

Southend Central Area Action Plan

Additional Document 9 – Statement of Common Ground

Statement of Common Ground between Southend Borough Council and The Stockvale Group as represented by RPS

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Section 1: Introduction

1.1 This Statement of Common Ground between Southend Borough Council (SBC) and The Stockvale Group (hereafter referred to as 'Stockvale') as represented by RPS relates to the Inspectors Additional Question 9 (and Additional Question 3) and matters arising in relation to car parking provision in Central Area South.

1.2 This Statement follows on from discussions that took place during the hearing sessions of the Examination in Public (EiP) of the Southend Central Area Action Plan (SCAAP), in May 2017, and subsequent discussions and correspondence between the parties.

1.3 The Inspector, in additional question 9, has requested that the following information be provided, together with a response by RPS to the SBC's response to Additional Question 3:

'Statement on car parking provision within Central Area South – to include:

- i. Base date
- ii. Names of each car park
- iii. Capacity of each car park
- iv. Map showing isochrone which defines the area within a 10 minute average walking distance from the seafront
- v. Criteria for assessing whether proposals for new development properly meet their own parking needs.'

1.4 The suggested modifications to the SCAAP, as set out in Section 2 of this Statement, address the Inspectors questions and relate to Policy DS5 and the Implementation and Monitoring section of the plan. This is based on discussions between SBC and RPS / Stockvale. The text below has been formulated by SBC as part of this process, and includes some matters where agreement has not been reached. These matters are set out, and an explanation provided by both parties, within Section 3 of this Statement.

Section 2: Suggested Amendments to the SCAAP agreed, addressing additional question 9 (areas where agreement could not be reached are detailed and explained in Section 3)

2.1 Following discussions, the following suggested amendments are proposed to paragraphs 135 and 136 of the SCAAP:

Suggested Amendments to Paragraph 135 and 136

Amend paragraph 135 of the SCAAP as follows:

~~The Study identifies around 2,550~~ There are 3,142 publicly available paid for car parking spaces to the south of the central area, which is approximately 10 minutes' walk from the shoreline (Appendix 9), serving both the seafront and southern parts of the Southend Central Area. 2,562 of these spaces are located in publicly available key visitor car parks (Table 5). As a result of the peak capacity issues, as identified by the Study, and to support the vitality and viability of the central seafront area, it is expected that there will be no net loss of ~~public~~ key visitor car parking to the south of the Central Area. Given the constraints and limited land availability of the Central Area, opportunities to increase car parking to the south will be limited, however where viable and feasible, the Council will seek further provision in association with development. One example of this is the New Southend Museum (Opportunity Site CS1.4), which has planning permission for approximately 220 public car parking spaces.

Add in Table 5, and update numbering of subsequent Tables in the SCAAP, as follows:

Table 5: Key Visitor Car Parks to the south of the Central Area within the area identified by Figure X*

<u>Key Visitor Car Park</u>	<u>Number of Spaces*</u>
<u>FAIRHEADS</u>	<u>211</u>
<u>SEAWAY</u>	<u>478</u>
<u>ROYALS**</u>	<u>426</u>
<u>SHOREFIELD</u>	<u>125</u>
<u>YORK ROAD</u>	<u>93</u>
<u>TYLERS</u>	<u>249</u>
<u>ALEXANDER ST</u>	<u>74</u>
<u>CLARENCE</u>	<u>126</u>
<u>WESTERN ESPL. CENTRAL</u>	<u>585</u>
<u>WESTERN ESPL. EAST</u>	<u>128</u>
<u>EASTERN ESPL.</u>	<u>67</u>
<u>TOTAL</u>	<u>2,562</u>

* As per Car Parking Study for the Central Area of Southend (base date May 2016)

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Amend bullet point 1 of paragraph 136 of the SCAAP as follows:

- ensure there is no net loss in key visitor car parking to the south

of the Central Area (for the purposes of Policy DS5.2.b, these are the key visitor car parks (Table 5) located within 10 minutes' walk of the shoreline (Figure X) ~~and generally located south of the central railway line~~), and to maintain overall capacity at a level that supports the vitality and viability of the SCAAP area, and enables the delivery of relevant Opportunity Sites;

2.2 The following suggested amendments are then proposed to Policy DS5.2.b:

Suggested Amendments to Policy DS5.2.b

Amend Policy DS5.2.b of the SCAAP as follows:

b. Development proposals that come forward on key visitor car parking areas (Table 5) to the south of the Central Area (Figure X) will need to ensure that there is no net loss of key visitor car parking. Any planning application, in these areas, would need to be accompanied by a detailed transport assessment that would include an analysis of the impact of the additional parking demand generated by the proposed development on the identified key visitor car parks, having regard to:

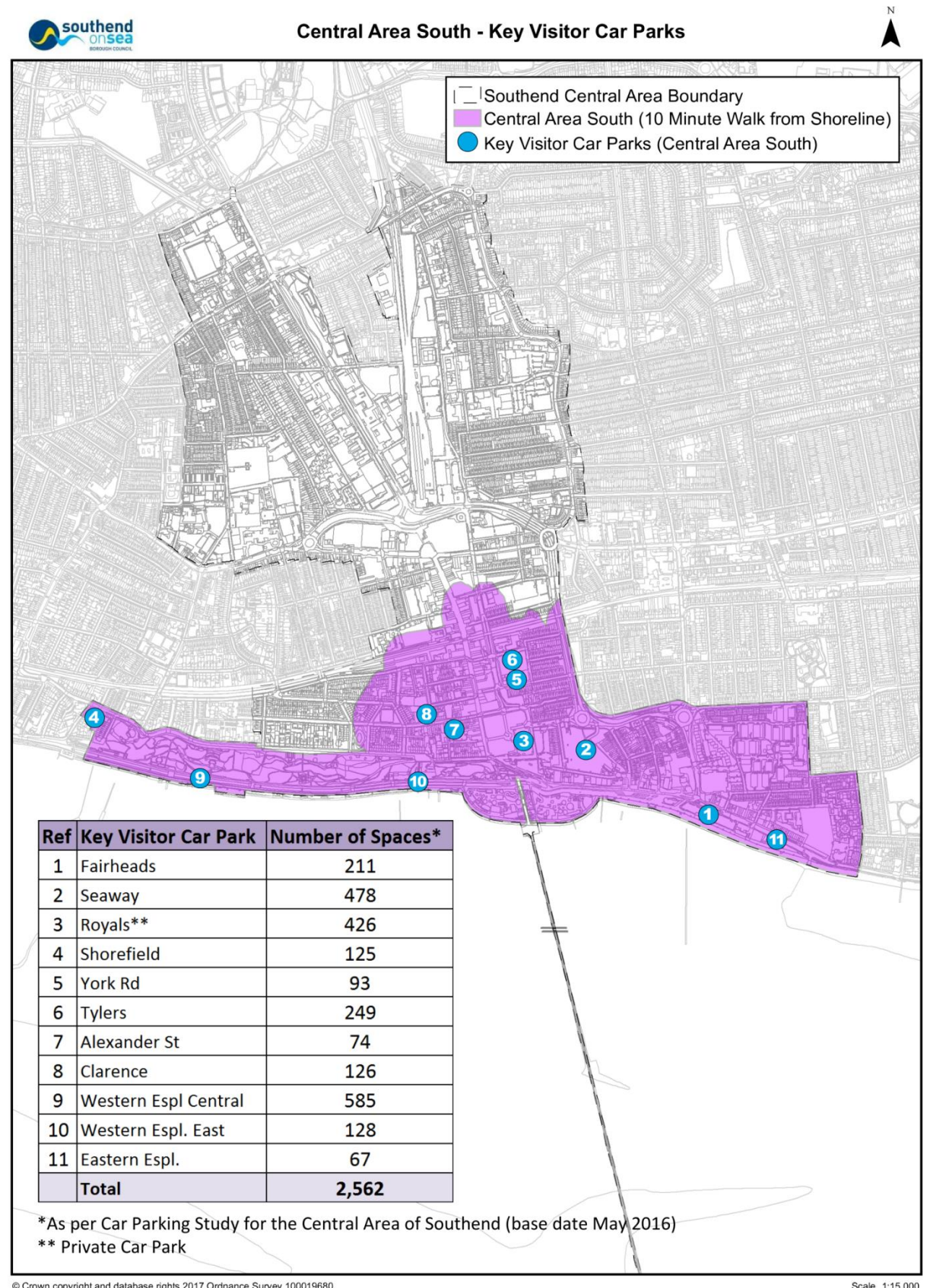
- adopted parking standards;
- consideration of the extent to which linked / combined trips and opportunities for further mode shift through the travel plan process will reduce the need for additional publicly available car parking spaces; and
- availability of parking to the south of the central area within the area shown in Figure X.

Where a development will result in a ~~Ensure that there is no~~ net loss in publicly available car parking spaces to the south of the ~~Southend~~ Central Area within the area shown in Figure X, and there is a proposal to provide replacement spaces, these should be provided within the area shown in Figure X, and be secured through a planning condition or obligation as part of the overall development scheme or through other means;

2.3 It is proposed to add Figure X to the SCAAP, as follows:

Proposed Figure X

Add Figure X to the SCAAP, immediately after Map 5 (following Policy DS5):



2.4 The following suggested amendments are then proposed to Implementation and Monitoring, Policy DS5 – p94 of the SCAAP:

Suggested Amendments to Implementation and Monitoring for DS5 (p94)

Amend Implementation and Monitoring, Policy DS5 (SCAAP p94) as follows:			
Key Responsibilities	Implementation	Monitoring Indicators and Targets	Risks
Southend Borough Council. Local Transport Operators. Public and private developers and owners.	Through the continual submission and determination of planning applications. Joint working with local transport operators. Joint working with private operators of car parks. Local Transport Plan and other funding mechanisms – £7m secured from first round of Local Growth Fund (LGF) to deliver transport and public realm improvements in the SCAAP area.	DS5.1 Providing a level of publically available car parking provision to support the vitality and viability of the central area: - keep car parking capacity, demand and traffic management provisions under review to ensure that this capacity remains at a level to support the vitality and viability of Southend Central Area. – no net loss of permanent publically available key visitor car parking (Table 5, 2,562 spaces) to the south of the Central Area (Figure X). - monitor any net change in overall paid for public parking within Central Area South (3,142 spaces) as outlined in Appendix 9. railway line. As Core Strategy Policy CP3. As Development Management Policy DM15.	Lack of funding for transport projects. Changes to rail or bus network, quality of service, number of services provided. Level of co-operation between operators and the local authority.
Other Relevant Policies	Core Strategy DPD: KP2, KP3, CP3, CP4: Development Management DPD: DM15		

2.5 Finally, it is proposed to add a new appendix to the SCAAP, Appendix 9, as follows:

Proposed New Appendix 9

Add new Appendix, to follow Appendix 8, and label as Appendix 9:

Appendix 9 – Publically available paid for Parking to the South of the Central Area (area defined by Figure X)*

<u>Publically available paid for Parking</u>	<u>Number of Spaces*</u>	<u>Within a 'Key Visitor Car Park</u>
<u>FAIRHEADS</u>	<u>211</u>	<u>Yes</u>
<u>SEAWAY</u>	<u>478</u>	<u>Yes</u>
<u>ROYALS**</u>	<u>426</u>	<u>Yes</u>
<u>SHOREFIELD</u>	<u>125</u>	<u>Yes</u>
<u>YORK ROAD</u>	<u>93</u>	<u>Yes</u>
<u>TYLERS</u>	<u>249</u>	<u>Yes</u>
<u>ALEXANDER ST</u>	<u>74</u>	<u>Yes</u>
<u>CLARENCE</u>	<u>126</u>	<u>Yes</u>
<u>WESTERN ESPL CENTRAL</u>	<u>585</u>	<u>Yes</u>
<u>WESTERN ESPL. EAST ON ST</u>	<u>128</u>	<u>Yes</u>
<u>EASTERN ESPL. ON ST</u>	<u>67</u>	<u>Yes</u>
<u>SOUTHEND CENTRAL STATION NCP**</u>	<u>138</u>	<u>No</u>
<u>BEACH RD**</u>	<u>40</u>	<u>No</u>
<u>MARINE PLAZA**</u>	<u>67</u>	<u>No</u>
<u>YORK ROAD. ON ST</u>	<u>22</u>	<u>No</u>
<u>CLIFFTOWN RD. ON ST</u>	<u>11</u>	<u>No</u>
<u>BALTIC AV. ON ST</u>	<u>6</u>	<u>No</u>
<u>CLARENCE RD. ON ST</u>	<u>16</u>	<u>No</u>
<u>CLARENCE ST. ON ST</u>	<u>12</u>	<u>No</u>
<u>WESTON RD. ON ST</u>	<u>19</u>	<u>No</u>
<u>NELSON ST. ON ST</u>	<u>18</u>	<u>No</u>
<u>CAPEL TERRACE. ON ST</u>	<u>6</u>	<u>No</u>
<u>ALEXANDRA ST. ON ST</u>	<u>16</u>	<u>No</u>
<u>CAMBRIDGE RD. ON ST</u>	<u>24</u>	<u>No</u>
<u>ALEXANDRA RD. ON ST</u>	<u>39</u>	<u>No</u>
<u>CASHIOBURY TERRACE. ON ST</u>	<u>14</u>	<u>No</u>
<u>RUNWELL TERRACE. ON ST</u>	<u>6</u>	<u>No</u>
<u>PRITTLEWELL SQ. ON ST</u>	<u>43</u>	<u>No</u>
<u>ROYAL TERRACE. ON ST</u>	<u>19</u>	<u>No</u>
<u>CLIFTON TER/ CLIFFTOWN PDE. ON ST</u>	<u>45</u>	<u>No</u>
<u>DEVEREUX RD. ON ST</u>	<u>19</u>	<u>No</u>
<u>TOTAL</u>	<u>3,142</u>	<u>N/A</u>

* Base date May 2016

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Section 3 – Matters where Common Ground could not be reached

3.1 The following Table sets out those Matters where common ground has not been agreed, including comments from SBC and RPS on this:

Matters where Common Ground could not be reached

	Matter	SBC Comment	RPS Comment
1	<p>Baseline date</p> <p>The SCAAP is based on evidence presented in the Car Parking Study for the Central area of Southend (CPS) (May 2016)</p>	<p>The CPS forms the baseline date for car park capacity as presented in the SCAAP (May 2016).</p> <p>The CPS provides detailed evidence on parking occupancy for the Key Visitor Car Parks as of May 2016 and reviews current and future car parking provision in Southend Central Area. It sets out the performance of the existing parking network, and the potential impact of development proposals on the network.</p>	<p>Stockvale and Seafront Traders Association set out significant errors in the CPS, so this data should not be relied on. We suggest the base date is the present day (June 2017), which enables any disagreement to be checked on site. RPS's amended policy text below includes the accurate capacity for each car park, and should form the basis of the Policy</p>
2	<p>Key Visitor Car Parks</p> <p>RPS consider that the following car parks should also be included as key visitor car parks and within the 'no net loss' policy: Marine Plaza, Beach Road, NCP Southend Central, Premier Inn. (impacts Para. 135, Table 5, Figure X, Monitoring Section, Appendix 9)</p>	<p>Designating the following privately owned car parks as 'Key Visitor Car Parks', without consultation, is not appropriate and may not align with commercial interests/ plans for the sites.</p> <p>Marine Plaza – (privately owned) Part of the site has recently been granted lawful use as a car park (67 spaces) and this has been included in the wider baseline figure as per new Appendix 9, set out above. However, the site is not considered to be a 'Key Visitor Car Park' - it is subject to an existing planning permission for mixed-use redevelopment, which includes 10 commercial spaces.</p>	<p>The identification of Key Visitor Car Parks is a modification to the Plan and will need to be consulted on. There is already a private car park in the list (Royals), so there should be no issue of principle in including private car parks.</p> <p>Marine Plaza: Although there is a lawful development certificate for the car park confirming the lawful use of 67 spaces, this does not represent the actual capacity of the car park, which is 200. However, given that any appeal of the LDC will not be resolved in time for the Inspector's Report, Stockvale has accepted the figure of 67 spaces. It should, however, be identified as a Key Visitor Car Park, as it is arguably the most prominent car park on the</p>

		<p>Beach Road – (privately owned) as per Section 1.68 of SCAAP Topic Paper 1: Parking and Access (March 2017) bullet point 4, small car parks (of fewer than 50 spaces) are less suitable to be signed for visitors arriving in Southend, due to the limited capacity.</p> <p>NCP Southend Central – (privately owned) and designated for a specific facility and primarily for visitors of this facility, and therefore less suitable to be signed for visitors arriving in Southend.</p> <p>Premier Inn – (privately owned) and designated for a specific facility and primarily for visitors of this facility, and therefore less suitable to be signed for visitors arriving in Southend. It is noted that the RPS Technical Note – Appraisal of Car Parking Evidence Base (December 2016), submitted in response to the published SCAAP, comments that it was perhaps correct to exclude this car park from the CPS.</p>	<p>seafront, being located at the junction between Southchurch Avenue and Marine Parade, and noted in a footnote that there is capacity for 200 across the whole site. The fact that it has an extant planning permission (which expires in July 2018) is not relevant. It is appropriate for the SCAAP to include policies against which any future applications can be considered.</p> <p>In Stockvale’s view, the designation of a key car park is not a function of whether it is signed, it is a function of the extent to which the car parks serve tourists visiting the town. As this site plays a key role, it should be included in the list of key car parks.</p> <p>This car park operates exactly the same way as The Royals Car Park. On weekends and school holidays it serves a joint shoppers and tourist role. It falls within Figure X isochrones, so should be included.</p> <p>We are more flexible on this car park given its clear dual role, however in the daytime it operates as a visitor car park that serves day visitors. Although we can understand why it was excluded from the CPS, it would seem appropriate to at least identify it as a key visitor car park in the SCAAP.</p>
3	<p><i>Seaway - Capacity</i> SBC consider the capacity for</p>	<p>The Seaway car park, at the time of the parking survey (May 2016)</p>	<p>This is a point about which Stockvale fundamentally</p>

	<p>Seaway as 478, as per the parking survey (May 2016). RPS considers the capacity to be 810, when considering potential capacity (661 marked bays). (Impacts Para 135, Table 5, Figure X, Monitoring Section, Appendix 9)</p>	<p>comprised 478 car parking spaces plus facilities for coach parking. To facilitate the development of the site, alternative coach parking facilities need to be secured. An opportunity to achieve this was taken up in August 2016. Pending development of Seaway, the coach parking spaces were converted to car parking spaces, increasing the capacity of the car park to 661. This increase is therefore an interim measure pending development of the Opportunity Site, and therefore a capacity of 478 car spaces is appropriate.</p>	<p>disagrees. There is no evidence to suggest that the Council intended the additional 183 spaces to be temporary, and this has been confirmed to us by the portfolio holder at the Council at the time the decision was taken. If it is agreed that the base date is the present day, then it is a fact that there are currently 661 marked bays, and at the recent meeting it was confirmed that there was no planned scheme to reduce these. We also noted that the current layout does not actually correctly reflect the capacity of the car park (which is what the Inspector has asked for). This is 810, based on the enclosed layout by SK Architects. So the correct figure is either 661 (current marked bays) or 810 (car park capacity). It is certainly not 478.</p>
4	<p><i>Parking Areas included in the Baseline</i> SBC does not seek to include unrestricted/ non-paid for on-street parking. RPS disagrees with this. (Impacts Para. 135, Monitoring Section, Appendix 9)</p>	<p>It is not considered that the unrestricted/ non-paid for on-street parking areas, which are primarily within residential areas, as identified by RPS, should be included within the baseline. As per Section 1.68 of SCAAP Topic Paper 1: Parking and Access (March 2017), bullet point 2, the Council must retain flexibility over the use of these areas, which often include loading bays and disabled bays and may also be required for road safety schemes and wider traffic management enhancements. Such parking areas are less suitable to be signed for visitors.</p>	<p>We accept that they should not form part of the ‘key car parks’ designation. However, on street parking is publicly available for visitors and tourists and therefore plays a significant role in supporting the tourist economy. RPS has applied an assumption that only 25% of these spaces would be available for use by visitors during the day.</p> <p>Note that in Stockvale’s amendments to Paragraph 135, we state “There are 3,581 publicly available paid for car parking spaces to the south of the central area” (not 3,142). This is a higher figure than the</p>

			Council, based on our corrected car park numbers, and also because we do not see the need to refer to “paid for” parking, as all car parking is equally important (free and paid for). Similarly, Stockvale states that “3,207 of these spaces are located in publicly available key visitor car parks”
5	<p><i>Parking Areas included in the Baseline. RPS disagree with the baseline of the following car parks (note, none of these car parks are considered to be ‘Key Visitor Car Parks’ (RPS suggested amendment in red):</i></p> <p>CLARENCE RD. ON ST 16 17 CLARENCE ST. ON ST 12 17 WESTON RD. ON ST 19 26 NELSON ST. ON ST 18 21 CAPEL TERRACE. ON ST 6 9 ALEXANDRA ST. ON ST 16-23 CAMBRIDGE RD. ON ST 24 26 ALEXANDRA RD. ON ST 39 40 CASHIOBURY TERRACE. ON ST 14 13 RUNWELL TERRACE. ON ST 6 9 CLIFTON TER/ CLIFFTOWN PDE. ON ST 45 53</p>	Disagree with RPS proposed changes to baseline car park figures. The figures provided by SBC are as per May 2016 and have been confirmed by the Highway Authority.	These figures were based on a more recent survey by Paul Thompson of the Seafront Traders Association. RPS has offered to verify these on site with SBC and is awaiting a response.
6	<p><i>Additional text for Para. 135 as proposed by RPS (RPS suggested amendment in red):</i></p> <p>Given the constraints and limited land availability of the Central Area, opportunities to increase car parking to the south will be limited, however where viable and feasible, the Council will seek further provision in association with development to allow for planned growth in seafront businesses, and a proportion of these spaces will be reserved for that purpose (i.e. not used to accommodate parking demand from a specific development). One example of this is the New Southend</p>	RPS suggested amendment is not considered necessary. This aspect would be pursued as part of a package of transport improvements, including measures to enhance visitor parking by improving access, signage, park and ride etc., as identified in the Car Parking Study and as referred to in section 2 of Policy DS5.	The amended text is a concession on behalf of Stockvale to try and reach agreement. At the Examination, much was said about the SCAAP’s objectives for growing the tourism economy in the early parts of the Plan, but it was recognised that there was no allowance for this growth anywhere in the Plan. At the Examination, Stockvale asked for Policy DS5 to include a requirement for developers to fund parking spaces to accommodate this growth (in addition to the no net loss policy, and the car parking to accommodate the

	<p>Museum (Opportunity Site CS1.4), which has planning permission for approximately 220 public car parking spaces.</p> <p>In addition, the Council will require the provision of appropriate levels of car parking spaces associated with development of the key car park themselves. This will involve no net loss of the existing car parking spaces, and sufficient additional spaces to accommodate the development, in line with the requirements of Policy DS5 below.</p>	<p>RPS suggested amendment is not considered necessary.</p>	<p>traffic generated by the development itself). As an alternative to that, Stockvale now proposes that if the Council identifies new sites for car parking in the 10-minute isochrone, that an allowance is made within that car park for accommodating tourism growth. This is appropriate in the Policy not in a general package of transport measures as a planning application will need to be submitted for a car park. Without this line, there will be no provision at all in the SCAAP for additional spaces to support the growth in the tourism economy that the SCAAP is seeking. This also removes the burden from developers of key car parks.</p> <p>These sentences are included simply for clarification so that developers are clear that the “no net loss” policy does not mean that they do not need to consider the impact of traffic generated by the development itself.</p>
7	<p>Additional text for Para. 136, 1st bullet, as proposed by RPS (RPS suggested amendment in red): ensure there is no net loss in key visitor car parking to the south of the Central Area (for the purposes of Policy DS5.2.b, these are the key visitor car parks (Table 5) located within 10 minutes’ walk of the shoreline (Figure X), and to maintain overall capacity at a level that</p>	<p>RPS suggested amendment is not considered necessary. Base date is as per the CPS (May 2016). The CPS provides detailed evidence on parking occupancy as of May 2016 and reviews current and future car parking provision in Southend Central Area. It sets out the performance of the existing parking network, and the potential impact of development proposals on the network.</p>	<p>Stockvale and the STC consider that the CPS is not a robust part of the evidence base and cannot be relied upon for the reasons that were set out by both parties at the Examination. We therefore prefer to refer to the present day capacity, which can be verified.</p>

	<p>supports the vitality and viability of the SCAAP area, generally aiming to retain the level of 3,713 spaces as of June 2017, and enables enabling the delivery of relevant Opportunity Sites, whilst ensuring that these sites provide sufficient spaces to accommodate their own needs, in addition to protecting existing parking levels;</p>	<p>An applicant would be unable to ensure overall provision as part of the planning application process. The Borough Council as principal land owner of publicly available parking areas and the Highway Authority would monitor overall provision to ensure the vitality and viability of the area is maintained in accordance with point 2a of Policy DS5.</p>	<p>This text does not require a developer to provide this number of spaces, but it does require the Council to consider the agreed June 2017 baseline and take this into account in considering applications/transport assessments if there has been a significant loss in spaces overall. The final sentence is for clarification only, but it is important to include it to provide the comfort that seafront businesses need that there will not be an erosion of car parking spaces that would harm the economy.</p>
8	<p>Additional text for Policy DS5, as proposed by RPS (RPS suggested amendment in red):</p> <p>2b. Development proposals that come forward on key visitor car parking areas (Table 5) to the south of the central area (Figure X) will need to ensure that there is no net loss of key visitor car parking. In addition to protecting the existing visitor parking spaces, any Any planning application, in these areas, would need to be accompanied by a detailed transport assessment that would include an analysis of the impact of the additional parking demand generated by the proposed development on the identified key visitor car parks, having have regard to:</p> <ul style="list-style-type: none"> • adopted parking standards; • consideration of the extent to which linked/ combined trips and opportunities for further mode shift through the travel plan process will reduce the need for additional publicly available car parking spaces (i.e. over and above existing spaces); 	<p>RPS suggested amendments are not considered necessary in terms of soundness of the SCAAP.</p> <p>Additional key visitor car parking could also be provided ‘through other means’, which is not directly linked to a development scheme. For instance, as referred to in Topic Paper 1, the Borough Council has allocated £5 million in the capital programme, over three years, to review options and car park capacity at sites in the south of the Central Southend area.</p> <p>To require replacement parking prior to the commencement or during construction of the redevelopment is considered to be restrictive and contrary to the provisions of the NPPF paragraph 173 (ensuring viability and deliverability) in that it could render the development proposal unviable in economic terms.</p> <p>SBC response to Inspector Matter 4.3(iii) sets out that there may be a need to permit temporary losses in</p>	<p>There appears to be a misunderstanding here. Stockvale has tried to move closer to the Council’s provision by no longer requesting that temporary car parking spaces, provided by a developer during construction, are provided before development commences. We are now only requesting that, where spaces are temporarily lost during construction, that the developer will <u>either</u> need to provide temporary replacement car parking for the duration of the development, or a bond to secure the reinstatement of the car parking spaces if the development commences (and the spaces are temporarily lost) but the development does not complete. RPS is aware of schemes that have commenced, resulting in the loss of car parking spaces, but then ground to a halt due to</p>

<p>and</p> <ul style="list-style-type: none"> • availability of parking to the south of the central area within the area shown in Figure X. <p>Where a development will result in a temporary net loss in publicly available car parking spaces on any of the key visitor car parks identified in Table 5, the developer will need to either provide temporary replacement provision for the duration of the construction project, or secure a bond in favour of the Council to ensure that in the event that the development is not completed the car parking can be reinstated.</p> <p>Where a development will result in a permanent net loss in publicly available car parking spaces on any of the key visitor car parks to the south of the Southend Central Area within the area shown in Figure X, and there is a identified in Table 5, this must be accompanied by a proposal to provide replacement spaces, and these should be provided within the area shown in Figure X, and be secured through a planning condition or obligation as part of the overall development scheme or through other means. The replacement spaces must be brought into use prior to commencement of development of the key car park.</p>	<p>parking during development works. The Borough Council would seek to ensure that any replacement provision is pursued outside of the peak tourist periods. The Borough Council will seek to mitigate the impact of temporary parking reduction, having regard to the amount of available parking located in nearby existing car parks within a reasonable walking distance, through the potential provision of additional parking within the Central Area and outside the Central Area (e.g. through Park and Ride), and through better management of the Central Area network as a whole to maximise use of available spare capacity.</p>	<p>any number of issues. The ‘key car parks’ are important car parks, and if they were lost for what was expected to be a temporary period, and this becomes an indefinite period, this would potentially have a very serious effect on seafront businesses. We do not consider that this policy will have any impact on viability and deliverability, and indeed is to ensure the latter.</p> <p>The only requirement to bring an alternative car park into use <u>prior</u> to commencement is where there is to be a permanent loss of key car park spaces. Where a developer is proposing to permanently remove spaces, where the policy requires no net loss, it is not unreasonable for this to be provided by the developer and the provision should be to a reasonable timescale. Without this requirement, seafront traders consider there to be a risk that the alternative provision will not come forward. The key car parks are so important that such an outcome would have far-reaching consequences for seafront businesses and the seafront economy as a whole.</p> <p>Note that the Council has also not accepted the phrase “must be accompanied by”. We do not consider that this is controversial in any way. It is</p>
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	<p>Where an opportunity arises for the Council to develop a new car park in the area shown in Figure x, the Council should identify a proportion of spaces (no less than 25%) that will be protected to allow for the predicted growth in visitor numbers to the seafront area.</p>	<p>This aspect would be reviewed as part of a package of transport improvements, including measures to enhance visitor parking by improving access, signage, park and ride etc., as identified in the Car Parking Study and as referred to in section 2 of Policy DS5.</p>	<p>reasonable for a developer that is building on a key car park and removing spaces permanently to provide alternative parking within the area shown in Figure X.</p> <p>The amended text is a concession on behalf of Stockvale to try and reach agreement. At the Examination, much was said about the SCAAP's objectives for growing the tourism economy in the early parts of the Plan, but it was recognised that there was no allowance for this growth anywhere in the Plan. At the Examination, Stockvale asked for Policy DS5 to include a requirement for developers to fund parking spaces to accommodate this growth (in addition to the no net loss policy, and the car parking to accommodate the traffic generated by the development itself). As an alternative to that, Stockvale now proposes that if the Council identifies new sites for car parking in the 10-minute isochrone, that an allowance is made within that car park for accommodating tourism growth. This is appropriate in the Policy not in a general package of transport measures as a planning application will need to be submitted for a car park. Without this line, there will be no provision at all in the SCAAP for additional spaces to support the growth in the tourism economy that the SCAAP is seeking. This also removes the burden from</p>
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			<p>developers of key car parks.</p> <p>For the avoidance of doubt, Stockvale has included a clean version of the policy as it would read (Section 4 of this Statement), if amended to incorporate our comments, below.</p>
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4 Clean version of the policy as proposed by Stockvale Group

Clean version of the policy as proposed by Stockvale Group:

135 There are 3,581 publicly available paid for car parking spaces to the south of the central area which is approximately 10 minutes' walk from the shoreline (Appendix 9), serving both the seafront and southern parts of the Southend Central Area, and an additional 132 free on-street spaces available for visitors. 3,207 of these spaces are located in publicly available key visitor car parks (Table 5). As a result of the peak capacity issues, as identified by the Car Parking Study, and to support the vitality and viability of the central seafront area, it is expected that there will be no net loss of key visitor car parking to the south of the Central Area. Given the constraints and limited land availability of the Central Area, opportunities to increase car parking to the south will be limited, however where viable and feasible, the Council will seek further provision in association with development to allow for planned growth in seafront businesses, and a proportion of these spaces will be reserved for that purpose (i.e. not used to accommodate parking demand from a specific development). One example of this is the New Southend Museum (Opportunity Site CS1.4), which has planning permission for approximately 220 public car parking spaces. In addition, the Council will require the provision of appropriate levels of car parking spaces associated with development of the key car park themselves. This will involve no net loss of the existing car parking spaces, and sufficient additional spaces to accommodate the development, in line with the requirements of Policy DS5 below.

Table 5: Key Visitor Car Parks to the south of the Central Area within the area identified by Figure X*

Key Visitor Car Park	Number of Spaces*
FAIRHEADS	211
SEAWAY***	810
ROYALS**	426
SHOREFIELD	125
YORK	93
TYLERS	249
ALEXANDER ST	74
CLARENCE	126
WESTERN ESPL CENTRAL	585
WESTERN ESPL. EAST	128
EASTERN ESPL.	67
NCP**	138
MARINE PLAZA****	67
BEACH ROAD**	40
PREMIER INN	68
TOTAL	3,207

*Base date June 2017

- ** Private Car Park
- *** 661 marked bays
- **** Capacity for 200, but 67 spaces covered by lawful development certificate.

136 (first bullet point) ensure there is no net loss in key visitor car parking to the south of the Central Area (for the purposes of Policy DS5.2.b, these are the key visitor car parks (Table 5) located within 10 minutes' walk of the shoreline and generally located south of the central railway line (Figure X), and to maintain overall capacity at a level that supports the vitality and viability of the SCAAP area, generally aiming to retain the level of 3,713 spaces as of June 2017, and enabling the delivery of relevant Opportunity Sites, whilst ensuring that these sites provide sufficient spaces to accommodate their own needs, in addition to protecting existing parking levels;

Policy DS5 2b would then read:

2b. Development proposals that come forward on key visitor car parking areas (Table 5) to the south of the central area (Figure X) will need to ensure that there is no net loss of key visitor car parking. In addition to protecting the existing visitor parking spaces, any planning application in these areas would need to be accompanied by a detailed transport assessment that would include an analysis of the impact of the additional parking demand generated by the proposed development on the identified key visitor car parks, having regard to:

- adopted parking standards;
- consideration of the extent to which linked/ combined trips and opportunities for further mode shift through the travel plan process will reduce the need for additional publicly available car parking spaces (i.e. over and above existing spaces); and
- availability of parking to the south of the central area within the area shown in Figure X.

Where a development will result in a temporary net loss in publicly available car parking spaces on any of the key visitor car parks identified in Table 5, the developer will need to either provide temporary replacement provision for the duration of the construction project, or secure a bond in favour of the Council to ensure that in the event that the development is not completed the car parking can be reinstated.

Where a development will result in a permanent net loss in publicly available car parking spaces on any of the key visitor car parks identified in Table 5, this must be accompanied by a proposal to provide replacement spaces, and these should be provided within the area shown in Figure X, and be secured through a planning condition or obligation as part of the overall development scheme. The replacement spaces must be brought into use prior to commencement of development of the key car park.

Where an opportunity arises for the Council to develop a new car park in the area shown in Figure X, the Council should identify a proportion of spaces (no less than 25%) that will be protected to allow for the predicted growth in visitor numbers to the seafront area.

Implementation and Monitoring, Policy DS5 - page 94 of SCAAP would then read:

Key Responsibilities	Implementation	Monitoring Indicators and Targets	Risks
Southend Borough Council. Local Transport Operators. Public and private developers and owners.	Through the continual submission and determination of planning applications. Joint working with local transport operators. Joint working with private operators of car parks. Local Transport Plan and other funding mechanisms – £7m secured from first round of Local Growth Fund (LGF) to deliver transport and public realm improvements in the SCAAP area.	DS5.1 Providing a level of publically available car parking provision to support the vitality and viability of the central area: - keep car parking capacity, demand and traffic management provisions under review to ensure that this capacity remains at a level to support the vitality and viability of Southend Central Area. - no net loss of key visitor car parking (Table 5, 3,207spaces) to the south of the Central Area (Figure X). - monitor any net change in overall public parking within Central Area South (3,713spaces) as outlined in Appendix 9. As Core Strategy Policy CP3. As Development Management Policy DM15.	Lack of funding for transport projects. Changes to rail or bus network, quality of service, number of services provided. Level of co-operation between operators and the local authority
Other Relevant Policies	Core Strategy DPD KP2, KP3, CP3, CP4: Development Management DPD: DM15		

Appendix 9 – Publically available Parking to the South of the Central Area (area defined by Figure X)*

Publically available Parking	Number of Spaces*	Within a 'Key Visitor Car
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		Park
FAIRHEADS	211	Yes
SEAWAY***	810	Yes
ROYALS**	426	Yes
SHOREFIELD	125	Yes
YORK	93	Yes
TYLERS	249	Yes
ALEXANDER ST	74	Yes
CLARENCE	126	Yes
WESTERN ESPL CENTRAL	585	Yes
WESTERN ESPL. EAST ON ST	128	Yes
EASTERN ESPL. ON ST	67	Yes
SOUTHEND CENTRAL STATION NCP**	138	Yes
BEACH RD**	40	Yes
MARINE PLAZA****	67	Yes
PREMIER INN	68	Yes
YORK ROAD. ON ST	22	No
CLIFFTOWN RD. ON ST	11	No
BALTIC AV. ON ST	6	No
CLARENCE RD. ON ST	17	No
CLARENCE ST. ON ST	17	No
WESTON RD. ON ST	26	No
NELSON ST. ON ST	21	No
CAPEL TERRACE. ON ST	9	No
ALEXANDRA ST. ON ST	23	No
CAMBRIDGE RD. ON ST	26	No
ALEXANDRA RD. ON ST	40	No
CASHIOBURY TERRACE. ON ST	13	No
RUNWELL TERRACE. ON ST	9	No
PRITTLEWELL SQ. ON ST	43	No
ROYAL TERRACE. ON ST	19	No
CLIFTON TER/ CLIFFTOWN PDE. ON ST	53	No
DEVEREUX RD. ON ST	19	No
CLIFFTOWN PARADE	47	No
ALEXANDRA ST	15	No
CAMBRIDGE RD	8	No
WILSON RD	8	No
SCRATTON RD	5	No
HEYGATE AV.	6	No
HERBERT GROVE	4	No
HARTINGTON RD	6	No

ASH WALK	1	No
PLEASANT RD	7	No
HARTINGTON PLACE	3	No
VICTORIA RD	9	No
NORTHUMBERLAND AV	5	No
ARNOLD AV	8	No
TOTAL	3,713	N/A

* Base date June 2017

** Private Car Park

*** Although Seaway Car Park currently has 661 marked bays, the car park has capacity for 810 spaces

**** Capacity for 200, but 67 spaces covered by lawful development certificate.

5 Comments on Additional Document 3 Central Area South Parking Provision: gains and losses since 2011 made by Stockvale Group

RPS's comments on the loss/ gain table

The Inspector requested RPS's views on this table. RPS's comments are as follows:

- If the car parking at Marine Plaza is not included in the list of key car parks because there is an extant planning permission to redevelop, it should be shown on the losses/gains schedule as -200, as the full 200 spaces have been available to support the tourism industry. However, the strong preference of The Stockvale Group is to include the car park as a key car park, given that it is part of the current supply and plays an extremely important role in supporting the seafront tourism economy, and its loss will be damaging to this economy.
- Seaway Car Park has been excluded, but this was increased from 478 to 661. (Note that the capacity of this car park is actually 810, but this has not yet been implemented).
- Cllr Tony Cox has proposed a further 163 spaces that can be achieved on-street, following a meeting with The Stockvale Group.
- The on-street parking locations in residential areas were subject to the Southend-wide Parking Management Scheme in circa 2012 to 2015 that introduced residents parking permits to a large number of streets. The losses associated with this are missing from the table. Those locations that are within the Central Area South and a 10 minute walk of the shoreline are the Beresford Area (Zone D), the Cliffs Pavilion Area (Zone CP) and the Queensway East Area (Zone QE) as set out below:

Beresford Area (Zone D)

This zone covers Arnold Avenue (South end only), Beach Road, Beresford Road, Burdett Road and Burnaby Road. RPS calculates there has been a net loss of 80 on-street car parking spaces that were unrestricted and publicly available but since 2011 are now residents permit holders only 9am to 9pm 7 days a week.

Cliffs Pavilion Area (Zone CP)

This zone covers Milton Avenue, Lydford Road, Winton Avenue and Westcliff Avenue. RPS calculates there has been a net loss of 69 on-street car parking spaces that were unrestricted and publicly available but since 2011 are now residents permit holders only 11am to 9pm 7 days a week.

Queensway East Area (Zone QE)

This zone covers Tyrrel Drive, Grange Gardens, Lancaster Crescent, Lancaster Gardens, Quebec Avenue (Nos. 25 to 34), Toledo Road, Hillcrest Road, Hastings Road, Kilworth Avenue, Cromer Road, York Road (Nos. 91 to 184), Horace Road, St. Leonards Road, Albert Road, Wesley Road, Old Southend Road and Stanley Road. RPS calculates that of those streets that are in the Central Areas South and a 10 minute walk of the shoreline (i.e. all of those listed but excluding Tyrrel Drive, Grange Gardens, Lancaster Crescent and Lancaster Gardens), there has been a net loss of 348 on-street car parking spaces that were unrestricted and publicly available but since 2011 are now residents permit holders only 9am to 9pm 7 days a week.

The combination of the above unrestricted and publicly available parking spaces in Central Area South totals 497 spaces. RPS believes these locations and spaces should be listed in the table.

In the meeting between RPS and SBC on 21 June a figure of 25% of total on-street car parking spaces in residential areas being available for visitors was discussed was broadly agreed¹. On that basis, we would assume that of the 497 total spaces that were lost, 124 of these would have been available for visitors. We would be happy to make this reference within the table, but it would of course be important to set out both 497 and 124 spaces.

¹ SBC note, this was not agreed.