
MATTER 4: TRANSPORT, ACCESS, PARKING AND PUBLIC REALM

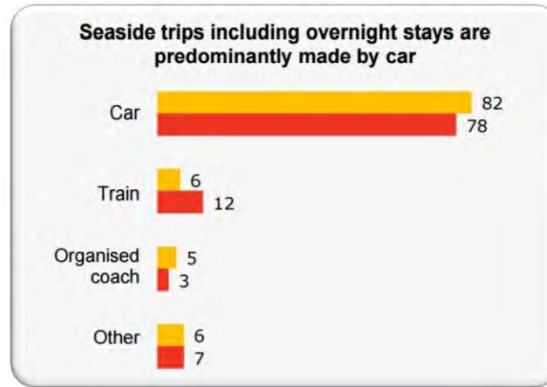
RESPONSE BY THE STOCKVALE GROUP

4.1

- 1 There is a traffic model of Southend-on-Sea to assess the impact of developments. This will be very capable of testing impacts upon congestion and inconvenience for everyday residents and workers. This is normal for traffic modelling, whereby, 'typical' days are assessed and mitigation measures are based upon such days. Therefore, it can be expected that SCAAP would be unlikely to have a severe impact (NPPF test) on everyday residents and workers.
- 2 However, this will not be the case for visitors. Busy days resulting from visitors will be considered 'abnormal' days (despite their regular occurrence) and models are not set up to assess such periods. Applications coming forward will not include traffic modelling of busy days resulting from visitors. Therefore, the impact of SCAAP upon congestion and inconvenience to visitors will not be assessed as applications come forward.
- 3 On busy days resulting from visitors, congestion and inconvenience to visitors is primarily caused by a lack of parking, queuing to enter car parks and vehicles circulating looking for available car parks.
- 4 An appraisal of the Parking Evidence Base, is reattached at Appendix A and shows in paragraphs 116-133 (including Tables 6 and 7) that SCAAP would actually reduce car parking in Central Area South(CAS). This would result in increased congestion and inconvenience to visitors and clearly does not align with the objectives of growth in the LTP3, nor the Core Strategy or SCAAP, particularly Objective 5.

4.2

- 5 Stockvale has promoted sustainable transport at Adventure Island for over 30 years. A list of the current marketing measures and initiatives are at Appendix B.
- 6 Despite this, car remains the dominant mode of travel at 85% with rail only 9%, as set out at Table 8 of the Appraisal of Car Parking Evidence Base, at Appendix A. This reflects family travel and demonstrates there is very limited opportunity to achieve modal shift for tourist destinations.
- 7 85% car mode share accords with seaside trips across Great Britain. The GB Tourism Survey, Visit Britain, 2015 shows 82% of trips to the seaside are undertaken by car, as below.



Seaside trips in yellow, all trips in red (Source: GBTS annual survey, Visit Britain)

- 8 This is also recognised in Topic Paper 1 where the last bullet point of paragraph 1.41 refers to longer distance visitors being less likely to have alternative travel options to the car.

4.3(i)

- 9 No. See the Appraisal of Car Parking Evidence Base, at Appendix A.

4.3(ii)

- 10 The total car parking stock in CAS has reduced over recent years, examples of which are Western Esplanade and Marine Parade due to City Beach and cycle lane schemes and Pier Hill as a result of the Pier Hill Enhancement Scheme.
- 11 Visitor numbers at Adventure Island in recent years is attached at Appendix C and shows a distinct general reduction which appears to correlate with the reduction in spaces. Given the link between parking availability and visitor numbers, it is reasonable to assume that total visitor numbers to CAS have similarly reduced over time.
- 12 Table 8 of Appendix A shows there is high demand for travel by car to Adventure Island and clearly loss of car parking will not maintain visitor numbers. The seafront trade exceeds car parking availability on busy days and operates to this ceiling. With a loss in car parking, this ceiling is lowered.
- 13 This is evidenced from a press release dated 29 February 2015, attached at Appendix D.
- 14 To restore visitors back to the seafront, Policy DS5 should be increasing car parking back to historical levels and beyond, not simply maintaining parking.
- 15 An increase in parking is required to accommodate the increase in parking demand expected to 2021. The LTP3 recognises future growth in demand for parking in Central Area up to 2021 of 25% whilst Core Strategy and SCAAP all aim to achieve growth. The precise figure of additional parking to achieve growth does not matter too much but the principles of an increase are very important if SCAAP is to follow the requirements of Core Strategy, LTP3 and its own objectives (Objective 5 in particular).
- 16 Paragraphs 116-133 (including Tables 6 and 7) of Appendix A show that SCAAP would actually reduce car parking in CAS.
- 17 During busy periods, there is significant congestion throughout the whole town because car parks are full and vehicles are queuing and circulating looking for alternatives. Additional parking reduces the

number of vehicles circulating, which reduces congestion and queuing vehicles which reduces emissions and improves air quality and amenity.

- 18 Using Leigh-on-Sea Railway Station for park and ride is not straightforward as its car park is not always available. A car boot sale is held in the Leigh-on-Sea Station car park, usually every Sunday and Holiday Mondays, as attached at Appendix E. The car parking evidence base does not appear to consider the car boot sale; it was not surveyed on a Sunday and although it was on a Holiday Monday, it may have been on a day when the car boot sale was not open.
- 19 There is already an incentive for visitors to travel by rail by offering a 20% discount (Appendix B); this results in an 85% car mode share. It is unlikely that a park and ride by rail facility from Leigh-on-Sea could result in any reduction in this, since this would be a lesser incentive than is already on offer.
- 20 Indeed, 85% car mode share is in line with seaside trips across the whole of Great Britain, as shown in Plate 1 above. This demonstrates that sustainable transport does not serve visitors to seaside resorts, because they are primarily families travelling as one whereby is difficult and expensive for this type of user to access public transport.
- 21 Table 9 of Appendix A shows that 84% of all visitors travelling by car to Adventure Island have 3 or more occupants in their vehicle with nearly 60% having 4 or more occupants. This in itself is a sustainable method of travel in our view.
- 22 In terms of increased sustainable transport, this would be welcomed, however, it would only 'tinker at the margins'. To meet the needs of tourism businesses and their visitors, retention and improvement of parking provision is essential.

4.3(iii)

- 23 All key car parks need to be listed along with their capacities so there is an agreed position and to ensure that future planning applications cannot dispute such matters.
- 24 To give sufficient teeth, SCAAP should be proposing an increase in parking to allow for business growth and to return to historic levels and beyond, as above.
- 25 The policy needs to ensure that any development provides equivalent replacement parking within a similar walking distance to the key visitor attractions in CAS. The key visitor attractions in CAS should be defined to enable this.
- 26 Table 13 of Appendix A shows that convenience is the key priority for visitors parking. Given the family nature of visitors to the CAS, replacement parking even 5 or 10 minutes' walk further would be less convenient. Indeed, a 5 or 10 minutes' walk from many car parks in CAS would include areas in Central Area North(CAN) and Appendix A already demonstrates the significant differences in users and parking between the two.
- 27 Thus, equivalent replacement parking needs to be equivalent in terms of distance to key visitor attractions in CAS.
- 28 The outcome of SCAAP should be retention of all key seafront parking spaces, development properly meeting its own needs and also development allowing for an increase in car parking spaces. That needs to be a key requirement of policy.

4.3(iv)

- 29 Car parking requirements for CAS are significantly different to CAN, as evidenced in the Car Parking Evidence Base, Paragraphs 82-95 and 134-157 of Appendix A and in Section 3 of Topic Paper 1, in particular, Figures 1 and 2.
- 30 This sets out evidence that there are periods when parking in CAS is at capacity but there remains available spaces in CAN. Visitors to CAS choose to park there out of convenience despite there being capacity problems.
- 31 There is an 85% mode share for cars to CAS compared to 29% to the Central Area as a whole as determined in the Car Parking Evidence Base; this in itself demonstrates the difference.
- 32 This provides strong evidence that parking in the CAS needs to be considered separately and not within the Central Area as a whole.

4.3(v)

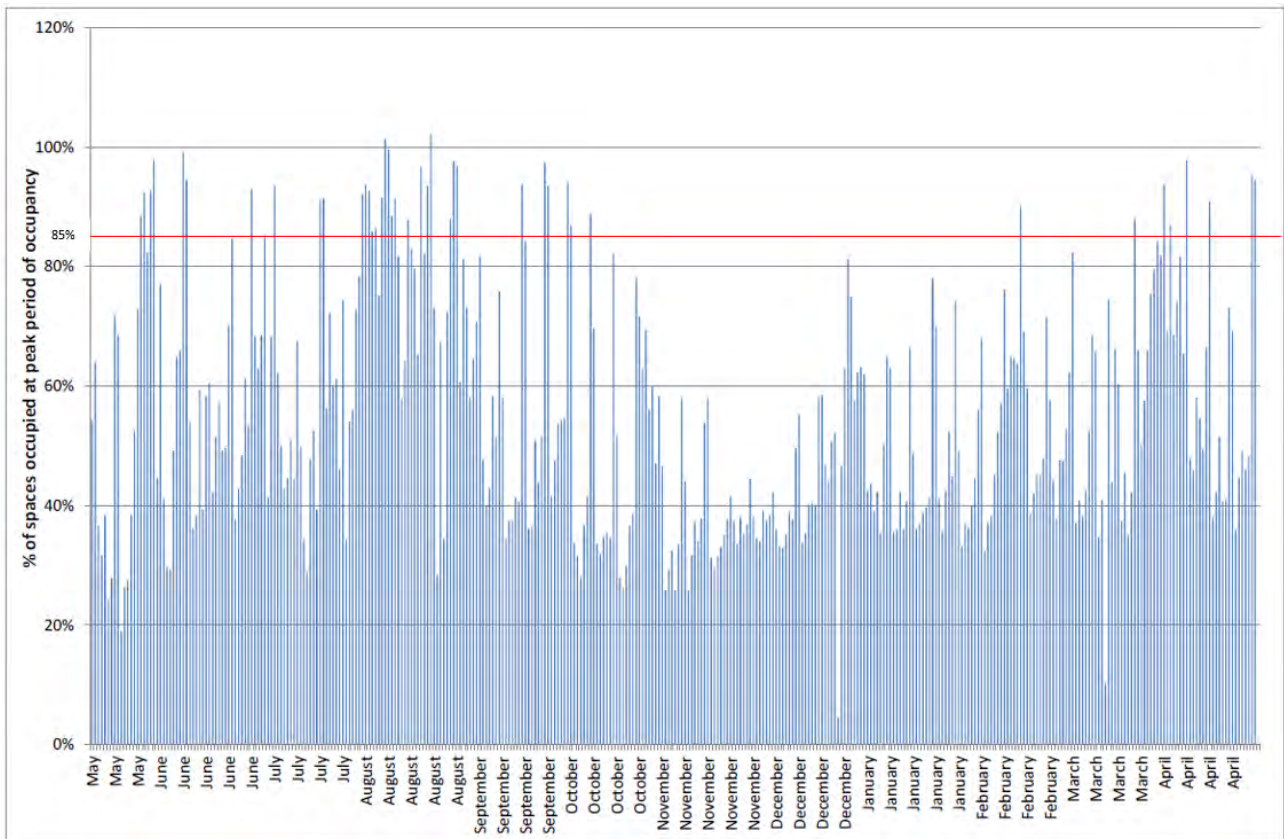
- 33 Requirements for a Transport Assessment to support a planning application for proposals similar to those for the key parking areas is no different to elsewhere in the UK, is a requirement of the NPPF and would detail parking in any event.
- 34 Alongside a Transport Assessment, a Travel Plan is typically prepared for developments which sets out measures and initiatives to seek a mode shift to sustainable modes of transport for the development.
- 35 As part of the Travel Plan, modes of travel are monitored and therefore any mode shifts that have been achieved at recent developments in the area will be known to the Council, who can present this to the Hearing.
- 36 In relation to parking, there has been a net loss of parking in CAS in recent years and there is no evidence that the policy has facilitated additional parking, in fact it has reduced it.
- 37 A recent example of a Transport Assessment being prepared to support a planning application in the key parking areas is Marine Plaza, as described at Appendix B of Topic Paper 1.
- 38 Marine Plaza is currently a publicly available pay and display 200 space car park located on Southchurch Avenue, is readily used by visitors and forms an important part of the seafront car parking stock.
- 39 A planning application was submitted for residential and commercial uses and was supported by a Transport Assessment, Appendix G of which set out an argument to provide reduced parking for the commercial uses. It sets out that Southend-on-Seas standards would require up to 293 parking spaces for the commercial uses (i.e. the publicly available spaces), however, argued only 10 would be provided i.e. only 3% of what could be provided. This was granted consent.
- 40 This precedent is concerning to Stockvale as it further reduces available parking in CAS.

4.3(vi)

- 41 See the Appraisal of Car Parking Evidence Base, as reattached at Appendix A, particularly paragraphs 37 to 49.
- 42 As a tool, the VMS is helpful to drivers, however, it is not being used properly, as evidenced further from the error data collected and photos taken by Stockvale, as attached at Appendix F.

4.3(vii)

- 43 The tourist industry relies upon busy days of the year to subsidise the attractions and other supporting businesses during other periods of the year when they are not busy. On quiet days, the attractions and other supporting businesses run at a loss, however, the business model sustains this by subsidising them with the profits made on busy days. If profits cannot be maximised on busy days then the business model fails. Days being close to peak days are also crucial to the business model as these also cumulatively sustain days that are not busy.
- 44 On these busy days, the tourism businesses need to be able to capture every visitor. If visitors are lost due to lack of car parking then these businesses are less able to remain open at quieter times of year when tourism businesses traditionally lose money. This can also mean an inability to keep on staff, which makes the business (and ultimately Southend seafront) more of a seasonal operation. This will have a damaging effect on the economy of the town and its overall prosperity, when a sizeable proportion of the town's economy is supported by its tourism role.
- 45 Peak days are also the days when the town is 'on display'. If the town does not look its best on days when large numbers of visitors are travelling to the seafront, then these visitors may not come back.
- 46 Peak days occur when the weather is good and may not necessarily be during summer months. The most recent example of a peak day was on 9th April 2017, the week before the Easter weekend – but not itself a 'special' day. This was a clear sunny day with a high of 24 degrees Celsius. Car parks were heavily oversubscribed and there was congestion through the town throughout the day, as reported in various outlets and attached at Appendix G.
- 47 Of particular concern is comments and photographs posted on 'Facebook', also attached at Appendix G, where visitors expressed dissatisfaction and that they may not return.
- 48 It is days like this where every visitor needs to be captured to ensure the longevity and sustainability of the businesses and this can only be achieved with adequate parking.
- 49 It is, however, very important to note that the busy days are not just a 'few days', as suggested in the question. Figure 2 of Topic Paper 1 shows the peak occupancy of CAS car parks whilst the Car Parking Evidence Base considers 85% occupancy to be the optimum maximum capacity.
- 50 85% has therefore been overlaid onto Figure 2, as shown below. This shows that there is over 40 days where optimum parking capacity in CAS is exceeded with many more being close to 85%.



- 51 Adequate parking is required for all of these days to allow tourism businesses to continue to operate successfully. To grow, or to even trade at historical levels, additional parking is required.
- 52 The seafront trade exceeds car parking availability on busy days and operates to this ceiling. To raise the ceiling, promote the tourist industry and ensure the future viability, additional parking is required. The SCAAP is currently proposing to lower that ceiling, which will be very damaging to businesses and not in line with national or local planning policy.
- 53 During busy periods, there is significant congestion throughout the whole town because car parks are full and vehicles are queuing and circulating looking for alternatives. Additional parking reduces the number of vehicles circulating, which reduces congestion and queuing vehicles which reduces emissions and improves air quality and amenity.
- 54 Well thought out and developed car parks can be designed with economic, social, public realm and environmental considerations integrated into part of far wider regeneration projects. A good example of this is the consented proposals for the museum within Cliff Gardens. Its Design and Access Statement is attached at Appendix H showing its car parking being integrated into the design with full consideration to these aspects and all cars and the building servicing arrangements being placed behind the active frontage.
- 55 There is no reason why other car parks cannot be developed using the same principles so as not to have any economic, social, public realm or environmental issues.

4.3(viii)

- 56 There has been a net loss in parking spaces in CAS in recent years. Appendix C shows that during this period there has been a general reduction in visitor numbers at Adventure Island.

- 57 Visitor numbers are clearly linked to spend and so the net loss in parking has had an adverse effect on the local economy.
- 58 Stockvale has historically purchased new rides for Adventure Island, however, due to having reached the ceiling, are unable to justify such an expense. Stockvale advise that wristband sales are down and that they now focus investment elsewhere. Clearly, the ceiling needs to be raised to increase investment and thus assist the local economy.

4.3(ix)

- 59 The amendments proposed in Paragraph 1.69 of Topic Paper 1 could be described as ‘steps in the right direction’, but do not go anywhere near far enough. Additional amendments are needed for the soundness of SCAAP. Our comments on the proposed amendments are as follows:
- Point 2: The definition of key visitor car parks is helpful, but a number of smaller car parks are excluded, as is Marine Plaza car park. Appendix I sets out a comparison of the car parks in CAS as added under Point 2 and as identified and measured by Stockvale. Also, no net loss needs to be defined. There also needs to be a reference to the car parks being expanded to accommodate any additional development and to accommodate growth in tourism.
 - Point 3: the same points are made in relation to this. There needs to be an agreed capacity for the car parks, a definition of no net loss, a statement that parking must be provided to meet the needs of any development proposed and an allowance for growth in tourists.
- 60 Paragraph 133 of SCAAP appears to acknowledge that more work needs to be done; if it is adopted before this work is done, and these policies adopted, it will be difficult to avoid some very serious consequences for the businesses operating on the seafront, as set out in RPS’ representations to this paragraph.
- 61 We do not believe the statements made in Paragraph 134 about car parks in CAN having the potential to serve the seafront are correct and should be amended, as set out in RPS’ representations to this paragraph.
- 62 We consider that Paragraph 135 needs amended to enable businesses to grow, as set out in RPS’ representations to this paragraph.
- 63 The added text to bullet point 1 of paragraph 136 is welcomed, however, we feel does not go far enough to enable growth, as set out in RPS’ representations to this paragraph.