



southend

BOROUGH COUNCIL

Ref

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Representation Form

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

Customer Contact Centre
10 DEC 2016
Time 15:26

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

First Name

Surname

Job Title*

Organisation*

Address line 1

Address line 2

Address line 3

Address line 4

Postcode

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 DSI) Paragraph 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

Paragraph 130 page 41

I object to the use of the Car Parking Study (CPS) commissioned by Southend Council and undertaken by Steer Davies Gleave as part of the evidence base for the SCAAP. The study has been used to form the Parking Management Techniques adopted within the SCAAP.

I believe the Study is flawed for reasons set out below and 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.

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 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 on over 99% of data from the VMS system which is inaccurate and unreliable. Therefore the report is flawed and thus the related policies within the SCAAP are flawed.

Paragraph 2.1, page 5 of the CPS recognises the increased future demand for parking predicted in the Southend Local Transport Plan 3 by 2021, stating:

“The Southend Local Transport Plan 3 (LTP3): Strategy Document outlines key considerations related to Central Area parking provision. It notes that Central Area car parking demand is forecast to grow by 25% by 2021.”

Although this context is set out very early in the CPS, no further account appears to be taken of it in the analysis. Thus, the predicted increased future demand for parking of 25% is not accounted for within the strategy.

Paragraph 2.1 goes on to say:

“The document notes that Southend Central Area has a high level of car parking, which can encourage people to drive to the Central Area rather than using other more sustainable modes.”

For some land uses, this can be the case, however, for tourist attractions, high levels of car parking are necessary. The tourist industry relies upon the busiest days of the year to subsidise other periods of the year when they are not busy. The car parking demand for these busy periods therefore must be met to maximise their customer attraction. If this is not met, then it jeopardises their viability throughout the remainder of the year, which has a significant knock-on effect in terms of jobs and the local economy.

Therefore, there will be some days that are not busy where there appears to be high levels of car parking availability, however, in reality, these spaces are necessary. In this regard, paragraph 2.1 recognises this by stating:

“The LTP highlights a seasonal shortfall of parking capacity in certain car parks in summer and in December.”

The CPS therefore recognises at a very early stage that there is a seasonal shortfall of parking capacity in some car parks and that there is a predicted 25% increase in future demand for parking. Despite this, the CPS makes no further reference to this.

Table 3.2 page 16 of survey report shows weather conditions on the survey days. These are incorrect and differ to the weather recorded at the time by traders:

13 August 2015 Rain & Thunderstorms

15 August 2015 Cloudy, Brightening up late afternoon

23 March 2016 Cloudy, Av temp 7c (90% seafront closed)

25 March 2016 Partly Cloudy, Av temp 11c

26 March 2016 Cloud & Rain, Av temp 10c (storm Katie weekend)

30 May 2016 Mostly Cloudy, Av temp 14c

No parking surveys done on a warm sunny day – ie in good weather

Thus surveys do not show how parking capacity in central area performs in good weather conditions, which obviously are the peak times. This report greatly influences the transport/parking section of SCAAP and thus it is flawed.

Page 8 Table 2.2 and page 9 table 2.4 shows the off street and on street car parking used in the report. However significant amounts of car parking spaces have not been included and some have not been identified. Table 2.3 page 8 identifies some car parks not included but gives no explanation as to why. The Marine Plaza car park is a major car park on the seafront with 200 spaces that has not been identified? (planning permission granted 26th Oct 2000 ref 00/00765FUL)

Not including this car park is considered to underestimate the total car parking stock for tourists and visitors within the Southend Central Area and also (by not counting cars parked here) underestimate the total car parking demand created by tourists and visitors within the Southend Central Area. Similarly this has the effect of over stating the percentage figure on any day for spare capacity.

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

(1) Positively Prepared

The plan should seek to meet local need where possible)



(2) Justified

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



(3) Effective

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



(4) Consistent with National Policy

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



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 SHEETS

continue on a separate sheet if necessary

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.

THE SEAPP NEEDS TO CONTAIN A POLICY THAT INCREASES PARKING CAPACITY BY 25% IN THE SOUTHERN CENTRAL AREA. IT SHOULD STIPULATE THAT ANY NEW DEVELOPMENT OR EXISTING CAR PARKS CONTAINS SUFFICIENT PARKING CAPACITY TO COPE WITH THE EXISTING SPACES AND TO MEET THE ADDITIONAL DEMAND FROM THE NEW DEVELOPMENTS NEW WE. ROADS AND ACCESSIBILITY BY CAR SHOULD TAKE PRIORITY OVER BUS + CYCLE LANES AND PEDESTRIAN PRIORITY ROUTES.

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

1. 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.

2. 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.

3. 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 

Date

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.

NOT POSITIVELY PREPARED

Policy DS5 page 44

1. In order to improve access to, from and within Southend Central Area through the implementation of the Opportunity Sites and Policies within this Plan, the determination of planning applications and other initiatives, and partnership working, the Council will:

- c. Implement sustainable transport measures in line with the Transport, Access, and Public Realm Strategy as set out in Appendix 5;
- f. Ensure bus priority measures enhance the A13 passenger transport corridor and the connections with London Southend Airport and the seafront, focusing on the Queensway dual-carriage way junctions at London Road, Southchurch Road and Seaways;
- g. Improve the quality of existing and promote the creation of new pedestrian and cycle priority routes to improve access to the SCAAP area, considering the potential for mixed-mode or segregated priority routes where appropriate.

2. In order to support the vitality and viability of the SCAAP area the Council will:

- a. Maintain parking capacity* within Southend Central Area at a level that supports vitality and viability and does not undermine the Central Area's ability to accommodate visitor trips;
- b. Ensure that there is no net loss in car parking to the south of the Southend Central Area;
- f. Seek to relieve the pressure on the more well-used car parks at peak times and encourage use of less occupied car parks through a combination of dynamic signage, competitive pricing and pre-journey information;

It is essential that the Transport Access and Public realm section recognises the need for tourists to be able to access the town and seafront by car. A survey carried out by Stockvale and the Seafront Traders Association has identified that 85% of tourists (out of 1500 surveyed) come by car.

The implementation of the points listed above under no.1 will be at the cost of the car. Bus lanes etc will increase journey times into the SCAAP area by car and result in more congestion. This will deter tourists from visiting Southend and result in cars turning around and going elsewhere as the roads are so congested.

The policies under section 2 are not sufficient to deal with the current or future demand for car spaces, particularly to the south.

The CPS and Local Transport Plan³ highlight the council's estimated 25% increase in demand for parking spaces in the SCAAP area in the next 4 years. The SCAAP and the measures above do nothing to address this extra demand that will arise.

On busy days, warm sunny days, there is a massive shortage of parking spaces and congestion results as cars are continually circulating looking for spaces. Visitors vow not to return as it can take hours to enter the town and get parked. Traffic jams back up along the A127 and many cars turn around and go elsewhere.

This means on warm sunny days the seafront has reached its maximum capacity as no more visitors can get here by car. As a result investment by businesses will stop. Visitors often cancel bookings as they can't get into the town. Visitors opt to visit other resorts and use out of town shopping centres such as Lakeside and Bluewater.

The policies do not meet the development needs of businesses on the seafront and the infrastructure will be insufficient to meet future growth in demand. The CPS recognises that there are already problems in the south on peak days but does nothing to deal with this.

CONSISTENT WITH NATIONAL POLICY

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.

The government recognises that different policies and measures will be required in different communities and different opportunities to maximise sustainable transport solutions will vary.

The sustainable transport policies identified in the SCAAP will make journey by car to the central area much longer and much harder to navigate and thus will cause economic harm to the local economy. Residents lives will also suffer due to increased congestion and pollution.