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RPS Response to Southend on Sea Borough Council

RPS Response to Addendum to Additional Document 14:

This response has been prepared to Southend on Sea Borough Councils (SBC) Addendum to Additional Document 14, which provides further clarification regarding the survey locations within the SCAAP area in March and May 2016.

Further clarification on the questionnaire surveys undertaken is welcomed, however, it does highlight further concerns with the data.

Additional Document 14 provided the opportunity to rectify any erroneous data. However, it now appears that the revised data it published remained incorrect and this Addendum to Additional Document 14 is required to further correct the data.

We are very concerned that the revised data remained incorrect and we have very little confidence in the accuracy of the further revised data contained within the Addendum to Additional Document 14.

The conclusions, recommendations and strategies contained within the Car Parking Study were formed from the original data which we know to be incorrect, and is still being corrected. Thus, we are even more concerned over the robustness of the Car Parking Study, its recommendations and its soundness.

We note with interest that the Addendum to Additional Document 14 alters SBCs definition of a peak day.

The Car Parking Study sets out its definition of 'peak' in Paragraph 3.1 as '*For Southend, these peak periods are in the Summer holiday season and public holidays*'. In its footnote after paragraph 3.10, it goes on to set out that a car park occupancy of 85% is the optimum maximum occupancy and then at paragraph 3.39 sets out that those days when 85% occupancy is exceeded are classed as peak days.

Additional Document 14 describes 30th May 2016 as a '*peak day*'. The Addendum to Additional Document 14 now describes 30th May 2016 as '*the survey day (a public holiday in Spring) that was closest to a "peak" day*'. This is a change of definition by SBC.

Figure 3.10 of the Car Parking Study shows that maximum car parking occupancy in the Central Area South on 30th May 2016 was 93%. This is a similar maximum car parking occupancy to all the other days described as peak days where surveys were undertaken.

If SBC do not consider 30th May 2016 to be a peak day, then that means they do not consider any day when they have undertaken surveys to be peak days.



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On the basis that the recommendations and the strategy set out in the Car Parking Study is based upon the surveys, for SBC to consider that these were not undertaken on peak days is very concerning. It further reinforces our view that the Car Parking Study is not robust and we have no confidence in its recommendations and its soundness.

The SBC view further highlights our concerns over SBCs understanding of the seafront area, the parking issues that arise and the recommendations contained within the Car Parking Study. In our Statement to Matter 4 of the Examination in Public, paragraph 50 demonstrated how there were over 40 peak days per year. It appears that SBC do not share this view which is very concerning to Stockvale.

We reiterate our position that the Car Parking Study cannot be relied upon as a robust evidence base on which to build planning policies. However, with the amendments proposed by RPS on behalf of Stockvale (amended policy/supporting text wording, using parking data based on existing capacity, not using information from the CPS), we consider that the SCAAP can be made sound.

11th August 2017