

Summary of main concerns on Town Centre AAP.

Some initial concerns regarding the TAAP were raised in my letter of 22 February 2012.

This note sets out a more detailed summary of concerns, taking account of the points raised in the Council's letter of 14 March 2012.

The Council's letter sets out its reasons for preparing the TCAAP:

- The Town Centre is an area where significant change is needed;
- The TCAAP will stimulate regeneration
- It will act as a catalyst for getting key agencies and landowners to work together

Furthermore it indicates that the TCAAP seeks to allocate sites and to set out the timetable for the implementation of proposals.

The letter also indicates that there is some supporting information which could be included in the Plan. I acknowledge that this may add detail and clarity, but I remain very concerned that the AAP fails to take a pro active and robust approach to demonstrate how and when the Town Centre proposals will be delivered. The main areas of concern are as follows:

Implementation and monitoring

An AAP such as this, which sets out a range of projects and initiatives for change in the town centre, should include an element of project planning to demonstrate that the projects are realistic and set out how and when they will be implemented.

TC17 sets out the Council's Master Planned approach to the Town Centre Development Sites. Whilst this has a strong emphasis on design it makes no reference to project planning, phasing and co ordination between the various projects.

It is unclear how proposals for the five development opportunity (DO) sites will be implemented both individually and in relation to each other, especially as some are planned to take place within the same five year period.

Has any project planning taken place? What are the key project milestones for the DO sites? DO1/ DO2 and DO3/ DO5 are shown

as taking place within the same period of the Plan. Have the physical/ economic/ transportation/ environmental impacts of developing more than one large town centre site at the same time been considered? Will the larger sites be phased? Will lead in work and development of each of the DO sites fit neatly within one of the five year periods?

The Council's letter of 22 March refers to specific discussions taking place with landowners and other stakeholders to take forward DO1, as well as to confidential discussions regarding two other DO sites. However the Implementation Framework refers mainly to "the development industry" with no reference to involvement of delivery partners, landowners or infrastructure providers. Whilst discussions may be confidential, the AAP objectives cannot be realised unless they are based on project planning. Ideally projects should have outline programmes with target dates for site assembly (if necessary), preparation of masterplans, submission of planning applications and estimated duration of construction periods.

Lead in work and early milestones are particularly relevant where projects are shown as being implemented in "short term".

Paragraph 6.2 sets out some options for delivery. However it is not clear whether any of these options are being actively pursued by the Council, for which projects they are appropriate and what progress has been made.

The Council's letter refers to the Reading Central Area Action Plan (RCAAP) which was adopted in 2009. The RCAAP is underpinned by supporting evidence which includes considerable detailed project planning work. Some of this, such as the summary of delivery timescales for the Major Opportunity Areas, is presented in the AAP and demonstrates a pro active approach. Furthermore the RCAAP differentiates between projects for which project planning is underway and projects which were at the time "aspirational."

There is little in the Eastbourne TCAAP to demonstrate that the Council is taking an active approach to project management or that any of the projects and initiatives are more than "aspirational".

The TCAAP acknowledges the importance of monitoring of policies. However the Monitoring Framework is vague with no dates or indication of information sources. An exception is the detailed targets for dwellings and employment floorspace in the DO sites, despite these figures not appearing in the corresponding DO policies.

Public Realm enhancements

TC2 and TC13 both list a range of public realm enhancements. The TCAAP does not make it clear where these locations are or how the list has evolved, although some may have emerged from figure 3.4 of the AAP Position Statement 2009 (in Core Document TCAAP5). It is unclear whether capital funding is or is likely to be available for these projects. Some of the projects are linked to and apparently depend upon development of the DO sites. However the relationship between them and the effect on programming is unclear. Similarly it is unclear when the projects that are not linked to DO sites are programmed to come forward.

The Arts Trail

TC8 states that the Council will commission an Arts Trail and the Implementation Framework shows this as taking place in the medium term. There is no indication of how or if this project will come forward, particularly as paragraph 4.41 introduces uncertainty that it will actually happen by stating that commissioning an Arts Trail would provide opportunities... etc. The approach to this project seems tentative and does not give the reader confidence that it is being planned for pro actively. Who are Arts Community partners? Has the project it been costed? What funding has been identified? What is the timescale of lead in activities required to achieve the proposed implementation date of medium term?

Building heights

TC11 is a prescriptive policy to control building heights in the Town Centre. However it is not clear on what evidence the height restrictions have been based and the policy does not provide coherent guidance as to where tall buildings will be permitted. Most of TC11 reads as if each application for a tall building will be determined on its merits, rather than setting out acceptable locations for tall buildings in response to the existing townscape, ideally illustrated on a plan. Was this the intention?

The 2009 Position Statement includes some townscape analysis and work to identify urban design strengths and weaknesses. However the policy does not appear to flow directly from an analysis of urban context and structure. What is the justification for location of tall buildings in DO 2? What is the difference between exceptionally tall buildings and tall buildings? Para 4.62 and TC11 refer to areas where uniformity of building heights contribute significantly to character and townscape qualities. Where are these areas?

Development Opportunities

Figure 1 defines the Town Centre boundary and the primary and secondary retail areas. It also identifies the DO sites and indicates the location of Transition Areas and Potential Areas of Change.

If the DO sites are intended to be site specific allocations they should each be clearly defined on a plan of a scale to enable site boundaries to be read. TC18 – TC22 set out aspirations for the DO sites, but the descriptive text alone does not create a clear picture of the vision and aspirations for each area.

A large scale plan for each area would provide a basis for the masterplanning exercise. It would enable the Council to set out constraints and objectives for building heights, vehicular and pedestrian access, routes and uses. It would also allow the relationship with linked public realm enhancements to be clarified. Some of the DO sites have options to be extended (eg DO 2, which could include Station Parade) and these options for extended site areas could also be illustrated.

It is unclear how the floor space indicators for each of the DO sites (in the monitoring framework) have been arrived at. It is illogical to use monitoring targets which do not relate to any figures in the policy that is being monitored.

Transition areas

These areas are indicated by a star on Figure 1. However TC23 sets out detailed development management policies. Will it be possible to apply these policies without defining the boundaries of the areas to which they apply?

Potential areas of change

These areas are also only indicated by star on Figure 1 and yet Policy TC24 refers to a master plan led approach. This suggests that the area which an eventual master plan would cover should be defined, even if provisionally, by a plan.

Implementation of the proposals in TC24 is proposed in the latter part of the Plan period. Nevertheless, as with the DO sites, it would be helpful to indicate when project planning is expected to take place. Paragraph 5.39 refers to the Council's review of Devonshire Park but there is no indication of when this review will be completed and what the next stage of the project will be.