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For Southend BID

Business Intelligence Officer,
Department for Place,
Southend-on-Sea Borough Council,
PO Box 5557,
Civic Centre,
Victoria Avenue,
Southend-on-Sea,
Essex
SS2 6ZF

16th December 2016

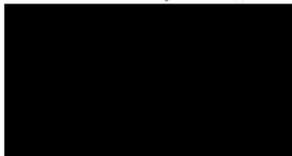
Dear Sirs,

SCAAP

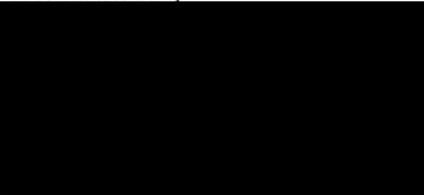
We attach representation form re the SCAAP.

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:

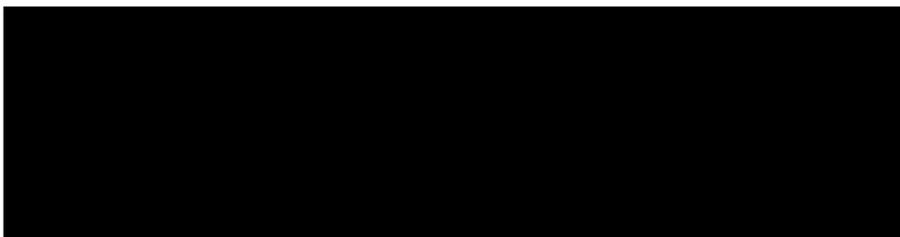
Paul Thompson,



Alan Bacon,



Yours faithfully,



Representation Form

Southend Central Area Action Plan (SCAAP) Revised Proposed Submission 2016

This form has two parts -

Part A - Personal Details

Part B - Your representation(s)

Completing this Response Form

Please complete this form and submit it to the Council.

Your comments will be used to check the plan is the most appropriate for the area at an independent examination. Paragraph 182 of the National Planning Policy Framework sets out more detail.

All comments must be supported by your full name and address. As this is a statutory stage of consultation, no late comments can be accepted.

We are legally required to publish comments received as part of the consultation for public inspection and keep these records on our files for the purpose of the Local Plan. By submitting, you consent to your information being disclosed to third parties for this purpose.

Please return completed form(s) to Department for Place to the address below:

email: ldf@southend.gov.uk

Post: FAO Business Intelligence Officer
Department for Place
Southend-on-Sea Borough Council
PO Box 5557
Civic Centre
Victoria Avenue
Southend-on-Sea
Essex SS2 6ZF



Part A

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

Agent Details (if applicable)

Title	[REDACTED]	
First Name	PAUL / ALAN	
Surname	THOMPSON / BACON	
Job Title*	BID DIRECTOR BID DIRECTOR	
Organisation*	SOUTHEND BUSINESS IMPROVEMENT DISTRICT	
Address line 1	[REDACTED]	
Address line 2	[REDACTED]	
Address line 3	[REDACTED]	
Address line 4	[REDACTED]	
Postcode	[REDACTED]	
Telephone No	[REDACTED]	
Email Address*	[REDACTED]	

Part B - Please use a separate sheet for each representation outlining the relevant section and page number.

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

Policy (e.g DSI) Paragraph Policies Map

2. Do you? Support

Object

Customer Cor
16 DEC 2015
Time 15:38

3. Do you consider the document is:

3(1) Legally Compliant

(If your representation is due to the way in which the Council has prepared and published the DPD) Yes No
UNABLE TO COMMENT

3(2) Sound

(If it is the actual content on which you wish to object/ support. See guidance notes for further assistance) Yes No

If you have entered No to 3(2), please continue to Q4. In all other circumstance, please go to Q5

* where relevant

4. Do you consider the DPD is UNSOUND because it is not:

4(1) Positively Prepared

(The plan should seek to meet local need where possible)



4(2) Justified

(The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence)



4(3) Effective

(The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities)



4(4) Consistent with National Policy

(The plan should enable the delivery of sustainable development in accordance with the



5. Please give your reasons below why you are supporting/ objecting to this part of the plan. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments

SEE ATTACHED

continue on a separate sheet if necessary

6. What changes would you suggest should be made to this part of the plan? Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 4 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SEE ATTACHED

continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/ justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

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

No - I do not wish to participate at the oral examination

Yes - I do wish to participate at the oral examination

Please note the written comments you have made will hold the same weight as those discussed at the examination and will also be fully considered by the Inspector.

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

SEE ATTACHED

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

8. Do you wish to be notified when the document is:

Submitted for independent examination

The Inspectors Report is published

Adopted

Please sign and date:

Signature

[Redacted Signature]

Date

16/12/2016

Data Protection Act 1998

Under the Data Protection Act 1998, we have a legal duty to protect any personal information we collect from you. We only use personal information you supply to us for the reason that you provided. All employees and contractors who have access to your personal data or are associated with the handling of that data are obliged to respect your confidentiality.

Please note: All representations will be published on our website excluding address, telephone number and email address.

Section 8

Southend Business Improvement District (The BID)

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.

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)

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.

Due to the number of and diverse type of businesses that make up the BID we feel it is vital for the BID to be represented at the oral examination.

POLICY DS5

Not Positively Prepared

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 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.

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.

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.

The Seafront businesses rely on easy access to car parking and convenient access to the seafront 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.

Justified

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.

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. Therefore the report cannot be relied upon and thus the related policy within the SCAAP, DS5 is flawed.

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.

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!

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 conditions on these dates were not as described in the CPS, but were far worse.

Effective

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.

Consistent with National Policy

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.

Changes to the Plan

The scaap should be written again to include;

- A strategy to increase parking stock in the central area by 25% over the next 4 years
- 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.

POLICY CS1

Tourism contributes significantly to the economy of Southend and particularly the central area. The businesses located in this sector feel that the scaap document has very little meaningful substance in terms of 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.

Changes to the Plan

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.