

[REDACTED]

From: Southend-on-Sea Borough Council <southend@jdi-consult.net>
Sent: 06 November 2016 20:24
To: [REDACTED]
Subject: Representation received. ID:2474

Mr Daryl Peagram,

Thank you for your representation which we received as follows:

Representation ID: 2474
Document: Southend Central Area Action Plan (SCAAP) - Revised Proposed Submission 2016
Section: 4.11 Transport, Access & Public Realm, 123
Support/Object: Object

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.

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 laid, and the solution is assumed to be a modal shift with no evidence of when how why for whom this will happen.

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 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'.

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.

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 is 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.

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 p95 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.

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.

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 stand 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.

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.

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 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.

SUMMARY

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.

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.

CHANGE TO PLAN

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.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified

iii. Effective

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.