southend onsea BOROUGH COUNCIL

Ref 2705 - 2708

for official use only

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	MR.
First Name	MICHAEL
Surname	KOUSPETRIS
Job Title*	
Organisation*	[redacted]
Address line 1	
Address line 2	
Address line 3	
Address line 4	
Postcode	[redacted]
Telephone No	
Email Address*	

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 DS1) DS5 Paragraph PAGES 40 - 46 Policies Map

2. Do you? Support ☐ Object ✓

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 ☐

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

PLEASE SEE ATTACHED SHEET

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.

Policy DS5 needs to include measures to increase parking capacity by a minimum of 25% in the southern central area. It should stipulate that any new development on existing car parks not only replaces the existing capacity but also provides sufficient capacity in addition to meet the demand from the new development's use. The CPS should be redone including data from new surveys done in Aug2017 on a number of hot sunny days, the entire parking stock across the central area to be included in these surveys. Roads and access via car should be prioritised over bike lanes, bus lanes, pedestrian priority routes etc.

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.*

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.*

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

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

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] Date 15-12-16

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 confidentially.

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

UNSOUND

Positively Prepared

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.

Justified

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.

Effective

5. The opportunity sites identified within the SCAAP would represent major developments which are not deliverable in 4 years.

Consistent with National Policy

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. Customers 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.

7. 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.