend seafront, the more chance there is of substantial traffic flow problems throughout the		

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				town in high seasonal periods, including the seafront		
	Policy DS5	2570	Comment	Parking zone charges for individual car parks should be made, depending whether they are north or south of the railway line.		
	Policy DS5 and Policy PA7	2571	Comment	To try and alleviate problems in relation to the re-development of Queensway, Seaway car park, Marine Plaza and the town centre, proposals should be considered to multi-storey Tylers Avenue car park as a first stage, before developing the car parks in Clarence and Alexandra Street and Warrior Square.		
	Policy PA7	2572	Comment	The aim should be to relocate the bus station from its current position, to that of the rebuilt Tylers Avenue car park, to encourage greater use of the bus service.		
	Policy CS1	2573	Comment	The compulsory purchase of the old gas works site to enable car parking to take place while the Seaway car park and the town centre were being developed should be considered.		
	Policy CS1 OS CS1.4	2574	Comment	Should be expediting the plans to build the 200 space car park for the new museum as a first stage of that development, replacing the unofficial car park on the Marine Plaza site, opposite the Kursaal		
	134	2575	Comment	The Council should be encouraging more use of the car parks in the eastern and western parts of town. A free of charge land train during the peak summer periods has to be considered, with the car parking ticket being used as the free ticket to ride.		
	Policy DS5	2576	Comment	No matter how many car parking places are provided, there will, at some point during the year, be a potential for lack of capacity. What we		

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				cannot do, is have empty parking spaces for the majority of the year, which will have no financial benefit to the town at all. The plans should also consider maximising the use of public transport, with serious consideration especially given in encouraging people to use the Southend-bound trains. One thing is for certain, the Council should never contemplate putting a decked car park on the beach side of the sea front, as this would restrict sea views and create a narrowing effect on the promenade between any proposed decked car park and the beach.		
	7	2577	Comment	It would be useful to have an indication of likely timescales of the forthcoming aspects of the plan process. Specifically the new Local Plan will set out new long term growth targets which will include a review of SCAAP proposals but there is no indication of timescales. We have no idea at this stage of when SCAAP is expected to be adopted and therefore how long it may be valid.		
	7	2578	Comment	The introduction makes reference (1.2 para 7) to a joint assessment of needs for the housing market but, and this was asked at the consultation draft stage, no indication as to who the joint assessment will be with.		
	68	2579	Comment	There seems to be a preoccupation with footfall to the extent that this supposed increase in footfall is the sole argument for providing more housing in the plan area. But the validity of this point is dubious. Residential areas are devoid of on street activity in the evening. The justification for more housing in the SCAAP area needs to be more robustly made. If greater footfall is required		

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				then leisure activities and housing are required, not solely housing.		
	Policy DS5	2580	Comment	The policy on accessibility appears to be skewed towards satisfying the demands of the residents of the Central area whereas additionally accessibility improvements must satisfy those wishing to access the area from outside. You appear to ignore the fact that a significant factor in determining car park usage overall and in particular the town centre and between individual car parks is the cost of parking, eg zoning.		
	Policy DS1	2581	Comment	The reality is that the High Street no longer provides any unique shopping experiences. The lack of investment shows that there is little sign the retailers have any interest in boosting Southend. Already most disposable income of Southend residents for non-food shopping finds its way to the regional centres including Chelmsford because the quality of merchandise on offer in our high street is so poor.		
	Para 52	2582	Comment	One way of encouraging a temporary uplift to empty units is to provide an example by dealing with the council's own property, and although it is not on the primary shopping frontage it is in a prime location. We are talking about the unit at the foot of the pier lift which has been empty since it was built. Perhaps the local college could be encouraged to join with businesses to provide visual displays.		
	Policy DS1	2583	Comment	Are you able to define in a planning context how a particular café/restaurant would contribute to the vitality of the town centre .Because Southend		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				at present probably has as many restaurants/cafes/fast food outlets as anywhere in the country but the overwhelming majority are of poor quality. The prospect of more of the same potentially making up 40% of the High Street is an appalling prospect not a unique and diverse visitor/shopper experience you are seeking.		
	Map 3	2584	Comment	It is difficult to see why the western side of the High street south of Alexandra Road has been downgraded to a secondary shopping frontage when a) the eastern side is primary and b) it is immediately at the meeting between the high street and the sea front. It seems to offer no less potential than the eastern side and is important in setting the scene for visitors from the sea side activities into the town. It should remain primary shopping frontage.		
Respondent	Amanda Parrott (Basildon Council)					
Full Submission	<p>Consultation Response to Southend Central Area Action Plan Revised Submission November 2016</p> <p>Thank you for consulting Basildon Borough Council on the Southend Central Area Action Plan Revised Submission November 2016. Please accept this letter as the response of Basildon Borough Council to the consultation.</p> <p>Please be advised that the proposals set out in the Southend Central Area Action Plan Revised Submission have been reviewed, and are not considered to have an adverse impact on Basildon Borough, its residents or proposals for the regeneration of Basildon Town Centre. Basildon Borough Council does not therefore seek to raise an objection to the Southend Central Area Action Plan Preferred Approach.</p> <p>Furthermore, it is recognised that additional work has been undertaken by Southend-on-Sea Borough Council to identify opportunity sites with the potential to deliver additional housing supply within the Southend Central Area, over and above that initially proposed in the Southend Core Strategy. This is welcomed by Basildon Borough Council in terms of meeting housing needs arising within the South Essex Housing Market Area. I trust this response is of assistance to you in progressing the Southend Central Area Action Plan.</p>					
EIP						
Reps	1	2585	Comment	The proposals set out in the Southend Central Area Action Plan Revised Submission have been reviewed, and are not considered to have an		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				adverse impact on Basildon Borough, its residents or proposals for the regeneration of Basildon Town Centre. Basildon Borough Council does not therefore seek to raise an objection to the Southend Central Area Action Plan		
	72	2586	Comment	Additional housing provision welcomed.		
Respondent	Mr Tony Nathan					
Full Submission	<p>Having waded through the Southend Central Action Plan (SCAAP) I am appalled by the proposals. Southend is a seaside resort an image successive councils have tried to suppress, even from before the days of Maplin. Success is not based restricting visitors, trying to make Southend unwelcoming or strangling business. Southend Council has a very poor reputation amongst the public for doing anything right! Encourage visitors and make Southend a 12 month attraction. To achieve this the most obvious is ease of car and coach parking with reasonable parking charges. Hotel chains have committed to coming to Southend. After years of dithering the Council released its unprofitable grip on the Airport to a company with business acumen – Stobart. (A hint there perhaps?)</p> <p>Reading this it might be thought that there is nothing constructive in it, but I want Southend Borough Council to think very carefully about these proposals. It should be remembers that Southend seafront is an asset that should be maintained as a key attraction. The High Street is struggling (Mainly by restricting parking and high parking charges). Come to think of it that might be the reason the suspicious claim that only 25% of visitors to Southend come by car – they are frightened off and have probably gone to Bluewater or Lakeside.</p>					
EIP						
Reps	DS5	2587	Object	Appalled by the proposals. Encourage visitors and make Southend a 12 month attraction. To achieve this it is obvious we need ease of car and coach parking with reasonable parking charges.		
	CS1	2588	Comment	It should be remembered that Southend seafront is an asset that should be maintained as a key attraction. The High Street is struggling (Mainly by restricting parking and high parking charges). Come to think of it that might be the reason the suspicious claim that only 25% of visitors to Southend come by car – they are frightened off and have probably gone to Bluewater or Lakeside.		
Respondent	Mrs Brenda Philips					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
Full Submission	<p>This being our second attempt to make a our comments on the SCAAP we hope it is successful.</p> <p>We are surprised and shocked that the SCAAP as it stands, incorporates the demolition of perfectly good dwellings in Baxter Avenue. If this were part of a 'slum clearance' programme, we would support it although with reservations.</p> <p>This seems to us, to be using a sledge hammer to crack a nut. Genesis (whom we have already contacted - no reply as yet) need to look at the management of the development and offer refurbishment where it is needed.</p> <p>Central Southend already has a high population density which will increase once the Office blocks are 'morphed' into flats. We feel that little consideration has so far been given to the infrastructure.</p>					
EIP						
Reps	PA8.2	2589	Comment	We are surprised and shocked that the SCAAP as it stands, incorporates the demolition of perfectly good dwellings in Baxter Avenue.		
	CS1	2590	Comment	Central Southend already has a high population density which will increase once the Office blocks are 'morphed' into flats. We feel that little consideration has so far been given to the need for infrastructure.		
Respondent	Rochford District Council (Natalie Heyward)					
Full Submission	<p>Thank you for inviting Rochford District Council, as a neighbouring Local Planning Authority, to comment on the above consultation.</p> <p>In principle the Council does not object to the Southend Central Area Action Plan as currently drafted. Southend town centre offers one of the largest retail experiences in proximity to Rochford District, and on the whole has a different retail offer to the main towns of Rayleigh, Hockley and Rochford. The Council generally supports the draft proposals to enhance the main retail core within the primary shopping area. The Council notes that the draft Southend Central Area Action Plan continues to be based on the Core Strategy, as this is the current local development plan for the Borough. In light of the identification of a much higher objectively assessed need for housing – although it is acknowledged that this is not the housing target, and needs to be tested through the plan-making process in line with national policy and guidance – the Council recommends that the draft Southend Central Area Action Plan should seek to exceed Core Strategy targets, wherever possible. It is recognised that bringing forward the draft Southend Central Area Action Plan will be instrumental in delivering dwellings in the short term, during the preparation of the new Southend Local Plan. A review of the draft Southend Central Area Action Plan prior to 2021, as appropriate, after adoption of a new Local Plan would also be welcomed.</p>					
EIP						
Reps	Policy DS1	2591	Support	Southend town centre offers one of the largest retail experiences in proximity to Rochford District, and on the whole has a different retail offer to the main towns of Rayleigh, Hockley and Rochford. The Council generally supports the		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				draft proposals to enhance the main retail core within the primary shopping area. .		
	67	2592	Comment	The Council notes that the draft Southend Central Area Action Plan continues to be based on the Core Strategy, as this is the current local development plan for the Borough. In light of the identification of a much higher objectively assessed need for housing – although it is acknowledged that this is not the housing target, and needs to be tested through the plan-making process in line with national policy and guidance – the Council recommends that the draft Southend Central Area Action Plan should seek to exceed Core Strategy targets, wherever possible		
	67	2593	Support	It is recognised that bringing forward the draft Southend Central Area Action Plan will be instrumental in delivering dwellings in the short term, during the preparation of the new Southend Local Plan.		
	7	2594	Support	A review of the draft Southend Central Area Action Plan prior to 2021, as appropriate, after adoption of a new Local Plan would be welcomed.		
Respondent	Southend Business Partnership (Murray Foster)					
Full Submission	<p>I write in regard to Southend Central Area Action Plan (revised proposed submission November 2016) and wish to raise some observations and concerns for consideration on behalf of Southend Business Partnership:-</p> <p>We are broadly supportive of the Strategy, Criteria based Policies and proposed Opportunity Sites subject to there being no detrimental impact to parking access and capacity particularly south of the Southend to Fenchurch St railway line</p> <p>In regard to parking aspects we would comment further:-</p> <ul style="list-style-type: none"> Southend Borough Council's Business Survey 2016 clearly showed that businesses rated "Parking" as their biggest concern <i>"negative factors impacting on the performance of your business"</i> - (Q14) 					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<ul style="list-style-type: none"> Southend Business Partnership's response to the Thames Estuary Growth Commission 2050- Call for Ideas highlighted the need for "New underground parking provision within the town centre" commenting "Southend's tourism offer is strong and has shown persistent growth during the last 5 years. However, on busy days, the number of people that can access the seafront and town centre is restrained by the number of car parking spaces available. New, subterranean parking provision will reduce the congestion created by motorists trawling the parking spaces; enable the tourism industry to further expand whilst preserving the utility of the surface land for development". Opportunity South Essex's (formerly South Essex Growth Partnership) new Growth Strategy indicates that there will be significant job creation and housing growth across South Essex including Southend. This will inevitably result in more people visiting Southend as a tourism and leisure destination; provided our offers remain fit for purpose, with the need for having the capacity in place both parking and infrastructure access to welcome them. This means our parking provision and access to it needs to be improved from now on as otherwise our tourism and leisure destination attractiveness will be compromised and future investment could be jeopardised. We need to continue to be able to retain and enhance the existing core tourism seafront offer which attracts thousands of people to the town whilst widening the range of our offers to attract new visitors to the town. <p>Notwithstanding the above observations re access to and capacity of car parking we do feel that the supplementary document "Car Parking Study for the Central Area of Southend" does go somewhat towards proposing mitigating measures however measures indicated "in the medium term "2-5 years" (page 2 of recommendations) do in our view need to be fast tracked and implemented within a 2-3 year period. We do identify with increasing parking supply for peak periods through a weekend and public holiday Park & Ride (train) but additionally broadening it to potentially to include Benfleet and Pitsea stations in addition to Leigh on Sea. However in the immediate term we would ask the Council to actively monitor the capacity and accessibility of parking, particularly at known busy times (Bank Holidays/summer weekends), and committing to taking earlier action if there is seen to be a worsening situation.</p>		
EIP						
Reps	3.1 (30)	2595	Comment	We are broadly supportive of the Strategy, Criteria based Policies and proposed Opportunity Sites subject to there being no detrimental impact to parking access and capacity particularly south of the Southend to Fenchurch St railway line		
	123	2596	Comment	Southend Borough Council's Business Survey 2016 clearly showed that businesses rated "Parking" as their biggest concern.		
	130	2597	Comment	Southend Business Partnership's response to the Thames Estuary Growth Commission 2050- Call for Ideas highlighted the need for "New underground parking provision within the town centre		
	130	2598	Comment	Opportunity South Essex's (formerly South Essex Growth Partnership) new Growth Strategy indicates that there will be significant job		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>creation and housing growth across South Essex including Southend. This will inevitably result in more people visiting Southend as a tourism and leisure destination; provided our offers remain fit for purpose, with the need for having the capacity in place both parking and infrastructure access to welcome them. This means our parking provision and access to it needs to be improved from now on as otherwise our tourism and leisure destination attractiveness will be compromised and future investment could be jeopardised. We need to continue to be able to retain and enhance the existing core tourism seafront offer which attracts thousands of people to the town whilst widening the range of our offers to attract new visitors to the town.</p>		
	130	2599	Comment	<p>The supplementary document "Car Parking Study for the Central Area of Southend" does go some way towards proposing mitigating measures however measures indicated "in the medium term "2-5 years" (page 2 of recommendations) do in our view need to be fast tracked and implemented within a 2-3 year period</p>		
	136	2600	Comment	<p>We do identify with increasing parking supply for peak periods through a weekend and public holiday Park & Ride (train) but additionally broadening it to potentially to include Benfleet and Pitsea stations in addition to Leigh on Sea. However in the immediate term we would ask the Council to actively monitor the capacity and accessibility of parking, particularly at known busy times (Bank Holidays/summer weekends),</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				and committing to taking earlier action if there is seen to be a worsening situation.		
Respondent	Mr Glen Cameron (Capital Services Facilities Ltd)					
Full Submission	I wish to register my disapproval of the proposed changes to the car parks in Southend.					
EIP						
Reps	Policy DS5	2601	Object	I wish to register my disapproval of the proposed changes to the car parks in Southend		
Respondent	Mr Martin Barrell (Environment Agency)					
Full Submission						
EIP						
Reps	29	2602	Support	We support the inclusion of objectives 9 and 10		Legally Compliant – Yes Sound - Yes
	DS4	2603	Support	We support the inclusion of this policy, in particular the comprehensive flood risk requirements in part 1 of the policy.		Legally Compliant – Yes Sound - Yes
	121	2604	Support	We fully support this requirement for early consideration of SuDS. This should assist in delivering the best possible schemes, to benefit flood risk reduction, biodiversity and amenity.		Legally Compliant – Yes Sound - Yes
	118	2605	Support	We support the reference to SuDS information and guidance. However, the references should be updated. The 'Non Technical Standards for Sustainable Drainage were published by DEFRA March 2015. The CIRIA SuDS Manual was updated in 2015. SuDS designs should also include sufficient treatment steps to ensure that	See Representation	Legally Compliant – Yes Sound - Yes

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				water quality is protected, the SuDS manual details this.		
	116	2606	Support	We support this paragraph which highlights the need for an early consideration of the FRA. We would also highlight that we would charge for detailed pre-application advice. This paragraph could direct developers to the 'Model Checklist' for Site Specific Flood Risk Assessment' in the flood risk and coastal change section of the Planning Practice Guidance in the first instance .	See Representation	Legally Compliant – Yes Sound – Yes
	CS3	2607	Support	We support part 2 of this policy, which seeks to protect biodiversity and flood risk interests.		Legally Compliant – Yes Sound – Yes
	97	2608	Support	We support the linking of green spaces. A linked network of green spaces and habitats creates a more robust framework for biodiversity.		Legally Compliant – Yes Sound – Yes
	CS2	2609	Support	We support part (e) of this policy in particular which again is promoting a joined up approach to green space provision across the area.		Legally Compliant – Yes Sound – Yes
	CS1	2610	Support	We support part (e) of this policy promoting an integrated approach to flood risk management.		Legally Compliant – Yes Sound – Yes
	111	2611	Support	We support the reference to the SMP and the future flood management requirements. This section would be further strengthened by also including reference to the Thames Estuary 2100 (TG2100) Plan policies for this area. The Plans recommended flood risk management policy for Leigh Old Town and SOS is "to take further action to keep up with climate and land use change so that flood risk does not increase".		Legally Compliant – Yes Sound – Yes
Respondent	Miss Ruth Wharfe					
Full Submission						
EIP						

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
Reps	CS2	2612	Support	Support approach to conserving nature and biodiversity – would welcome opportunity for more wildlife habitats in central seafront area.		Legally Compliant – Yes Sound – Yes
	72	2613	Support	Support provision of more housing particularly a good mix of affordable housing including consideration for the homeless		Legally Compliant – Yes Sound – Yes
Respondent	Mrs Gillian Crossley					
Full Submission						
EIP						
Reps	CS1	2614	Comment	Better access to the seafront . The lift to be repaired quicker. More access to toilets in the town and seafront.		
	PA1	2615	Comment	Better access to the seafront. The lift to be repaired quicker. More access to toilets in the town and seafront.		
Respondent	Powerhaus Consultancy on behalf of Southend United Football Club					
Full Submission	<p>We write on behalf of Southend United Football Club (SUFC) to make representations concerning the Southend Area Action Plan (SCAAP) Revised Proposed Submission (November 2016). Our principle objection to the SCAAP is the removal of and the lack of an allocation of the Roots Hall Football Stadium site at Victoria Avenue, for future mixed--use development. The site, which comprises the stadium, stadium parking, SUFC shop, housing fronting Victoria Avenue and commercial property fronting Fairfax Drive, was formerly allocated in the SCAAP Preferred Approach Document (December 2015). Roots Hall was designated in the December 2015 document for mixed--use development for convenience retail and approximately 290 homes, for development post 2021 (ref: OS13). The SCAAP (November 2016), however now omits the site from any formal allocation. No explanation in the document has been given as to the subsequent exclusion of the Roots Hall site from the Opportunity Sites of the SCAAP (November 2016). And it is of particular surprise to the Club that the site allocation has been removed, despite the advanced stage of pre--application discussions for the relocation of the football stadium to Fossetts Farm and consequential redevelopment of the Roots Hall site.</p> <p>The Council will be aware of the emerging development proposals for both sites and that subject to securing planning permissions, the developments are capable of commencing delivery from 2018/19 onwards. The availability for the Roots Hall site for development is subject to the relocation of the Southend United Football Club stadium. SUFC has expressed intent for over 10 years through the planning process, for the club to relocate to a new stadium at Fossetts Farm. Planning permission was previously granted in 2008 for the stadium relocation and enabling development, and the linked permission for the training grounds (within Rochford District Council) is extant. Therefore, the Roots Hall site can be considered to be available for development in the future due to the clear intent of SUFC to create an alternative location for the stadium, and the site should therefore be allocated in the SCAAP. Moreover, the Club and its development partners have been involved in extensive and on--going pre-- application discussions with the Council for over a year on the development proposals for both the Roots Hall and Fossetts Farm sites. These discussions are at an advanced stage and SUFC have expressed</p>					

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	<p>intention to submit the two applications concurrently early in 2017. Therefore, subject to the grant of planning permission, the site could be available for development within the next 5 years (pre--2021).</p> <p>The redevelopment of the Roots Hall site will provide 675 homes in a strategic, town centre location, in addition to providing up to approximately 4,000sqm of mixed retail including a foodstore and enhancing the shopping frontage on Victoria Avenue as a gateway to the Southend Central Area. This development would support the strategic objectives of the SCAAP and would most importantly contribute towards housing delivery in the Borough in the earlier part of the Plan (pre--2021).</p> <p>The SCAAP (November 2016) refers to the Core Strategy (December 2007) targets for housing provision in the Town Centre Area and the ability of the SCAAP to meet the outstanding requirement for the remainder of the plan period (to 2021). The Core Strategy target set is 325 dwellings per annum for the plan period (2001--2021). However, the most recently identified objectively assessed housing need for Southend grossly exceeds the plan target at 950--1135 dwellings per annum for the period of 2014--2037 (South Essex Strategic Housing Market Assessment, May 2016). Furthermore, the Council has recently highlighted its difficulty in meeting its objectively assessed housing need through the Local Plan process, in a letter to the Examiner of the Caste Point New Local Plan (dated 18th November 2016), with particular reference to the constraints of the Borough in finding suitable land for development. The Roots Hall site is not only suitable for development, as previously highlighted in the SCAAP (December 2015) and pre--application discussions with the Council, but would be available within the next 5 years, and would therefore deliver much needed housing towards the Council's objectively assessed needs.</p> <p>We therefore respectfully request that the site allocation for the Roots Hall Stadium site be re--instated in the SCAAP, to include a mixed--use development for convenience/ retail and residential uses, with an indicative capacity of 675 homes It has the potential to be delivering homes by 2018/19 linked to the delivery of a new stadium at Fossetts Farm.</p>					
EIP						
Reps	Policy PA8	2616	Object	<p>Our principle objection to the SCAAP is the removal of and the lack of an allocation of the Roots Hall Football Stadium and adjacent land. Roots Hall was designated in the December 2015 document for mixed--use development for convenience retail and approximately 290 homes, for development post 2021 (ref: OS13). The SCAAP (November 2016), however now omits the site from any formal allocation.</p> <p>The availability of the Roots Hall site for development is subject to the relocation of the Southend United Football Club stadium. It is of particular surprise to the Club that the site allocation has been removed, despite the advanced stage of pre-application discussions for the relocation of the football stadium to Fossetts</p>	<p>The site allocation for the Roots Hall Stadium site should be re--instated in the SCAAP, to include a mixed--use development for convenience/ retail and residential uses, with an indicative capacity of 675 homes It has the potential to be delivering homes by 2018/19 linked to the delivery of a new stadium at Fossetts Farm.</p>	

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				Farm and consequential redevelopment of the Roots Hall site.		
	71	2617	Object	The most recently identified objectively assessed housing need for Southend grossly exceeds the plan target at 950--1135 dwellings per annum for the period of 2014--2037 (South Essex Strategic Housing Market Assessment, May 2016). Furthermore, the Council has recently highlighted its difficulty in meeting its objectively assessed housing need through the Local Plan process, in a letter to the Examiner of the Caste Point New Local Plan (dated 18th November 2016), with particular reference to the constraints of the Borough in finding suitable land for development. The Roots Hall site is not only suitable for development, as previously highlighted in the SCAAP (December 2015) and pre-application discussions with the Council, but would be available within the next 5 years, and would therefore deliver much needed housing towards the Council's objectively assessed needs.		
Respondent	Pegasus Planning Group Ltd (Jonathon Rainey) On behalf of The Co-operative Group					
Full Submission	<p>Pegasus Group are writing on behalf of The Co-operative Group in relation to land which they own at 53-57 Sutton Road, Southend-on-Sea. This site is identified within the SCAAP Proposed Submission document as Opportunity Site PA9.2: Guildford Road. This letter and enclosed attachments set out The Co-operative Group's formal response to the current consultation.</p> <p>Examining Local Plans</p> <p>The National Planning Policy Framework (NPPF) at paragraph 182 sets out that a local planning authority should submit a plan (including Area Action Plans) for examination where it considers them to be "sound". The paragraph goes onto outline that for a plan to be considered sound it must be demonstrated that it is:</p> <ul style="list-style-type: none"> • Positively prepared • Justified • Effective • Consistent with national policy <p>These representations have been prepared with these 'tests' in mind and where necessary specific reference is made to these tests.</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>The SCAAP is considered by Southend-on-Sea Borough Council (the Council) to be a key driver in stimulating investment and for the delivery of the remaining planned regeneration by 2021. This includes the following targets:</p> <ul style="list-style-type: none"> • 2,474 additional dwellings • 7,250 additional jobs <p>The SCAAP aims to develop a 'City by the Sea' and central to this is its vision that Southend will be: <i>"A prosperous and thriving regional centre and resort, it will be an area that is vibrant, safe and hospitable, rich in heritage, commerce, learning and culture and an attractive, diverse place where people want to live, work and visit for both day trips, overnight and longer stays."</i></p> <p>In order to deliver this vision, the SCAAP breaks down the Central Area into a series of sub-policy areas. For the purposes of these representations the focus is on the Sutton Gateway Neighbourhood (PA9).</p> <p>Housing</p> <p>The Core Strategy requires at least 2,474 net additional dwellings to be delivered (Policy CP8) within the Southend Central Area by 2021. Table 1 of the SCAAP seeks to break this figure down by sub-policy area.</p> <p>In the case of Sutton Gateway Neighbourhood, it identifies that a minimum of 211 dwellings should be delivered. We would note that the total units identified within Table 1 for the whole of the SCAAP falls short of the Core Strategy total by approximately 300 dwellings. There is no explanation as to how the Council intends to deliver these additional units.</p> <p>A series of Opportunity Sites (proposed allocations) are identified within Table 5. The land which our client controls is identified within this table as Opportunity Site PA9.2 with an indicative delivery of 50 units.</p> <p>Sutton Gateway Neighbourhood Policy Area</p> <p>The SCAAP identifies its aim for the Sutton Gateway that the area will be: <i>"regenerated, with high quality, sustainable buildings helping to restore the urban grain, creating a distinctive sense of place where people are proud to live and work. It will be supported by a thriving local shopping parade on Sutton Road."</i></p> <p>This vision is intended to be delivered through 'Draft Policy PA9: Sutton Gateway Neighbourhood Policy Area Development Principles'. This policy identifies the proposed allocation of PA9.2: Guildford Road and states that: <i>"The Council will support the redevelopment of this site to achieve a replacement convenience store fronting Sutton Road that enhances the Secondary Shopping Offer of this locality together with new residential accommodation. The façade of the current building fronting onto Sutton Road must be retained and linked architecturally into any proposal. The scheme should also incorporate amenity, open space, urban greening and sustainability measures. Site access will be via Guildford Road."</i></p> <p>The Co-operative Group supports this proposed allocation in principle. As conveyed to the Council during pre-application discussions (and previous representations to earlier rounds of consultation) the site is significantly under-utilised. Paragraph 220 of the SCAAP notes that the upper two levels of the three storey convenience store are vacant. The underutilisation of the site is not just limited to these upper floors but should also include the unused area of car parking at the rear of the site which is overly generous for the requirements of the convenience store. We consider that a comprehensive redevelopment of the site, including the car park area can result in scheme which delivers high quality, sustainable development.</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>Whilst the Co-operative Group supports this allocation in principle there are however a couple of detailed aspects of the policy wording that the Co-operative Group would wish to see amended as the plan progresses.</p> <p>Replacement convenience store Firstly, Paragraph 3ii notes the Council’s support for the redevelopment of this site “to achieve a replacement convenience store”. We are concerned that such a statement is too vague and imprecise and could be interpreted as necessitating a like for like replacement. Whilst we acknowledge that the site is located within an area of secondary shopping frontage (Policy DM131: Secondary Shopping Frontage), this should not necessitate the retention of like for like floorspace. The Co-operative Group would like flexibility in terms of size of any replacement retail floorspace (i.e. provided opportunity to increase or decrease which is currently present). The Co-operative Group agrees that the current arrangement sees the entrance facing rearwards and that a comprehensive re-development of the site could create a more active street frontage. The Co-operative Group see this enhancement as being of more fundamental importance in this location than a like for like replacement.</p> <p>We therefore consider that the draft policy should be amended as follows: the Council will support the redevelopment of this site to achieve a replacement convenience store (with a minimum GIA of 4,50sqm)” We consider at present the policy cannot be considered to be either justified or effective in requiring a like for like replacement.</p> <p>Existing Facade Secondly, the Co-operative Group is concerned that the wording of paragraph 220 and Policy PAg(ii) will necessitate the retention of the existing façade. The site is not located within a defined Conservation Area and the building itself is not listed either nationally or locally. The SCAAP at section 4.9 identifies landmark buildings which are described as buildings which “may become, a point of reference because of its positive contribution to place making”. This site, and its buildings, are not identified within this category. Accordingly, the facade has not been considered of value to be protected by other policy. As currently worded, the policy requires that the facade must be retained. This results in an unnecessary constraint which would reduce the flexibility associated with any redevelopment of this site. We consider that the policy should be worded more flexibly and there should not be the protection where the need to do so is not justified and the protection may result in an inferior scheme being achieved. We would therefore request the following amendment: “The façade of the current building fronting onto Sutton Road should preferably be retained subject to viability and architectural/engineering constraints.” Without this amendment we are concerned that this element of this policy is not justified as per the requirements of Paragraph 182 of the NPPF.</p> <p>Amenity open space, urban greening etc. Thirdly, the final sentence of 3(ii) states that: “The scheme should also incorporate amenity open space, urban greening and sustainability measures.” We consider that this wording is vague, generalised and imprecise. There is no justification within the supporting text or the policy itself to justify measures which place a greater onus on sites within the SCAAP and requirements which would not be the case on development sites elsewhere outside the SCAAP. Any application for development would need to be determined in accordance with other policies within the Development Plan. We therefore suggest that this sentence should be deleted so as to ensure that the policy can reasonably be considered to be effective in this regard.</p>		
EIP						<p>We would wish to appear at the oral examination in order to expand upon points made within our written submission regarding the context and case for the allocation of 53-57 Sutton Road as an opportunity site for mixed development. We consider this would be most appropriately done through oral representation.</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
Reps	Table 1 (73)	2618	Comment	We would note that the total units identified within Table 1 for the whole of the SCAAP falls short of the Core Strategy total by approximately 300 dwellings. There is no explanation as to how the Council intends to deliver these additional units.		
	PA9.2	2619	Support	Support in principle the proposed allocation of 53-57 Sutton Road for mix use development. The Co-Operative Group are committed to pursuing the redevelopment of this site and consider that this is achievable within the SCAAP timeframe by 2021. As the Council is aware pre-application discussions were held in February 2015 and since then the site has been openly marketed		Legally Compliant: Yes Sound: No 4(2) Justified 4(3) Effective
	220	2620	Comment	The underutilisation of the site is not just limited to these upper floors but should also include the unused area of car parking at the rear of the site. consider that a comprehensive redevelopment of the site, including the car park area can result in scheme which delivers high quality, sustainable development.		
	PA9.2	2621	Object	Whilst we acknowledge that the site is located within an area of secondary shopping frontage (Policy DM13 ³ : Secondary Shopping Frontage), this should not necessitate the retention of like for like floorspace. The Co-operative Group would like flexibility in terms of size of any replacement retail floorspace (i.e. provided opportunity to increase or decrease which is currently present).	Consider that the draft policy should be amended as follows: the Council will support the redevelopment of this site to achieve a replacement convenience store (with a minimum GIA of 450sqm)	Legally Compliant: Yes Sound: No 4(2) Justified 4(3) Effective
	PA9.2	2622	Object	Concerned that the wording of paragraph 220 and Policy PA9(ii) will necessitate the retention of the existing façade. The site is not located within	Consider that the policy should be worded more flexibly and there should not be the protection where the need to do so is not justified and the	Legally Compliant: Yes Sound: No 4(2) Justified 4(3) Effective

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				a defined Conservation Area and the building itself is not listed either nationally or locally.	protection may result in an inferior scheme being achieved. Suggested amendment: <i>'The façade of the current building fronting onto Sutton Road should preferably be retained subject to viability and architectural/engineering constraints'</i>	
	PAg.2	2623	Object	We consider that the wording relating to 'amenity open space, urban greening and sustainability measures' is vague, generalised and imprecise. There is no justification within the supporting text or the policy itself to justify measures which place a greater onus on sites within the SCAAP and requirements which would not be the case on development sites elsewhere outside the SCAAP. Any application for development would need to be determined in accordance with other policies within the Development Plan.	We therefore suggest that this sentence should be deleted so as to ensure that the policy can reasonably be considered to be effective in this regard. Suggested amendment: <i>'The scheme should also incorporate amenity open space, urban greening and sustainability measures.'</i>	Legally Compliant: Yes Sound: No 4(2) Justified 4(3) Effective
Respondent	Carter Jonas LLP (Matthew Hare) on behalf Turnstone Southend Ltd					
Full Submission	<p>Introduction 1. This Representations Report has been prepared by Carter Jonas LLP on behalf of Turnstone Southend Ltd (TSL) to the Revised Proposed Submission Southend Central Area Action Plan (SCAAP) consultation document.</p> <p>2. These representations relate to Opportunity Site 'CS1.2: Seaways' as contained within Policy CS1: Central Seafront Policy Area Development Principles. Principally however, comment is made with respect to draft policy DS5 entitled 'Transport, Access and Public Realm'.</p> <p>3. We broadly support the proposed policy approach for CS1.2 and policy DS5, but we do suggest some minor changes to the policy wording for policy DS5 to ensure the delivery of the development now proposed for the Seaway Car Park site.</p> <p>4. TSL is an experienced developer in the retail and leisure sector. TSL has an interest in the Seaways site, and is the developer for a destination cinema-led leisure scheme on the site. A planning application is being prepared for the proposed development, and detailed discussions have been held with the Council during the last couple of years and a public exhibition was held in December 2015.</p> <p>5. The proposed development comprises the following uses:</p> <ul style="list-style-type: none"> • Cinema; • Indoor leisure; • Restaurants and cafes; 					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<ul style="list-style-type: none"> • Hotel; • New public square and open space; • Surface level and multi-storey car park; • Coach and drop-off and pick-up area; • Motorcycle and cycling parking; <p>6. A new arm would be provided to the A1160 Roundabout to create highway access to the site. The site is accessible by walking, cycling and public transport, and it is close to existing retail and leisure facilities. The proposed development complies with local and national planning policies which seek to direct leisure uses to town centres, and it would attract people to visit Southend-on-Sea town centre. In addition, the proposed development would make more efficient use of previously developed land within the town centre.</p> <p>7. In summary, our representations are as follows:</p> <ul style="list-style-type: none"> • We welcome the removal of a proposed requirement for the preparation of a Development Brief to bring forward development at the Seaways site. • We suggest a slight revision to the wording of criterion 2a of proposed policy DS5 • We suggest either a removal of or a revision to the wording of criterion 2b of proposed policy DS5 <p>8. We address each of these matters below, and then set out our requested changes to policy DS5 in full.</p> <p>Criterion 2a of policy DS5</p> <p>9. Criterion 2a of proposed policy DS5 reads as follows: <i>'In order to support the vitality and viability of the SCAAP area the Council will maintain parking capacity within Southend Central Area at a level that supports vitality and viability and does not undermine the Central Area's ability to accommodate visitor trips, whilst enabling the delivery of relevant opportunity sites'</i></p> <p>10. In the case of Tesco Stores v Dundee City Council [2012] UKSC 13 the Supreme Court held that in principle, policy statements should be interpreted objectively in accordance with the language used when read in its proper context. Accordingly it is important to consider policy wording carefully.</p> <p>11. In this instance the words <i>'...and does not undermine the Central Area's ability to accommodate visitor trips...'</i> when interpreted objectively and having regard to the wording of the criterion as a whole suggests that parking capacity within the Southend Central Area must be able to fully accommodate all those seeking to park in the central area at any given time.</p> <p>12. Paragraph 29 of the NPPF 2012 states that <i>'Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.'</i></p> <p>13. Paragraph 30 of the NPPF 2012 states that <i>'Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport'</i></p> <p>14. Accordingly, the promotion of a policy wording that seeks to ensure that there is parking provision to accommodate all demand for private vehicular trips is contrary to principles of sustainability and national planning policy requirements for the local transport systems to be <i>'balanced in favour of sustainable transport modes'</i>. It is well evidenced that the general propensity to use sustainable forms of transport increases when private car parking is not abundantly available.</p> <p>15. It is suggested that the word 'accommodate' is replaced by the word 'attract' and that visitor trips are more broadly defined to include all modes of transport. If worded in this manner then criterion 2a of policy DS5 would not undermine national planning policy objectives for sustainable modes of transport.</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>Criterion 2b of policy DS5</p> <p>16. Criterion 2b of proposed policy DS5 reads as follows: <i>'In order to support the vitality and viability of the SCAAP area the Council will ensure that there is no net loss in car parking to the south of the Southend Central Area'</i></p> <p>17. The south of the Southend Central Area is defined as land generally south of the railway line. As such the Seaways site falls within the south of the Southend Central Area.</p> <p>18. The draft policy draws on the observations and recommendations of the Car Parking Study for the Central Area of Southend dated November 2016 and carried out by Steer Davies Gleave.</p> <p>19. The results of the Parking Study generally show that typically car parking capacity is not an issue within central Southend, including the Seaways car park. The Southend Central Area parking capacity rarely exceeds 85% occupancy. Capacity issues only occur at the seafront car parks during peak periods (bank holidays and summer holiday periods). During these peak periods seafront parking is at capacity during the day, but capacity was available in the northern car parks.</p> <p>20. The study raises a number of interesting issues in relation to car parking in the Southend Central Area. A key point is that all the car parks do not provide a clear distinction between long-stay and short-stay with the pricing regime broadly consistent across all the car parks. As a result there is no financial incentive for long or short stay parking demand to be directed to particular locations. As a result, most people will park in a location closest to their destination, resulting in short and long stay parking demands putting combined pressure on the car parks located closest to the seafront and town centre.</p> <p>21. Typically long-stay parkers are happy to accept longer walking distances to their destination if lower long-stay charges are available.</p> <p>22. Having regard to the findings and recommendations of the Parking Study therefore it not strictly the case that car parking provision in south of the Southend Central Area needs to be maintained at current levels in order to support the vitality and viability of the SCAAP. Rather it is the case that, with a dedicated parking strategy to distinguish between long and short term car parking in the area the vitality and viability of the SCAAP could be maintained even if there were to be a slight reduction in the car parking in the south of the Southend Central Area. Accordingly we do not consider that criterion 2b is necessary and should be removed from the policy.</p> <p>23. If the Council is not minded to remove criterion 2b then it is suggested that it should be explicitly tied to a base level of existing car parking provision within the southern SCAAP area for reasons of clarity that are self-evident. The Parking Study provides an up to date assessment of parking provision within the SCAAP area and provides a breakdown for the southern SCAAP area that equates to 2,543 spaces (including both on street and off street provision). Criterion 2d of the policy DS5 should therefore make reference to the results of the Parking Study as a benchmark.</p> <p>24. For these reasons we request that criterion 2b of policy DS5 either be removed or, failing this, be expressed in less definitive terms with the addition of wording to the effect of <i>'unless it can be demonstrated that the Central Area's ability to attract visitor trips overall will not be materially harmed'</i> and that reference is made to the parking study in the policy text.</p> <p>Requested Change</p> <p>25. We request the following changes to Section 2 of Policy DS5 (set out in bold and strikethrough):</p> <p>2. In order to support the vitality and viability of the SCAAP area the Council will:</p> <p>a. Maintain parking capacity* within Southend Central Area at a level that supports vitality and viability and does not undermine the Central Area's ability to accommodate attract attract visitor trips across all modes of transport, whilst enabling the delivery of relevant opportunity sites;</p> <p>b. Ensure that there is no net loss in car parking** to the south of the Southend Central Area, unless it can be demonstrated that the Central Area's ability to attract visitor trips overall will not be materially harmed'</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>c. Seek to rebalance the discrepancies of parking supply within Southend Central Area by acting on the outcome of the Parking Study and work with private car park owners and operators to ensure maximum usage of car park capacity;</p> <p>d. Assess the costs and benefits of an extension to the existing VMS scheme, or updated technology to enable real-time direction of drivers to the most appropriate car park for their destination based on proximity and available capacity, avoiding unnecessary circulating traffic, and by giving consideration to the management of the road network and access points to car parks;</p> <p>e. Improve the information available about the range of parking and sustainable travel options for visitors to Southend, including improvements to the Council website and through working with local businesses;</p> <p>f. Seek to relieve the pressure on the more well-used car parks at peak times and encourage use of less occupied car parks through a combination of dynamic signage, competitive pricing and pre-journey information;</p> <p>g. Ensure pedestrian routes to and from public car parks, railway stations and other public transport interchanges are direct, well-lit and signposted, benefiting from a high quality public realm that links well with main areas of interest;</p> <p>h. Ensure new and existing car parks add to the overall aesthetic quality of an area through such measures as landscaping, green walls, public art, pedestrian walkways and pedestrian permeability, as well incorporating innovative layouts to reduce visual impact and effect on key views within and to Southend Central Area.</p> <p>* Parking capacity includes provision for cars, motorcycles, taxis, bicycle and Blue Badge holder provision</p> <p>** For the purposes of this policy parking capacity in the south of the Southend Central Area will be benchmarked against the existing provision in this area identified in the Car Parking Study for the Central Area of Southend dated November 2016 and carried out by Steer Davies Gleave</p>		
EIP	Written					
Reps	DS5.2.a	2624	Object	<p>When interpreted objectively and having regard to the wording of Policy DS5.2.a as a whole suggests that parking capacity within the Southend Central Area must be able to fully accommodate all those seeking to park in the central area at any given time.</p> <p>Accordingly, the promotion of a policy wording that seeks to ensure that there is parking provision to accommodate all demand for private vehicular trips is contrary to principles of sustainability and national planning policy (Paragraph 29 and 30) requirements for the local transport systems to be '<i>balanced in favour of sustainable transport modes</i>'. It is well evidenced that the general propensity to use sustainable</p>	<p>It is suggested that the word 'accommodate' is replaced by the word 'attract' and that visitor trips are more broadly defined to include all modes of transport. If worded in this manner then criterion 2a of policy DS5 would not undermine national planning policy objectives for sustainable modes of transport.</p> <p>Suggested amendment DS5.2.a: '<i>Maintain parking capacity* within Southend Central Area at a level that supports vitality and viability and does not undermine the Central Area's ability to <u>attract</u> visitor trips <u>across all modes of transport</u>, whilst enabling the delivery of relevant opportunity sites'</i></p>	<p>Legally Compliant: No Sound : Yes 4(4) Consistent with National Policy</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				forms of transport increases when private car parking is not abundantly available.		
	DS5.2.b	2625	Object	<p>The Southend Central Area parking capacity rarely exceeds 85% occupancy. Capacity issues only occur at the seafront car parks during peak periods (bank holidays and summer holiday periods). During these peak periods seafront parking is at capacity during the day, but capacity was available in the northern car parks.</p> <p>A key point is that all the car parks do not provide a clear distinction between long-stay and short-stay with the pricing regime broadly consistent across all the car parks. As a result there is no financial incentive for long or short stay parking demand to be directed to particular locations. As a result, most people will park in a location closest to their destination, resulting in short and long stay parking demands putting combined pressure on the car parks located closest to the seafront and town centre. Typically long-stay parkers are happy to accept longer walking distances to their destination if lower long-stay charges are available.</p> <p>Having regard to the findings and recommendations of the Parking Study therefore it not strictly the case that car parking provision in south of the Southend Central Area needs to be maintained at current levels in order to support the vitality and viability of the SCAAP. Rather it is the case that, with a dedicated parking strategy to distinguish between long and short term car parking in the area the vitality and</p>	<p>Do not consider that criterion 2b is necessary and should be removed from the policy.</p> <p>If the Council is not minded to remove criterion 2b then it is suggested that it should be explicitly tied to a base level of existing car parking provision within the southern SCAAP area for reasons of clarity that are self-evident. The Parking Study provides an up to date assessment of parking provision within the SCAAP area and provides a breakdown for the southern SCAAP area. Criterion 2d of the policy DS5 should therefore make reference to the results of the Parking Study as a benchmark and be expressed in less definitive terms with the addition of wording to the effect of 'unless it can be demonstrated that the Central Area's ability to attract visitor trips overall will not be materially harmed' and that reference is made to the parking study in the policy text.</p> <p>Suggested amendment Policy DS5.2.b: 'Ensure that there is no net loss in car parking** to the south of the Southend Central Area, <u>unless it can be demonstrated that the Central Area's ability to attract visitor trips overall will not be materially harmed</u></p> <p>** <u>For the purposes of this policy parking capacity in the south of the Southend Central Area will be benchmarked against the existing provision in this area identified in the Car Parking Study for the</u></p>	<p>Legally Compliant: No Sound : Yes 4(4) Consistent with National Policy</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				viability of the SCAAP could be maintained even if there were to be a slight reduction in the car parking in the south of the Southend Central Area.	<u>Central Area of Southend dated November 2016 and carried out by Steer Davies Gleave'</u>	
	Opportunity Site CS1.2 Seaways	2882	Support	We broadly support the proposed policy approach for CS1.2.		
Respondent	Peter Grubb (Uncle Toms Cabin)					
Full Submission	<p>I am writing directly to you regarding the SCAPP consultation. If you are not dealing with this matter please would you pass this document on as I require my comments to be included within the consultation period ending 5.00pm 16th December 2016</p> <p>Whilst I am registered on the Councils System for commenting - I cannot get it to work for me regarding SCAAP.</p> <p>The scope & range of the documents for consideration is such that possibly most will not bother, put off by the input system?</p> <p>Hopefully the following will be considered in relation to the Seaway car park 'Windfall development opportunity'</p> <p>1) The basic flaw in the proposal is that it robs the town of a Parking asset no matter what the skillfully crafted reports state about alternatives.</p> <p>2) Council data suggests it (the carpark) is a poor revenue generator for the town --this is misguided -- many local & national businesses benefit from the revenue stream generated by those using the facility.</p> <p>3) <u>More important to a long list of objections is the highlighting of a possible work around?</u></p> <p>5) The parachuted in Windfall development proposal could easily go ahead if the developer was told to provide <u>on site replacement parking by way of underground car parking</u> - soil away could easily disposed of at Gunners Park Shoeburyness!</p> <p>6) A simple practical local illustration is the new mini development at Bond Street Chelmsford---underground parking, shops, Restaurants & and even a luxury Cinema!!</p> <p>Regarding infrastructure, it is a given that the town has serious problems at peak times on the roads - forcing people to walk will not work without a comprehensive Park & Ride scheme -why is it that the town has never considered such an option? Again in use all over the Country --Local example refer: Chelmsford</p>					
EiP Reprs	Policy CS1.2	2626	Comment	<p>The basic flaw in the proposal is that it robs the town of a Parking asset no matter what the skillfully crafted reports state about alternatives.</p> <p>Council data suggests (the carpark) is a poor revenue generator for the town --this is misguided -- many local & national businesses benefit from the revenue stream generated by those using the facility.</p>	The parachuted in Windfall development proposal could easily go ahead if the developer was told to provide on site replacement parking by way of underground car parking.	

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	Policy DS5.2	2627	Comment	Regarding infrastructure, it is a given that the town has serious problems at peak times on the roads - forcing people to walk will not work without a comprehensive Park & Ride scheme		
Respondent	GL Hearn Ltd part of Capita Real Estate (David Maxwell)					
Full Submission	<p>Part B</p> <p>1. To which part of the document does this representation relate? Map 6: SCAAP Policy Areas and Opportunity Sites</p> <p>2. Support</p> <p>5. Please give your reasons below why you are supporting / objecting to this part of the plan.</p> <p>Genesis Housing Association (GHA) supports the identification of Opportunity Site PA8.2 (Baxter Avenue) falling within the Victoria Gateway Neighbourhood as indicated by Map 6 of the SCAAP.</p> <p>The red line site boundary of Opportunity Site PA8.2, as depicted by Map 6, is a true and accurate reflection of the Baxter Avenue site within the ownership and control of GHA. The red-line boundary accords with the development vision and proposals prepared by Capita on behalf of GHA and discussed with Southend-on-Sea Borough Council Housing and Planning departments throughout 2016. GHA recognises the need for the Baxter Avenue development to take place within the context of the wider regeneration of the Victoria Gateway Neighbourhood, and with particular attention to the redevelopment of land immediately to the east of Baxter Avenue at Opportunity Site PA8.1 (Victoria Avenue). There are likely to be public realm and measures to be considered for improved access and connectivity between Opportunity Sites PA8.2 and PA8.1, as well as links to the town centre to the south and Southend Victoria railway station to the east.</p> <p>The Aims set out in the Victoria Gateway Neighbourhood Policy Area have clear synergies with the development vision GHA have set out in the Baxter Avenue Urban Design Appraisal & Concept Masterplan, dated May 2016. GHA are keen to regenerate site PA8.2 and create an attractive and vibrant residential-led gateway to the town centre with high levels of accessibility, quality design features and a high standard of public realm.</p> <p>GHA and GL Hearn (part of Capita) will continue to work collaboratively with the Council to ensure a joined up approach for the development of PA8.2 that will seek to work with the proposals submitted with the adjoining allocated site PA8.1. GHA are committed to delivering a site that is in accordance with the associated Policies relating to Map 6 – specifically the Victoria Gateway Neighbourhood Policy Area Development Principles.</p> <p>Overall, identification of Opportunity Site PA8.2 within Map 6 is supported by GHA as this will allow for uplift in market, affordable and sheltered accommodation for at least 500 units, which supports the overall achievement of the Strategic Objectives and the Vision of the SCAAP. In addition, this minimum number should be stated to allow for a degree of flexibility to allow for changes in economic conditions.</p> <p>Part B</p> <p>1. To which part of the document does this representation relate? Paragraph 28: Proposed Vision</p> <p>2. Support</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>5. Please give your reasons below why you are supporting / objecting to this part of the plan.</p> <p>Genesis Housing Association (GHA) is a major landowner within the Southend Central Area. GHA supports the Vision for Southend Central Area set out within the SCAAP. GHA is particularly supportive of the Vision seeking to create a prosperous and thriving regional centre, being vibrant, safe and hospitable and an attractive, diverse place where people will want to live, as well as a place to work and visit.</p> <p>GHA intends to deliver major regeneration at SCAAP Opportunity Site PA8.2 (Baxter Avenue), within the Victoria Gateway, which will contribute notably towards the SCAAP aim to transform the perception and image of Southend. Redevelopment of the Baxter Avenue site will deliver and achieve high quality development as well as social provision as a popular location for residents, as well as for businesses, students and visitors.</p> <p>GHA has been, and remains, committed to working with Southend on Sea Borough Council to ensure that regeneration at the Baxter Avenue Opportunity Site contributes positively and effectively towards the SCAAP Proposed Vision.</p> <p>Part B</p> <p>1. To which part of the document does this representation relate?</p> <p>Paragraph 29: Strategic Objectives</p> <p>2. Support</p> <p>5. Please give your reasons below why you are supporting / objecting to this part of the plan.</p> <p>Genesis Housing Association (GHA) supports the Strategic Objectives 1-11 set out within the SCAAP, and GHA agrees that the SCAAP Proposed Vision will be achieved by meeting Strategic Objectives 1-11.</p> <p>GHA has a development vision to regenerate the SCAAP Opportunity Site PA8.2 (Baxter Avenue). Delivery of new homes and regeneration of the Baxter Avenue site will contribute to and adhere to each of the objectives as applicable, with particular relevance to the following Strategic Objectives:</p> <p>1. Redevelopment of the Baxter Avenue site will contribute towards establishment of a wider range of homes, likely to include a mixture of affordable, market, shared ownership and new starter homes, as well as re-provision of sheltered accommodation;</p> <p>2. The Baxter Avenue development will provide a high quality design delivering notable public realm improvements that respond positively towards and enhance the Victoria Gateway public realm;</p> <p>3. The Baxter Avenue development will increase the number and diversity of people living within the Southend Central Area through delivery of at least 250 new homes in the SCAAP period. The new homes provided at Baxter Avenue will be modern, efficient and appealing to a wide range of people, including families with children;</p> <p>7. Redevelopment of the Baxter Avenue site will provide notable improvements to accessibility in the area to ensure that local streets, public and green spaces are well-connected. The Baxter Avenue development will also provide a design and streetscape that encourages and improves opportunities for walking and cycling, with excellence connections to Southend Victoria railway, bus services and the town centre.</p> <p>Part B</p> <p>1. To which part of the document does this representation relate?</p> <p>Policy PA8: Victoria Gateway Neighbourhood Policy Area Development Principles</p> <p>2. Support</p> <p>5. Please give your reasons below why you are supporting / objecting to this part of the plan.</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>Genesis Housing Association (GHA) supports Policy PA8: Victoria Gateway Neighbourhood Policy Area. GHA supports, specifically, section (4) of Policy PA8 relating to Opportunity Site PA8.2 (Baxter Avenue). GHA has identified the Baxter Avenue site as contributing towards the GHA strategic objective to provide 1,000 new homes a year for the next 10 years. GHA owns site PA8.2 and has set out a development vision for redevelopment of the Baxter Avenue site for at least 500 dwellings. GHA together with GL Hearn (part of Capita) has worked closely and successfully with officers from Southend on Sea Borough Council's planning and housing departments throughout 2016. GHA has provide an 'Urban Design Appraisal & Concept Masterplan', dated May 2016, setting out a vision for redevelopment of the Baxter Avenue site to deliver more than 500 dwellings, together with open space/ communal gardens together with new and improved pedestrian and cycle connectivity and access. The Concept Masterplan identified that the site could accommodate 389 x 1 bed units and 223 x 2bed units, with 375 parking spaces. Genesis Housing Association is now working with architects to prepare a scheme for public and stakeholder consultation and then for submission as a planning application. GHA, together with GL Hearn (part of Capita) has carried out an initial assessment of the phased redevelopment of the Baxter Avenue site. In conclusion, GHA would progress phased demolition, decant of residents and phased construction of the new development to provide 250 dwellings prior to 2021. Subsequent phases of development, to be implemented after 2021 would be able to deliver at least 374 additional new homes i.e. the site has capacity to achieve at least 624 dwellings. GHA supports the very specific wording at section (4) (ii) of Policy PA8.2, which states that: "Within Opportunity Site (PA8.2): Baxter Avenue the Council will promote the regeneration of the site for high quality mixed tenure residential development, including sheltered and additional affordable housing. Any scheme should incorporate amenity open space, urban greening and sustainability measure as well as providing pedestrian access and linkages between Victoria, Baxter and Boston Avenues". It is submitted that further clarification could be made through the addition of wording to section (4) (ii) to make clear that Opportunity Site PA8.2 is expected to deliver at least 500 dwellings, 250 of which will be in the SCAAP period. This should also be provided with a degree of flexibility in delivery time-frames to allow for unforeseen changes in economic circumstances. Policy PA8.2 section (4) (ii) is otherwise very closely aligned to the development vision for the Baxter Avenue site as set out by GHA and GL Hearn (part of Capita) within the Urban Design Appraisal & Concept Masterplan, dated May 2016 (copy enclosed for reference). In conclusion, GHA endorses Policy PA8: Victoria Gateway, and specifically Policy PA8.2 section (4) (ii) relating to GHA land at Baxter Avenue. GHA intends to continue working closely with Southend on Sea Borough Council, as well as with local residents and stakeholders to ensure that a high quality mixed tenure residential scheme is brought forward and delivered at this key and highly sustainable site within the Southend Central Area.</p> <p>Part B</p> <ol style="list-style-type: none"> 1. To which part of the document does this representation relate? Section 5.10: The Victoria Gateway Neighbourhood Policy Area. 2. Support 5. Please give your reasons below why you are supporting / objecting to this part of the plan. <p>Genesis Housing Association (GHA) supports section 5.10 which confirms the aims of regenerating Victoria Avenue and its surroundings. GHA recognises and supports the improvement of connections and accessibility within the Victoria Gateway area, to include the Baxter Avenue and Victoria Avenue Opportunity Sites. GHA has already entered into pre-application discussions with Planning and Design officers from Southend on Sea Borough Council to consider the potential measures to be applied within a redevelopment of the Baxter Avenue site to achieve a high standard of urban design, to include urban greening techniques, as well as measures to encourage and walking and cycling, notably to allow easy access to the town centre, employment area and public transport interchanges.</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	GHA supports and intends to deliver regeneration of the Opportunity Site PA8.2 (Baxter Avenue) to provide a high quality, mixed tenure residential development including social housing, additional sheltered and affordable housing, and market housing.					
EiP	Appearance - GL Hearn (part of Capita Real Estate) would like to participate at the oral part of the examination to consider the further details, at the time of the examination, relating to the proposed development by Genesis Housing Association of Opportunity Site PA8.2 (Baxter Avenue)					
Reps	Map 6	2628	Support	Map 6: SCAAP Policy Areas and Opportunity Sites. Genesis Housing Association (GHA) supports the identification of Opportunity Site PA8.2 (Baxter Avenue) falling with the Victoria Gateway Neighbourhood as indicated by Map 6 of the SCAAP.		Legally Compliant: Yes Sound: Yes
Reps	29 Proposed Vision	2629	Support	Genesis Housing Association (GHA) is a major landowner within the Southend Central Area. GHA supports the Vision for Southend Central Area set out within the SCAAP. GHA is particularly supportive of the Vision seeking to create a prosperous and thriving regional centre, being vibrant, safe and hospitable and an attractive, diverse place where people will want to live, as well as a place to work and visit. GHA intends to deliver major regeneration at SCAAP Opportunity Site PA8.2 (Baxter Avenue), within the Victoria Gateway, which will contribute notably towards the SCAAP aim to transform the perception and image of Southend.		Legally Compliant: Yes Sound: Yes
	29 Strategic Objectives	2630	Support	Genesis Housing Association (GHA) supports the Strategic Objectives 1-11 set out within the SCAAP, and GHA agrees that the SCAAP Proposed Vision will be achieved by meeting Strategic Objectives 1-11. GHA has a development vision to regenerate the SCAAP Opportunity Site PA8.2 (Baxter Avenue). Delivery of new homes and regeneration of the Baxter Avenue site will contribute to and adhere to each of the objectives as applicable, with		Legally Compliant: Yes Sound: Yes

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>particular relevance to the following Strategic Objectives:</p> <ol style="list-style-type: none"> 1.Redevlopment of the Baxter Avenue site will contribute towards establishment of a wider range of homes, likely to include a mixture of affordable, market, shared ownership and new starter homes, as well as re-provision of sheltered accommodation; 2.The Baxter Avenue development will provide a high quality design delivering notable public realm improvements that respond positively towards and enhance the Victoria Gateway public realm; 3.The Baxter Avenue development will increase the number and diversity of people living within the Southend Central Area through delivery of at least 250 new homes in the SCAAP period. The new homes provided at Baxter Avenue will be modern, efficient and appealing to a wide range of people, including families with children; 7.Redevlopment of the Baxter Avenue site will provide notable improvements to accessibility in the area to ensure that local streets, public and green spaces are well-connected. The Baxter Avenue development will also provide a design and streetscape that encourages and improves opportunities for walking and cycling, with excellence connections to Southend Victoria railway, bus services and the town centre. 		
	PA8	2631	Support	Genesis Housing Association (GHA) supports Policy PA8: Victoria Gateway Neighbourhood Policy Area.	It is submitted that further clarification could be made through the addition of wording to section (4) (ii) to make clear that Opportunity Site PA8.2 is expected to deliver at least 500 dwellings, 250 of	Legally Compliant: Yes Sound: Yes

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>GHA supports, specifically, section (4) of Policy PA8 relating to Opportunity Site PA8.2 (Baxter Avenue). GHA has identified the Baxter Avenue site as contributing towards the GHA strategic objective to provide 1,000 new homes a year for the next 10 years. GHA owns site PA8.2 and has set out a development vision for redevelopment of the Baxter Avenue site for at least 500 dwellings. GHA together with GL Hearn (part of Capita) has worked closely and successfully with officers from Southend on Sea Borough Council's planning and housing departments throughout 2016. GHA has provide an 'Urban Design Appraisal & Concept Masterplan', dated May 2016.</p> <p>Genesis Housing Association is now working with architects to prepare a scheme for public and stakeholder consultation and then for submission as a planning application.</p> <p>GHA, together with GL Hearn (part of Capita) has carried out an initial assessment of the phased redevelopment of the Baxter Avenue site. In conclusion, GHA would progress phased demolition, decant of residents and phased construction of the new development to provide 250 dwellings prior to 2021. Subsequent phases of development, to be implemented after 2021 would be able to deliver at least 374 additional new homes i.e. the site has capacity to achieve at least 624 dwellings.</p> <p>GHA supports the very specific wording at section (4) (ii) of Policy PA8.2, which states that: <i>"Within Opportunity Site (PA8.2): Baxter Avenue the Council will promote the regeneration of the site for high quality mixed tenure residential</i></p>	<p>which will be in the SCAAP period. This should also be provided with a degree of flexibility in delivery time-frames to allow for unforeseen changes in economic circumstances.</p> <p>In addition, this minimum number should be stated to allow for a degree of flexibility to allow for changes in economic conditions.</p>	

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<i>development, including sheltered and additional affordable housing. Any scheme should incorporate amenity open space, urban greening and sustainability measure as well as providing pedestrian access and linkages between Victoria, Baxter and Boston Avenues”.</i>		
	209 5.10 Aims	2632	Support	<p>Genesis Housing Association (GHA) supports section 5.10 which confirms the aims of regenerating Victoria Avenue and its surroundings. GHA recognises and supports the improvement of connections and accessibility within the Victoria Gateway area, to include the Baxter Avenue and Victoria Avenue Opportunity Sites. GHA has already entered into pre-application discussions with Planning and Design officers from Southend on Sea Borough Council to consider the potential measures to be applied within a redevelopment of the Baxter Avenue site to achieve a high standard of urban design, to include urban greening techniques, as well as measures to encourage walking and cycling, notably to allow easy access to the town centre, employment area and public transport interchanges.</p> <p>GHA supports and intends to deliver regeneration of the Opportunity Site PA8.2 (Baxter Avenue) to provide a high quality, mixed tenure residential development including social housing, additional sheltered and affordable housing, and market housing.</p>		Legally Compliant: Yes Sound: Yes
	Table 5	2633	Support	Genesis Housing Association (GHA) supports the identification of Opportunity Site PA8.2 (Baxter Avenue) within Table 5: Opportunity Sites of the SCAAP.		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>Opportunity Site PA8.2 (Baxter Avenue) is within the full ownership of GHA. The site is currently used as a low density mixed tenure housing located at the southern point of the Victoria Gateway Neighbourhood Area containing; The Clusters; Catherine Lodge; Charlotte Mews; Alexandra Court; Elizabeth Tower. It is submitted that redevelopment of this site will accord with the aims, objectives and principles of the Estate Regeneration National Strategy, DCLG, November 2016. GHA recognise that the proposed regeneration of the Baxter Avenue site will transform the neighbourhood and people's lives through delivery of a high quality, well designed residential development with improved public space. The proposed redevelopment of Baxter Avenue will also connect with the wider redevelopment initiatives in the Victoria Gateway area, and Central Southend throughout and beyond the SCAAP period.</p> <p>GHA has worked productively and positively throughout 2016 with Southend on Sea Borough Council Housing and Planning departments to consider and confirm the development vision that GHA has for redevelopment of the Baxter Avenue site. Positive discussions with the Borough Council's Housing and Planning departments remain ongoing. At the time of the submission of these representations the most recent development vision for the Baxter Avenue site is set out within the document titled 'Urban Design Appraisal & Concept Masterplan', dated May 2016 prepared by Capita on behalf of GHA. The vision provides for redevelopment of the</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>Baxter Avenue site to provide at least 500 dwellings, of which half would be delivered within the SCAAP period. GHA is now working with architects to progress the scheme in greater detail to be progressed to resident and public consultation, further pre-application and stakeholder consultation, and a planning application.</p> <p>GHA therefore supports the identification of Opportunity Site PA8.2 (Baxter Avenue) within Table 5, as well as the indicative residential capacity and phasing indicated by Table 5.</p> <p>GHA does however recommend that Table 5 should be amended to indicate that the indicative residential capacity figures should be noted within the SCAAP as anticipated minimum residential capacities.</p>		
Respondent	Indigo Planning (Helen Greenhalgh) on behalf of Valad Europe Ltd					
Full Submission						
EiP						
Reps	DS5	2634	Comment	<p>Draft Policy DS5 continues to state that the Council will encourage businesses to provide appropriate service and delivery arrangements and minimise their environmental impact; working with the freight industry and logistics to implement more efficient use of vehicles in terms of guidance, zoning and delivery timetables and that this can be set out in freight management plan. As per our previous representations, the requirement for a freight management plan should not be set out in Policy but dealt with by a case-by-case basis and, as necessary.</p>		<p>Legally Compliant: Yes Sound: Yes</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	DS5.1.m	2635	Comment	Part 1 (M) of Draft Policy DS5 states that the Council will encourage visually active frontages to the installation of public art, green walls, well detailed signage and appropriately placed window and entrance ways to enliven blank frontages. It should be recognised that this is not always possible due to the internal requirements of certain retailers and the need to include for example, fire escapes.		
	PA6.1	2636	Support	The proposal to promote independent small scale retail, boutiques, café's, restaurants, bars and small studio styled workshops to create an area with a strong cultural identity together with residential uses above is welcomed. This will also help reinforce the vitality and viability of the High Street through linked trips.		Legally Compliant: Yes Sound: Yes
	PA6.2	2637	Support	Part 2 seeks to redevelop Central House for new larger retail units with frontage on the High Street and Clifton Road and office and residential above which is also supported for the reasons set out above.		Legally Compliant: Yes Sound: Yes
	29	2638	Support	A number of strategic objectives are set out within the SCAAP which include: Improving and transforming the "economic vitality, viability and diversity of Southend's area by encouraging establishment of a wider range of homes, business and shops whilst providing new opportunities for learning, recreation, leisure and tourism". It also seeks to improve accessibility to the area, ensuring street, public and green spaces are well-connected, well-designed and safe, which is welcomed.		Legally Compliant: Yes Sound: Yes
	29	2639	Comment	As per our previous representations submitted in relation to the draft SCAAP Preferred Approach		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	Strategic Objectives			Version 2015 in February 2016, we suggest that a further strategic objective be included that makes it clear that the SCAAP seeks to maintain and protect existing shops and town centre uses in the Southend Central area.		
	PA1.2.d	2640	Support	We note that Part 2D of this policy states that proposals that would assist with delivery of the provision of an active frontage on the southern façade of The Royals Shopping Centre will be supported in principle which is welcomed.		Legally Compliant: Yes Sound: Yes
	PA1.2.e	2641	Comment	Part E also states that the introduction of additional A3 cafes and restaurants will be supported in principle, subject to the provisions of Policy DS1: A Prosperous Retail Centre. It is important to include the provision of certain non-A1 uses in the town centre to ensure the vitality and viability of the town centre and also to support the town centres night time economy.		
	PA1.4.d	2642	Comment	Part 4D of Draft Policy PA1 seeks to further connect the town centre to the central seafront policy area through improved signage which will help to link the seafront with the Town Centre and High Street, thus benefiting the Town Centre as a whole and, as such, is welcomed by Valad Europe.		
	PA7	2643	Support	Draft Policy PA7 seeks to provide enhanced connectivity to the Central, Seafront and High Street policy areas which is welcomed because by enhancing the link, this will help to increase footfall, linked trips which, in turn, will help boost the vitality and viability of the town centre, and on this basis, Valad Europe support this policy.		Legally Compliant: Yes Sound: Yes
	PA4	2644	Comment	Part 1 of this Policy states that the Council will promote residential and supporting uses that		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				deliver the aims for the policy area. However, in Part 3, it states that it would be suitable primarily for residential development, supported by social and community uses and retail provision. There appears to be an error in the summary table as it specifies under 'timescales for delivery' proposed uses. This table needs to be updated and amended.		
	All 30	2645	Support	Valad Europe is supportive of the draft policies set out in the SCAAP Document subject to the proposed changes being made. However, the SCAAP needs to have a greater emphasis on protecting the town centre from out-of-centre retailing. Consideration should also be given to directing new large retail developments onto existing town centre car parks with replacement car parking re-provided in the form of undercroft or multi-storey parking which would assist in relieving pressure on existing parking facilities, whilst bolstering the town centre, thus enhancing its vitality and viability. We feel that this option has not been fully explored and is an opportunity missed.		Legally Compliant: Yes Sound: Yes
	Map 3	2646	Support	We note that part of The Royals Shopping Centre is shown as being located in the primary shopping frontage with the Church Road and Alexander Road frontages lying in secondary shopping frontage. For clarity, the upper level should be shown as secondary shopping frontage similar to the Victoria Shopping Centre.		Legally Compliant: Yes Sound: Yes
	CS1.3.b	2647	Support	Part 3 (B) of draft Policy CS1 states that the Council will promote the creation of a well-designed Piazza area at the southern end of the High Street between The Royals, the Palace and		Legally Compliant: Yes Sound: Yes

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				Pier Hill and encourage new and existing uses to provide active frontages to face into this space. The proposal to provide a defined Piazza area is welcomed, however, it must be recognised that there are a number of land ownerships in place and, as such, a certain degree of flexibility will have to be employed in order to ensure that this can be delivered.		
	CS1.2. Seaways	2648	Support	Valad Europe support the proposed allocation of Proposed Opportunities Site (CS1.2: Seaways) on the basis that it proposes a mix of uses that will help to bolster the town centre economy and encourage linked trips. The delivery of this site and the proposed uses is an important part of ensuring the vitality and viability of the SCAAP area and is supported. However, the Council must actively resist developments that would undermine this policy and what it seeks to achieve for the town centre. As noted in our previous representations, the Council should consider whether the inclusion of retail at this site would further benefit the town centre, with the success of the development and the subsequent beneficial spinoff effects being largely down to how well the site links with the town centre.		Legally Compliant: Yes Sound: Yes
	DS1	2649	Object	Our client Valad Europe largely agrees to the proposed approach to maintaining a prosperous retail centre and note that Part 1 has been updated to include the provisions of the National Planning Policy Framework (NPPF) as requested in our previous representations. We note that Part 3 now includes provision to allow no more than 40% of the town centre primary shopping frontage being used for non-retail purposes and		Legally Compliant: Yes Sound: Yes

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>the clarification provided on how the shopping frontage will be measured. More A3 uses will increase footfall and linked trips whilst also supporting the night time economy adding to the vitality and viability of the town centre and this is welcomed.</p> <p>We note that exceptions to this requirement will be considered if it can be demonstrated to the satisfaction of the Council that the A1 use is no longer viable through an effective two year marketing exercise where the vacant property has been offered for sale or letting in the open market at a realistic price and no reasonable offers have been refused. This seems very onerous and we suggest that the marketing exercise requirement be for 6 to 12 months to ensure that units do not lie vacant for two years otherwise this could have a detrimental impact on the High Street, particularly when the Council are trying to ensure its vitality and viability.</p>		
Respondent	Cllr Walker (SBC)					
Full Submission	What is needed is a full review of parking in the town. Not just a review of paid-for parking as was carried out.					
EiP						
Reps	DS5	2650	Comment	What is needed is a full review of parking in the town. Not just a review of paid-for parking as was carried out.		
Respondent	Mrs Sylvia Myers					
Full Submission	<p>Response to Part 5</p> <p>I believe that the proposal to regenerate the Baxter Avenue site (site reference PA8.2) is unsound. Catherine Lodge, which is within the Baxter Avenue "opportunity area" is a supported housing unit for residents over the age of 65. It was only built in 1984 and was renovated in 2006. The building is perfectly adequate and its owner, Genesis Housing Association, stated at a meeting on November 21 st 2016 that, absent the SCAAP, it had no plans to refurbish Catherine Lodge as there were many other properties within its</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	<p>portfolio that were more in need of refurbishment. As the other properties owned by Genesis in the Baxter Avenue area (Charlotte Mews, The Clusters etc} are of similar age and appear to be in a similar condition I would imagine that it has no plans to refurbish/regenerate these buildings either. Therefore, I believe that there is no economic justification in knocking down perfectly acceptable housing and, indeed, that it is financially unsound particularly as there are many areas of much older housing in the Southend area that are in far greater need of regeneration. I am 92 years old and moved into Catherine Lodge in the belief that it would see me through the remainder of my life and that I would never have to move again. On that basis, I spent £4,000 on fitted furniture that will be of no use elsewhere. I believe that it is grossly unfair that I should spend the rest of my life living amidst a building site worrying about when I will have to move and what I will have to move into.</p> <p>Response to part 6</p>					
EiP	I believe that it is important that the views of older residents affected by the Councils plans are heard					
Reps	PA8.2. Baxter Avenue	2651	Object	<p>I believe that the proposal to regenerate the Baxter Avenue site (site reference PA8.2) is unsound. Catherine Lodge, which is within the Baxter Avenue "opportunity area" is a supported housing unit for residents over the age of 65. It was only built in 1984 and was renovated in 2006. The building is perfectly adequate and its owner, Genesis Housing Association, stated at a meeting on November 21 st 2016 that, absent the SCAAP, it had no plans to refurbish Catherine Lodge as there were many other properties within its portfolio that were more in need of refurbishment. As the other properties owned by Genesis in the Baxter Avenue area (Charlotte Mews, The Clusters etc} are of similar age and appear to be in a similar condition I would imagine that it has no plans to refurbish/regenerate these buildings either. Therefore, I believe that there is no economic justification in knocking down perfectly acceptable housing and, indeed, that it is financially unsound particularly as there are many areas of much older housing in the Southend area that are in far greater need of regeneration. I am 92 years old and moved into Catherine Lodge in</p>	<p>I believe that the Baxter Avenue area should be removed from the SCAAP in order to best utilise the financial resources of Southend Borough Council. This will make the plan more sound as it will ensure that the council's limited funds are used in the regeneration of older, more dilapidated areas within the borough.</p>	<p>Legally Compliant: Yes Sound: Yes</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				the belief that it would see me through the remainder of my life and that I would never have to move again. On that basis, I spent £4,000 on fitted furniture that will be of no use elsewhere. I believe that it is grossly unfair that I should spend the rest of my life living amidst a building site worrying about when I will have to move and what I will have to move into.		
Respondent	Mr Brian Demmen					
Full submission	<p>I am writing to you concerning the above matter, having been a resident of Charlotte Mews for the last three years, and very happy with my accommodation. The thought of having a move thrust upon me at my time of life is extremely daunting, as although my general health is good, I do have a disability issue, and this whole concern makes me very anxious.</p> <p>I am in a first floor flat, and am pleased to say that the stairs issue is shortly to be addressed by the installation of a stair lift, and agreement is in place to ease my bathing difficulties by the conversion of my bathroom into a wet room. These modifications will enable me to happily remain in Charlotte Mews for many years to come, which is my sincere desire, having built a humble apartment into a secure and comfortable home.</p> <p>Following the tenants meeting this afternoon with Mr Peter Arey, representative of Genesis Housing, time frames and schedules were indicated and, as this is the very beginning of the proposed activity, it is understandable that little specific information is currently available. However, as mentioned, the mere fact that this proposal is under consideration, myself and my fellow residents are uneasy, having this matter hanging over our heads.</p> <p>I ask you to forward my views to the relevant body for inclusion in the Consultation.</p>					
EiP	Written					
Reps	PA8.2. Baxter Avenue	2652	Object	<p>I am writing to you concerning the above matter, having been a resident of Charlotte Mews for the last three years, and very happy with my accommodation.</p> <p>The thought of having a move thrust upon me at my time of life is extremely daunting.</p> <p>Following the tenants meeting this afternoon with Mr Peter Arey, representative of Genesis Housing, time frames and schedules were indicated and, as this is the very beginning of the proposed activity, it is understandable that little specific information is currently available.</p> <p>However, as mentioned, the mere fact that this</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				proposal is under consideration, myself and my fellow residents are uneasy, having this matter hanging over our heads.		
Respondent	Belfairs Gardens Residents Association & Southend District Pensioners Campaign (Barbara Armitage)					
Full Submission	<p>The following response includes comments from Belfairs Gardens Residents Association and Southend District Pensioners Campaign.</p> <p>A major concern with the plan, as it has been with previous development plans for 2006, 2010 and 2015 which I have, is that the plan is prepared solely on planning and environmental grounds and the Department responsible has no dialogue with departments concerned with people. There is therefore no recognition of an ageing population , that people will work into older age but have health issues of that age and no mention or concept of dealing with disability in all ages whatsoever. The document repeats the assumptions that people will use public transport or cycle. Transport has been an issue in the town for decades. East West is possible except no buses to the sea front at all, but North South has always been poor. The bus companies control the public transport on road and routes come and go as the recent withdrawal of No. 5 bus along Leigh Road shows. The numbers cycling are low and doing so into pensionable age is questionable. Therefore cars remain the main means of transport both for personal shopping and important appointments with opticians, dentists and other practitioners either personally driven or assisted by friends and family. Blue badge spaces are not mentioned and again maintaining a worthwhile lifestyle for a disabled person is often dependant upon a blue badge. 'Making reasonable provision' is required under the disability legislation and the diminution of any blue badge spaces should be resisted. Culture and leisure, recreation and tourism are mentioned on page 28. People have to get there and park . Pedestrianisation of further parts of the town such as London Road P.58 near the Odeon will make it difficult for older and disabled people to take advantage of the excellent transmissions of opera and ballet and the Thursday afternoon tea and films much enjoyed. I have been asked specifically to mention this and I have difficulty finding a blue badge space in the evening now. If it is too far away in the dark with a bad pavement and near the collegewhich seems have some undesirable happenings, I just go back home. My friend's husband can sometimes take us and meet us afterwards .</p> <p>The statement that there is a low level of car ownership in the town centre , possibly because of multi occupation, is losing credibility as more flats are coming all over the town and the exceptionally high cost of many would indicate that car ownership will go up rapidly. There is also a statement that there is an excess of parking available has been in these plans for years. In my opinion they take account of all the sea front which few would park and walk uphill from to shop in Hamlet Court Road or the town centre. Also The Cliffs Pavilion not used much without a show is not near shops and any restaurants on the sea front are a substantial walk. Also underground car parking by the university is only at certain times and including any parking by private shopping areas is quite wrong.</p> <p>Building on central car parks therefore is a retrograde step. P42 It might provide additional facilities but these could be offset by the public going elsewhere that Southend and we support the Traders is saying that town car parking is essential.(plus disabled places as above). The car park by the Southend Association of Voluntary Services and the old municipal offices are examples. Around that area are lots of businesses such as solicitors, accountants, care providers etc. whose customers go there for short periods of time and then go on to other places. The idea of an out of town car park and bus or walk could lead those to lose business and just move out. Places like Colchester and Ipswich are a nightmare.</p> <p>We support the sea front style p72 but why put a tower of flats by the Kursaal or flats above the Esplanade pub(former) . This should just be leisure not housing. We support the key views but we have already lost some by enormous flat development in Leigh and on the sea front. The Council never seems to enforce this and developers rely on appeals. Prittlewell Conservation area is certainly important because there is little of it now so we do not understand why the Council wanted to allow demolition of cottages in East Street and we hope that the Council is facilitating the restoration of these.</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	<p>Shared Space. This has been an ongoing problem with accidents near Southend Victoria Station and on the sea front. We do not want any more shared spaces. On the sea from there is nowhere for taxis to drop off (no buses of course) . Kerbs help to keep pedestrians safe and also, vitally to direct rainwater to drains. There is flooding there as the owner of Happidrome will agree. Southend Victoria needs a crossing . There are so many near misses and elderly and disabled people are afraid to use as I am myself. One senior Councillor from previous administration said it did not matter what buildings looked like as long as they brought in money. Another current councillor said it was ok to build on car parks if there was parking underneath. The costs are great and underground car parks can be very dangerous places.</p> <p>Conclusion We recognise the amount of work which has gone into this document but too many assumptions have continued from previous ones and the absence of any consideration of people we feel makes it not viable as a policy document. Thank you for the opportunity to comment.</p>					
EiP	Written					
Reps	30	2653	Comment	The plan is prepared solely on planning and environmental grounds and the Department responsible has no dialogue with departments concerned with people. There is therefore no recognition of an ageing population , that people will work into older age but have health issues of that age and no mention or concept of dealing with disability in all ages whatsoever.		
	DS5	2654	Comment	The document repeats the assumptions that people will use public transport or cycle. Transport has been an issue in the town for decades. East West is possible except no buses to the sea front at all, but North South has always been poor. The bus companies control the public transport on road and routes come and go as the recent withdrawal of No. 5 bus along Leigh Road shows.		
	DS5	2655	Comment	The numbers cycling are low and doing so into pensionable age is questionable. Therefore cars remain the main means of transport both for personal shopping and important appointments with opticians, dentists and other practitioners either personally driven or assisted by friends and family. Blue badge spaces are not mentioned and		

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				again maintaining a worthwhile lifestyle for a disabled person is often dependent upon a blue badge. 'Making reasonable provision' is required under the disability legislation and the diminution of any blue badge spaces should be resisted.		
	PA2.2.a	2656	Object	Pedestrianisation of further parts of the town such as London Road P.58 near the Odeon will make it difficult for older and disabled people to take advantage of the excellent transmissions of opera and ballet and the Thursday afternoon tea and films much enjoyed.		
	128	2657	Comment	The statement that there is a low level of car ownership in the town centre , possibly because of multi occupation, is losing credibility as more flats are coming all over the town and the exceptionally high cost of many would indicate that car ownership will go up rapidly.		
	132	2658	Comment	There is also a statement that there is an excess of parking available. This has been in these plans for years. In my opinion they take account of all the sea front parking which few would park at and walk uphill from to shop in Hamlet Court Road or the town centre. Also the Cliffs Pavilion car park is not used much when a show is not taking place. This is not near shops and any restaurants on the sea front are a substantial walk away. Also underground car parking by the university is only at certain times and including any parking by private shopping areas is quite wrong.		
	135	2659	Comment	Building on central car parks is a retrograde step. P42 It might provide additional facilities but these could be offset by the public going elsewhere. We support the Traders that town car		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				parking is essential.(plus disabled places as above). The car park by the Southend Association of Voluntary Services and the old municipal offices are examples. Around that area are lots of businesses such as solicitors, accountants, care providers etc. whose customers go there for short periods of time and then go on to other places. The idea of an out of town car park and bus or walk could lead those to lose business and just move out.		
	Policy CS1	2660	Comment	We support the sea front style p72 but why put a tower of flats by the Kursaal or flats above the Esplanade pub(former) . This should just be leisure not housing. We support the key views but we have already lost some by enormous flat development in Leigh and on the sea front. The Council never seems to enforce this and developers rely on appeals.		
	84	2661	Comment	Prittlewell Conservation area is certainly important because there is little of it now so we do not understand why the Council wanted to allow demolition of cottages in East Street and we hope that the Council is facilitating the restoration of these.		
	PA8.3	2662	Comment	Shared Space. This has been an ongoing problem with accidents near Southend Victoria Station and on the sea front. We do not want any more shared spaces. On the seafront there is nowhere for taxis to drop off (no buses of course) . Kerbs help to keep pedestrians safe and also, vitally to direct rainwater to drains. There is flooding there as the owner of Happidrome will agree. Southend Victoria needs a crossing. There are so many near		

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				misses and elderly and disabled people are afraid to use as I am myself.		
	CS1.3	2663	Comment	Shared Space. This has been an ongoing problem with accidents near Southend Victoria Station and on the sea front. We do not want any more shared spaces. On the seafront there is nowhere for taxis to drop off (no buses of course). Kerbs help to keep pedestrians safe and also, vitally to direct rainwater to drains. There is flooding there as the owner of Happidrome will agree. Southend Victoria needs a crossing. There are so many near misses and elderly and disabled people are afraid to use as I am myself.		
Respondent	Simon Mitchell (OFCOM)					
Full Submission	Ofcom only deal with <u>Wind turbine/farm requests</u> that are sent in by e-mail (see text in red below for what we require). We are very much hands off in this process. Our policy is not to advise or get involved with any planning applications.					
EiP						
Rep	1	2664	Comment	No Comment		
Respondent	Mr Jason Finley (Legenddeli Ltd)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. 					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	<p>Consistent with National Policy</p> <p>6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>					
EiP	Written					
Rep	DS5	2666	Object	We need more sustainable parking – not less – its becoming a difficulty to travel and park in the town centre and I believe further cuts to parking would only damage the town further and independent businesses.		Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective 4(4) Consistent with National Policy
	DS5	2667	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		Sound: No 4(2) Justified
	DS5	2668	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		
	152	2669	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2670	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
Respondent	Mrs Jackie Carmichael (SRG)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan³ stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> 3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. 4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> 5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	<p>6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>					
EiP Rep						
	DS5	2671	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		Sound: No 4(1) Positively Prepared
	DS5	2672	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		
	152	2673	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2674	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.		
Respondent	Mr Simon Patterson (Chinnerys)					
Full Submission	<p>UN SOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> 3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. 4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> 5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p> <ol style="list-style-type: none"> 6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area. <p>The document does not comply with the council's Statement of Community Involvement.</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	<p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say. "Have your say on future development of Southend's town centre and central seafront " Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am. B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk. C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>					
EiP Rep	DS5	2675	Object	<p>UNSOUND Positively Prepared The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		Legally Compliant – No 4(1) Positively Prepared
	DS5	2676	Object	<p>Justified I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		
	152	2677	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2678	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
1.		2679	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p>		Legally compliant - no

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>		
Respondent	Mr Martin Maynard (Maynard Milton Insurance Services LLP)					
Full Submission	<p>UN SOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> 3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. 4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> 5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p> <ol style="list-style-type: none"> 6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area. <p>The document does not comply with the council's Statement of Community Involvement.</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	<p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say. "Have your say on future development of Southend's town centre and central seafront " Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am. B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk. C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>					
EiP						
Rep	DS5	2680	Object	<p>UNSOUND Positively Prepared The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		Sound: No 4(1) Positively Prepared
	DS5	2681	Object	<p>Justified I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		
	152	2682	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2683	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
1.		2684	Object	<p>5. The document does not comply with the council's Statement of Community Involvement. A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p>		Legally compliant - No

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk. C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.		
Respondent	Mrs Maria Siciliani (Rossi Ice Cream)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p> <ol style="list-style-type: none"> Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area. 					
EiP	Written					
Rep	DS5	2685	Object	UNSOUND Positively Prepared		Sound: No

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan³ stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		4(1) Positively Prepared
	DS5	2686	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				current car park network can't cope with demand.		
	152	2687	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.		Sound: No 4(3) Effective
	DS5	2688	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
Respondent	Mrs Ann Bush (Annie's Bistro)					
Full Submission	<p>UN SOUND Positively Prepared</p> <ol style="list-style-type: none"> The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan³ stating demand for parking in the central area will increase by 25% in the next 4 years. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p> <ol style="list-style-type: none"> Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area. 					
EiP	Written					
Rep	DS5	2689	Object	<p>UN SOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan³ stating demand for parking in the central area will increase by 25% in the next 4 years.</p>		<p>Sound: No</p> <p>4(1) Positively Prepared</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				If adopted the transport section of the SCAAP will result in increased congestion and journey times.		
	DS5	2690	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		Sound: No 4(2) Justified
	152	2691	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2692	Object	Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
Respondent	Mrs Amy Snelling (Stuarts)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> 3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the 					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p> <p>Effective</p> <p>5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p> <p>Consistent with National Policy</p> <p>6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
EiP	Written					
Rep	DS5	2693	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		<p>Sound: No</p> <p>4(1) Positively Prepared</p>
Rep	DS5	2694	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the</p>		<p>Sound: No</p> <p>4(2) Justified</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		
	152	2695	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2696	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
Respondent	Mr Robert Stevens (Clarence House Jewellers)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> 3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. 4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> 5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p> <ol style="list-style-type: none"> 6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. 					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.					
EiP	Written					
Rep	DS5	2697	Object	<p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan³ stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		Sound: No 4(1) Positively Prepared
	DS5	2698	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		
	152	2699	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2700	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.		
Respondent	Mr Robert Stevens (The PawnBroker)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> 3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. 4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> 5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p> <ol style="list-style-type: none"> 6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area. 					
EiP	Written					
Rep	DS5	2701	Object	UNSOUND Positively Prepared The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central		Sound: No 4(1) Positively Prepared

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>area (seafront). This is despite the Local Transport Plan³ stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		
	DS5	2702	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		Sound: No 4(2) Justified
	152	2703	Object	Effective		Sound: No 4(3) Effective

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.		
	DS5	2704	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		Sound: No 4(4) Consistent with National Policy
Respondent	Mr Micheal Kouspetris (Bizarre)					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
Full Submission	<p>UN SOUND Positively Prepared</p> <ol style="list-style-type: none"> The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p> <ol style="list-style-type: none"> Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area. 					
EiP	Written					
Reps	DS5	2705	Object	<p>UN SOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p>		<p>Sound: No</p> <p>4(1) Positively Prepared</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				If adopted the transport section of the SCAAP will result in increased congestion and journey times.		
	DS5	2706	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		Sound: No 4(2) Justified
	152	2707	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2708	Object	Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
Respondent	Mrs Lisa Raymond (East Anglia Pubs Co)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	<p>3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p> <p>Effective</p> <p>5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p> <p>Consistent with National Policy</p> <p>6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p> <p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>					
EiP	Written					
Rep	1	2709	Object	5. The document does not comply with the council's Statement of Community Involvement. A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the		Legally Compliant - No

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>		
	DS5	2710	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p>		Sound: No 4(1) Positively Prepared

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				If adopted the transport section of the SCAAP will result in increased congestion and journey times.		
	DS5	2711	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		Sound: No 4(2) Justified
	152	2712	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2713	Object	Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
Respondent	Mr Christopher Papouis (H2o Barber Shop)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p> <p>Effective</p> <p>5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p> <p>Consistent with National Policy</p> <p>6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
EiP	Written					
Rep	DS5	2714	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		<p>Sound: No</p> <p>4(1) Positively Prepared</p>
	DS5	2715	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in</p>		<p>Sound: No</p> <p>4(2) Justified</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		
	152	2716	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2717	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
Respondent	Mr Steve Solly (Sancto Party Store)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> 3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. 4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> 5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	6.			<p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p> <p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A - The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>		
EiP	Written					
Rep	DS5	2718	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		<p>Sound: No</p> <p>4(1) Positively Prepared</p>
	DS5	2719	Object	Justified		Sound: No

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		4(2) Justified
	152	2720	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2721	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
1.		2722	Object	<p>The document does not comply with the council's Statement of Community Involvement. A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p>		Legally compliant - no

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st Jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>		
Respondent	Mr Neil Raven (Ravens of Southend)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan 3 stating demand for parking in the central area will increase by 25% in the next 4 years. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p> <ol style="list-style-type: none"> Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. 					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	<p>The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p> <p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say. "Have your say on future development of Southend's town centre and central seafront " Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>					
EiP	Written					
Rep	DS5	2723	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		<p>Sound: No</p> <p>4(1) Positively Prepared</p>
	DS5	2724	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed</p>		<p>Sound: No</p> <p>4(2) Justified</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		
	152	2725	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2726	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
1.		2727	Object	<p>5. The document does not comply with the council's Statement of Community Involvement. A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p>		Legally compliant - no

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>		
Respondent	Mr Perry Reynolds (Laurelle London Ltd)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p> <ol style="list-style-type: none"> Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. 					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.					
EiP	Written					
Rep	DS5	2728	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan³ stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		Sound: No 4(1) Positively Prepared
	DS5	2729	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		
	152	2730	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2731	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.		
Respondent	Mr Richard Prewer Las Vegas Grill					
Full Submission	<p>UN SOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> 3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. 4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> 5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p> <ol style="list-style-type: none"> 6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area. <p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	<p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st Jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>					
EiP	Written					
Rep	DS5	2732	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		Sound: No 4(1) Positively Prepared
	Ds5	2733	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		
152	2734	Object	Effective	<p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
DS5	2735	Object	Consistent with National Policy	<p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.		
1.		2736	Object	<p>5. The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments</p>		Legally Compliant - No

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.		
Respondent	Mrs Gloria Humphreys (Copacabana Leisure)					
Full Submission	<p>UN SOUND Positively Prepared</p> <ol style="list-style-type: none"> The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p> <ol style="list-style-type: none"> Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area. 					
EiP	Written					
Rep	DS5	2737	Object	UN SOUND Positively Prepared The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in		Sound: No 4(1) Positively Prepared

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		
	DS5	2738	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		Sound: No 4(2) Justified
	152	2739	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	DS5	2740	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		Sound: No 4(4) Consistent with National Policy
Respondent	Miss Jodie Humpreys (Rio Leisure Ltd)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. 					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	<p>Justified</p> <p>3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p> <p>Effective</p> <p>5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p> <p>Consistent with National Policy</p> <p>6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>					
EiP						
Rep	DS5	2741	Object	<p>UN SOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		<p>Sound: No</p> <p>4(1) Positively Prepared</p>
	DS5	2742	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed</p>		<p>Sound: No</p> <p>4(2) Justified</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		
	152	2743	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2744	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
Respondent	Mr David Prewter (Clarkes Restaurant)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan³ stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> 3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. 4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> 5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. 					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	<p>Consistent with National Policy</p> <p>6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p> <p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A - The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say. "Have your say on future development of Southend's town centre and central seafront " Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm. The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>					
EiP	Written					
Rep	DS5	2745	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		<p>Sound: No</p> <p>4(1) Positively Prepared</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	DS5	2746	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		Sound: No 4(2) Justified
	152	2747	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2748	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
1.		2749	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p>		Legally Compliant - No

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>		
Respondent	Mr John Remblance (Star Amusements)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> 3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. 4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> 5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. 					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	<p>Consistent with National Policy</p> <p>6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>					
EiP	Written					
Rep	DS5	2750	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		Sound: No 4(1) Positively Prepared
	DS5	2751	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		
	152	2752	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2753	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.		
Respondent	Mr Ron Collier (Neptune Fish Restaurant)					
Full Submission	<p>UN SOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> 3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. 4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> 5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p> <ol style="list-style-type: none"> 6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area. 					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>					
EiP						
Rep	DS5	2754	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		Sound: No 4(1) Positively Prepared
	DS5	2755	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		
	152	2756	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2757	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
1.		2758	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p>		Legally compliant - No

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk. C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.		
Respondent	Ms Emma Brown (Seabeds Ltd)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p> <ol style="list-style-type: none"> Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area. 					
EiP						
Rep	DS5	2759	Object	UNSOUND Positively Prepared		Sound: No

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan³ stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		4(1) Positively Prepared
	DS5	2760	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				current car park network can't cope with demand.		
	152	2761	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.		Sound: No 4(3) Effective
	DS5	2762	Object	Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable		Sound: No 4(4) Consistent with National Policy
Respondent	Mr Michael Tall (Papillon)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p> <p>Effective</p> <p>5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p> <p>Consistent with National Policy</p> <p>6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p> <p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>		
EiP						
Rep	DS5	2763	Object	UN SOUND Positively Prepared The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central		Sound: No 4(1) Positively Prepared

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>area (seafront). This is despite the Local Transport Plan³ stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		
	DS5	2764	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		Sound: No 4(2) Justified
	152	2765	Object	Effective		Sound: No 4(3) Effective

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.		
	DS5	2766	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		Sound: No 4(4) Consistent with National Policy
	1.	2767	Object	The document does not comply with the council's Statement of Community Involvement.		Legally compliant - No

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>		
Respondent	Mr Chris Petris (Roses Restaurant)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	3.			I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.		
	4.			The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.		
	5.			The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.		
	6.			Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.		
	<p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p> <p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>					
EiP						
Rep	DS5	2768	Object	UN SOUND Positively Prepared The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south		Sound: No 4(1) Positively Prepared

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>central area (seafront). This is despite the Local Transport Plan³ stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		
	DS5	2769	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		Sound: No 4(2) Justified
	152	2770	Object	Effective		Sound: No 4(3) Effective

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		
	DS5	2771	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		<p>Sound: No 4(4) Consistent with National Policy</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	1.	2772	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>		Legally compliant - No
Respondent	Mr Justin Carmichael (Southend Rock & Gifts)					
Full Submission	UNSOUND Positively Prepared					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>2. If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p> <p>Justified</p> <p>3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p> <p>Effective</p> <p>5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p> <p>Consistent with National Policy</p> <p>6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p> <p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>		
EiP						
Rep	DS5	2773	Object	UNSOUND Positively Prepared		Sound: No

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan³ stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		4(1) Positively Prepared
	DS5	2774	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				current car park network can't cope with demand.		
	152	2775	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.		Sound: No 4(3) Effective
	DS5	2776	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	1.	2777	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>		Legally Compliant - No
Respondent	Mr David Rayment (Beaches Cafe Bar Bistro)					
Full Submission	<p>UNSOUND Positively Prepared</p> <p>1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>2. If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p> <p>Justified</p> <p>3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p> <p>Effective</p> <p>5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p> <p>Consistent with National Policy</p> <p>6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p> <p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>		
EiP						
Rep	DS5	2778	Object	UN SOUND Positively Prepared The SCAAP document does not recognise the need for more parking spaces in the central area		Sound: No 4(1) Positively Prepared

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		
	DS5	2779	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	152	2780	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2781	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		Sound: No 4(4) Consistent with National Policy
	1.	2782	Object	The document does not comply with the council's Statement of Community Involvement.		Legally Compliant - No

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>		
Respondent	Mr Chris Elvin (Falcon Pub)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p> <p>Effective</p> <p>5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p> <p>Consistent with National Policy</p> <p>6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
EiP						
Rep	DS5	2783	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		Sound: No 4(1) Positively Prepared
	DS5	2784	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		
	152	2785	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2786	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
Respondent	Mr Carl Vanner (Harry Levy)					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> 3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. 4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> 5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	<p>6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>					
EiP						
Reps	DS5	2787	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		Sound: No 4(1) Positively Prepared
	DS5	2788	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		
	152	2789	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2790	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.		
Respondent	Mr Roger Eary					
Full Submission	<p>UN SOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> 3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. 4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> 5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p> <ol style="list-style-type: none"> 6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area. 					
EiP						
Rep	DS5	2791	Object	UN SOUND Positively Prepared		Sound: No

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan³ stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		4(1) Positively Prepared
	DS5	2792	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				current car park network can't cope with demand.		
	152	2793	Object	Effective The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.		Sound: No 4(3) Effective
	DS5	2794	Object	<p>Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
Respondent	Mr Simon Stephens					
Full Submission	<p>UN SOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan³ stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> 3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. 4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand. <p>Effective</p> <ol style="list-style-type: none"> 5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years. <p>Consistent with National Policy</p> <ol style="list-style-type: none"> 6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area. 					
EiP						
Rep	DS5	2795	Object	UN SOUND Positively Prepared The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan ³ stating demand for parking in the central area will increase by 25% in the next 4 years.		Sound: No 4(1) Positively Prepared

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				If adopted the transport section of the SCAAP will result in increased congestion and journey times.		
	DS5	2796	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		Sound: No 4(2) Justified
	152	2797	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2798	Object	Consistent with National Policy Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
Respondent	Mr Alan Cropley					
Full Submission	<p>UNSOUND Positively Prepared</p> <ol style="list-style-type: none"> 1. The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan3 stating demand for parking in the central area will increase by 25% in the next 4 years. 2. If adopted the transport section of the SCAAP will result in increased congestion and journey times. <p>Justified</p> <ol style="list-style-type: none"> 3. I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking report and surveys have underestimated the parking stock, particularly in the central area to the 					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>4. The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p> <p>Effective</p> <p>5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p> <p>Consistent with National Policy</p> <p>6. Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
EiP						
Rep	DS5	2800	Object	<p>UNSOUND Positively Prepared</p> <p>The SCAAP document does not recognise the need for more parking spaces in the central area and fails to implement a policy to increase parking capacity particularly in the south central area (seafront). This is despite the Local Transport Plan³ stating demand for parking in the central area will increase by 25% in the next 4 years.</p> <p>If adopted the transport section of the SCAAP will result in increased congestion and journey times.</p>		Sound: No 4(1) Positively Prepared
	DS5	2801	Object	<p>Justified</p> <p>I object to the use of the Car Parking Study produced by Steer Davies Gleave as it is flawed and based on Car parking surveys carried out in bad weather and on inaccurate, unreliable data from the council's VMS system. The parking</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street thus the parking situation & demand to the south of the railway line has been misrepresented even though the southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable.</p> <p>The SCAAP document and its Car Parking Survey fails to recognise that on many busy days the current car park network can't cope with demand.</p>		
	152	2802	Object	<p>Effective</p> <p>The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.</p>		Sound: No 4(3) Effective
	DS5	2803	Object	<p>Consistent with National Policy</p> <p>Policy DS5, by failing to deliver sufficient parking capacity, and by introducing sustainable transport measures will create congestion and have a major negative impact on my business. Customer by car will not be able to access and park in the central area and thus will not be able to or will make the choice not to visit the central area. The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should</p>		Sound: No 4(4) Consistent with National Policy

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary. Due to large numbers of visitors coming to Southend by car and due to its geographical location and access routes measures such as bus lanes and cycle routes only add to congestion. The public transport system is not of a high quality and is unsuitable for families wishing to visit Southend from outside the area.</p>		
Respondent	Ms Anna Grech (Sunset Club & Bar)					
Full Submission	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>					
EiP Rep						
Rep	1.	2804	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public</p>		Legally Compliant - No

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>		
Respondent	Ms Anne Marie Jeffrey (The Hope Hotel)					
Full Submission	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	<p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council. Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk. C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>					
EiP						
Rep	1.	2805	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/</p>		Legally compliant - No

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				residents wanting to submit an online representation would simply give up.		
Respondent	Mr Paul Thompson (Pebbles One Ltd, Spar, Subway, Baskin Robbins & Maple House)					
Full Submission	<p>page 41</p> <p>I object to the use of the Car Parking Study (CPS) commissioned by Southend Council and undertaken by Steer Davies Gleave as part of the evidence base for the SCAAP. The study has been used to form the Parking Management Techniques adopted within the SCAAP. I believe the Study is flawed for reasons set out below and will result in an inefficient transport network in and around the SCAAP area, with a severe shortage of parking capacity to the south resulting in heavy congestion at busy periods. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street and on bad weather days thus the parking situation & demand to the south of the railway line has been misrepresented. The southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. Therefore the report is flawed and thus the related policies within the SCAAP are flawed</p> <p>Page 5 of the CPS recognises the increased future demand for parking predicted in the Southend Local Transport Plan 3 by 2021, stating: "The Southend Local Transport Plan 3 (L TP3): Strategy Document outlines key considerations related to Central Area parking provision. It notes that Central Area car parking demand is forecast to grow by 25% by 2021." Although this context is set out very early in the CPS, no further account appears to be taken of it in the analysis. Thus, the predicted increased future demand for parking of 25% is not accounted for within the strategy. Paragraph 2.1 goes on to say: "The Southend Local Transport Plan 3 (L TP3): Strategy Document outlines key considerations related to Central Area parking provision. It notes that Central Area car parking demand is forecast to grow by 25% by 2021." Although this context is set out very early in the CPS, no further account appears to be taken of it in the analysis. Thus, the predicted increased future demand for parking of 25% is not accounted for within the strategy. Paragraph 2.1 goes on to say: The document notes that Southend Central Area has a high level of car parking, which can encourage people to drive to the Central Area rather than using other more sustainable modes." For some land uses, this can be the case, however, for tourist attractions, high levels of car parking are necessary. The tourist industry relies upon the busiest days of the year to subsidise other periods of the year when they are not busy. The car parking demand for these busy periods therefore must be met to maximise their customer attraction. If this is not met, then it jeopardises their viability throughout the remainder of the year, which has a significant knock-on effect in terms of jobs and the local economy. Therefore, there will be some days that are not busy where there appears to be high levels of car parking availability, however, in reality, these spaces are necessary. In this regard, paragraph 2.1 recognises this by stating: "The L TP highlights a seasonal shortfall of parking capacity in certain car parks in summer and in December." The CPS therefore recognises at a very early stage that there is a seasonal shortfall of parking capacity in some car parks and that there is a predicted 25% increase in future demand for parking. Despite this, the CPS makes no further reference to this. Table 3.2 page 16 of survey report shows weather conditions on the survey days. These are incorrect and differ to the weather recorded at the time by traders: 13 August 2015 Rain & Thunderstorms 15 August 2015 Cloudy, Brightening up late afternoon 23 March 2016 Cloudy, Av temp 7c (90% seafront closed)</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>25 March 2016 Partly Cloudy, Av temp 11c 26 March 2016 Cloud & Rain, Av temp 1 Oc (storm Katie weekend) 30 May 2016 Mostly Cloudy, Av temp 14c No parking surveys done on a warm sunny day - ie in good weather Thus surveys do not show how parking capacity in central area performs in good weather conditions, which obviously are the peak times. This report greatly influences the transport/parking section of SCAAP and thus it is flawed. Page 8 Table 2.2 and page 9 table 2.4 shows the off street and on street car parking used in the report. However significant amounts of car parking spaces have not been included and some have not been identified. Table 2.3 page 8 identifies some car parks not included but gives no explanation as to why. The Marine Plaza car park is a major car park on the seafront with 200 spaces that has not been identified? (planning permission granted 26th Oct 2000 ref 00/00765FUL) Not including this car park is considered to underestimate the total car parking stock for tourists and visitors within the Southend Central Area and also (by not counting cars parked here) underestimate the total car parking demand created by tourists and visitors within the Southend Central Area. Similarly this has the effect of over stating the percentage figure on any day for spare capacity.</p> <p>NOT POSITIVELY PREPARED It is essential that the Transport Access and Public realm section recognises the need for tourists to be able to access the town and seafront by car. A survey carried out by Stockvale and the Seafront Traders Association has identified that 85% of tourists (out of 1500 surveyed) come by car. The implementation of the points listed under CS1.c, f and g will be at the cost of the car. Bus lanes etc will increase journey times into the SCAAP area by car and result in more congestion. This will deter tourists from visiting Southend and result in cars turning around and going elsewhere as the roads are so congested. The policies under section 2 are not sufficient to deal with the current or future demand for car spaces, particularly to the south. The CPS and Local Transport Plan3 highlight the council's estimated 25% increase in demand for parking spaces in the SCAAP area in the next 4 years. The SCAAP and the measures above do nothing to address this extra demand that will arise. On busy days, warm sunny days, there is a massive shortage of parking spaces and congestion results as cars are continually circulating looking for spaces. Visitors vow not to return as it can take hours to enter the town and get parked. Traffic jams back up along the A 127 and many cars turn around and go elsewhere. This means on warm sunny days the seafront has reached it's maximum capacity as no more visitors can get here by car. As a result investment by businesses will stop. Visitors often cancel bookings as they can't get into the town. Visitors opt to visit other resorts and use out of town shopping centres such as Lakeside and Bluewater. The policies do not meet the development needs of businesses on the seafront and the infrastructure will be insufficient to meet future growth in demand. The CPS recognises that there are already problems in the south on peak days but does nothing to deal with this.</p> <p>CONSISTENT WITH NATIONAL POLICY The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car. The government recognises that different policies and measures will be required in different communities and different opportunities to maximise sustainable transport solutions will vary.</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	The sustainable transport policies identified in the SCAAP will make journey by car to the central area much longer and much harder to navigate and thus will cause economic harm to the local economy. Residents lives will also suffer due to increased congestion and pollution.					
EiP	Appearance					
Rep	130	2806	Object	<p>page 41</p> <p>I object to the use of the Car Parking Study (CPS) commissioned by Southend Council and undertaken by Steer Davies Gleave as part of the evidence base for the SCAAP. The study has been used to form the Parking Management Techniques adopted within the SCAAP. I believe the Study is flawed for reasons set out below and will result in an inefficient transport network in and around the SCAAP area, with a severe shortage of parking capacity to the south resulting in heavy congestion at busy periods. The parking report and surveys have underestimated the parking stock, particularly in the central area to the south of railway, and thus has underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street and on bad weather days thus the parking situation & demand to the south of the railway line has been misrepresented. The southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. Therefore the report is flawed and thus the related policies within the SCAAP are flawed.</p>	The CPS should be done again based on more up to date surveys. New surveys were not done in July or August 2016. The parking surveys should be done in August 2017, containing data for ALL publicly available car parks and on days where the weather is sunny and hot.	Sound – No 4(2) Justified
	2.1 (29)	2807	Object	Page 5 of the CPS recognises the increased future demand for parking predicted in the Southend Local Transport Plan 3 by 2021, stating:		Sound – No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>"The Southend Local Transport Plan 3 (L TP3): Strategy Document outlines key considerations related to Central Area parking provision. It notes that Central Area car parking demand is forecast to grow by 25% by 2021." Although this context is set out very early in the CPS, no further account appears to be taken of it in the analysis. Thus, the predicted increased future demand for parking of 25% is not accounted for within the strategy.</p> <p>Paragraph 2.1 goes on to say: "The Southend Local Transport Plan 3 (L TP3): Strategy Document outlines key considerations related to Central Area parking provision. It notes that Central Area car parking demand is forecast to grow by 25% by 2021."</p> <p>Although this context is set out very early in the CPS, no further account appears to be taken of it in the analysis. Thus, the predicted increased future demand for parking of 25% is not accounted for within the strategy.</p> <p>Paragraph 2.1 goes on to say: The document notes that Southend Central Area has a high level of car parking, which can encourage people to drive to the Central Area rather than using other more sustainable modes."</p> <p>For some land uses, this can be the case, however, for tourist attractions, high levels of car parking are necessary. The tourist industry relies upon the busiest days of the year to subsidise other periods of the year when they are not busy. The car parking demand for these busy periods therefore must be met to maximise their customer attraction. If this is not met, then it jeopardises their viability throughout the</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>remainder of the year, which has a significant knock-on effect in terms of jobs and the local economy.</p> <p>Therefore, there will be some days that are not busy where there appears to be high levels of car parking availability, however, in reality, these spaces are necessary. In this regard, paragraph 2.1 recognises this by stating: "The L TP highlights a seasonal shortfall of parking capacity in certain car parks in summer and in December." The CPS therefore recognises at a very early stage that there is a seasonal shortfall of parking capacity in some car parks and that there is a predicted 25% increase in future demand for parking. Despite this, the CPS makes no further reference to this. Table 3.2 page 16 of survey report shows weather conditions on the survey days. These are incorrect and differ to the weather recorded at the time by traders:</p> <p>13 August 2015 Rain & Thunderstorms 15 August 2015 Cloudy, Brightening up late afternoon 23 March 2016 Cloudy, Av temp 7c (90% seafront closed) 25 March 2016 Partly Cloudy, Av temp 11c 26 March 2016 Cloud & Rain, Av temp 1 Oc (storm Katie weekend) 30 May 2016 Mostly Cloudy, Av temp 14c No parking surveys done on a warm sunny day - ie in good weather Thus surveys do not show how parking capacity in central area performs in good weather conditions, which obviously are the peak times. This report greatly influences the</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>transport/parking section of SCAAP and thus it is flawed.</p> <p>Page 8 Table 2.2 and page 9 table 2.4 shows the off street and on street car parking used in the report. However significant amounts of car parking spaces have not been included and some have not been identified. Table 2.3 page 8 identifies some car parks not included but gives no explanation as to why. The Marine Plaza car park is a major car park on the seafront with 200 spaces that has not been identified? (planning permission granted 26th Oct 2000 ref 00/00765FUL)</p> <p>Not including this car park is considered to underestimate the total car parking stock for tourists and visitors within the Southend Central Area and also (by not counting cars parked here) underestimate the total car parking demand created by tourists and visitors within the Southend Central Area. Similarly this has the effect of over stating the percentage figure on any day for spare capacity.</p>		
	DS5	2808	Object	<p>NOT POSITIVELY PREPARED</p> <p>It is essential that the Transport Access and Public realm section recognises the need for tourists to be able to access the town and seafront by car. A survey carried out by Stockvale and the Seafront Traders Association has identified that 85% of tourists (out of 1500 surveyed) come by car.</p> <p>The implementation of the points listed under CS1.c, f and g will be at the cost of the car. Bus lanes etc will increase journey times into the SCAAP area by car and result in more congestion.</p>	<p>The SCAAP needs to contain a policy that increases parking capacity by 25% in the southern central area. It should stipulate that any new development on existing car parks contains sufficient parking capacity to cope with the existing spaces and to meet the additional demand from the new developments new use. Roads and accessibility by car should take priority over bus and cycle lanes and pedestrian routes.</p>	<p>Sound: No</p> <p>4(1) Positively Prepared</p> <p>4(4) Consistent with National Policy</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>This will deter tourists from visiting Southend and result in cars turning around and going elsewhere as the roads are so congested. The policies under section 2 are not sufficient to deal with the current or future demand for car spaces, particularly to the south. The CPS and Local Transport Plan³ highlight the council's estimated 25% increase in demand for parking spaces in the SCAAP area in the next 4 years. The SCAAP and the measures above do nothing to address this extra demand that will arise.</p> <p>On busy days, warm sunny days, there is a massive shortage of parking spaces and congestion results as cars are continually circulating looking for spaces. Visitors vow not to return as it can take hours to enter the town and get parked. Traffic jams back up along the A 127 and many cars turn around and go elsewhere. This means on warm sunny days the seafront has reached it's maximum capacity as no more visitors can get here by car. As a result investment by businesses will stop. Visitors often cancel bookings as they can't get into the town. Visitors opt to visit other resorts and use out of town shopping centres such as Lakeside and Bluewater.</p> <p>The policies do not meet the development needs of businesses on the seafront and the infrastructure will be insufficient to meet future growth in demand. The CPS recognises that there are already problems in the south on peak days but does nothing to deal with this.</p>		
	DS5	2809	Object	CONSISTENT WITH NATIONAL POLICY		Sound: No

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and different opportunities to maximise sustainable transport solutions will vary.</p> <p>The sustainable transport policies identified in the SCAAP will make journey by car to the central area much longer and much harder to navigate and thus will cause economic harm to the local economy. Residents lives will also suffer due to increased congestion and pollution.</p>		4(4) Consistent with National Policy
Respondent	Mr Paul Thompson (Seafront Traders Association)					
Full Submission	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up</p> <p>The consultation process should be done again in a way that complies with the Councils Statement of Community Involvement. The 6 week consultation period in which representations can be made prior to the Government Inspectors hearing should be done again in a way that allows everyone to submit a representation in a simple manner</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>I am making this representation on behalf of the Seafront Traders Association in my role as Chair of the association. The Association represents approximately 30 seafront businesses which are all located on the seafront within the Southend Central Area. I have been a trader on the seafront for over 15 years and own 4 businesses located on Marine Parade. I have been the Chair of this association for the past 3 years and a member for 15 years. I am also a director of the Southend BID. Parking and the road network infrastructure in central Southend has been an issue that has caused much debate within the association for many years. The association meets on a regular basis and the SCAAP document and consultation process has been widely discussed at meetings for the last few years. The view of the businesses in the association is a unanimous one and has been represented in this form. feel it is important for the association to be represented at the oral examination as the body represents a significant percentage of the businesses that are located in the main tourist part of Southend and the scaap area (The Golden Mile as it has been named historically). I have spent considerable time over the last few years working with businesses and the council on various committees with issues related to parking, congestion and infrastructure. I have spent time at the civic centre with the council's VMS team and have a good understanding of how this works. I have even walked round and counted every parking space in the SCAAP area to the south of the railway line and can thus safely state that my figures for the parking capacity in this area are far more accurate and significantly different to those published. I have also spent considerable time this summer walking around the car parks on busy weekends witnessing how the network performs and where problems exist. Sharing this first hand knowledge at the oral examination would be useful I think from the inspector's point of view.</p> <p>We have significant evidence with regard to the accuracy of the council's vms system, and have strong concerns re the Car Parking Study commissioned by SBC. The oral examination is the best forum to discuss this information as it is difficult to scribe.</p> <p>The importance of the dpd is vital to the viability of businesses in the scaap area. We feel the document needs to be re written including a policy that will increase parking capacity in the Southern part of the scaap area by a minimum of 25% in the next 3 years. The statement of 'no net loss' is vague with no exact definition, and it is insufficient to allow the growth of tourism to occur. In fact we believe it will have the effect to hamper growth. It should stipulate that any new development on existing car parks should contain replacement car parking equal to the existing stock, and in addition sufficient capacity to serve the new development's use.</p> <p>Due to the central area's reliance on tourism the road network should give priority to the car, and any sustainable transport routes should not take priority or occupy existing road space used by cars. The CPS should be done again based on more up to date surveys. No surveys were done in the summer 2016 in July or August during 2 months of virtually unbroken sunshine. New parking surveys should be done on warm sunny days in July & August 2017. These surveys should focus on the total car parking network, including all publically available spaces. This will enable data taken at peak times to be assessed.</p> <p>NOT POSITIVELY PREPARED</p> <p>It is essential that the Transport Access and Public realm section recognises the need for tourists to be able to access the town and seafront by car. A survey carried out by Stockvale and the Seafront Traders Association has identified that 85% of tourists (out of 1500 surveyed) come by car. Southend has built up its reputation over the last 100 years as a resort popular for family day trips, with many visitors coming from the Thames gateway area, London, Essex and Kent. For families, the easiest, convenient and most cost effective mode of transport to visit Southend is the car. Sustainable modes of transport are often too impractical for family visits to Southend seaside. As car ownership has increased considerably over the last 20 years the importance of the car to the local tourist economy is vital. The scaap and the CPS fail to recognise this and its importance to the viability of the tourist industry in Southend. The implementation of the points listed above under no.1 will be at the</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>cost of the car. Bus & cycle lanes etc will increase journey times into the SCAAP area by car and result in more congestion. This will deter tourists from visiting Southend and result in cars turning around and going elsewhere as the roads are so congested.</p> <p>The policies under section 2 are not sufficient to deal with the current or future demand for car spaces, particularly to the south.</p> <p>The CPS and Local Transport Plan³ highlight the council's estimated 25% increase in demand for parking spaces in the SCAAP area in the next 4 years. The SCAAP and the measures above do nothing to address the capacity shortages this extra demand will create.</p> <p>On busy days, warm sunny days, there is already a massive shortage of parking spaces and congestion results as cars are continually circulating looking for spaces. Visitors vow not to return as it can take hours to enter the town and get parked. Traffic jams back up along the A 127 and many cars turn around and go elsewhere.</p> <p>This means on warm sunny days the seafront has reached it's maximum capacity as no more visitors can get here and parked by car. As a result investment by businesses will stop. Visitors often cancel bookings as they can't get into the town. Visitors opt to visit other resorts and use out of town shopping centres such as Lakeside and Bluewater.</p> <p>The policies do not meet the development needs of businesses on the seafront and the infrastructure will be insufficient to meet future growth in demand. The CPS recognises that there are already existing problems in the south on peak days but does nothing to deal with this.</p> <p>CONSISTENT WITH NATIONAL POLICY</p> <p>The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and different opportunities to maximise sustainable transport solutions will vary.</p> <p>The sustainable transport policies identified in the SCAAP will make journey by car to the central area much longer and much harder to navigate and thus will cause economic harm to the local economy. Residents lives will also suffer due to increased congestion and pollution.</p> <p>JUSTIFIED</p> <p>Paragraph 130 page 41</p> <p>The Traders Association objects to the use of the Car Parking Study (CPS) commissioned by Southend Council and undertaken by Steer Davies Gleave as part of the evidence base for the SCAAP. The study has been used to form the Parking Management Techniques adopted within the SCAAP.</p> <p>We believe the Study is flawed for reasons set out below and will result in an inefficient transport network in and around the SCAAP area, with a severe shortage of parking capacity to the south resulting in heavy congestion at busy periods.</p> <p>The Association has worked in conjunction with Stockvale Ltd and RPS planning in assessing the accuracy and reliability of the CPS. RPS have evaluated the CPS and their report has been submitted as part of Stockvale Ltd's representation. The Traders association fully support the findings of this report. The parking report and surveys have underestimated the parking capacity, particularly in the central area to the south of railway, and thus have underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street and on bad weather days thus the parking situation & demand to the south of the railway line has been misrepresented.</p> <p>The southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. Therefore the report is flawed and thus the related policies within the SCAAP are flawed.</p> <p>Page 5 paragraph 2.1 of the CPS identifies the increased future estimated growth in demand for</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>parking within the scaap area in the Southend Local Transport Plan 3 by 2021, stating: <i>"The Southend L TP3 Strategy Document outlines key considerations related to Central Area parking provision. It notes that Central Area car parking demand is forecast to grow by 25% by 2021. 11</i> Although this is stated early in the CPS, no further policies have been suggested to increase the parking capacity to meet this forecast demand. Thus, the predicted increased future demand for parking of 25% is not accounted for within the strategy. Paragraph 2.1 goes on to say: <i>"The document notes that Southend Central Area has a high level of car parking, which can encourage people to drive to the Central Area rather than using other more sustainable modes.</i> For tourist attractions, high levels of car parking are necessary. The tourist industry in Southend relies upon the busiest days of the year to subsidise other periods of the year when they are not busy. The car parking demand for these busy periods therefore must be met to maximise their customer attraction. If this is not met, then it jeopardises the viability of the businesses throughout the remainder of the year, which has a significant knock-on effect in terms of jobs and the local economy. There are many days where there is spare capacity in the parking network however these spaces are vital as they fill up rapidly on busiest days. Figures from the council's car park department show the annual revenue per space in the Seafront car parks is higher than elsewhere in the town. paragraph 2.1 recognises this by stating: <i>"The L TP highlights a seasonal shortfall of parking capacity in certain car parks in summer and in December."</i> Table 3.2 page 16 of survey report shows weather conditions on the survey days. These are incorrect and differ to the weather recorded at the time by traders: 13 August 2015 Rain & Thunderstorms 15 August 2015 Cloudy, Brightening up late afternoon 23 March 2016 Cloudy, Av temp 7c (90% seafront closed) 25 March 2016 Partly Cloudy, Av temp 11c 26 March 2016 Cloud & Rain, Av temp 1 Oc (storm Katie weekend) 30 May 2016 Mostly Cloudy, Av temp 14c Please see attached time stamped photos taken on seafront on 4 of the dates above No parking surveys done on a warm sunny day - ie in good weather Thus surveys do not show how parking capacity in central area performs in good weather conditions, which obviously are the peak times. This report greatly influences the transport/parking section of SCAAP and thus it is flawed. Page a Table 2.2 and page 9 table 2.4 shows the off street and on street car parking used in the report. However significant amounts of car parking spaces have not been included and some have not been identified. Table 2.3 page 8 identifies some car parks not included but gives no explanation as to why. The Marine Plaza car park is a major car park on the seafront with 200 spaces that has not been identified? (planning permission granted 26th Oct 2000 ref 00/00765FUL) Not including this car park underestimates the total car parking supply for tourists and visitors within the Southend Central Area and also (by not counting cars parked here) underestimates the total car parking demand created by tourists and visitors within the Southend Central Area. Similarly this has the effect of over stating the percentage figure on any day for spare capacity. Policy CS1 The scaap document has very little meaningful substance in terms or a strategic approach to tourism within the central area. The document fails to understand the drivers behind tourism and the attractions, facilities and infrastructure that is needed to grow tourism within the scaap area. The</p>		

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	dpd in effect neglects the day visitor to the area for a desire to attract longer stay visitors. It is important to try to encourage visitors to stay for longer but this should not be at the expense of the vast amount of day visitors which form the bulk of the industry's customer base.					
EiP	Appearance					
Rep	1.	2810	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>	The consultation process should be done again in a way that complies with the Councils Statement of Community Involvement. The 6 week consultation period in which representations can be made prior to the Government Inspectors hearing should be done again in a way that allows everyone to submit a representation in a simple manner.	Legally compliant - no
	DS5	2811	Object	I am making this representation on behalf of the Seafront Traders Association in my role as Chair	The importance of the dpd is vital to the viability of businesses in the scaap area. We feel the document	Sound: No 4(1) Positively Prepared

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>of the association. The Association represents approximately 30 seafront businesses which are all located on the seafront within the Southend Central Area. I have been a trader on the seafront for over 15 years and own 4 businesses located on Marine Parade. I have been the Chair of this association for the past 3 years and a member for 15 years. I am also a director of the Southend BID. Parking and the road network infrastructure in central Southend has been an issue that has caused much debate within the association for many years. The association meets on a regular basis and the SCAAP document and consultation process has been widely discussed at meetings for the last few years. The view of the businesses in the association is a unanimous one and has been represented in this form.</p> <p>feel it is important for the association to be represented at the oral examination as the body represents a significant percentage of the businesses that are located in the main tourist part of Southend and the scaap area (The Golden Mile as it has been named historically). I have spent considerable time over the last few years working with businesses and the council on various committees with issues related to parking, congestion and infrastructure. I have spent time at the civic centre with the council's VMS team and have a good understanding of how this works. I have even walked round and counted every parking space in the SCAAP area to the south of the railway line and can thus safely state that my figures for the parking capacity in this area are far more accurate and</p>	<p>needs to be re written including a policy that will increase parking capacity in the Southern part of the scaap area by a minimum of 25% in the next 3 years. The statement of 'no net loss' is vague with no exact definition, and it is insufficient to allow the growth of tourism to occur. In fact we believe it will have the effect to hamper growth.</p> <p>It should stipulate that any new development on existing car parks should contain replacement car parking equal to the existing stock, and in addition sufficient capacity to serve the new development's use.</p> <p>Due to the central area's reliance on tourism the road network should give priority to the car, and any sustainable transport routes should not take priority or occupy existing road space used by cars. The CPS should be done again based on more up to date surveys. No surveys were done in the summer 2016 in July or August during 2 months of virtually unbroken sunshine. New parking surveys should be done on warm sunny days in July & August 2017. These surveys should focus on the total car parking network, including all publically available spaces. This will enable data taken at peak times to be assessed.</p>	<p>4(2) Justified 4(3) Effective 4(4) Consistent with National Policy</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>significantly different to those published. I have also spent considerable time this summer walking around the car parks on busy weekends witnessing how the network performs and where problems exist. Sharing this first hand knowledge at the oral examination would be useful I think from the inspector's point of view.</p> <p>We have significant evidence with regard to the accuracy of the council's vms system, and have strong concerns re the Car Parking Study commissioned by SBC. The oral examination is the best forum to discuss this information as it is difficult to scribe.</p>		
	DS5	2812	Object	<p>NOT POSITIVELY PREPARED</p> <p>It is essential that the Transport Access and Public realm section recognises the need for tourists to be able to access the town and seafront by car. A survey carried out by Stockvale and the Seafront Traders Association has identified that 85% of tourists (out of 1500 surveyed) come by car.</p> <p>Southend has built up its reputation over the last 100 years as a resort popular for family day trips, with many visitors coming from the Thames gateway area, London, Essex and Kent. For families, the easiest, convenient and most cost effective mode of transport to visit Southend is the car. Sustainable modes of transport are often too impractical for family visits to Southend seaside. As car ownership has increased considerably over the last 20 years the importance of the car to the local tourist economy is vital. The scaap and the CPS fail to recognise this and its importance to the viability</p>		<p>Sound: No 4(1) Positively Prepared</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>of the tourist industry in Southend. The implementation of the points listed above under no.1 will be at the cost of the car. Bus & cycle lanes etc will increase journey times into the SCAAP area by car and result in more congestion. This will deter tourists from visiting Southend and result in cars turning around and going elsewhere as the roads are so congested. The policies under section 2 are not sufficient to deal with the current or future demand for car spaces, particularly to the south. The CPS and Local Transport Plan³ highlight the council's estimated 25% increase in demand for parking spaces in the SCAAP area in the next 4 years. The SCAAP and the measures above do nothing to address the capacity shortages this extra demand will create. On busy days, warm sunny days, there is already a massive shortage of parking spaces and congestion results as cars are continually circulating looking for spaces. Visitors vow not to return as it can take hours to enter the town and get parked. Traffic jams back up along the A 127 and many cars turn around and go elsewhere. This means on warm sunny days the seafront has reached it's maximum capacity as no more visitors can get here and parked by car. As a result investment by businesses will stop. Visitors often cancel bookings as they can't get into the town. Visitors opt to visit other resorts and use out of town shopping centres such as Lakeside and Bluewater. The policies do not meet the development needs of businesses on the seafront and the</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				infrastructure will be insufficient to meet future growth in demand. The CPS recognises that there are already existing problems in the south on peak days but does nothing to deal with this.		
	DS5	2813	Object	<p>CONSISTENT WITH NATIONAL POLICY</p> <p>The NPPF is clear that policies should contribute to building a strong responsive and competitive economy. The provision of infrastructure is vital to this and the plan should proactively meet the development demands of business. This plan will deter from economic growth as it does not allow for the growth in visitor numbers by car.</p> <p>The government recognises that different policies and measures will be required in different communities and different opportunities to maximise sustainable transport solutions will vary.</p> <p>The sustainable transport policies identified in the SCAAP will make journey by car to the central area much longer and much harder to navigate and thus will cause economic harm to the local economy. Residents lives will also suffer due to increased congestion and pollution.</p>		Sound: No 4(4) Consistent with National Policy
	DS5	2814	Object	<p>JUSTIFIED</p> <p>Paragraph 130 page 41</p> <p>The Traders Association objects to the use of the Car Parking Study (CPS) commissioned by Southend Council and undertaken by Steer Davies Gleave as part of the evidence base for the SCAAP. The study has been used to form the Parking Management Techniques adopted within the SCAAP.</p> <p>We believe the Study is flawed for reasons set out below and will result in an inefficient transport</p>		Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>network in and around the SCAAP area, with a severe shortage of parking capacity to the south resulting in heavy congestion at busy periods. The Association has worked in conjunction with Stockvale Ltd and RPS planning in assessing the accuracy and reliability of the CPS. RPS have evaluated the CPS and their report has been submitted as part of Stockvale Ltd's representation. The Traders association fully support the findings of this report. The parking report and surveys have underestimated the parking capacity, particularly in the central area to the south of railway, and thus have underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street and on bad weather days thus the parking situation & demand to the south of the railway line has been misrepresented.</p> <p>The southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies on over 99% of data from the VMS system which is inaccurate and unreliable. Therefore the report is flawed and thus the related policies within the SCAAP are flawed.</p> <p>Page 5 paragraph 2.1 of the CPS identifies the increased future estimated growth in demand for parking within the scaap area in the Southend Local Transport Plan 3 by 2021, stating: <i>"The Southend L TP3 Strategy Document outlines key considerations related to Central Area parking provision. It notes that Central Area car parking demand is forecast to grow by 25% by 2021. 11</i></p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>Although this is stated early in the CPS, no further policies have been suggested to increase the parking capacity to meet this forecast demand. Thus, the predicted increased future demand for parking of 25% is not accounted for within the strategy.</p> <p>Paragraph 2.1 goes on to say: <i>"The document notes that Southend Central Area has a high level of car parking, which can encourage people to drive to the Central Area rather than using other more sustainable modes.</i></p> <p>For tourist attractions, high levels of car parking are necessary. The tourist industry in Southend relies upon the busiest days of the year to subsidise other periods of the year when they are not busy. The car parking demand for these busy periods therefore must be met to maximise their customer attraction. If this is not met, then it jeopardises the viability of the businesses throughout the remainder of the year, which has a significant knock-on effect in terms of jobs and the local economy.</p> <p>There are many days where there is spare capacity in the parking network however these spaces are vital as they fill up rapidly on busiest days. Figures from the council's car park department show the annual revenue per space in the Seafront car parks is higher than elsewhere in the town.</p> <p>paragraph 2.1 recognises this by stating: <i>"The L TP highlights a seasonal shortfall of parking capacity in certain car parks in summer and in December."</i></p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>Table 3.2 page 16 of survey report shows weather conditions on the survey days. These are incorrect and differ to the weather recorded at the time by traders:</p> <p>13 August 2015 Rain & Thunderstorms 15 August 2015 Cloudy, Brightening up late afternoon 23 March 2016 Cloudy, Av temp 7c (90% seafront closed) 25 March 2016 Partly Cloudy, Av temp 11c 26 March 2016 Cloud & Rain, Av temp 1 Oc (storm Katie weekend) 30 May 2016 Mostly Cloudy, Av temp 14c</p> <p>Please see attached time stamped photos taken on seafront on 4 of the dates above</p> <p>No parking surveys done on a warm sunny day - ie in good weather</p> <p>Thus surveys do not show how parking capacity in central area performs in good weather conditions, which obviously are the peak times. This report greatly influences the transport/parking section of SCAAP and thus it is flawed.</p> <p>Page a Table 2.2 and page 9 table 2.4 shows the off street and on street car parking used in the report. However significant amounts of car parking spaces have not been included and some have not been identified. Table 2.3 page 8 identifies some car parks not included but gives no explanation as to why. The Marine Plaza car park is a major car park on the seafront with 200 spaces that has not been identified? (planning permission granted 26th Oct 2000 ref 00/00765FUL)</p>		

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				<p>Not including this car park underestimates the total car parking supply for tourists and visitors within the Southend Central Area and also (by not counting cars parked here) underestimates the total car parking demand created by tourists and visitors within the Southend Central Area. Similarly this has the effect of over stating the percentage figure on any day for spare capacity. Policy CS1</p> <p>The scaap document has very little meaningful substance in terms or a strategic approach to tourism within the central area. The document fails to understand the drivers behind tourism and the attractions, facilities and infrastructure that is needed to grow tourism within the scaap area. The dpd in effect neglects the day visitor to the area for a desire to attract longer stay visitors. It is important to try to encourage visitors to stay for longer but this should not be at the expense of the vast amount of day visitors which form the bulk of the industry's customer base.</p>		
Respondent	Mr Paul Thompson (Pebbles One Ltd)					
Full Submission	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to gam.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
EiP	Appearance					
Rep	1.	2815	Object	<p>The document does not comply with the council's Statement of Community Involvement.</p> <p>A -The invitations sent out to businesses in Southend to visit the consultation public workshops contained incorrect dates for the meetings. As a result I missed the 2 sessions that were for businesses and was not able to have my say.</p> <p>"Have your say on future development of Southend's town centre and central seafront "</p> <p>Please see 2 attached letters showing the workshops on 21 st Jan 10am to 1230pm, and 6 pm to 830 pm.</p> <p>The actual workshops for businesses were on 20th Jan 3pm to 4pm and 21st jan 8am to 9am.</p> <p>B - This submission form downloadable from the council's website is in a pdf format which can't be edited. Thus many businesses/ residents have not been able to email their representations to the council.</p> <p>Responses can also be made using the Representation Form and emailed to ldf@southend.gov.uk.</p> <p>C - The on line submission process is very difficult to navigate. It is time consuming and not at all user friendly, and does not allow for attachments to be submitted. Due to this many businesses/ residents wanting to submit an online representation would simply give up.</p>		Legally Compliant - No
Respondent	Mr James Blackender					

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
Full Submission	It is difficult on a normal day to park in Southend sea front area. If the council decide to reduce the parking in this area for whatever reason they will definitely reduce the amount of visitors. It will not stop me or my very large family going to the sea front but sadly it won't be Southend that we will visit. Please do not turn Southend back to a second class seafront.					
EiP						
Rep	CS1	2816	Object	It is difficult on a normal day to park in Southend sea front area. If the council decide to reduce the parking in this area for whatever reason they will definitely reduce the amount of visitors. It will not stop me or my very large family going to the sea front but sadly it won't be Southend that we will visit. Please do not turn Southend back to a second class seafront.		
Respondent	Mr Aaron Dorn					
Full Submission	I find it insane that we cannot show our displeasure and disagreement with the scaap development. You have made it to complicated on purpose. I wanted to find out about apparent (ridiculous) proposal to build on more car parks in the town, but you've made it too complicated for laypersons directly affected by it. Not cool					
EiP						
Rep	DS5	2817	Object	I wanted to find out about apparent (ridiculous) proposal to build on more car parks in the town, but you've made it too complicated for laypersons directly affected by it.		
Respondent	Ms Katherine Gibbinson					
Full Submission	I have heard about the plans to make Southend a car free zone. I feel that this would be inappropriate for the town for a number of reasons. I have 3 disabled children and the only way I can enjoy the seafront is if I travel by car. This is true for many people with disabilities and being car free could be considered discriminatory towards them. I think you would find that in reality the majority of visitors to the town travel by car. I think that the study showing only 25 percent may have been conducted outside of the train station.					
EiP						
Rep	DS5	2818	Object	I have heard about the plans to make Southend a car free zone. I feel that this would be inappropriate for the town for a number of reasons. I have 3 disabled children and the only way I can enjoy the seafront is if I travel by car. This is true for many people with disabilities and		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				being car free could be considered discriminatory towards them. I think you would find that in reality the majority of visitors to the town travel by car. I think that the study showing only 25 percent may have been conducted outside of the train station.		
Respondent	Ms Frances Auger					
Full Submission	I want to make a comment and an objection regarding the new plans for Southend Central. this is one of these most difficult websites I have encountered, is it that you do not wish for people to make their views known!					
EiP						
Rep	1.	2819	Object	I want to make a comment and an objection regarding the new plans for Southend Central.		
Respondent	Mr A Millman (Goldwyns)					
Full Submission	I refer to the publicity regarding the above. The Council appears to be proceeding with plans which (with the greatest respect) do not appear to have been thought through and do not benefit either residents or businesses in the Town. In particular, there is already a lack of car parking available in the town and the plans to develop sites which are currently car parks appear nonsensical. I also understand that there will be bicycle/bus lanes, which will simply further add to the already congested state of the roads in the Borough. I already frequently have calls from clients who are attending meetings at my office where they advise me they are late due to the traffic problems. I trust my letter an indeed those of others who have written will be acted upon.					
EiP						
Rep	DS5	2820	Object	There is already a lack of car parking available in the town and the plans to develop sites which are currently car parks appear nonsensical.		
	PA7	2821	Object	There is already a lack of car parking available in the town and the plans to develop sites which are currently car parks appear nonsensical.		
	Cs1	2822	Object	There is already a lack of car parking available in the town and the plans to develop sites which are currently car parks appear nonsensical.		
	DS5	2823	Object	I understand that there will be bicycle/bus lanes, which will simply further add to the already congested state of the roads in the Borough.		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
Respondent	Mrs Vivien Fletcher					
Full Submission	I have been trying to register my concern about the reduction of car parking spaces at Tyler's Ave, Seaway and Marine Plaza but find it impossible to navigate the SBC document. This is impossible for most residents to use and therefore removes input from most residents. I am extremely concerned that parking in the town is already poor and absolutely object to the removal of any more parking places. This summer I have had many problems finding both parking spaces and finding working meters. It is as if the council want to deter visitors and make things as difficult as possible. Please use a common sense approach and think again if you want Southend to be a welcoming and prosperous seaside venue.					
EiP						
Rep	DS5	2824	Comment	Concerned about the reduction of car parking spaces at Tyler's Ave, Seaway and Marine Plaza. Parking in the town is already poor and absolutely object to the removal of any more parking places. This summer I have had many problems finding both parking spaces and finding working meters. It is as if the Council want to deter visitors and make things as difficult as possible.		
	PA7	2825	Comment	Concerned about the reduction of car parking spaces at Tyler's Ave, Seaway and Marine Plaza. Parking in the town is already poor and absolutely object to the removal of any more parking places. This summer I have had many problems finding both parking spaces and finding working meters. It is as if the Council want to deter visitors and make things as difficult as possible.		
	Cs1	2826	Comment	Concerned about the reduction of car parking spaces at Tyler's Ave, Seaway and Marine Plaza. Parking in the town is already poor and absolutely object to the removal of any more parking places. This summer I have had many problems finding both parking spaces and finding working meters. It is as if the Council want to		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				deter visitors and make things as difficult as possible.		
Respondent	Mrs Gillian Beeching					
Full Submission	<p>I'm writing with concern about plans to change the parking in Southend. I live in Kent but am an annual pass holder at Adventure Island so visit quite regularly. On most occasions we have visited, especially in the summer we have found traffic into town slow and the parking around the seafront awful – sometimes taking at least 45 minutes to find a space and almost getting in a fight on one occasion. Every time we visit it is the thing that mars my anticipation of arriving, travelling that far with 2 young children and not knowing how long we will be driving round to find a space. Due to this I have researched travelling to Southend by public transport, but this would take me even longer than the journey time and at least some of the parking time and cost a lot more, plus would mean having to walk further from the station or getting another bus with 2 kids, so driving is still our best option. I'm concerned that the SCAAP seems to be reducing the amount of parking available for getting easily to the Seafront. I don't know Southend well and so could not easily interpret the map. I wonder if you could allay my concerns and explain how it is you intend to "Maintain parking capacity* within Southend Central Area at a level that supports vitality and viability and does not undermine the Central Area's ability to accommodate visitor trips, whilst enabling the delivery of relevant opportunity sites and Ensure that there is no net loss in car parking to the south of the Southend Central Area;" and if the plan goes ahead let me know where I should park! I couldn't find an obvious place to respond to the consultation and hope this will be taken as a response in the open period.</p>					
EiP						
Rep	DS5	2827	Object	<p>On most occasions we have visited Southend, especially in the summer, we have found traffic into the town slow and the parking around the seafront awful – sometimes taking at least 45 minutes to find a space and almost getting in a fight on one occasion. Every time we visit it is the thing that mars my anticipation of arriving, travelling that far with 2 young children and not knowing how long we will be driving round to find a space. Due to this I have researched travelling to Southend by public transport, but this would take me even longer than the journey time and cost a lot more, plus would mean having to walk further from the station or getting another bus with 2 kids, so driving is still our best option. I'm concerned that the SCAAP seems to be</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				reducing the amount of parking available for getting easily to the Seafront. Ensure that there is no net loss in car parking to the south of the Southend Central Area;" and if the plan goes ahead let me know where I should park!		
	PA7	2828	Object	<p>On most occasions we have visited Southend, especially in the summer, we have found traffic into the town slow and the parking around the seafront awful – sometimes taking at least 45 minutes to find a space and almost getting in a fight on one occasion. Every time we visit it is the thing that mars my anticipation of arriving, travelling that far with 2 young children and not knowing how long we will be driving round to find a space.</p> <p>Due to this I have researched travelling to Southend by public transport, but this would take me even longer than the journey time and cost a lot more, plus would mean having to walk further from the station or getting another bus with 2 kids, so driving is still our best option.</p> <p>I'm concerned that the SCAAP seems to be reducing the amount of parking available for getting easily to the Seafront.</p> <p>Ensure that there is no net loss in car parking to the south of the Southend Central Area;" and if the plan goes ahead let me know where I should park!</p>		
	Cs1	2829	Object	<p>On most occasions we have visited Southend, especially in the summer, we have found traffic into the town slow and the parking around the seafront awful – sometimes taking at least 45 minutes to find a space and almost getting in a</p>		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>fight on one occasion. Every time we visit it is the thing that mars my anticipation of arriving, travelling that far with 2 young children and not knowing how long we will be driving round to find a space.</p> <p>Due to this I have researched travelling to Southend by public transport, but this would take me even longer than the journey time and cost a lot more, plus would mean having to walk further from the station or getting another bus with 2 kids, so driving is still our best option.</p> <p>I'm concerned that the SCAAP seems to be reducing the amount of parking available for getting easily to the Seafront.</p> <p>Ensure that there is no net loss in car parking to the south of the Southend Central Area;" and if the plan goes ahead let me know where I should park!</p>		
Respondent	Castle Point Borough Council (Mr Steve Rogers)					
Full Submission						
EiP						
Rep	1.	2830	Comment	Castle Point Borough Council does not wish to make any representations at this time.		
Respondent	National Grid (Mr Robert Deanwood)					
Full Submission	National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.					
EiP						
Rep	1.	2831	Comment	We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.		

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
Respondent	RPS Planning & Development (Mr Nick Laister) on behalf of Stockvale Group					
Full Submission	<p>RPS has prepared the following representations to Southend Borough Council's Southend Central Area Action Plan (SCAAP), Revised Proposed Submission Version (November 2016) The following Headings represent Paragraphs or Policies contained within the SCAAP. These representations should be read in conjunction with the accompanying completed Representations Forms.</p> <p>Our client operates the largest and most successful tourism businesses in Southend (The StockvaleGroup is the owner and operator of: Adventure Island theme park; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex). We would like an opportunity to explain our client's business aspirations and explain why the policies in the Plan will not provide a firm basis for the growth of tourism in Southend, and indeed will have the opposite effect on tourism businesses to the objectives set out at the start of the SCAAP. It is very important to our client that the Inspector understands the consequences of adopting the SCAAP as currently drafted.</p>					
EiP	Appearance - To challenge the evidence base that has been put together by the Council. We also need to explain in more detail why the quality of the evidence base has impacted upon the policies, the interrelationships between the different policies and to explain in more detail how the policies will affect our client's businesses.					
Rep	1. Context and Issues Item e 'Tourism, Culture, Leisure and Recreation'	2832	Object	<p>Our representations are on behalf of The Stockvale Group, which is the owner and operator of: Adventure Island; Sealife Adventure; Three Shells beach café; Pavilion Fish and Chips; Feelgoods Pizza Pasta Restaurant; Sands Bistro restaurant; Adventure Inside and Radio Essex. We do not repeat this in our representations to other paragraphs and policies.</p> <p>We support the opportunities to maximise Southend's potential as a visitor destination and resort, and enhancing the evening economy, encouraging overnight and longer stays, and by creating a positive experience for visitors. It is essential that policies in this document support this. However, this section should recognise the proportion of visitors who visit Southend on day trips. It is still primarily a day trip destination, given its accessibility to London and Essex towns, and unless this is recognised explicitly here it is likely that policies will not respond adequately to this issue. Indeed, this is the case, as set out in</p>	"...However, there is opportunity to further maximise Southend's potential as a visitor destination and resort, particularly in terms of the evening economy and through encouraging overnight and longer stays, by building on the resort's success as a day visitor destination and by creating a positive experience of the central area for visitors."	Legally Compliant: Yes Sound: No 4(1) Positively Prepared

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>our representations on other paragraphs and policies. It is essential that the day visitor tourism economy is placed right at the heart of the plan's policies for the seafront, or (as can be seen in policies currently drafted) they will simply be causing and then managing decline, not planning positively for growth.</p>		
	<p>1. Context and Issues Item g 'Transport, Access and Public Realm</p>	<p>2833</p>	<p>Object</p>	<p>Comments on first paragraph: It is essential that the 'Transport, Access and Public Realm' section recognises the need for car access to support Southend's tourism economy. The seafront attractions are serving a much wider catchment area than the town centre, and catering much more for families; therefore the private car is a much more important component for travel. The strategy needs to recognise the need to attract car-borne visitors and park them close to the seafront. There needs to be high quality, sustainable ways of getting visitors to the various attractions. Simply "acknowledging the role the car plays in this balance" is not enough when creating policies to support an industry that is largely reliant on the private car. In our other representations we refer to surveys that demonstrate the reliance of this industry on the private car, and the fact that this can be sustainable when car occupancy levels are considered. There needs to be a clear statement that in the Central Seafront Area, policies will aim to support the day visitor economy, and a key element of this is providing sufficient car parking spaces to enable this economy to thrive and prosper.</p>	<p>First para: "...whilst acknowledging the role the car plays in this balance. In the Central Seafront Area sufficient provision will be made to ensure that all day visitors can park at a reasonable distance from the seafront, including at peak periods, to support the ongoing success and growth of this thriving tourism area."</p>	<p>Legally Compliant: Yes Sound: No 4(1) Positively Prepared</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>The second paragraph discusses the Central Area car parks and goes on to state: "It will be important to ensure that a level and quality of provision is provided that supports the vitality and viability of Southend Central Area." This statement needs to be far stronger, and should be looking for the protection of existing spaces that serve the seafront, the achievement of additional spaces to enable growth in tourism businesses, to support the significant new development proposed and the improvement of the quality of car parks and the routes from the car parks to the attractions. This is because, unlike the Town Centre, the seafront area is less easy to access by public transport because of the origins of visitors (a large proportion from outside Southend) and the fact that these trips are family trips which are much more difficult to serve by public transport. A survey of visitors to Adventure Island undertaken by The Stockvale Group in 2016 using Survey Monkey showed that out of 1,532 respondents only 137 (9%) of visitors originated from Southend and 1,295 of the 1,532 respondents (84.7%) travelled by car. The survey also showed that 30% of visitors had four passengers in the car and 29% had three passengers, demonstrating how difficult it is to serve this type of family visitor by public transport.</p> <p>The third paragraph recognises that "there is a clear imbalance in the Southend Central Area parking network at periods of peak demand, with car parking to the south of the central area</p>	<p>Second para: "It will be important to ensure that a level and quality of provision is provided that supports the vitality and viability of Southend Central Area. In the Central Seafront Area the quality and quantity of this provision will need to be improved to support the growth of this important component of Southend's economy."</p>	

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				experiencing over capacity issues, while car parking to the north has available spare capacity." This is a key issue and needs to be addressed and needs to be followed through in other policies. The 85% figure used in this paragraph is misleading as it relates to the entire SCAAP area. The seafront has significant capacity issues at peak times which are causing serious problems for operators and preventing growth.		
	28. Vision (p12)	2834	Support	We support this Vision as it recognises that day visitors are an integral component of Southend's economy now and will need to be in the future. It is essential that policies elsewhere in the Plan recognise this.	No changes	Legally Compliant: Yes Sound: Yes
	29. Strategic Objectives 5	2835	Support	The Strategic Objectives are generally supported. Paragraph 5 looks to attract greater visitor numbers to Southend. There will need to be clear, justified and effective policies to deliver this objective. The rest of the Plan does not, unfortunately, follow this through. Paragraph 8 is supported. This objective supports the vitality of CSA, addressing peak demand and capacity, good access to seafront and well located car parks. Need to ensure policies are effective at achieving this elsewhere in the document.	None	Legally Compliant: Yes Sound: Yes
	29. Strategic Objectives 8	2836	Support	The Strategic Objectives are generally supported. Paragraph 5 looks to attract greater visitor numbers to Southend. There will need to be clear, justified and effective policies to deliver this objective. The rest of the Plan does not, unfortunately, follow this through.	None	Legally Compliant: Yes Sound: Yes

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				Paragraph 8 is supported. This objective supports the vitality of CSA, addressing peak demand and capacity, good access to seafront and well located car parks. Need to ensure policies are effective at achieving this elsewhere in the document.		
	30.	2837	Object	This is a very residential-based approach, which does not reflect the proposed Vision and Strategic Objectives in the previous chapter. This is not effective in that it is not delivering on the objectives set out in Chapter 2. Indeed, this appears to be ignoring a number of the objectives and focusing on one specific area. Tourism is a large component of Southend's economy, and a key reason why the resort is well known regionally and nationally. Tourism jobs account for 12.3% of all employment in the Borough (according to the Council's Local Economic Assessment [LEA], December 2013). It is one of the few seaside resorts in the UK of this scale that has such a large reliance on day visitors (95.8%, LEA 2013) and where the visitor numbers are not supported by significant hotel or self-catering accommodation in our around the Town. For example, resorts like Great Yarmouth and Skegness are supported by thousands of caravan parks surrounding the resorts. Blackpool and Scarborough are supported by large numbers of hotels/B&Bs. Southend has historically never been primarily a short break/holiday destination; it has been a location for day trips from the surrounding urban areas and London. The Southend-on-Sea Local Economic Assessment (Southend Borough Council, December 2013)	"30 The Central Area Strategy seeks to develop a 'City by the Sea' – a change in the function and transformation in the quality of the Town Centre and Seafront and renewal of Southend Central Area with additional residential development creating a new critical mass to support growth and inward investment and additional tourism development focused on the Central Seafront, supported by an increase in car parking capacity serving the Seafront area."	<p>Legally Compliant: Yes</p> <p>Sound: No</p> <p>4(1) Positively Prepared</p> <p>4(2) Justified</p> <p>4(3) Effective</p> <p>4(4) Consistent with National Policy</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>confirms (Section 5.4) that 95.8% of visitors to the town are day visitors. Whilst it is commendable that the Council is attempting to increase overnight stays and support the provision of accommodation, it is a very dangerous strategy to 'side-line' the day trip market, which this Paragraph, and subsequent paragraphs and policies do. This is not in line with the Vision and Objectives and needs to be amended. Significant other changes are needed elsewhere in the Plan if the Vision and Objectives are to be realised. This is not in line with national policy. In particular Paragraph 17 of the NPPF, which states that planning should:</p> <p>"...proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities."</p>		
	48.	2838	Object	<p>Paragraph 48 makes reference to the central seafront area being a "destination in its own right, comprising a range of leisure uses..." This should make reference to the fact that the seafront comprises primarily tourism, not leisure</p>	<p>"The central seafront area represents an important visitor destination in its own right, comprising a range of tourism and leisure uses, which together with the town centre supports a wider multifunctional Central Area within Southend that</p>	<p>Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>uses. Tourism uses primarily serve visitors to a town and leisure uses primarily serve residents (although leisure uses can provide facilities for tourists and vice versa). These are distinct and separate land uses and are listed separately in the NPPF (see 'Main town centre uses' in the Glossary). Because they are aiming at different markets they have differing needs. Tourism uses are generally providing for visitors from outside a town. In the case of Southend this is a predominantly family market. Given that these visitors are travelling from outside the town and family groups often include children, it is a very difficult market to serve by public transport. The results of Stockvale's own survey of visitors to Adventure Island (see RPS Transport Technical Note submitted alongside these representations) show that 85% of visitors travel to Southend by car. A survey by Radio Essex in December 2016 found that 79% of visitors to Southend would prefer to use seafront car parks, even if it takes them longer to find a space, which demonstrates the resistance amongst this type of visitor to using methods of travel other than the private car. Traditionally seaside towns have accepted this and provided car parking for visitors from outside the town. This was recognised, for example, in the Blackpool Core Strategy, adopted in January 2016. Following representations from seafront attractions, the Plan was amended by the Council to recognise the importance of ensuring that car parks support the resort's tourism economy, and then subsequently by the Inspector (Malcolm Rivett) in</p>	<p>offers a unique and diverse visitor/ shopper experience."</p>	<p>4(4) Consistent with National Policy</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>his report dated November 2015. The Inspector recognised the need for a clear statement on retaining parking provision for tourist parking in the policy on transport and parking, not in the supporting text. He also acknowledged that the supporting text should include a statement recognising that car parks need to accommodate peak weekend/bank holiday parking. His conclusion on this point was:</p> <p>"91. Policy CS22 is a positively prepared policy recognising the importance of the attractiveness of key gateways to the resort in attracting visitors to Blackpool. However, for the sake of clarity, and thus effectiveness, modifications MM26 and MM27 are necessary to include the parking provision element of supporting text paragraph 7.39 in the policy itself and to refer to the importance of peak visitor day parking requirements in the supporting text."</p> <p>It appears that Southend Borough Council does not recognise this, and this lack of understanding about how the resort functions has resulted in policies in the SCAAP that will not support tourism.</p> <p>Instead, these policies will actually undermine the tourist economy of the town.</p> <p>This is not positively prepared as it is ignoring a key sector on the seafront. It is also not compliant with Paragraph 17 of the NPPF.</p> <p>Policies are not justified by the evidence base as they ignore a large proportion of the local economy, which has made representations previously. The policies are not effective because</p>		

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				they do not provide for this significant element of the economy.		
	58.	2839	Object	<p>This paragraph recognises that tourism is still a significant component of Southend's economy ("While tourism remains a central pillar of Southend's employment base..."). What the Plan does not acknowledge, however, is the fragility of this type of economy and the need to develop clear and positive policies to protect and grow this component. A survey of Adventure Island visitors undertaken by The Stockvale Group in 2016 showed that of 1,481 responses to the question, 54% of visitors, had visited Southend more than five times in the past 12 months. This shows that Southend operates very much like other traditional seaside resorts that rely significantly on repeat visits from people who make regular visits to the resort. This type of visitor can go elsewhere and if the Council does not protect this important component of the economy, there could be serious consequences for the visitor attractions on the seafront. The attached cutting (see Supporting Information below) from the November 2016 edition of theme park industry magazine 'Park World' shows the fragility of this type of tourism business. This page has two separate articles reporting on difficulties at two seaside amusement parks. The first is Pleasure Island at Cleethorpes, which closed down permanently in October 2016 due to dwindling visitor numbers and Dreamland in Margate, one of the UK's largest and longest established seaside</p>	<p>"While tourism remains a central pillar of Southend's employment base, the creative and cultural sectors, aviation and medical technologies are all growing and offer further potential for growth in the future. The Council also considers that tourism has the potential for growth, and policies will facilitate that. The Town Centre is a sustainable location for significant employment growth. This growth is concentrated in service sectors that require flexible and good quality offices, such as those for finance and business services as well as knowledge based creative industries."</p>	<p>Legally Compliant: Yes Sound: No 4(1) Positively Prepared</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>amusement parks which has gone into administration and is threatened with closure. Businesses like Adventure Island need to be able to attract every single person that wishes to attend, including very importantly an ability to accommodate everybody who would like to visit in peak periods. We deal with this issue in more detail in our objections to parking-related policies, but for the purposes of this paragraph, it is sufficient to simply state that the peak summer days subsidise these operations throughout the rest of the year. An inability to capture all visitors during these very short periods mean less investment, fewer staff, and shorter operating periods for the rest of the year. This is certainly the case with Adventure Island, and this will have a local effect, given the source of most of the staff at Adventure Island is local and also the local supply chain (noting the company uses local trades and suppliers as a matter of policy). Over time visitors are likely to go elsewhere if they repeatedly cannot find a parking space. It is important, therefore, to ensure that there is a more positive statement in the Plan dealing with this point that doesn't only recognise the need for growth in these new industries, but also in the tourism industry.</p>		
	77.	2840	Support	<p>We support the recognition that there should be "further enhancement" of tourism facilities in Southend Central Area. These facilities need to include car parking for visitors, the enhancement of these car parks, additional parking capacity and improvements of links between the car parks and seafront area. We also support the</p>	No Change	<p>Legally Compliant: Yes Sound: Yes</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				recognition that the Council will aim to "build on" the town's role as a major tourism destination.		
	124.	2841	Object	<p>This paragraph refers to Map 4: SCAAP Car Parking, Access and Public Realm, which apparently depicts the existing car parking network. This appears to exclude the Marine Plaza/Dizzyland site which, although privately owned, forms an important part of the seafront car parking supply.</p> <p>Planning permission has been granted for the redevelopment of this site (with very little on-site parking to accommodate the traffic generated), but we understand that this has not come forward due to viability reasons. It may be necessary for a further planning application to be submitted for this site and if the SCAAP has been adopted with the amendments requested by The Stockvale Group it may be possible to secure improved car parking provision as part of any amended scheme.</p> <p>This would also ensure that the loss of existing car parking was properly considered in accordance with proposed Policy DS5 (2).</p>	Map 5 to be amended so that the Marine Plaza/Dizzyland site is included in the category 'Off Street Payment Parking'.	Legally Compliant: Yes Sound: No 4(2) Justified
	128.	2842	Object	<p>Paragraph 128 refers to the "low rate of car ownership in Southend Central Area" and that this provides opportunities for other measures to facilitate the use of sustainable transport modes, such as cycle lanes and bus priority measures, together with linked improvements to the public realm.</p> <p>We would like to make two points in relation to this paragraph.</p>	"With a low rate of car ownership in Southend Central Area there is a need and opportunities along access routes to allow other measures to be implemented that facilitate the use of sustainable transport modes, such as cycle lanes and bus priority measures, which will be implemented through the Local Transport Plan and associated strategies, together with linked improvements to the quality of the public realm. Any such measures must demonstrate that there would be no loss of	Legally Compliant: Yes Sound: No 4(3) Effective

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>Firstly, although residents of Southend Central Area have a low rate of car ownership, tourists visiting Southend Central Area, particularly the seafront, do not. The survey of visitors to Adventure Island undertaken by The Stockvale Group demonstrated that 85% of visitors to Adventure Island use the car. This is due to the high level of car occupancy for the largely family visitors (the same survey showed that 60% of family visitors had three or more passengers in their cars). It is difficult and expensive for this type of family user to access public transport. Of course, with such a high proportion of seats being used it is actually a sustainable method of travel in our view, with only 3% being single occupancy vehicles. It is therefore essential that policies in this Plan reflect this reliance on the private car, and the fact that for this type of visitor the use of a private car is not necessarily unsustainable. This is confirmed in the RPS Technical Note.</p> <p>Secondly, if the improvements mentioned in this paragraph are put in place it is essential that care is taken that the supply of car parking spaces is not reduced in the Southend Central Area to such an extent that it causes displacement into car parks serving the seafront. The impact of changes to parking across the entire Central Area needs to be considered strategically. On the seafront itself there should be no loss of car parking spaces and, indeed, we strongly suggest that the SCAAP needs to positively plan for an increase in spaces to support the growth of businesses on the seafront, as set out in the Vision and Strategic Objectives (page 12).</p>	<p>car parking space south of the railway line and that any loss north of the railway line does not result in displacement of cars into car parks that serve the seafront area resulting in a loss of important spaces that support the town's tourism businesses."</p>	

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
	129.	2843	Support	We support the improvement of signage and way-finding within and around Southend Central Area. This needs to include signage for drivers seeking car parking spaces from the main routes into Southend that are used by tourists who may not know which car parks are most appropriate for their purposes. It also needs to include improved way-finding within the Central Area, particularly those routes that link the main car parks to the seafront area as these routes are most likely to be used by visitors who do not already know the routes around the town.	No specific change, but please ensure that the comments above are noted.	Legally Compliant: Yes Sound: Yes
	130.	2844	Object	The Stockvale Group strongly objects to the use of the Car Parking Study that was commissioned by Southend Borough Council and undertaken by Steer Davies Gleave as part of the evidence base of the SCAAP. There are numerous issues with this study, both in terms of its scope, methodology, surveys carried out and the extent to which it takes into account the specific needs of the seafront tourism businesses. Stockvale has commissioned transport planning consultants at RPS to review this from a technical perspective and the RPS Technical Note is attached to these representations (see below) and should be read alongside them. The key conclusions are set out in our representations to Policy DS5.	We consider that the issues raised by the Car Parking Study are so severe, and have such a serious impact on the policies that follow, that it is difficult to rectify through any amendment to the wording of this paragraph as the Study needs to be updated to take into account the needs of the seafront businesses. However, if the amendments that we request in our representations on other policies and paragraphs are taken into account we consider that the Plan can proceed to adoption without this Study being updated.	Legally Compliant: Yes Sound: No 4(3) Effective
	131.	2845	Object	Please see our comments on Paragraph 130, as they apply equally to this paragraph and summarise our concerns about the significant flaws in the Study. In relation to the points made in this paragraph, we make the following comments:	"The Study reviews current and future car parking provision in Southend Central Area. It sets out the performance of the existing parking network, and the potential impact of development proposals on the network, based on surveys that were focused on the town centre. It also assesses the economic	Legally Compliant: Yes Sound: No 4(2) Justified

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>Paragraph 131 states that the Study “reviews current and future car parking provision in Southend Central Area”. In our view, the Study does not correctly identify all capacity in the Central Area.</p> <p>It states that the Study “sets out the performance of the existing parking network”. The Study has not recorded correctly the performance of the car parks that serve the seafront area on peak days when the weather is good. These are the days (which can be relatively few) when the tourism businesses need to be able to capture every visitor. These days essentially subsidise the operation of the attractions and other supporting businesses throughout the year. If visitors are lost due to lack of car parking then these businesses are less able to remain open at quieter times of year when tourism businesses traditionally lose money. This can also mean an inability to keep on staff, which makes the business (and ultimately Southend seafront) more of a seasonal operation. This will have a damaging effect on the economy of the town and its overall prosperity, when a sizeable proportion of the town’s economy is supported by its tourism role. This model applies to pretty much all mainly outdoor tourism businesses. The author of these representations (Nick Laister of RPS) is a specialist planning consultant who has worked on projects in most of the UK’s main seaside towns, including Blackpool, Southport, Rhyl, Weston-super-Mare, Exmouth, Southsea, Hayling Island, Isle of Wight, Eastbourne, Hastings, Margate, Lowestoft, Great Yarmouth, Skegness and Scarborough. These</p>	<p>importance of parking in Southend Central Area based on a recent survey of shoppers. As a result it provides a good indication of modes of travel and associated spend within Southend Central Area. It reveals that all visitors, including those who travelled by car, bus, train, cycle or walk, contribute to the local economy by spending in Southend Central Area. It also shows that generally car users spend more but visit less often than other mode users. Additional surveys have also been undertaken to better understand the needs of visitors to the seafront area. This shows that car travel is the dominant mode of travel (85% of visitors), with very high car occupancy levels (84% of cars having three or more occupants, and 56% having four or more occupants), and that these visitors have a very high sensitivity to availability of spaces and the ease of finding spaces.”</p>	

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				<p>issues have emerged at a number of those resorts. It is an issue that is almost unique to the outdoor tourism industry but without an understanding of the need to accommodate the main peaks there can be significant harmful outcomes from ill-conceived policies.</p> <p>Until the Study is amended to reflect these critical periods for the operators of seafront attractions it is not a suitable basis on which to build the policies that will impact upon the way the seafront operates.</p> <p>This paragraph also mentions “the potential impact of development proposals on the network”. We do not consider that this has been adequately assessed, for the reasons set out in the RPS Technical Note.</p> <p>This paragraph goes on to state: “It also assesses the economic importance of parking in Southend Central Area based on a recent survey of shoppers. As a result it provides a good indication of modes of travel and associated spend within Southend Central Area. It reveals that all visitors, including those who travelled by car, bus, train, cycle or walk, contribute to the local economy by spending in Southend Central Area.” It is not clear why a similar survey was not undertaken of tourists visiting the town as these are equally important to the town’s economy and have very different requirements (and, of course, their use focuses on different parts of the Central Area).</p> <p>The statement: “As a result it provides a good indication of modes of travel and associated spend within Southend Central Area” simply</p>		

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				<p>cannot be justified as this only gives part of the picture. It does not give a picture of the needs of the seafront businesses, nor does it try to understand how visitors to Southend might have different requirements, patterns of movement, mode of travel, time of travel and priorities compared to shoppers. This is a key reason why this section of the SCAAP is likely to be so damaging to the important seafront businesses.. As stated in relation to our representations on other policies and paragraphs, Stockvale carried out its own survey of visitors to Adventure Island, which more accurately reflects the requirements of visitors to the seafront area. This is summarised in the RPS Technical Note, which is submitted with these representations. It shows that there is a much greater reliance on car travel, a very high occupancy of vehicles and a high sensitivity to the availability of spaces and the difficulty in finding those spaces. This Paragraph needs to be amended to reflect the needs of tourists visiting Southend</p>		
	132.	2846	Object	<p>Paragraph 132 again uses the Parking Study as its basis and this causes a number of errors or inappropriate conclusions. For example, it states that "The Study found that the Southend Central Area parking network rarely exceeds 85% occupancy." This masks the problems faced in the seafront areas where there is currently a significant under capacity of parking spaces. Although this paragraph does acknowledge an imbalance, the Study fails to capture the extent of the issue as the survey dates used were not appropriate for understanding how tourism</p>	<p>It is difficult to specify amendments to this paragraph as additional background work needs to be undertaken to understand the issue. This can only be done in the summer, so would need to be undertaken in August 2017 on sunny days.</p>	<p>Legally Compliant: Yes Sound: No 4(2) Justified</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>businesses operate and how their visitors get to them (for example, inappropriate dates, surveys undertaken in poor weather). This is covered in more detail in the RPS Technical Note. But looking at the dates used compared to the peak days recorded at The Stockvale Group's Adventure Island theme park and Sea Life Adventure attractions, it can be seen that the dates selected were far from representative of a peak day in the school holidays. The level of visitors to Southend seafront is primarily a result of the weather, and the consultants did not select appropriate days to understand the existing level of pressure on car parks that serve the seafront, and therefore how sensitive the seafront businesses will be to change in this capacity.</p> <p>As can be seen in our separate comments on policies that are partly based on this study, this has had the effect of generating policies that do not support the seafront tourism businesses. Indeed, these policies will have the effect of reducing visitor numbers and therefore investment into Southend seafront.</p>		
	133.	2847	Object	<p>Paragraph 133 appears to acknowledge that more work needs to be done. Unfortunately, if the SCAAP is adopted before this work is done, and these policies brought into use, it will be difficult to avoid some very serious, long-lasting and damaging consequences for the businesses operating on the seafront.</p> <p>Paragraph 29 of the NPPF acknowledges that different policies for sustainable travel are appropriate for different areas:</p>	<p>This paragraph acknowledges "further work will be needed , in the light of the Study, to ensure that parking supply is carefully balanced between the car parks and development sites north and south of the Central Area." This work must be undertaken before adopting this Plan to ensure that the policies are informed by this work. It must include properly planned surveys in the peak summer period and develop a realistic and robust evidence base on which to consider policies. It is not,</p>	<p>Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective 4(4) Consistent with National Policy</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>“Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives...The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.”</p> <p>In the case of Southend, visitors to the seafront attractions have different needs to residents using town centre facilities and a greater reliance on the private car (see our representations on paragraph 128). It is essential that the SCAAP differentiates in this way and takes these needs into account. This paragraph states that additional parking expected to be provided by development in Southend Central Area “is likely to accommodate future demand for parking generated in the plan period up to 2021”. This, however, does not reflect the reality that there is likely to be a reduction in car parking spaces in the seafront area caused by the proposed SCAAP policies. This is caused by:</p> <ul style="list-style-type: none"> · the likely loss of car parking spaces (for example, Marine Plaza/Dizzyland, Seaways and reduction of parking in the town centre); · displacement of cars parked elsewhere in the Southend Central Area, where parking spaces will be reduced (noting that the Council’s Car Parking Study underestimates the demand for parking and incorrectly identifies capacity – see RPS 	<p>therefore, possible to provide alternative wording at the present time without this work being undertaken. However, the following amendment to the paragraph would be a fall-back option:</p> <p>“However, this is indicative only and further work will be needed, in the light of the Study, to ensure that parking supply is carefully balanced between the car parks and development sites north and south of the Central Area. Until this work is undertaken, no development on an existing car park serving the seafront area shall proceed pending a review of car parking space supply, peak summer demand, the quality of spaces and the routes from car parks to the main seafront attractions. There will then be an early review of the SCAAP to incorporate these results.”</p>	

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				<p>Technical Note); and demand created by the new developments proposed in the SCAAP/Core Strategy.</p> <p>The SCAAP should be proposing increasing the spaces to allow for business growth, not reducing the number of spaces.</p> <p>As stated above, the paragraph does acknowledge shortcomings and states that further work will be needed. The enclosed RPS Technical Note, which reviewed the Council's Parking Study, shows the extent to which this document is flawed as a basis for a planning policy document. The effects of implementing the SCAAP in its current form, informed as it is by the results of a flawed Parking Study that does not grasp the nature and importance of tourist-related visitors and businesses, will be to harm the businesses on the seafront. The 'further work' referred to in this paragraph must be undertaken before the SCAAP is adopted. The Stockvale Group, and many of the other businesses on the seafront, would be happy to work with the Council, and share its existing survey data, to establish a more robust evidence base on which to build the policies of this Plan.</p>		
	134.	2848	Object	<p>Paragraph states that "collectively the car parks located in Southend Central Area have the potential to serve both the Town Centre and Central Seafront, facilitating linked trips and increasing the potential for associated shared spend". This is not correct. As appears to be acknowledged in the second part of this paragraph, the town centre car parks are not all well located to accommodate visitors to</p>	<p>"134 It is considered, that there is some potential for the car parks located in Southend Central Area to have the potential to serve both the Town Centre and Central Seafront, facilitating linked trips and increasing the potential for associated shared spend. Nevertheless, many of the car parks in the Town Centre do not adequately serve the seafront. It is also recognised that those car parks which are approximately 10 minutes' walk</p>	<p>Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective 4(4) Consistent with National Policy</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>Southend who are visiting for the seafront area. These visitors would not find it attractive to park in car parks in the town centre, particularly those north of the railway line. There will undoubtedly be an opportunity for linked trips, but the most important factor for those operating businesses is to ensure that the visitors are able to get to Southend and park conveniently for the seafront. Once these people are parked, then they will be able to use both the seafront and town centre, especially if routes between the two are improved.</p> <p>We know that convenience of car parking spaces is a major factor in the attractiveness of Southend as a tourist destination. The survey of Adventure Island visitors undertaken by The Stockvale Group (set out in the accompanying RPS Technical Note) shows that this is a very important issue for visitors.</p> <p>When asked how important parking and the journey to Southend is in making a decision to come back again (on a scale of 1 to 10, where 10 is the highest importance), 10 was the category most commonly provided by the 1,484 respondents, with 33% of respondents giving 10, and 65.03% scoring this issue 8, 9 or 10. This cannot be underestimated. As stated in our representations to paragraph 58, return visits forms the basis of businesses such as Adventure Island, and they operate in a very competitive environment. If visitors cannot get access to convenient car parks they may choose not to return to Southend. The tourism economy of the town relies on these day visitors, and a reduction</p>	<p>from the shoreline (south Central Area, i.e. those generally located south of the central railway line) are better positioned to provide more direct and convenient access to the Central Seafront area, which is the focus of the tourism and leisure resort.”</p>	

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>in availability or attractiveness of parking will potentially reduce visitor numbers, shorten season, reduce employment levels and ultimately will reduce the attractiveness of Southend seafront. It is essential that the Plan recognises why tourism-related traffic has to be considered differently to traffic associated with journeys to work, school and other regularly used destinations.</p>		
	135.	2849	Object	<p>This paragraph states that there are 2,550 publicly available spaces to the south of the central area. As stated in the RPS Technical Note, this is actually closer to 4,000. It goes on to state that there will be “no net loss of public car parking to the south of the Central Area.”</p> <p>Firstly, The Stockvale Group objects to this statement because it is a negative approach, not a positive one to meet the needs of businesses. The Stockvale Group have been planning for growth in visitor numbers, supported by significant investments in their attractions Adventure Island and Sea Life Adventure, as well as their numerous restaurants, cafes and kiosks on the seafront. It states in paragraph 28 that the Council’s vision is to promote economic growth. Specifically, in Paragraph 29 it states that a Strategic Objective is to attract “greater visitor numbers”, which is a direct reference to the town as a resort. Paragraph 30 also reiterates that the Council is aiming to support growth. Similarly, in Paragraph 81, the Council states: “The tourism and hotel sector is expected to grow in Southend over the next 20 years”.</p>	<p>This paragraph, which supports Policy DS5 and will be read in conjunction with it, needs to clarify how it will ensure no net loss of spaces. It needs to be clear exactly which spaces are part of the capacity against which the net loss will be calculated, it needs to make it clear that additional spaces will be required over and above existing supply and it needs to be clear which are the prime seafront car parks, with good links to the seafront attractions, that will be protected and enhanced.</p> <p>More importantly, there needs to be a clear statement that the Council intends to plan positively and develop policies that implement its own Vision and Strategic Objectives. This statement should be as follows: “The Council will seek to increase the number of car parking spaces available south of the railway line. Any developments in this area should ensure that provision is made to accommodate their own needs and that this is over and above the supply existing in 2016. Taking into account new developments, and the poor accessibility to car parks in the town centre due to topography, there will be no net loss of car parking spaces that serve the seafront area when measured against the 2016</p>	<p>Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>A policy of no net loss of public car parking spaces south of the Central Area will not support growth.</p> <p>As Stockvale’s surveys have shown (see the RPS Technical Note), the seafront tourism sector is reliant on visitors from outside the town who largely travel by car, with high car occupancies (families). This Paragraph should be making a clear statement that the intention of the Council is to increase the number of car parking spaces that provide convenient access to the seafront area. If this statement is not included, then this plan cannot be considered to be positively prepared as it is not meeting the needs of the seafront area. Equally seriously, it is not clear whether this approach will even be effective in protecting against net loss of spaces as the Plan is not clear enough about how this is calculated. In order to make investment decisions. The Stockvale Group and other seafront traders need the certainty that visitors will be able to access their attractions and other facilities that support tourists visiting Southend. A number of points need to be clarified:</p> <ol style="list-style-type: none"> 1. It is not clear to Stockvale how the net loss will be calculated. As can be seen from the RPS Technical Note, the Council does not appear to have included all available spaces in and around Southend seafront in the capacity, nor accounted for all the demand. Given that, at peak times the seafront car parks are full, this is likely to result in an over-estimation of the percentage of available spaces in Southend north of the railway line. 	<p>car parking supply of 4,000 [this figure to be agreed between Southend Council, The Stockvale Group and seafront traders, who have a good knowledge of car parking availability in this part of the Central Area].”</p> <p>This will enable Policy DS5 to be effective when the Council is determining planning applications. We also consider that there should be a clear statement that the 220 spaces proposed at the New Southend Museum shall not be considered part of the current or future supply until the development has commenced.</p>	

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				<p>2. It is not clear whether the Council has taken into account the trips generated by substantial new development proposed, for example, at the Seaways car park site. If this has not been taken into account, then there will be an immediate net loss on spaces due to displacement caused by traffic parking for the new developments. The RPS Technical Note suggests that this has not been correctly factored in.</p> <p>3. It is not clear what level of importance will be attached to the most accessible spaces, or whether spaces nearer the town centre (some of which are up a steep slope from the main seafront area) will be considered as part of this 'net' figure.</p> <p>4. Similarly it is not clear if the Council has considered spaces that have poor links to the seafront as part of this 'net' figure.</p> <p>We support the Council's attempt to secure additional car parking spaces as part of the new Southend Museum development (approximately 220 spaces). However, this development is in the very early stages, is not yet funded and cannot be relied upon. For the purposes of this policy, and in the timescales available to this plan, we do not consider much regard should be taken to this in assessing the availability of car parking spaces now and in the future.</p> <p>In short we do not have the confidence that this policy is going to be effective. Indeed, it is likely on the basis of the work undertaken by RPS that this policy will be ineffective and actually counterproductive by resulting in a net loss of spaces available to visiting tourists. We are not</p>		

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				confident that the Council is planning positively to accommodate growth, nor that its policies will be effective in ensuring no net loss.		
	136	2850	Object	<p>The first bullet point covers the same ground as paragraph 135. Please see our representations to paragraph 135. However, we wish to make the following additional points:</p> <p>The first bullet point also includes the statements: "maintain overall capacity at a level that supports the vitality and viability of the SCAAP area, and enables the delivery of relevant Opportunity Sites". It is not clear whether this means that the levels of car parking will be increased to accommodate development at opportunity sites. If not, this could have a serious effect on the viability of seafront businesses that serve tourists travelling from outside the town. It is also important to note that the seafront area includes opportunity sites and therefore it is essential that any developments do not result in the loss of easily accessible spaces, as well as provide for their own parking needs.</p>	The paragraph needs to be clarified.	<p>Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective</p>
	DS5	2551	Object	<p>We are very concerned about this Policy. It is partly based on the Car Parking Study (CPS), undertaken by Steer Davis Gleave, Reference 22958604, dated November 2016. The Stockvale Group commissioned a review of the CPS by RPS Transport. This review is summarised in the RPS Technical Note submitted with these representations.</p> <p>This review highlights a significant number of errors and omissions within the report which in our view demonstrate that this is not a robust evidence base on which to build policies on</p>	2b should be changed as follows: "Ensure that there is no net loss in car parking to the south of in the Southend Central Area. The Council will seek a 25% increase in net publicly available car parking capacity in Central Area South, by requiring additional car parking capacity as part of proposals to redevelop Opportunity Sites in the Central Area South. Every planning application shall demonstrate how car parking capacity in the Central Area South shall be increased, taking into account the trips generated by any new development proposed for the sites."	<p>Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective</p>

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				<p>transport and access. In summary, these points include: No recognition of the fact that the Local Transport Plan 3 (LTP3) forecasts a 25% increase in parking demand by 2021, which is ignored throughout the document. LTP3 also recognises a shortfall in seafront car parking in the summer. The report underestimates both parking supply and demand. The report severely underestimates tourism demand in the seafront area due to a number of omissions/errors. The RPS Transport Technical Note states that it has "no confidence" in the results for this area (Paragraph 66/67). The methodology used actually has the effect of suppressing peak demand and spreading it throughout the day (Paragraph 71) and makes no attempt to assess the true demand (Paragraph 75).</p> <p>Visitors to the seafront area choose not to use capacity elsewhere in the Central Area when it is available, but this is not recognised in the CPS (Paragraph 91).</p> <p>The busiest days for the seafront are not assessed (Paragraph 98).</p> <p>Key car parks are excluded from the calculations of the impacts of the Opportunity Sites. This seriously underestimates the number of spaces lost to development and overestimates parking availability.</p> <p>RPS concludes that the Opportunity Sites will result in a net loss of parking spaces, so will not cater for their own impact, let alone provide an increase in spaces to allow for the growth of Southend's seafront attractions. Indeed, the Opportunity Sites result in a loss of</p>	<p>We are unable to provide changes to 2c, as the evidence base on which this policy is based is not sufficiently robust. We recommend that the car park survey work is undertaken again, responding to the points made in the RPS Technical Note, and this should then form a sound basis for developing suitable policies for transport and access.</p>	

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				<p>car parking space in the areas where there is already significant pressure and a predicted significant increase by 2021.</p> <p>In addition, the visitor surveys were mainly undertaken in the Town Centre area, yet the report identifies the main car parking pressure as being the seafront, and there is little attempt to disaggregate the results.</p> <p>The recommendations mainly assist the Town Centre area, not the seafront.</p> <p>We cannot rely on the CPS and we therefore do not consider policies that are clearly based upon the conclusions and recommendations of the CPS as being sound.</p> <p>Our representations to Paragraphs 123 to 136 summarise a large amount of our concerns and should be read in conjunction with our representations on this policy.</p>		
	DS5 Point 1a	2852	Support	We support 1a, the provision of strategic junction improvements, which is important to improve vehicle circulation and to accommodate growth.		
	DS5 Point 1b	2853	Support	We also support 1b, which is to better manage the demand on the road network. However, the RPS Transport Technical Note demonstrates that visitors to the seafront do not like to utilise car parks elsewhere in the Central Area, even when there is spare capacity. Traffic management measures are only, therefore, part of the solution, and there needs to be a focus on convenient supply for the seafront area, noting that evidence in the Stockvale visitor survey (reported in the RPS Note) shows that car occupancy is very high amongst visitors to Adventure Island as they are predominantly families, so at these occupancy		

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				levels this is actually a sustainable use of the road network.		
	DS5 Point 1g	2854	Support	We strongly support 1g, as there needs to be a marked improvement in the quality of pedestrian routes from the main parking areas and Town Centre to the seafront areas.		
	DS5 Point 2a	2855	Object	We object to 2a, as this only proposes to "maintain parking capacity".		Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective
	DS5 Points 2b	2856	Object	We strongly object to the wording of 2b, which states that the Council will "Ensure that there is no net loss in car parking to the south of the Southend Central Area". We set out in some detail our concerns about this statement in our representations to Paragraph 135, and these representations should be read as representations to Part 2b of Policy DS5. The proposals to redevelop three of the Council's main seafront car parks (Tylers Avenue, Seaways and Marine Plaza) have resulted in great uncertainty for Stockvale, which is impacting upon its investment plans for Adventure Island (Southend's most visited commercial attraction and the UK's most successful seaside fun park) and the Sea-Life Adventure aquarium attraction. Business needs confidence to invest; the SCAAP as currently drafted, and most worryingly Policies DS5 and CS1, have almost entirely removed confidence and this is now holding back investment and growth. It has already resulted in the cancellation of significant projects at	2b should be changed as follows: "Ensure that there is no net loss in car parking to the south of in the Southend Central Area. The Council will seek a 25% increase in net publicly available car parking capacity in Central Area South, by requiring additional car parking capacity as part of proposals to redevelop Opportunity Sites in the Central Area South. Every planning application shall demonstrate how car parking capacity in the Central Area South shall be increased, taking into account the trips generated by any new development proposed for the sites."	Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective

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				<p>Adventure Island. A Policy that results in such a lack of certainty and confidence is inherently unsound and not effective.</p> <p>The RPS Technical Note shows that there is already significant pressure on car parks in the Central South Area that serve the seafront. The SCAAP recognises the need to support the growth of businesses on the seafront, as set out in the Vision and Strategic Objectives (page 12). It states in Paragraph 28 that the Council's vision is to promote economic growth. Specifically, in Paragraph 29 it states that a Strategic Objective is to attract "greater visitor numbers", which is a direct reference to the town as a resort.</p> <p>Paragraph 30 also reiterates that the Council is aiming to support growth, as does Paragraph 81. LTP3 also advises planning for a 25% increase in car parking demand in the central area (see RPS Technical Note). The businesses along Southend seafront had been planning for growth, including The Stockvale Group at their attractions Adventure Island and Sea Life Adventure, as well as investment in their various sea front catering establishments. Yet this policy is only looking for no net loss in car parking capacity, and when coupled with Policy CS1 (which allows for the redevelopment of the three most important car parks serving the seafront), it has left businesses with a level of uncertainty that is not conducive to investment as there can be no confidence that these policies will support growth. Quite the contrary, these proposed policies as drafted are the single biggest cause of business uncertainty amongst seafront operators. In addition to not</p>		

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				being effective, by having the opposite effect to that intended in the early sections of the SCAAP, this approach is also not justified, especially when our work has shown that “no net loss” is likely to mean a significant loss of parking in the seafront area.		
	DS5 Point 2c	2857	Object	We also object to 2c, as it proposes acting on the outcomes of the Parking Study. As set out in the RPS Technical Note, this study cannot be relied upon as it does not correctly respond to the parking situation in the seafront area, and because of this the conclusions and recommendations are seriously flawed. This Plan cannot be sound if it is relying on this Study. This is a fundamental issue with this and other policies in the SCAAP and the seafront traders are very concerned that the Plan might be adopted on the basis of this flawed work. We ask that this is carefully reviewed prior to the adoption of this part of the Plan.	We are unable to provide changes to 2c, as the evidence base on which this policy is based is not sufficiently robust. We recommend that the car park survey work is undertaken again, responding to the points made in the RPS Technical Note, and this should then form a sound basis for developing suitable policies for transport and access.	Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective
	DS5 Point 2f	2858	Comment	Whilst the approach set out in 2f is welcomed (relieving pressure on the more well-used car parks), this is only likely to have a marginal impact, for the reasons set out in the RPS Technical Note. In addition, the supporting text does not adequately explain how this can be done		
	155	2859	Object	This Paragraph states that: “The policies are not explicit on the precise quantum of development...” Whilst we do not object to this in principle, there is not an adequate policy framework on which to judge the impact of different scales of development. This partly as a result of the	We do not require any amended text at this stage. We need to understand how the Council is going to resolve serious issues with its evidence base, which will enable us to better understand the potential impact of development of the Opportunity Sites	Legally Compliant: Yes Sound: No 4(2) Justified

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				inadequate and partly erroneous evidence base that is being used, particularly the Parking Study. To be effective, we need to ensure that the effects of development on the operation of the important sea front tourism area is understood. Until this is resolved, we will maintain a holding objection to this point.		
	PA1	2860	Object	It is essential that car parking in this area is protected to avoid displacement onto sensitive seafront car parks (see the Council's Parking Study and the RPS Technical Note).	Addition of an additional point under Part 2 of the Policy: "g. Protection of overall car parking levels within the High Street Policy Area to avoid displacement onto sensitive seafront parking areas."	Legally Compliant: Yes Sound: No 4(3) Effective
	18g. Tylers Policy Area Aims	2861	Object	Page 69 – Tylers Policy Area Aims The aims state that "car parking will be addressed". There needs to be significantly more clarity here as this is an important car park serving the South Central Area, where the most car park pressure has been identified in the Council's Car Park Study and the RPS Technical Note. Simply stating "addressed" is not a positively prepared statement and the outcome could be serious harm to the seafront tourism area, which would mean the policy was not effective.	There needs to be a clear statement that this is an important car park for the seafront and town centre: "Car parking will be addressed within this integrated approach to development, which combines with other objectives for the policy area, and contributes to the vitality and viability of the town centre. Any development proposals for this important car park will need to demonstrate how they can achieve a 25% increase in publicly available car parking spaces."	Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(3) Effective
	PA7	2862	Object	We strongly object to this policy. The Council's Car Parking Study (CPS), undertaken by Steer Davis Gleave, Reference 22958604, dated November 2016 and the RPS Technical Note, which is submitted with in support of these representations, show that the car parks south of the railway line are the ones that are most under pressure, with 97% occupancy recorded on a day that was far from the busiest of the year. This site is an important part of that capacity, and also	"ii. Any development of the Opportunity Site should address a need for replacement car parking provision in line with Policy DS5: Transport, Access and Public Realm, identifying how any displaced parking needs, and an allowance for an increase in capacity of 25%, are to be met on the site or in this part of the town centre on another site south of the railway line and accessible to the seafront attractions and explore the potential for relocating the travel centre on the northern extent of the site	Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(3) Effective

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				<p>needs to play a role in increasing capacity to support the growth of the seafront tourism sector proposed by the SCAAP and to deal with the capacity issues identified in the two car parking documents.</p> <p>We are surprised that the policy only mentions addressing a need for replacement car parking provision by "identifying how any displaced parking needs are to be met on the site or in this part of the town centre". This makes no allowance for the growth in the tourism industry that the SCAAP states that it is seeking, which will generate additional demand for parking (noting that there is a greater reliance on the private car by tourists – see RPS Technical Note). It also does not reflect the statement in Local Transport Plan 3 that there is likely to be a 25% growth in car parking demand by 2021. There needs to be a clear statement that any development proposals which remove areas of surface car parking should contribute to the replacement of that car parking, with an increase of around 25%. If this policy does not aim to deal with capacity issues identified in the CPS and the RPS Technical Note, as well as providing for the growth in tourism that the SCAAP is seeking to achieve (see our representations on other paragraphs and policies covering growth), then this will not have been positively prepared. In addition, a policy that cannot accommodate and facilitate this growth will not be effective in meeting the objectives of the SCAAP set out on Page 12. The statement about finding an alternative site in "this part" of the town centre</p>	<p>where applicable to provide for enhanced passenger transport facilities and improved pedestrian connectivity to the town centre and central railway station;"</p>	

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				needs to be clear that the site must be south of the railway line; otherwise the seafront area, where it has been identified that there is the greatest pressure, will suffer from a reduction in parking capacity, with serious consequences for the businesses on the seafront.		
	CS1 Section 5.9 Central Seafront Policy Area Aims	2863	Object	We are surprised that, given the serious issues raised in the Car Parking Study (CPS), undertaken by Steer Davis Gleave (which are more accurately summarised in the RPS Technical Note attached to these representations), there is no mention of car parking in the Aims. The resolution of a longstanding and worsening problem, that is having a serious impact on seafront traders, is something that should be identified up front.	"Additional car parking capacity will be secured with high quality links to the seafront attractions. This will be achieved either through the development of new sites, improvements to existing sites or via the redevelopment of an existing site.	Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(3) Effective
	195	2864	Object	This paragraph identifies Seaways as: "...a major opportunity for mixed-use development, contributing to the leisure and cultural offer of Southend Central Area through the provision of uses such as restaurants and cinema as well as possibly a hotel or residential, car parking, public open and green spaces, improved access and connectively through the creation of 'Spanish Steps' linking this opportunity site to the promenade of Marine Parade." We are concerned about this paragraph for a number of reasons. This is the single most important car park for the seafront, and supports numerous growing businesses on Southend seafront. In short, the seafront tourism businesses rely on this car park. It is worrying to see it referred to as a "major opportunity for mixed-use development", as we are concerned about its ability to continue in this role. If this car park is lost, there will be significant	"195 Seaways presents a major opportunity to enhance the Town's tourism infrastructure, contributing to this important part of the local economy. for mixed use development, contributing to the leisure and cultural offer of Southend Central Area through the provision of uses such as restaurants and cinema as well as possibly a hotel or residential, The Council will be seeking an-increase in car parking, provision of public open and green spaces, improved access and connectively through the creation of 'Spanish Steps' linking this opportunity site to the promenade of Marine Parade. Some limited development will be acceptable if it results in an enhancement of the site, an increase in car parking spaces and supports the Town's seafront tourism offer."	Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective

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				<p>implications for the seafront businesses, including the major attractions operated by The Stockvale Group (Adventure Island and Sea Life Adventure, as well as its several restaurants and other catering outlets on the seafront).</p> <p>We are also worried by the statement that this development will contribute “to the leisure and cultural offer” of Southend Central Area, as we consider that this car park primarily serves the town’s tourism offer. As we have stated in our representations on other paragraphs and policies, there is a difference between tourism and leisure. Although there is crossover, tourism serves primarily visitors to an area and leisure mainly provides for residents. There needs to be a clear statement in the Plan that this site serves the town’s tourism industry, and any loss of that role to other developments (such as leisure and residential) will be a major concern to us. We don’t dispute that a cinema would provide a facility for visitors to the town, but this would not be its primary role. Most visitors to Southend come from towns with cinemas; they do not visit Southend of this reason. It is essential that this point is understood by the Council because the loss of an important tourism resource to a development that is primarily serving local residents is going to be a sizeable blow to the town’s tourism economy. There is no mention in the supporting text of protecting and expanding the site’s tourism role, and in particular increasing and enhancing the parking provision on the site to accommodate the growth in the town’s tourism offer that the SCAAP proposes.</p>		

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	Cs1	2865	Object	<p>This Policy needs to recognise the serious concerns that seafront traders have in relation to the impact of policies as currently drafted in the SCAAP. There is an opportunity here to clearly state the Council’s intention to protect and increase seafront parking and support tourism development on the seafront.</p> <p>As stated in our representations on Policy DS5, the proposals set out in this Policy, when read alongside the content of Policy DS5, gives seafront traders serious cause for concern. Business needs confidence to invest. This policy threatens to remove the most important car parks serving the seafront (Seaways and Marine Plaza), with no firm proposal to retain the spaces that are existing, let alone provide for the developments themselves and the growth in seafront tourism that the SCAAP is looking for (see our representations on Paragraph 135 and Policy DS5 for a summary of the Council’s objectives in the SCAAP for achieving growth in tourism and the local economy). This uncertainty is already resulting in investment plans being shelved and staffing levels being reviewed at the Stockvale attractions in Southend (Adventure Island and Sea Life Adventure). A policy that creates such high levels of uncertainty, and which has almost the opposite result intended when read alongside the statements in the SCAAP about facilitating growth, simply cannot be effective. It is therefore unsound. It is difficult to understand how the Council’s Car Parking Study (CPS), undertaken by Steer Davis Gleave, identifies the seafront area as being under</p>	<p>Amend 1a as follows: “consider favourably proposals which enhance or diversify the range of arts, culture, entertainment, tourism, leisure and recreational facilities, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and environmental designations, including protected green space and car parking capacity, where the Council will normally expect to see an increase in provision as part of any proposal in the Central Seafront Policy Area”.</p> <p>We support 3i, which seeks provision for new/improved pedestrian/cycle priority links.</p> <p>Amend 4ii as follows: “ii. Opportunity Site (CS1.2): Seaways, the Council will pursue with private sector partners, landowners and developers the enhancement of this important site that supports the seafront tourism offer. a high quality, mixed use development including the provision of leisure, cultural and tourism attractions, which may include: restaurants, cinema, gallery, hotel, The development will be centred on the continuation of the site as the most important car park serving the seafront, but it can also include public and private open spaces. The potential for some limited redevelopment can be explored, to potentially include restaurants, cinema, gallery, hotel and residential development, but any development must be able to demonstrate that it can deliver an increase in car parking spaces (the Council is seeking a 25% increase) and will supports the Town’s seafront tourism offer.</p>	<p>Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective</p>

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				<p>pressure and unable to cope with existing demand (note that the RPS Technical Review of this document identified significant errors and other flaws in the document that mean it underestimates this problem), and yet Policy CS1 proposes to redevelop two of the largest seafront car parks and allow the sites to be permanently lost. This is an extremely worrying situation for seafront traders, who were relying on the SCAAP to protect and enhance these sites, especially when one of the key objectives of the SCAAP is to grow the seafront tourism economy, and increase the number of visitors to the town. We strongly object to the wording of part 4ii (Opportunity Site (CS1.2): Seaways) for the reasons set out in our objection to Paragraph 195. This site is a key part of the infrastructure of the seafront tourism area and we believe that the Council has misunderstood the difference between tourism and leisure, which serve different people and have very different characteristics. We need to ensure that development of leisure and residential uses, which primarily serve local people, does not undermine the tourism offer of the seafront. Operators on the seafront are looking to grow the Southend offer, and attract more visitors to the town, and this is one of the main objectives of the SCAAP (see our objections to earlier sections of the Plan). The loss of a huge part of the seafront infrastructure will have a devastating effect on this part of the Town. Southend's seafront is its most famous asset, and is still the main reason why tourists visit the town.</p>	<p>The potential for residential development may also be explored. Design and layout solutions should allow for:</p> <ul style="list-style-type: none"> a. remodelling of the urban form to create a north-south axis on the Seaway site, providing a clear sight-line from Queensway dual carriageway to the sea; b. a stronger relationship with the Town Centre through the provision of safe and legible pedestrian and cycle routes; c. opportunities for a new link to Marine Parade from the Seaway site designed around 'Spanish Steps' and in doing so ensure that development does not prejudice its future delivery as a new link between the seafront and town centre; d. addressing the need for replacement an increase in the existing capacity of car parking provision on the site in line with Policy DS5: Transport, Access and Public Realm; e. active frontages to all new and existing streets and spaces; f. a palette of good quality materials to reflect the vibrancy and colour of the seaside; g. relocation of a coach-drop off point within the site. The relocation of coach parking bays may be provided either on or off-site or a combination of both, provided off-site provision is well connected to the Seaway site and the main seafront attractions and would not significantly adversely impact the local transport network or the ability of coach users to safely and conveniently access the seafront area; 	

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				<p>There must be adequate provision for them to park and access the seafront conveniently and safely.</p> <p>This site should play a continuing role with this. We are very concerned with the proposals to allow a significant amount of development in this area, which will undoubtedly displace car parking and add additional parking demand. This is partly covered in the RPS Technical Note that is submitted with these representations.</p> <p>We consider that this is not planning positively for the very growth in the tourism offer that the early sections of the SCAAP propose to facilitate. Indeed, this policy is doing the exact opposite and will have an undesirable effect on the seafront. It is therefore not an example of planning positively and it will not be effective in that it will have an impact that will undermine the objectives of the Plan.</p> <p>We strongly object to Part 4iii (Opportunity Site (CS1.3): Marine Plaza). This is an important seafront car park with a capacity for around 200 cars. In the Council's Car Parking Study (CPS), undertaken by Steer Davis Gleave, and the RPS Technical Note submitted with these representations, it is clear that the contribution of this important and well-located site has been ignored.</p> <p>It is essential that any redevelopment of this site, which has operated as a seafront car park for well over 10 years, incorporates at least the same number of publicly-accessible spaces as it currently does, as well as an allowance for growth.</p>	<p>h. urban greening projects, including the creation of new public and private green space within new development;</p> <p>i. innovative design which allows the site to take advantage of the elevation and creates a legible environment with views of the estuary, respecting the amenity of neighbouring residential uses;</p> <p>j. the provision of appropriate seating, signage and way-finding aids to improve connectivity to the Town Centre, Seafront and Opportunity Site CS1.3: Marine Plaza."</p> <p>Amend 4iii as follows: "iii. Opportunity Site (CS1.3): Marine Plaza, , the Council will support the comprehensive redevelopment of the site for high quality/ iconic residential development with complimentary leisure and supporting uses that create activity at ground floor fronting Marine Parade, incorporating areas of public open space into the site which take advantage of views of the seafront and estuary. The development must increase the level of publicly available parking above existing levels (200), as well as provide appropriate parking for its residents. The provision of appropriate seating, signage and way-finding aids to improve connectivity to the seafront and town centre, including links to Opportunity Site CS1.2: Seaways, will also be promoted.</p> <p>Amend 4iv as follows: "iv. Opportunity Site (CS1.4): New Southend Museum, the Council will promote the development of</p>	

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				<p>Whilst we acknowledge that planning permission already exists for the redevelopment of this site, we understand that it has not commenced and may not be viable. There remains an opportunity for the Council to ensure the site still retains a significant role in providing car parking capacity for the seafront areas in any future development proposals that come forward. This Plan is the appropriate place in which to control this redevelopment.</p> <p>In terms of 4.iv, we support the development of the New Southend Museum, which will add to the offer of Southend's seafront and should assist in increasing visitors to the Town. It is essential that it provides sufficient car parking to cater for its visitors and to contribute towards the existing undersupply.</p> <p>But this development cannot be relied on as it is at a very early stage.</p>	<p>an exemplary, sustainable building that includes the new Southend Museum, gallery space, planetarium, conference/events spaces, and associated café/restaurant, together with public car and cycle parking and the creation of high quality green space, including amphitheatre within the cliffs, seating and good signage, linked to the High Street and Central Seafront via Cliff Gardens, Prittlewell Square and the wider Clifftown Policy Area. The design of new development will need to retain the open feel of this area and ensure that new planting includes native species and increases biodiversity in the area. Vehicular access should ensure that the primary road network, i.e. via Western Esplanade, is used to access the development and any new parking facilities. The proposed car park shall not be included as part of the existing car park capacity when assessing displacement of car parking from other Opportunity Sites in the Central Seafront Area."</p>	
	228 Page 94 - Implementatio & Monitoring	2866	Object	<p>In its monitoring indicators and targets for DS5, this proposes: "DS5.1 Providing a level of publically available car parking provision to support the vitality and viability of the central area – no net loss of permanent publically available car parking south of the central railway line." There needs to be more detail here to provide comfort to seafront traders that existing supply will be retained and enhanced. The following is not clear: 1. Which car parks form part of the baseline against which to measure this? The RPS</p>	<p>"DS5.1 Providing a level of publically available car parking provision to support the vitality and viability of the central area – no net loss of permanent publically available car parking south of the central railway line, taking into account vehicles displaced from other car parks where capacity is lost, traffic generated by new development on car parks and elsewhere in the Central Seafront Area. Also monitor the extent to which an increase in the number of parking spaces south of the central railway line is being achieved."</p>	<p>Legally Compliant: Yes Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective</p>

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				<p>Technical Note shows that the existing capacity in the Council's Car Parking Study (CPS), undertaken by Steer Davis Gleave, is inaccurate and needs to be reviewed, as it severely underestimates supply in the seafront area by excluding a number of car parks.</p> <p>2. How will this take into account additional demand in seafront car parks caused by the displacement from car parks elsewhere in the Southend Central Area where there has been a reduction in capacity (as there is no policy protecting capacity here)?</p> <p>3. How will this take into account the trips generated by new development, both on existing car park sites and elsewhere in the Southend Central Area?</p> <p>4. How will this monitor the success of the main SCAAP objectives, which is to secure growth? Simply maintaining no net loss could have the effect of reducing investment and visitors to the Central Seafront Area. There needs to be a mechanism to measure how parking capacity in the Central Seafront Area is being increased, and whether these spaces are sufficient.</p>		
	1. General Consultation Process	2867	Object	<p>Consultation Process</p> <p>Southend Borough Council issued a letter to businesses dated 13 January 2016. This letter invited businesses to have their say on the SCAAP. It stated that there were two public workshops planned on 21st January at the Laurel & Hardy Room, Park Inn Palace, one in the morning and one in the evening. Although dated 13th January, these letters were only received by seafront businesses two days before the deadline</p>	No specific change required.	Legally Compliant: No Sound: Yes

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				<p>(i.e. on 19th January). Many businesses were not able to attend the event due to the short notice. Only three businesses turned up and one trader went along and was told that he had missed it. In addition, the workshop appeared to be primarily about residential issues, not business issues. The letter to Adventure Island is attached for information.</p> <p>The Statement of Community Involvement (SCI, 2013) states that the Council will consult local businesses (third bullet point, 'Who we will consult', Page 2). Under 'How we will consult', it states the following:</p> <ul style="list-style-type: none"> · "We will contact appropriate organisations and individuals directly by post or electronic means" (second bullet); · "We may publicise consultations by methods such as...community events, public exhibitions, workshops..." (fifth bullet). <p>We consider that seafront businesses are major stakeholders and should have been properly consulted in accordance with the SCI. The Council failed to properly consult the business community in line with the SCI, by holding an event but not adequately informing businesses of the event in advance.</p>		
Respondent	Natural England (Mr Steve Roe)					
Full Submission	<p>Thank you for your consultation on the above which was received by Natural England on 03 November 2016. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p><i>Context</i></p>					

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	We responded on 11 July 2011 on the Draft Southend Central Area Action Plan and associated HRA Screening Report (our ref 27040) and supplied comments online to the Central Area Action Plan – Proposed Submission on 17 October 2011 (our ref 33069). We also responded on 26 January 2016 on the Preferred Approach Option 2015 (our ref 176229). While you have provided a Representation Form, we are providing comments below in the same format as that form in order to expedite this response:					
EiP						
Rep	Policy CS1 Point 1. i. ii)	2868	Support	Natural England support the statement in point 1.i.i.ii "safeguard, and where appropriate, enhance the biodiversity of the foreshore and respect the European designations". We welcome the recognition of the environmental importance of the foreshore as reflected in point 1.a. "an assessment of the scale, character, location and impact of the proposal on existing facilities and environmental designations, including protected green space". We also support point 3c c. regarding the "integration of the open spaces of the seafront and foreshore with the 'green grid' to create a series of linked, functional green spaces" in order to relieve recreational pressure on designated sites.		
	Policy CS1 Point 1 f	2869	Object	However within Policy CS1 there are the following matters which we raise as unsound: 1. We note that the Policy states "restricting development south of the sea wall" which we view does not provide sufficient protection for the international, European and national designated sites in accordance with paragraph 118 of the NPPF.	1. We would advise this be amended to the wording originally used in the Draft Southend Central Area Action Plan 2011 (DSCAAP 2011) that "Development south of the seawall will not normally be permitted" where any proposal has potential to adversely affect a European site or cause significant harm to a Site of Special Scientific Interest (SSSI).	
	Policy CS1 Point 3d	2870	Comment	Point 3.d. describes use of creative lighting and we refer you to our previous advice relating to Policy CS6 (2011) that new lighting should be arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore. This is to avoid potential impact on designated areas and the species they contain, in	There are a number of places within the SCAAP that lighting and creative lighting are described, we have no preference for where the words "new lighting should be arranged as to avoid direct illumination of the foreshore or excessive glare when viewed from the foreshore" might be included.	

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				accordance with paragraph 118 of the NPPF. In addition, light pollution can have negative impacts on local amenity and nature conservation (especially bats and invertebrates).		
	Policy CS1 Point 4i	2871	Object	<p>Point 4.i. Opportunity Site (CS1.1): Southend Pier. As the pier crosses the Benfleet and Southend Marshes designated site, we would have concerns that future proposals to alter the structure (such as undertaking work to deck timbers), or widening the pier (as recently considered in order to facilitate a transport system) would have the potential to impact on the designated site.</p> <p>NOTE: Point 4.i. Opportunity Site (CS1.1): Southend Pier. We would advise that the Plan incorporate measures to reduce potential impacts on the important high-tide roost of wintering turnstone <i>Arenaria interpres</i> at the northeast corner of the pier-head. For example a recent new building close to this slipway was carefully designed to minimise overshadowing the slipway and was given a 'turnstone-friendly' rough-surfaced curved roof.</p>	We would advise that the following words be added to the Point 4.i: "...angling; creative lighting; and sensitively sited renewable technologies, where appropriate and where there can be a net gain in biodiversity". There is a link here to our recommendations in point 1 of Question 6 in Policy CS2: Nature Conservation and Biodiversity (see below)	
	Policy CS2 Point 1a	2872	Support	Natural England welcomes the inclusion of our previous advice from 26 January 2016 within point 1.a. of the Policy to "ensure that all development proposals within the Central Seafront Area are accompanied by a Habitats Regulations Assessment and associated documentation to ensure there will be no adverse effect on the European and International foreshore designations (SPA and Ramsar) either alone or in combination with other plans or projects".		

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	Policy Cs2 Point 1e	2873	Support	We also welcome the aspiration in point 1.e. of the Policy to link open space within a Southend 'green grid' (see CS1) and we support point 1.f to satisfy the need to make visitors and residents aware of the significance of the SSSIs through interpretation at a high-quality visitor facility.		
	Policy CS2	2874	Object	<p>It is our view that Policy CS2 as presented however is not consistent with National Policy:</p> <ol style="list-style-type: none"> 1. It does not clearly set out criteria to firstly avoid, then mitigate and, as a last resort compensate for adverse impacts on biodiversity. The Southend on Sea Development Management Document (July 2015) also does not refer to the avoidance-mitigation-compensation hierarchy (see paragraph 118 of the NPPF). 2. It does not make a clear distinction between the protected sites hierarchy of international, national and local sites. A clear distinction should be made between the protected sites hierarchy of international, national and local sites in order to ensure consistency with paragraph 113 of the NPPF. There are descriptions of 'designated sites', 'international and European designated sites'. Nationally designated sites are not described at all. 	<p>We would advise that the Policy include criteria to firstly avoid, then mitigate and, as a last resort compensate for adverse impacts on biodiversity, in accordance with paragraph 118 of the NPPF. We would advise the addition of a form of words such as "Development should aim to ensure that there is a net gain of biodiversity by protecting existing biodiversity and geodiversity assets and by:</p> <ol style="list-style-type: none"> a. Refusing development proposals where significant harm to an asset cannot be avoided, mitigated or, b. as a last resort, compensated. <p>The weight accorded to an asset will reflect its status in the hierarchy of biodiversity and geodiversity designations."</p> <p>2. We would advise that the SCAAP is critically compared to the Southend on Sea Core Strategy (2007) with regards the hierarchy of designated sites and (within the context that the Core Strategy may not be NPPF-compliant) included.</p>	
	Policy DS4	2875	Support	Natural England welcomes this policy requiring Flood Risk Assessments and the widespread adoption of SuDS techniques.		

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	Policy DS4	2876	Object	We note that climate change appears in Policy DS4 as well as in other places throughout the document; the main focus of attention relates to Flood Risk management. Whilst we recognise the intentions of paragraph 97 with regard mitigation of climate change by tree planting, we would advise that the SCAAP include a separate Policy on climate change, to cover both mitigation and adaptation, in accordance with paragraphs 94 and 156 of the NPPF. This Policy could focus on measures to assist biodiversity to adapt, and include green infrastructure measures to assist people to adapt (principally to extreme high temperature events, extreme high/low rainfall events, and for coastal areas, sea level rise and extreme storm surge events). For example, using tree planting to moderate heat island effects and SuDS to address flooding. For more information, see PPG on Climate Change.		
	Policy CS3	2877	Object	Natural England draws your attention to our advice on 17 October 2011: "any new or enhanced marine facilities as referred to in point 1.b may potentially need to be restricted to seasonal usage if [there will be no unacceptable impact upon navigation, biodiversity, flood risk or the special character and designations]". The seasonal restriction relates to avoidance of potential impacts on the interest features of Benfleet and Southend Marshes Special Protection Area / Ramsar in accordance with paragraph 118 of the NPPF.	We would recommend amending wording of this policy from "2. Proposals for waterfront development within the Central Seafront Area and improved facilities will need to demonstrate that there will be no unacceptable impact upon navigation, biodiversity, flood risk or the special character and designations of the area" to "2. Proposals for waterfront development within the Central Seafront Area and improved facilities will need to demonstrate that there will be no unacceptable impact upon navigation, the conservation objectives or features of Benfleet and Southend Marshes Special Protection Area, Ramsar and SSSI, flood risk or the special character of the area.	

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	Para 29 Strategic Objectives	2878	Support	<p>Point 10 Natural England supports the Objective 10 “to enhance the quality of, and access to... natural environment and open spaces” as a means to relieve pressure on designated sites and to enhance local biodiversity and nature conservation through connection to the green grid.</p>		
	Para 94 - 98	2879	Object	<p>There is likely to be increased recreational and development pressures on designated international, European and nationally designated sites. While Natural England welcomes the inclusion of various measures of urban greening described in Policies: DS5, PA1, PA3, PA4, PA5, PA6, CS1, PA8, PA9, the Plan should include a strategic approach for networks of biodiversity and for green infrastructure. The SCAAP Consultation Draft Proposed Submission (2011) contained Policy PR1: Open Space Provision and the environment: a policy supported by Natural England. It contained a number of thematic-links: reducing recreational pressure on Benfleet and Southend Marshes SPA / Ramsar / SSSI and climate change mitigation within a framework of linking open spaces in the green grid. Every effort should be made to minimise the severance of green infrastructure. Therefore although we welcome the intention expressed in paragraph 96 to remedy the deficit of green spaces within the Town Centre within the relevant Policy Areas and Opportunity Sites, it is not clear that the approach described at paragraph 95 is consistent with the NPPF paragraphs 114 and 117. It is also not clear</p>	<ol style="list-style-type: none"> 1. Natural England recommends the links between Policies DS5 and CS1 are strengthened to demonstrate clearly a strategic approach. One recommendation would be to overlay the 'green grid' map of Thames Gateway South Essex Green Grid Strategy on to the Policy Map, and also include a wider-level map (as was included on p62 of the SCAAP Consultation Draft Proposed Submission (2011)) to help demonstrate strategic approach. 2. We would advise that a check is undertaken as to what assessment of open space needs has been undertaken either as part of the SCAAP or in any connected strategic plan. We would recommend the inclusion of the analysis of the adequacy of open space provision for Essex in the evidence base. 3. We would also advise that the SCAAP DPD makes the distinction between natural greenspace and general open space provision, as well as distinguishing between formal and informal open space. 	

	Policy, Para,	Rep No	Object/ Support	Representation (Summary of Original Submission)	Respondents Suggested Changes to Plan	Test of Soundness
				whether a robust and up-to-date assessment of the needs for open space, and opportunities for new provision has been undertaken, in accordance with paragraph 73 of the NPPF. Natural England has an Accessible Natural Greenspace Standard and has produced an analysis of the adequacy of open space provision for Essex, with details for each district.		
	Policies Map	2880	Object	Nature Improvement Areas (NIA) are fundamental to the step-change needed to establish a coherent and resilient ecological network. Policies should ensure that any development affecting the Greater Thames Marshes NIA should be compatible with their purpose and make a positive contribution to NIA enhancement (using CIL/S106 agreements/conditions as appropriate).	Natural England advise that the Greater Thames Marshes NIA is included in the Plan Policy Map.	
	HRA 25 - 26	2881	Support	We note that the Habitat Regulations Assessment -Screening Report (draft) dated June 2016 is still described as a Scoping Report. It is in fact a Screening Report - as previously advised on 26 January 2016 (our ref 174743) and 19 August 2016 (our ref: 191786). We note that the data presented in Table 1 - Conservation Objectives and Designated Features of European Sites on the Condition of the SSSIs has now been updated to accurately reflect the current condition of these sites. We also welcome the inclusion of the Southend-on-Sea Shoreline Strategy Plan following our advice of 26 January 2016. Several of the Policies may result in additional development and/or intensification close to the European sites (particularly Benfleet and Southend Marshes SPA and Ramsar site).		

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				Notwithstanding this, Natural England is generally supportive of the HRA 'Scoping Report' and concurs with its conclusions that "the SCAAP, in conjunction with the Southend on Sea Core Strategy and related documents, will not have a significant effect on European sites". NOTE The Thames Estuary 2100 Project table showing the Recommended Preferred Options for PMU Action Zones 8 & 6 contains duplicated information (pp 43-45 of the pdf).		
Respondent	Mr Paul Thompson (Southend Bid)					
Full Submission	<p>We attach representation form re the SCAAP. The enclosed form is submitted by us as members of Southend BID whose details and address are included in Part A of the form. However all communications should be with or sent to us at the telephone numbers and email addresses shown in Part A or by post to: Paul Thompson, Alan Bacon</p> <p>This representation is made on behalf of members of The Southend BID. The BID is comprised of 378 levy paying members which comprises a wide range of businesses in sectors including retail, tourism, education and office based professional services to name a few. The BID zone in broad terms is made up of businesses within the High Street and its surrounding side streets together with the main tourist part of the seafront. The BID zone falls within the Southend Central Area and thus its members make up the majority of businesses within the SCAAP area. The BID was established 4 years ago following a ballot of the 378 businesses that now comprise the levy payers.</p> <p>Through the BID a number of representations have been made following the BID's own consultation on a range of issues. The BID appointed SK Architects Ltd to make a formal representation as part of an earlier consultation by Southend Council on its SCAAP. SK Architects attended the council's consultation workshop and as the 2 sessions were poorly advertised the attendance by businesses was low. SK Architects then undertook its own consultation on behalf of the BID and produced a consultation form based on the key themes and opportunity sites highlighted in the SCAAP. The consultation responses helped form the 35 page document that SK prepared and which the BID submitted to SBC in February as it's formal representation to the SCAAP. (submission document attached)</p> <p>Following on from the publication of the final version of the SCAAP the BID board of directors decided that certain parts of it's representation had been ignored by SBC and feel that sections of the dpd would threaten the economic viability of businesses within the scaap area. It was agreed by the board to make this further formal representation to the public consultation process prior to the oral examination with the government inspector.</p>					
EiP	Appearance					
Rep	DS5	2883	Object	Transport and Access into the Town is a key theme and in order to deliver the aspired number of new dwellings and new jobs in the Central	Not Positively Prepared. •A strategy to increase parking stock in the central area by 25% over the next 4 years	Legally Compliant: Sound: No 4(1) Positively Prepared

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				<p>Area, the BID wish to see this appropriately addressed through the SCAAP documentation. At present the BID does not believe that the Transport, Access and Parking issues have been given enough consideration. Nor has the ability of the existing infrastructure to cope with the increased pressure on it that will be created from the aspirational growth. During busy periods business believes that the parking and infrastructure network is insufficient to deal with existing demand, let alone cope with the predicted growth.</p> <p>The Council's Local Transport Plan 3 estimates the growth in demand for car parking in the central area over the next 4 years will be 25%. No policy is in place within the scaap to deal with this estimated shortage in capacity. The BID notes that the omission of an effective parking strategy, stating the need to increase parking stock over the next 4 years, neglects the needs of existing business and the development needs of the area as well as the existing and future infrastructure requirements.</p> <p>The BID would like to emphasise its concern that the above, combined with the desired sustainable transport measures proposed in DS5, will lead to a major shortage of parking capacity during peak periods and heavy congestion throughout the area.</p> <p>The Seafront businesses rely on easy access to car parking and convenient access to the seafront</p>	<ul style="list-style-type: none"> •Necessary infrastructure improvements to be made to sustain the planned growth of residential units and jobs in the area •A freeze on sustainable transport routes such as bus lanes, cycle routes and pedestrian priority routes due to the importance of the car to the economy of the high st. and seafront •A CPS that is based on accurate car parking data, covering the entire parking stock of publicly available spaces and using surveys that have been done in peak periods, ie warm sunny conditions in the summer holidays. •The report produced by SK architects for the BID should be given higher priority and used to influence the economic and transport sections of the dpd. 	<p>4(2) Justified 4(3) Effective 4(4) Consistent with National Policy</p>

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				<p>so the large number of families visiting by car can access the tourist attractions on the seafront easily. The retail businesses located in and around the high street rely on a large supply of easy to access car parking spaces to encourage trips into the high street. The BID believe the omission of planned infrastructure improvements and increases in the parking stock will create parking chaos and congestion and drive the customers of its businesses elsewhere. Tourists will simply choose another resort destination and increasing numbers of shoppers will choose out of town shopping centres and retail parks such as Lakeside and the Mayflower retail Park at Basildon.</p>		
	DS5	2884	Object	<p>Members of the BID have raised considerable concerns as to the validity of the evidence in the form of the Car Parking Study produced by Steer Davies Gleave for SBC. The CPS helped formed the transport and access policy DS5.</p> <p>The parking report and surveys have underestimated the parking capacity, particularly in the central area to the south of railway, and thus have underestimated the demand for spaces from visitors to the seafront. The surveys have been predominantly focused on the High Street and on bad weather days thus the parking situation & demand to the south of the railway line has been misrepresented. The southern area has been identified as the area which experiences the greatest pressure on its parking supply. The report relies heavily on data from the VMS system which is inaccurate and unreliable.</p>	<p>Justified</p> <ul style="list-style-type: none"> •A CPS that is based on accurate car parking data, covering the entire parking stock of publicly available spaces and using surveys that have been done in peak periods, ie warm sunny conditions in the summer holidays. 	<p>Legally Compliant: Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective 4(4) Consistent with National Policy</p>

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				<p>Therefore the report cannot be relied upon and thus the related policy within the SCAAP, DS5 is flawed.</p> <p>The policy as it stands will result in an inefficient transport network in and around the SCAAP area, with a severe shortage of parking capacity to the south resulting in heavy congestion at busy periods, clogging up the road network across the whole of Southend.</p> <p>The CPS makes reference to car parking studies carried out on 6 dates over 2015 and 2016. SBC consulted the BID board of directors in February 2016 as to when the BID thought the surveys should be carried out to best give an indication of how the parking network performs in busy periods. The recommendations from the BID were that the council should not conduct any surveys at Easter and should concentrate surveys on hot sunny weekends during July and August. Following on from this advice SBC conducted surveys at Easter and one in May but none in July or August 2016!</p> <p>The dates the surveys were done on experienced poor weather conditions, and thus the high street and seafront were not busy. Thus the surveys do not show how the network copes at peak busy times, ie when the sun is out and it is warm. Table 3.2 page 16 of survey report shows weather conditions on the survey days. The weather conditions were not published in any earlier version of the dpd. The BID contests the weather conditions published by SDG in the CPS. Weather</p>		

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				conditions on these dates were not as described in the CPS, but were far worse.		
	DS5	2885	Object	Most of the opportunity sites in the scaap are large car parks owned by SBC. Due to the scale and complexity of developments that would likely replace the car parks the BID does not see the sites as deliverable in the next 4 years.		Legally Compliant: Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective 4(4) Consistent with National Policy
	DS5	2886	Object	Great emphasis has been placed in the NPPF on the 'golden thread' of sustainable development. The scaap should deliver a strategy that leads to the growth of a strong economy within the area, and the economic role is one of the key principles of sustainable development. "an economic role -contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure" A major concern held by the businesses in the BID is that policy DS5 will make access to the central area by car difficult and frustrating, driving it's customer base elsewhere. This will have a severe negative impact on economic growth and will threaten the viability of retail and tourism within the central area. This policy thus is inconsistent with the NPPF.		Legally Compliant: Sound: No 4(1) Positively Prepared 4(2) Justified 4(3) Effective 4(4) Consistent with National Policy
	CS1	2887	Object	Tourism contributes significantly to the economy of Southend and particularly the central area. The businesses located in this sector feel that the	The dpd should be re written to included a well thought out policy that will enable the tourist industry to grow over the next 4 years	

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				<p>scaap document has very little meaningful substance in terms or a strategic approach to tourism. The document fails to understand the drivers behind tourism and the attractions, facilities and infrastructure that is needed to grow tourism within the scaap area. The dpd in effect neglects the day visitor to the area for a desire to attract longer stay visitors. It is important to try to encourage visitors to stay for longer but this should not be at the expense of the vast amount of day visitors which form the bulk of the industry's customer base.</p>		