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By email:

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2 April 2019

Dear Sir or Madam

SOUTHEND-ON-SEA NEW LOCAL PLAN ISSUES AND OPTIONS CONSULTATION REPRESENTATIONS BY CROMWELL PROPERTY GROUP

On behalf of the Valad European Diversified Fund (Jersey) 3 Ltd, a fund managed by Cromwell Property Group, who are the owners of the Royals Shopping Centre, we submit our representations on the Issues and Options consultation document.

The Royals Shopping Centre is a strong anchor to Southend town centre with 280,000 sqft of floorspace across 27 units with four key anchor stores and 450 managed parking spaces. The Royals provides a key draw within the town centre as a modern shopping facility with a good tenant mix which is well located to the sea front activity and public transport nodes.

The Cromwell Property Group welcome the opportunity to comment on the future options for the town centre and the general strategy going forward. Cromwell wish to make it clear that they are keen to continue this dialogue throughout the Plan process and as a key stakeholder they would wish to meet with Officers to discuss these options further. The representations below focus on the continued need to provide for a vibrant and attractive town centre in Southend.

Section 5 - Providing for Vibrant and Attractive Town Centres

The vision and strategy for the Plan is underpinned by a new evidence base covering a range of topics including a new retail and leisure study. The Retail and Leisure Study produced by Peter Brett Associates (pba) is dated as July 2018 and has been produced in parallel with the South Essex Retail Study (SESRS) which is based on market research carried out in July 2016. A wider view of the region is very much welcomed; however, we raise concerns that the Council's own 'new' study appears to be already dated in a number of the assumptions made which will have implications for the strategy going forward. Whilst it is understood that

household surveys are expensive and time consuming to update and are done so less frequently, there are other areas that the new study should have used more up to date information at this stage.

The health check of Southend town centre uses industry and survey data from 2016, this could have been easily updated using 2018 data which would not only have been more up-to-date but would also illustrate growing concerns about the fragility of the health of the Southend town centre. Vacancy data needs to be more up to date and should be more forensic in illustrating long term vacant units / clusters and what types of retailers have taken up vacant space. The report masks some real areas of concern in this regard. The concern is that there are a number of long term vacancies and that new tenants coming in are often short term and not national multiples which provide a wider trade draw. A time series analysis of vacancy rates stops at 2016, this trend could be continued to at least 2018 and future iterations of the Plan must take account of more up to date information in this regard.

Retailing is going through a structural change and this is most acutely represented in town centres. To assess future trends then the Plan must have regard to up to date data and the implications this will have. The indications for Southend very much point to more investment required within the town centre as the overall health is more fragile than that set out in pba's study which used 2016 data. Future iterations of the Plan will need to be informed by more up to date information and sufficient monitoring will have to be put in place to ensure the successful delivery of it. The pba study does helpfully acknowledge on several occasions that the proposed out of centre retailing at Fossetts Farm has created long term uncertainty for the future prospects of the town centre. This further endorses the point that any investment and future retailing in Southend should be focussed within the town centre itself.

Turning to the retail capacity estimates in pba's study, it is acknowledged that there is a limited need for new comparison (non-food) goods floorspace in the short to medium term. Whilst the planned expansion of Lakeside and improvements to Chelmsford have drawn a lot of the potential capacity away from Southend, the Plan should not encourage any trade to be drawn back by allocating future retail floorspace in out of centre locations. Whilst arguments can be made about destination retail and leisure being created to draw trade back to a Borough location, the health of Southend town centre is such that any such development would cause a significant material impact on the centre.

This would be contrary to national planning policy and would undermine the core sustainable principles of the Plan moving forward. The Plan at this stage does not attempt to allocate such a location but we strongly caution against any counter arguments and representations likely to be made in this respect. The creation of a new retail destination within Southend Borough outside of the town centre would not accord with the core principles of the Plan nor that of national policy and should not be considered.

There is a short term convenience (food) goods need within Southend and it would be a benefit to the town centre to focus that need within it in the first instance.

In response to the specific questions raised in the Issues and Options, we consider that Southend Town Centre should remain the first preference for all forms of retail development and uses attracting large numbers of people. We further agree that the town centre should benefit from a more flexible approach and allow a range of uses which encourage footfall in the centre. Furthermore, opportunities for residential development should be promoted as this will bring further vitality back to the centre. We would welcome a review of primary and secondary designations both in terms of length and also in the sense of the restrictions this currently imposes and what flexibility might be introduced to allow occupiers to locate in the town centre. These designations should encourage and focus high footfall uses within them and not be an overly prescriptive barrier to entry.

It is agreed there needs to be a more flexible approach to the town centre to encourage investment and occupiers. It also needs to be recognised that this investment is equally being undermined by the threat of large scale retailing at Fossetts Farm and that the Plan should not seek to provide any encouragement for this as it will undermine any future strategies for the town centre.

In response to Question 5.3 it is considered that the paving across the town centre needs to be improved and properly sealed. Enhancements to the High Street should be priority. Access to the High Street should be more legible, especially from Victoria station, for example the extension to accommodate New Look acts as a visual barrier to the centre and enhancement is needed to encourage pedestrians into the High Street. The centre would also benefit from more cycle lanes through it to assist the delivery of the sustainable transport objectives of the Plan.

Other Areas of the Plan

In response to other sections of the Plan, we set out our brief responses below. We make no comment on the housing growth or new job projections, but we would encourage that they are focused within the town centre wherever possible to help to improve its vibrancy. There is a real opportunity for residential growth in the town centre and this should be considered in detail in future iterations of the Plan. Cromwell are keen to be part of that debate and explore what their centre could also offer in this respect.

The need to look at new locations for housing outside of built up areas is understood and a location to the north of Fossetts Farm is noted. There is more evidence and debate required on such options, however, we would state at this stage that the growth of residential in this location should not justify the inclusion of large scale retail and leisure uses as part of any future allocation. It is likely that small scale retail and services will be required in areas of larger housing growth, but the Plan should not allow for large scale retail and leisure uses as currently proposed at Fossetts Farm to be included in any future allocations.

Cromwell very much supports the objective of the Plan to promote Southend as a major resort. In response to Question 4.3 the promotion of the second phase of the City Beach is supported and the area to the west of the pier would benefit from the

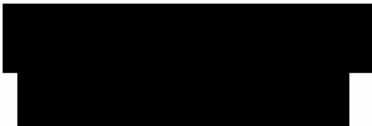
focus of new developments and improvements.

In response to Question 4.5 further enhancement of links with the town centre should be promoted as a priority. The current pier lift area needs to be maintained and enhanced to improve safety. The strategy for directional signage across the town centre and seafront needs to be reviewed and the inclusion of more prominent directional signage between the two would be of benefit. The town centre should be continued to be promoted for hotel and tourist accommodation.

As a key stakeholder in the town centre Cromwell are very keen to engage in the development of the Plan going forward and wish for the comments above to be considered and would like to discuss in a meeting with Officers in the near future.

We look forward to the opportunity to discuss these matters further with Officers. Please contact Andrew Pepler or George Burgess in the first instance.

Yours faithfully

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Indigo Planning