

Project Title: Southend Central Area Action Plan (SCAAP)

Date: 4 May 2017

MATTER 8: THE POLICY AREAS

RESPONSE BY THE STOCKVALE GROUP

8.1 Are the following policies setting out the development principles, including Opportunity Sites, where appropriate, in relation to the following policy areas, justified and deliverable within the plan period?

- 1 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. We have responded to the Inspector's questions on each of the main areas of concern below.

(vii) Policy PA7: Tylers Policy Area

- 2 The Council's proposals for the Tylers Policy Area includes the development of around 150 residential units. There will also be a retail element, along with car parking and a possible public transport bus interchange (see Paragraph 185, and also referred to under the 'Aims'), although the proposals in this regard are not particularly clear.
- 3 The Tylers Policy Area does have an impact on the seafront area as the car parking is often used by people visiting the seafront as it is relatively conveniently located, albeit up a hill.
- 4 The Aims state that "car parking will be addressed". As stated in our representations, 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 justified by the evidence that we have seen (including the RPS Transport Technical Note) and the outcome could be serious harm to the seafront tourism area.
- 5 Given the significant public realm works required, and the aim of creating a new public transport interchange that would be integrated with the development, it seems unlikely that this development will be delivered within the plan period. The Council will need to provide significantly more information on the status of the site for the Inspector and other respondents to take an informed view on this.

(viii) Policy CS1: Central Seafront Policy Area

- 6 We have already mentioned in our representations that we were surprised that the Aims that apply to this Policy Area (Page 72) do not refer to car parking. The focus seems to be on redevelopment, rather

than resolving existing issues in this Policy Area that have a significant detrimental effect on tourism related businesses on the seafront.

- 7 We consider that the development of hotels within the Central Seafront Policy Area is justified by the need to increase overnight stays, as is the need to improve connectivity between the seafront and town centre.
- 8 Paragraph 195, which explains the “major opportunity” for “mixed use development” at Opportunity Site CS1.2 (the Seaways site) does not seem to be justified by anything other than the need to improve connectivity and public realm. Whilst we accept that improving connectivity and public realm is a requirement, we are surprised that the importance of the site as the most important car park serving the seafront area is not recognised. There does not seem to be any justification within the Plan that we can see for a major mixed-use development on this site. The public realm improvements and improved links can all be achieved without the need for large-scale development that will undoubtedly have a significant detrimental impact upon the seafront tourism businesses.
- 9 As stated in our representations, this is the single most important car park for the seafront, and supports numerous growing businesses on Southend seafront. The seafront tourism businesses rely on this car park. It is worrying for seafront businesses to see it referred to as a “major opportunity for mixed-use development” without any justification other than the connections and public realm improvements. We are concerned about its ability to continue in this role after a mixed use development has been completed on the site. If this car park is lost, or its contribution reduced, there will significant 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). We can see no justification for the car park to be lost or reduced. These proposals are therefore not justified.
- 10 We are also very concerned 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, 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.
- 11 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 for 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.
- 12 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.
- 13 The potential loss of car parking is not justified by the evidence base, the need for a cinema and restaurants in this location are not justified. In short, there are numerous issues with this development, which mean that in planning terms it is not justified.

- 14 Similarly the reference to Marine Plaza (Opportunity Site CS1.3) makes no reference to its current role as a seafront car park, a role which it has occupied for well over 10 years following the closure of the Dizzyland Amusement Park in the 1990s. Whilst we can understand that this site would potentially make a good site for a landmark building opposite the listed Kursaal building, we consider that there is justification for it to also continue its role as a car park, which should be incorporated in any redevelopment. We are aware that planning permission was granted in 2015 for a residential redevelopment, but this has not come forward yet so there is no reason why the SCAAP should not bring forward a clear policy setting out how the site should be developed in a way that does not harm the seafront tourism economy. If the Plan is merely going to accept what has already got planning permission, then it should merely be noted as a commitment and no further comment needs to be made. However, on the basis of the information presented in our representations, including our Transport Technical Note, this approach would not be justified. There is an opportunity for the SCAAP to influence future development of this site, and this opportunity should be taken.
- 15 We set out in our representations how Policy CS1 should be amended so that it recognises the serious concerns that seafront traders have. To ensure that the policy is justified in its current form, the Council should clearly state its intention to protect and increase seafront parking and support tourism development on the seafront. As it currently stands, this policy threatens to remove, or call into question the future of, 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. As stated in our representations, 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).
- 16 In terms of Policy CS1 being justified, 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 pressure and unable to cope with existing demand, 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.
- 17 We strongly objected to the wording of part 4ii (Opportunity Site (CS1.2): Seaways) for the reasons set out above. This site is a key part of the infrastructure of the seafront tourism. 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. The loss of a huge part of the seafront infrastructure will have a devastating effect on this part of the Town.
- 18 Southend's seafront is its most famous asset, and is still the main reason why tourists visit the town. There must be adequate provision for visitors to park and access the seafront conveniently and safely. This site should play a continuing role with this, and the proposals for improved public realm and connectivity should assist with this.
- 19 We also strongly objected 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 CPS, and the RPS Technical Note submitted with our representations, it is clear that the contribution of this important and well-located site has been ignored.

- 20 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.
- 21 Whilst we acknowledge that planning permission already exists for the redevelopment of this site, we know that it has not commenced and this may be because it is not 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, which is presumably why the Council would like to include the site in the Plan.
- 22 The Inspector also asks about deliverability in the Plan period. We consider that it is highly unlikely that the Seaways development can be delivered within the Plan period, especially if it involves work on the public highway. Although there is a preferred developer we are not aware of a scheme having been assembled, or whether potential operators have been found. The Council will need to provide an update on the scheme at the Examination to enable the Inspector and other parties to take a view on deliverability.
- 23 In terms of CS1.4, 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 under-supply, and we understand that this is the plan.
- 24 However, this development cannot be relied on as it is at a very early stage. Although we understand that it has planning permission, funding has not yet been secured. It is possible that this development will not come forward at all, but we do consider that it is appropriate to include it within the Plan to assist in giving confidence to funders that it is an integral part of the Council's plans for the Southend seafront area.