

Comments Received on the Proposed Submission Version Town Centre Area Action Plan (via Limehouse system)

Area of the AAP Comments Relate to: 1.0 Introduction: Overview of the Town Centre

Name/ rep number	Mrs Scarlett McNally (22)
Q1 A: AAP is/is not legally compliant	Legally Compliant
Q1 B: AAP is/is not Sound	Sound
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	Yes
Q6 Why do you feel it necessary to partake in examination	All the objectives are good. 1.7 does not go far enough in enhancing provision for cycling in Eastbourne. This will also encourage modal shift in the way people access the town and improve the health of Eastbourne residents.
<p>The AAP recognises the importance of making it easy to access and move around the town centre by all modes. Additionally, an Eastbourne Cycling Strategy is being jointly prepared by the Borough Council and East Sussex County Council and will be used to inform decision making during the AAP period. The draft Cycling Strategy includes the provision of two priority cycle routes (Horsey and King Edwards Parade/Seafront). Work on providing the first stage of the Horsey Cycle Route is programmed to commence in December this year and the route will be fully constructed in a number of phases over the next few years. This route will run between Langney roundabout and the Eastbourne railway station, utilising the alignment of the Horsey Sewer and providing a link between the Town Centre and Sovereign Harbour.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Area of the AAP Comments relate to: 1.0 Introduction: How does the AAP relate to other plans?

Name/ rep number	Mrs Scarlett McNally (23)
Q1 A: AAP is/is not legally compliant	Legally Compliant
Q1 B: AAP is/is not Sound	Sound
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	Yes
Q6 Why do you feel it necessary to partake in examination	We welcome the desire to join up with other regional plans. We are aware that East Sussex County Council has been working on the LTP3 involving sustainable transport. There are cycle paths planned across Horsey Sewer and part of the Seafront. We hope ESCC will consider a North-South cycle route into the town centre. It would be good if the Town centre plan could link in with this. If cycling was acknowledged as a key component of accessibility for the town centre, this would be useful. The interchanges with Eastbourne station and cycle access to all areas should be improved. Please note that many people in Eastbourne (the majority on our questionnaires) do not cycle because of the perception of danger. To combat this, provision for cycling needs to be very prominent (cycle parking, signage, lanes, drop kerbs, advance stop lines at junctions, analysis of key junctions from cyclist's point of view etc.)
<p>An Eastbourne Cycling Strategy is being jointly prepared by the Borough Council and East Sussex County Council and will be used to inform decision making during the AAP period.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Area of the AAP Comments Relate to: 2.0 Vision: What will Eastbourne Town Centre be like in 2027?

Name/ rep number	Mrs Scarlett McNally (24)
Q1 A: AAP is/is not legally compliant	Legally Compliant
Q1 B: AAP is/is not Sound	Sound
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	
Q6 Why do you feel it necessary to partake in examination	Please can you add 'increasing investment in the town centre, and the infrastructure needed to improve provision for cycling and walking, will bring wide-ranging benefits to health and the economy...'
<p>Comments are noted. Policies within the AAP recognise the importance of supporting a range or modes of transport in the Town Centre. An Eastbourne Cycling Strategy is being jointly prepared by the Borough Council and East Sussex County Council and will be used to inform decision making during the AAP period.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Area of the AAP Comments Relate to: 2.0 Vision: Town Centre Objectives

Name/ rep number	Ms Catherine Widdowson Nathaniel Litchfield & Partners (18)
Q1 A: AAP is/is not legally compliant	Legally Compliant
Q1 B: AAP is/is not Sound	Sound
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	In line with PPS4, the TCAAP objectives aim to promote the vitality and viability of the town centre. The Cooperative Group particularly supports Objective 6, which seeks to increase the mix of uses within the town centre, which, in line with PPS4 will contribute towards providing a wide range of services and promote sustainable development through reducing the need to travel.
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	
Q6 Why do you feel it necessary to partake in examination	
Support is welcomed	

Name/ rep number	Mrs Scarlett McNally (25)
Q1 A: AAP is/is not legally compliant	
Q1 B: AAP is/is not Sound	
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	
Q6 Why do you feel it necessary to partake in examination	The danger of separating into neighbourhoods is that it is easy to ignore the need for joined up sustainable transport solutions, e.g. cycle paths, across Eastbourne.

The AAP recognises the importance of making it easy to access and move around the town centre by all modes. An Eastbourne Cycling Strategy is being jointly prepared by the Borough Council and East Sussex County Council and will be used to inform decision making during the AAP period. The draft Cycling Strategy includes the provision of two priority cycle routes (Horsey and King Edwards Parade/Seafront). Work on providing the first stage of the Horsey Cycle Route is programmed to commence in December this year and the route will be fully constructed in a number of phases over the next few years. This route will run between Langney roundabout and the Eastbourne railway station, utilising the alignment of the Horsey Sewer and providing a link between the Town Centre and Sovereign Harbour.

NO CHANGES are proposed to the AAP in response to this representation.

Area of the AAP Comments Relate to: 3.0 Development Strategy and Spatial Framework: Approach to development within the Town Centre

Name/ rep number	Mrs Scarlett McNally (26)
Q1 A: AAP is/is not legally compliant	
Q1 B: AAP is/is not Sound	
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	
Q6 Why do you feel it necessary to partake in examination	The identity of the town needs to take into account the safety and well-being of those within it. Currently those on foot, in mobility scooters and on bikes feel unsafe and more ignored than those using cars. Changing the priorities would go a huge way to improving the feel and identity of Eastbourne.
<p>The AAP recognises the importance of designing streets in the Town Centre to ensure they are useable, safe and accessible, particularly for pedestrians, cyclist and public transport users. An Eastbourne Cycling Strategy is being jointly prepared by the Borough Council and East Sussex County Council and will be used to inform decision making during the AAP period.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Area of the AAP Comments Relate to: 3.0 Development Strategy and Spatial Framework: The Town Centre Spatial Framework

Name/ rep number	Mrs Scarlett McNally (27)
Q1 A: AAP is/is not legally compliant	
Q1 B: AAP is/is not Sound	
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	
Q6 Why do you feel it necessary to partake in examination	It is interesting that all your artist's impressions include able bodied healthy young people! Thank you for putting the occasional bicycle into the pictures. Thank you for mentioning cycle storage. Please be aware that although you mention being pedestrian friendly as important for access to the Town Centre, you need to make it cycle-friendly as well, as people will not walk more than 3/4 mile, but will cycle 3 miles. Be wary of disenfranchising those just outside the walkable limit, both those in areas of more deprivation (eg Shinewater and Langley) and those in densely populated Sovereign Harbour. You need these people engaged and using the Town centre for the project to work." Objective 2: Ensure a safe, people focused, pedestrian friendly environment that is fronted by development." This needs to be adjusted to "Ensure a safe, people focussed environment friendly to pedestrians, cyclists and those with mobility impairments."
<p>The AAP promotes a balanced approach to accessibility to the Town Centre with policies which support pedestrians, cyclists and public transport users. An Eastbourne Cycling Strategy is being jointly prepared by the Borough Council and East Sussex County Council and will be used to inform decision making during the AAP period. The draft Cycling Strategy includes the provision of two priority cycle routes (Horsey and King Edwards Parade/Seafront). Work on providing the first stage of the Horsey Cycle Route is programmed to commence in December this year and the route will be fully constructed in a number of phases over the next few years. This route will run between Langney roundabout and the Eastbourne railway station, utilising the alignment of the Horsey Sewer and providing a link between the Town Centre and Sovereign Harbour.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Area of the AAP Comments Relate to: 4.0 Town Centre Policies: Theme 2 Town Centre Identity (general)

Name/ rep number	Mrs Scarlett McNally (28)
Q1 A: AAP is/is not legally compliant	
Q1 B: AAP is/is not Sound	
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	
Q6 Why do you feel it necessary to partake in examination	If you are planning to make more one-way streets, we urge the consideration of counter-flow cycle routes Please do not create traffic flows that make cycling more difficult or encourage cyclists to flout the law. The railways station needs better paths into it for bicycles - currently the recently enhanced station cycle park on the Enterprise centre side can only be accessed via a gap by a gate, or through the busy station concourse.
<p>Comments are noted. The AAP recognises the importance of designing streets in the Town Centre to ensure they are useable and accessible, particularly for pedestrians, cyclist and public transport users. An Eastbourne Cycling Strategy is being jointly prepared by the Borough Council and East Sussex County Council and will be used to inform decision making during the AAP period.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Part of the AAP Comments Relate to: 4.0 Town Centre Policies: Theme 3 Town Centre Public Realm (general)

Name/ rep number	Jaffer Manek (9)
Q1 A: AAP is/is not legally compliant	Legally Compliant
Q1 B: AAP is/is not Sound	Unsound
Q2: The AAP is Unsound Because it is not...	Effective
Q3: Comments as to why the AAP is not legally compliant or is unsound	The townspeople are unhappy with the so called diesel alley on terminus road between the railway station and HSBC bank premises due to the bus exhaust fumes harmful to health, danger of collision of shoppers with passing buses and inhibited use of prime shopping location. Therefore, this issue needs to be addressed properly. The current plan does not solve this serious problem.
Q4: Any changes necessary to make the AAP legally Compliant or sound	Terminus Road from the railway station to HSBC Bank premises be pedestrianised and the bus park be relocated in Hyde Gardens i.e. in the square behind Tourist Information. There is wider land in Hyde Gardens for buses to line up and for passengers to board and alight. Buses can arrive and depart from Cornfield Road at the Tourist Information end since that is a two way street. Buses would need a two way traffic layout on from the railway station to Gildredge Road for two way access, may be even move up the roundabout. The air quality in Hyde Gardens would be much less polluted in view of greater width between the facing buildings. There will be less danger of accidents and collisions if motor vehicles other than buses are excluded. The professional firms with offices in Hyde Gardens should be glad that potential customers from the buses would see their signboards and name plates much better and therefore they would have an improvement in their business turnover.
Q5: Y/N to take part in the exam	Yes
Q6 Why do you feel it necessary to partake in examination	I can explain the options and also clear out any mistaken assumptions.
<p>The AAP recognises the importance of making it easy to access and move around the town centre by all modes. The AAP also recognises that parts of Terminus Road could be given greater pedestrian priority. The re-routing of services away from Terminus Road will be difficult but if a proposal could be made to work and has support then it will be seriously considered. Nevertheless the AAP requires design enhancements to the bus area and Terminus Road that will improve the environmental quality and character of the area what ever solution is found for the bus routes. Improvements to pedestrian crossing facilities at the junction with Terminus Road/Ashford Road/Gildredge Road will also improve pedestrian accessibility.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Name/ rep number	Jaffer Manek (12)
Q1 A: AAP is/is not legally compliant	Legally Compliant
Q1 B: AAP is/is not Sound	Unsound
Q2: The AAP is Unsound Because it is not...	Effective
Q3: Comments as to why the AAP is not legally compliant or is unsound	There are no weekly farmers' market style of open air stalls where local and nearby people can sell produce, fruits, cheese, honey and traditional foods. The local people need an alternative to the few large supermarkets. People need the facility to have cottage industry style of trading to be able to earn income for themselves. The Mediterranean market on seafront is good but is not a sufficient to address this matter
Q4: Any changes necessary to make the AAP legally Compliant or sound	Pedestrianised streets should have allocated areas for local farmers and market traders to sell their produce, fruits and cottage industry. This should be held on a particular day every week. Stall holders should be charged an affordable amount for them to be able to make a reasonable living
Q5: Y/N to take part in the exam	No
Q6 Why do you feel it necessary to partake in examination	
<p>Comment is noted. The AAP identifies opportunities for new retail development as well as protecting existing retailing in the Town Centre. The AAP contains policies to promote a mix of uses in the Town Centre and support secondary and independent retailing. Markets can be accommodated within the existing spaces such as the highway and are a regular occurrence associated with other events taking place in the town. New areas of public realm are proposed at 'Langney Place' and adjoining the railway station which could both accommodate markets. The Council is currently considering it's policy on market trading with the intention to bring a regular market into the town centre. This approach is consistent with the policies in the AAP</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Name/ rep number	Jaffer Manek (11)
Q1 A: AAP is/is not legally compliant	Legally Compliant
Q1 B: AAP is/is not Sound	Unsound
Q2: The AAP is Unsound Because it is not...	Effective
Q3: Comments as to why the AAP is not legally compliant or is unsound	There are no street billboards or information boards along the seafront to advise tourists and locals not to feed seagulls with bread, fish and chips and other human foods since that adversely affects their

	guts and so reduces their population. Many people complain seagulls snatch their ice cream as they sit on benches eating them.
Q4: Any changes necessary to make the AAP legally Compliant or sound	Create suitable billboards and information plaques like those on Bexhill sea front and install them at Eastbourne seafront to persuade them not to feed sea gulls for the reasons stated
Q5: Y/N to take part in the exam	Yes
Q6 Why do you feel it necessary to partake in examination	I can explain fully and properly.
<p>Comments are noted. This is a detailed matter that cannot appropriately be dealt with as a part of the AAP. The Council does educate the community in this respect through the usual channels such as press releases and attending events. However preventing people from feeding birds is not an enforceable matter.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Name/ rep number	Mrs Scarlett McNally (29)
Q1 A: AAP is/is not legally compliant	
Q1 B: AAP is/is not Sound	
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	
Q6 Why do you feel it necessary to partake in examination	This area clearly needs cycle parking and the traffic lights outside the Coop should be modified with advanced stop lines for cyclist. The part of Terminus road leading to the sea should be considered for contra flow cycle lane, or a parallel street be designated a preferred cycle route.
<p>Improvements to cycle provision within the Town Centre are included in the AAP particularly parking and storage facilities. An Eastbourne Cycling Strategy is being jointly prepared by the Borough Council and East Sussex County Council and will be used to inform decision making during the AAP period.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Area of the AAP Comments Relate to: 4.0 Town Centre Policies: Theme 4 Accessing the Town Centre (general)

Name/ rep number	Ms Alison Attwood (16)
Q1 A: AAP is/is not legally compliant	Legally Compliant
Q1 B: AAP is/is not Sound	Unsound
Q2: The AAP is Unsound Because it is not...	Effective
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	There is scarcely any mention of improved access to the town centre for CYCLISTS, apart from a brief mention about cycle parking and signage. If EBC is serious about encouraging more visitors AND being environmentally friendly, there should be, in addition to the town centre plan, a clear plan for improving safety and access into the central part of Eastbourne for cyclists. This should include, as a priority, a full-length seafront cycle path (akin to the one in Brighton) which would encourage cyclists to visit Eastbourne as a welcome destination where they can enjoy the seafront and also spend money in the town centre.
Q5: Y/N to take part in the exam	No
Q6 Why do you feel it necessary to partake in examination	
<p>The AAP recognises the importance of making it easy to access and move around the town centre by all modes. Improvements to cycle provision within the Town Centre are included in the AAP particularly parking, storage facilities. An Eastbourne Cycling Strategy is being jointly prepared by the Borough Council and East Sussex County Council and will be used to inform decision making during the AAP period. The draft Cycling Strategy includes the provision of two priority cycle routes (Horsey and King Edwards Parade/Seafront). Work on providing the first stage of the Horsey Cycle Route is programmed to commence in December this year and the route will be fully constructed in a number of phases over the next few years. This route will run between Langney roundabout and the Eastbourne railway station, utilising the alignment of the Horsey Sewer and providing a link between the Town Centre and Sovereign Harbour.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Area of the AAP Comments Relate to: 4.0 Town Centre Policies: Policy TC3

Name/ rep number	Ms Catherine Widdowson Nathaniel Litchfield & Partners (19)
Q1 A: AAP is/is not legally compliant	Legally Compliant
Q1 B: AAP is/is not Sound	Sound
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	In line with PPS4, the Co-operative Group supports the promotion of mixed uses within the Town Centre (including Development Opportunity sites), and particularly the range of uses which will supported, including retail, leisure and cultural, employment generating, residential, supporting community uses and evening and night time economy uses. Such a mix of uses will promote the vitality and viability of the town centre
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	No
Q6 Why do you feel it necessary to partake in examination	
Support is welcomed	

Part of the AAP Comments Relate to: 4.0 Town Centre Policies: Policy TC6

Name/ rep number	Jaffer Manek (13)
Q1 A: AAP is/is not legally compliant	Legally Compliant
Q1 B: AAP is/is not Sound	Unsound
Q2: The AAP is Unsound Because it is not...	Effective
Q3: Comments as to why the AAP is not legally compliant or is unsound	There is a need for youngsters to have free of charge shows and movies in the open air. This is not provided and so they resort to alcohol drinking establishments which is unaffordable, creates anti-social behaviours, emergencies that creates costs for hospital A& E department and also negatively affects their health.
Q4: Any changes necessary to make the AAP legally Compliant or sound	Large screens should show non-violent movies on Western Lawn. A dramatic and musical talent performance stage should be created on the east of the Pier part of the beach (redoubt space?) for young people to have a creative place for them to be busy away from alcohol selling places.
Q5: Y/N to take part in the exam	I can explain the details and eradicate misunderstandings or unwarranted assumptions.
Q6 Why do you feel it necessary to partake in examination	
<p>Comments are noted. The AAP notes the importance of the public realm and identifies new and prioritised areas of public space in the Town Centre. As part of the wider programming of the public realm within the Town Centre these issues could be addressed, but it is not a matter that can be appropriately dealt with as part of the AAP. The Council has a wide programme of events to which young people take part and this is better addressed through the addition of further events on the seafront, many of which would be outside of the AAP area.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Area of the AAP Comments Relate to: 4.0 Town Centre Policies: Policy TC7

Name/ rep number	Mr Adrian Ley (17)
Q1 A: AAP is/is not legally compliant	Legally Compliant
Q1 B: AAP is/is not Sound	Unsound
Q2: The AAP is Unsound Because it is not...	Effective
Q3: Comments as to why the AAP is not legally compliant or is unsound	The first sentence of para 4.33 raised considerable concern at a recent meeting involving members of the Town Centre Panel. Some argued that it was undermining the efforts of the council to limit hours in problem areas such as Area 1. Although it mentions licensing it fails to give sufficient emphasis to using planning as an instrument to reinforce the cumulative impact policy. The cumulative impact policy should have priority in the statement not be tacked on at the end. The essential feature of areas which have a cumulative impact policy is that there is already an over supply of certain types of licensable premises which are conflicting with other uses in the immediate area. This should be emphasised as a limiting factor for more applications in the cumulative impact area.
Q4: Any changes necessary to make the AAP legally Compliant or sound	Replace the first two sentences of 4.33 with "Within these areas later opening will be considered subject to the cumulative impact of proposals in order to minimise the potential for noise and disturbance". Delete the word also from the last sentence of TC7.
Q5: Y/N to take part in the exam	No
Q6 Why do you feel it necessary to partake in examination	
<p>Comments noted.</p> <p>PROPOSED CHANGE TO AAP: amend first sentences of paragraph 4.33, page 25 to read:</p> <p>"Within these areas later opening will be considered subject to the cumulative impact of proposals in order to minimise the potential for noise and disturbance. All licensing applications or variations will be considered in line with the relevant legislation existing at the time".</p> <p>Amend last sentence of Policy TC7 to read:</p> <p>"The individual and cumulative impact of proposals will also be carefully considered in order to minimise the potential for noise, nuisance and disturbance."</p>	

Area of the AAP Comments Relate to: 4.0 Town Centre Policies: Policy TC11

Name/ rep number	Ms Catherine Widdowson Nathaniel Litchfield & Partners (20)
Q1 A: AAP is/is not legally compliant	Legally Compliant
Q1 B: AAP is/is not Sound	Unsound
Q2: The AAP is Unsound Because it is not...	Not consistent with national planning policy
Q3: Comments as to why the AAP is not legally compliant or is unsound	The Co-operative Group considers that a policy which limits buildings heights within the town centre to 3-5 storeys is not justified. In addition, it is considered that it allows insufficient flexibility to ensure the most appropriate development within the town centre is brought forwards. Each application for development should be judged on its merits, on a case-by-case basis, as part of the consideration of a planning application and in the context of the specific design considerations, which should be set out in design and access statements. There may be some instances where buildings above 5 storeys in height may be acceptable and this should be recognised within the policy. Placing a limit on building heights allows insufficient flexibility and may stifle development, which is contrary to the Governments Growth Agenda.
Q4: Any changes necessary to make the AAP legally Compliant or sound	It is suggested that the policy is reworded to allow greater flexibility and would suggest the following amended wording: Buildings within the Town Centre will generally be acceptable within a range of 3 to 5 storeys in height having regard to the context of the area and longer distance views. Taller buildings may be acceptable in some locations, where it can be demonstrated that they are acceptable in townscape terms and from longer distance views.
Q5: Y/N to take part in the exam	No
Q6 Why do you feel it necessary to partake in examination	
<p>The AAP includes policy guidance on building heights in the Town Centre including limiting the location of taller buildings in order to maintain the established character of Eastbourne. Taller landmark buildings up to 6 storeys in height are also acceptable in key locations including adjoining the Terminus Road corridor. Development Opportunity Sites have site specific guidance.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Area of the AAP Comments Relate to: 4.0 Town Centre Policies: Policy TC13

Name/ rep number	Jaffer Manek (10)
Q1 A: AAP is/is not legally compliant	Legally compliant
Q1 B: AAP is/is not Sound	Unsound
Q2: The AAP is Unsound Because it is not...	Effective
Q3: Comments as to why the AAP is not legally compliant or is unsound	Plastic waste such as bottles and packing is not collected for recycling. Plastic waste is put into rubbish bins and sent presumably to landfill
Q4: Any changes necessary to make the AAP legally Compliant or sound	All households in Eastbourne should have all their plastic waste collected as part of the weekly refuse collection rounds.
Q5: Y/N to take part in the exam	No
Q6 Why do you feel it necessary to partake in examination	
<p>Comments are noted. Although no proposals are made in the AAP for plastic waste collection, the council is committed to promoting sustainable development. Objective 12 of the AAP supporting the Vision sets out how the AAP will address the issue of sustainable development. Additionally the AAP includes provision for access to private amenity space and bin and recycling storage facilities as part of proposals for new residential development in the Town Centre. The recycling of plastic bottles from the kerbside currently takes place and the Council is actively looking at ways to minimise waste. Also the Council is currently tendering its waste collection contract and this new contract will have increased targets for recycling waste.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Area of the AAP Comments Relate to: 4.0 Town Centre Policies: Policy TC16

Name/ rep number	Mrs Scarlett McNally (31)
Q1 A: AAP is/is not legally compliant	
Q1 B: AAP is/is not Sound	
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	
Q6 Why do you feel it necessary to partake in examination	Although Bespoke cycle group realise that parts of the plan will occur in isolation, they request that every opportunity should be made to consider the wider needs of potential cyclists in each area. In many cases it is one dangerous junction that is putting off individuals from embarking on sustainable transport.
<p>Comments are noted. The AAP recognises the importance of designing streets in the Town Centre to ensure they are useable and accessible, particularly for pedestrians, cyclist and public transport users. An Eastbourne Cycling Strategy is being jointly prepared by the Borough Council and East Sussex County Council and will be used to inform decision making during the AAP period.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Area of the AAP Comments Relate to: 5.0 Site Specific Policies: Policy TC18

Name/ rep number	Mrs Scarlett McNally (32)
Q1 A: AAP is/is not legally compliant	
Q1 B: AAP is/is not Sound	
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	
Q6 Why do you feel it necessary to partake in examination	Why is there no reference to improving the provision for those cycling to or in the Town Centre? TC15 mentions increased car parking as a goal. Why not monitor how many cyclists are using cycle parks? Other towns have shown that if facilities for cycling have been put in, they are used. TC16 needs to say: "pedestrians, cyclists and users of mobility aids". And monitoring - we suggest an audit of different types of use. TC23 needs to acknowledge Seaside as a way into the town centre from areas with high population to the East, and reduce their dependency on car use.
<p>Comments are noted. The Council are keen to make the Town Centre more accessible by public transport, pedestrians and cyclists; and policies within the AAP support this aim. An Eastbourne Cycling Strategy is being jointly prepared by the Borough Council and East Sussex County Council and will be used to inform decision making during the AAP period. Policy TC16 is particularly focused on pedestrians. Policy TC23 relates to Transition Areas, with particular reference to the potential for a new mix of uses, and it is not appropriate to reference accessibility.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Area of the AAP Comments Relate to: 5.0 Site Specific Policies: Policy TC19

Name/ rep number	Mrs Scarlett McNally (33)
Q1 A: AAP is/is not legally compliant	
Q1 B: AAP is/is not Sound	
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	
Q6 Why do you feel it necessary to partake in examination	There should be a clear plan for how cyclists will access this key area. You mention 'signage to routes' does this mean directing them away from the area, or embracing their presence within the town centre?
<p>The AAP addresses the needs of pedestrians, public transport uses and cyclists through policy proposals and priorities. The AAP places an emphasis on making the Town Centre more accessible particularly for pedestrians and public transport users. An Eastbourne Cycling Strategy is being jointly prepared by the Borough Council and East Sussex County Council and will be used to inform decision making during the AAP period. The draft Cycling Strategy includes the provision of two priority cycle routes (Horsey and King Edwards Parade/Seafront). Work on providing the first stage of the Horsey Cycle Route is programmed to commence in December this year and the route will be fully constructed in a number of phases over the next few years. This route will run between Langney roundabout and the Eastbourne railway station, utilising the alignment of the Horsey Sewer and providing a link between the Town Centre and Sovereign Harbour.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Area of the AAP Comments Relate to: 5.0 Site Specific Policies: Policy TC22

Name/ rep number	Ms Catherine Widdowson, Nathaniel Litchfield & Partners (21)
Q1 A: AAP is/is not legally compliant	Legally Compliant
Q1 B: AAP is/is not Sound	Unsound
Q2: The AAP is Unsound Because it is not...	Consistent with National Planning Policy
Q3: Comments as to why the AAP is not legally compliant or is unsound	<p>Whilst the Co-operative Group supports the identification of the site as a Development Opportunity Site, it considers that the policy wording should allow sufficient flexibility to ensure the most appropriate development within the town centre comes forward. Whilst the requirement for active frontages addressing Terminus Road and Trinity Trees is encouraged, the Cooperative Group considers that a requirement to provide retail floorspace at ground floor level may prevent other, appropriate town centre uses being promoted on this site. Whilst the policy sets out certain acceptable additional uses, it is considered that to maximise flexibility and to ensure that the site does not remain vacant in the long-term, the policy should set out various acceptable ground floor uses. In terms of the mix of uses, to ensure maximum flexibility, it is considered that the policy wording should acknowledge that other uses, or other forms of living accommodation, such as student housing would also be acceptable in this location. We also note that there appears to be a typographical error as D2 uses are mentioned twice, whereas we presume the first reference should be corrected to read D1 community uses. The Co-operative Group also considers that the policy should not limit buildings heights to 3-5 storeys, as it may not allow sufficient flexibility to ensure the most Appropriate development comes forward. It is considered that any application for the redevelopment of the site should be judged on its merits as part of the consideration of the development proposals and in the context of the specific design considerations of the scheme. It is considered that the policy is overly prescriptive and may stifle development, which is contrary to the Governments Growth Agenda. It is considered that any financial contributions required, such as the public realm contributions identified, meet the tests set out in Circular 05/05.</p>
Q4: Any changes necessary to make the AAP legally Compliant or sound	<p>It is suggested that the policy is reworded to allow greater flexibility and omits reference to specific building heights. It is also suggested that the policy is reworded to require an active frontage is provided on the ground floor, rather than a requirement to provide a retail use. To ensure maximum flexibility is maintained, it is considered that the policy wording should acknowledge that other forms of living accommodation, such as student housing would also be acceptable in this location, and that other uses will be acceptable. Correct the typographical error and amend where it says D2 community uses to read D1 community uses to avoid any confusion. We suggest the following revised policy wording: Development Opportunity Site Five Proposals for the comprehensive redevelopment of Development</p>

	<p>Opportunity Site Five, as identified on AAP Figure 1, will include the following key development components: Active frontages will address Terminus Road and Trinity Trees to incorporate window displays and principal pedestrian entrances Storey heights: New development ranging from 3 to 5 storeys above street level will generally be acceptable. A taller building may be appropriate, where it can be demonstrated that it is acceptable in townscape terms and from longer distance views. An important corner will be incorporated as part of the built form of buildings at the corner of Terminus Road and Trinity Trees. Mix of uses. Uses which provide an active frontage at ground floor level is required. Acceptable ground floor uses include Class A1 retail, A3 restaurants and cafes and/or A4 drinking establishment. Other uses providing an active frontage at ground floor level may be acceptable. On the upper floors, acceptable uses include Class C3 residential, B1 (a) offices, C1 hotel, D1 community uses and D2 assembly and leisure. Pedestrian access will be provided from Terminus Road and Trinity Trees. Servicing and vehicle access will be provided from Trinity Place Public realm contributions will be sought, where appropriate, towards enhancements to the junction of Terminus Road, Seaside Road and Trinity Trees to improve pedestrian accessibility between the primary retail core and the Seafront.</p>
<p>Q5: Y/N to take part in the exam</p>	<p>No</p>
<p>Q6 Why do you feel it necessary to partake in examination</p>	
<p>The AAP includes policy guidance on building heights in the Town Centre including limiting the location of taller buildings in order to maintain the established character of Eastbourne. Taller landmark buildings up to 6 storeys in height are also acceptable in key locations including adjoining the Terminus Road corridor. The Policy wording will be amended to allow for development up to 6 storeys in height. Taller buildings in this location may be considered on their merits having regard to Policy TC11 and the prevailing character of the area. This location is outside the primary and secondary retail areas and therefore a requirement for ground floor A1 retail is not reasonable. Typographical error acknowledged.</p> <p>PROPOSED AAP CHANGES to Policy TC22:</p> <p>“Storey heights: New development up to 6 storeys above street level.”</p> <p>“Mix of uses. Uses which provide an active frontage at ground floor level are required and to include Class A1 retail, A3 restaurants and cafes, and/or A4 drinking establishment. On the upper floors, acceptable uses include Class C3 residential, B1 (a) offices, C1 hotel, D1 community uses and D2 assembly and leisure.”</p>	

Name/ rep number	Mrs Scarlett McNally (34)
Q1 A: AAP is/is not legally compliant	
Q1 B: AAP is/is not Sound	
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	
Q6 Why do you feel it necessary to partake in examination	You need to clearly mention cycle access in this key area. Although this is implied with shared use, Sometimes promoting cycling with signs and markings empowers those less confident on their bikes and encourages more people to make the change.
<p>Comments are noted. The AAP recognises the importance of making it easy to access and move around the town centre by all modes. An Eastbourne Cycling Strategy is being jointly prepared by the Borough Council and East Sussex County Council and will be used to inform decision making during the AAP period.</p> <p>NO CHANGES are proposed in response to this representation.</p>	

Area of the AAP Comments Relate to: 5.0 Site Specific Policies: Policy TC23

Name/ rep number	Mrs Scarlett McNally (35)
Q1 A: AAP is/is not legally compliant	
Q1 B: AAP is/is not Sound	
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	
Q6 Why do you feel it necessary to partake in examination	Thank you for supporting cycle parking and signage. Please consider contra flow cycle lanes if you are planning one-way streets. Please make a clear plan for cyclists within pedestrianised areas. Terminus Road is currently not accessible to bicycles, but would be ideal, especially joining the station with the sea. Please consider whether there is a level of footfall where a segregated cycle path would be preferable to congested multiuse thoroughfares.
<p>Comments are noted. The AAP recognises the importance of designing streets in the Town Centre to ensure they are useable and accessible, particularly for pedestrians and public transport users. An Eastbourne Cycling Strategy is being jointly prepared by the Borough Council and East Sussex County Council and will be used to inform decision making during the AAP period.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Area of the AAP Comments Relate to: 6.0 Implementation and Monitoring (general)

Name/ rep number	Mrs Scarlett McNally (36)
Q1 A: AAP is/is not legally compliant	
Q1 B: AAP is/is not Sound	
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	
Q6 Why do you feel it necessary to partake in examination	The proposed 7 character areas have road junctions on their boundaries. Please be aware that junctions are the most dangerous areas for those on bicycles. Clear attention needs to be focussed on the need to improve the junctions, especially roundabouts, any left turns and traffic lights. (Traffic lights should all have advanced stop lanes for bicycles). Unless junctions are made safer, few people will make the modal shift onto bicycles, and the town centre plan will not work due to congestion.
<p>Comments are noted. The AAP recognises the importance of designing streets in the Town Centre to ensure they are useable, safe and accessible, particularly for pedestrians and public transport users. An Eastbourne Cycling Strategy is being jointly prepared by the Borough Council and East Sussex County Council and will be used to inform decision making during the AAP period.</p> <p>NO CHANGES are proposed to the AAP in response to this representation.</p>	

Area of the AAP Comments Relate to: 6.0 Implementation and Monitoring Table 2 Monitoring Framework

Name/ rep number	Mrs Scarlett McNally (37)
Q1 A: AAP is/is not legally compliant	Legally compliant
Q1 B: AAP is/is not Sound	Sound
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	
Q5: Y/N to take part in the exam	Yes
Q6 Why do you feel it necessary to partake in examination	Point 9 clearly needs cycling mentioned explicitly. Economic points need to include the accessibility of the town centre by bicycle as a means of providing employment to those in parts of Eastbourne with higher levels of deprivation, but within a 3-mile easy cycling distance of the Town centre.
Comments noted.	

Part of the AAP Comments Relate to: Comments on Whole Document

Name/ rep number	Helen McCabe (14)
Q1 A: AAP is/is not legally compliant	Not Legally Compliant
Q1 B: AAP is/is not Sound	Unsound
Q2: The AAP is Unsound Because it is not...	Justified, effective
Q3: Comments as to why the AAP is not legally compliant or is unsound	<p>Introduction I have been given the opportunity to read the Town Centre Action Plan and I am highlighting my amends below. You will see some suggestion typo amends and also concerns on the contents of this report. 1. Contents. I suggest that (AAP) is added after the Area Action Plan in section 1.0. 2. Page 2 I would suggest that a map is included in this page as it is unclear what you are referring to as the town centre. 3. Page 2 point 1.2 it states For the most part the Town Centre is an attractive and vibrant plan. Im not sure what you are trying to say maybe for the most time of the year is an attractive place or is it placed on geography? I would suggest that this is amended. 4. In the same point it states that The two main areas for activity in the Town centre are the Seafront and Terminus Road and Im quite surprised that the Arndale isn't mentioned here or is this not a main activity. What about the train station? 5. Point 1.3 states that the shopping areas around Little Chelsea give Eastbourne a special quality of shopping experience however it hasn't identified that many of the little boutique shops have had to close including my favourite and is now mainly taken up by restaurants and cafes. Neither does it mention anywhere in this report that Eastbourne has a very high percentage of closed retail units or how you seek to overcome this problem. The view shared by many people in Eastbourne is not an expansion on the Arndale would not be supported unless something is done about these empty retail units both in South Street and the Seafront. Evidence can be provided from town developments in other areas of the impact that a town centre shopping mall has on small retail units that are not in the main area and I would like to express my concern in this area. 6. Page 4 section 1.19 I would suggest that you uppercase retaining and residential. 7. Page 7. I was quite surprised that the word "community is missing out of the plan. Again evidence can be provided on our lack of community spirit and a lack of any communications infrastructure within the town centre. 8. Page 8 point 3.2 it states that "The centre neighbourhood is at the heart of Eastbourne and is home to principal shopping, employment and tourist attractions. I would suggest that you add in the word "some' before tourist attractions as the town centre only does not offer the majority of tourist attractions that are in Eastbourne. 9. In the bullet points under 3.2 I am quite surprised that getting into the town centre is not listed as surely this is a major concern. Local people are already struggling to get into the town centre so a development that encourages more people into the town would only hinder this. I would suggest that unless this is made easier then you will not encourage more people into the town. As someone who lives and works in Eastbourne I</p>

personally do not shop in Eastbourne. 10. Page 9 point 3.9. It states that Eastbourne Town Centre is already a focus for many activities. If you would like this report to be realistic then I would advise that however it lacks community spirit after this. 11. In the same point it states that One way of enhancing the overall character of the Town Centre is through identifying a number You can identify as much as you like however this wont do any enhancing whatsoever so I would strongly recommend that this is amended. 12. In point 3.11 it states that the towns retail heart focuses on Terminus Road, Sussex Gardens and the Arndale centre is a key destination however having already stated that the Town Centre is the heart of Eastbourne and that Terminus Road and Seaside are the key destinations this really doesn't quite make sense. So far we have 2 hearts and 5 key destinations in and around Eastbourne" perhaps you can let us know what these are? 13. Page 10 Little Chelsea it states that Little Chelsea has a vibrant mix of independent retailers and business when because many shops have had to close it is now mainly restaurants and pubs. I am very concerned that Little Chelsea will become desolate as small retail units are unable to sustain their business when more, larger shops that are able to offer similar offerings at competitive prices will be in the development of the Arndale Centre. This has been seen in my towns and I would like to see proof of what you are doing to protect these businesses before buying in to the development. 14. Page 11 point 3.19 it states that "walks and public squares which must be carefully managed to ensure ease of mobility for everyone maximising accessibility however it doesn't mention that this includes people that are not fully able bodied people that have to rely on wheelchairs or other walking instructions to get around. My experience of using a wheelchair in Eastbourne is that it is not easy. Pavements are not flat and there is a limited (if any) amount of eating places that offer room for wheelchairs and pushchairs. It has also been noticed that there aren't any photographs of elderly or disabled people in the photographs which is quite surprising as this is such a concern for many people who live and work in Eastbourne. With the increase of people using the town and the increase of wheelchairs and pushchairs in the town centre I would like to know what facilities you are using as this is already an issue for many shoppers and is one of the main reasons why I don't shop in Eastbourne I got fed up of being bashed! Are you offering a pushchair park, children's crèche family friendly restaurants, large restaurants for people with wheelchairs to sit at tables in the Town Centre? We can provide evidence of this need if needed. 15. Page 13 point 4.3 it states that "The Town Centre is an important neighbourhood within Eastbourne and the natural focus for a range of activities. However, unlike many neighbourhoods which are primarily residential areas of the Town Centre performs an additional function and is used by larger numbers of people who do not necessarily live there. This seems quite a strange sentence to include and states the obvious surely this is the nature of town centres? 16. Page 14 point 4.7 it states that These opportunities would complement the existing leisure, tourism and cultural facilities within the Town Centre. I would be interested to know what is meant by "leisure here as I am not aware of much happening in the town Centre. 17. In point 4.9 it states that "there is a clear desire to ensure that Eastbourne retains and strengthens its retail offer and

I'm not sure that you can do both! 18. Unfortunately I don't agree with the bullet points in section 4.11. If you aren't proactively working to ensure that current businesses stay then you won't be expanding the retail you will only be relocating it to the Arndale and making other streets desolate. I would like to know what proactive measures you are putting in place to avoid this (which has been seen in many towns).

19. Neither do I agree with point 4.13 and I would like to see what evidence there is to support the view that non-retail uses will cause harm to the vitality and viability of the primary retail core and diluting to an unacceptable extent the character and identity of the areas as a focus etc I think you may be making a big mistake here! 20. In Page 17 point 4.19 it states that Increasing the population of the town centre also benefits local businesses and employers however I would suggest that you add however it will make it more difficult to travel into and around the town. As it already takes me over an hour to drive a mile so therefore don't go into town on a Saturday I really need to know what infrastructures you are putting in place to support the development in the town.

21. In point 4.22 it has been stated that a range of community facilities will also need to be provided to meet the needs of the town centre community and that a childcare, GP service has been recognised however much more is needed that this and a few of these are listed above.

22. It states in point 4.25 that the Town Centre supports a range of leisure and I would really love to know what these are.

23. Page 19 point 4.32 states that a mixed and inclusive event and night-time economy will be promoted which then talks about conflicts between other uses within the Town Centre. It might help you to think outside of the box here as there could be other uses of the evening in the town centre that just isn't about restaurants and pubs. Maybe even ask the business community what they could provide?

24. Section 4.34 on page 20 states that The art district focused on the Towner and the congress and Devonshire theatres causes me much concern. There are many local community groups who would like to be involved in the cultural strategy of Eastbourne however these places do not encourage involvement at a local level and therefore by focusing on these you are excluding many local artist groups.

25. In point 4.39 page 21 it states that "the Towner has received critical acclaim and has made a positive contribution to the image of Eastbourne. I do not believe this statement to be true and I know many local art groups and individual professionals who do not share this opinion! The Towner has also had a negative impact on the livelihood of many local artists and community groups by excluding them from the resources that they have to offer.

26. Again in point 4.40 it states that by establishing enhanced connectivity through the creation of an arts trail that links the railway station to the arts district only excludes local artists who are unable to be involved in the arts district. There are many local groups that work in and out of the town centre. We really need an infrastructure in place!

27. Again in point 4.41 I do not agree with the statement for reasons described above they are all council owned!

28. Disabled users are not mentioned in point 4.50 on page 22 and point 4.76 on page 29 or on 4.101 on page 36.

29. Point 4.77 of page 30 states that Eastbourne already has many fine streets and beautiful seafront however this is not the full picture. It also has streets that are not so why don't you state this?

30. Point 4.84 on page 33 actually the key issue is to

	<p>avoid traffic jams rather than find our way around. 31. Point 4.99 on page 35 states that the quality of parking provision will be improved however unless this is reasonably priced it wont make any difference whatsoever! 32. In the development opportunities have been provided however I would like to raise my concerns if this is all that is being done and not addressing the concerns that I have raised above. Summary After reading the Town Centre Action Plan I would like to question the validity of this report. After working in the community alongside a number of local groups and charities and as a community rep I am certain that the views shared in this report are NOT the view of several people and groups that live and work in Eastbourne. The report is very biased and does not paint the whole picture of Eastbourne or identify the needs that people are expecting with this plan. My concern is that if this report is within the public arena then community buy-in would be very low which would be a big shame as we are hoping that the Town Centre will be developed to the advantage of the majority of people that live and work in Eastbourne. We can provide evidence of the points raised in this response should you wish to see them.</p>
<p>Q4: Any changes necessary to make the AAP legally Compliant or sound</p>	<p>I have been given the opportunity to proof read the Town Centre Action Plan and I am highlighting my amends below. You will see some suggestion typo amends and also concerns on the contents of this report. 1. Contents. I suggest that (AAP) is added after the Area Action Plan in section 1.0. 2. Page 2 I would suggest that a map is included in this page as it is unclear what you are referring to as the town centre. 3. Page 2 point 1.2 it states For the most part the Town Centre is an attractive and vibrant place. I'm not sure what you are trying to say maybe for the most time of the year its an attractive place or is it placed on geography? I would suggest that this is amended. 4. In the same point it states that The two main areas for activity in the Town centre are the Seafront and Terminus Road and Im quite surprised that the Arndale isn't mentioned here or is this not a main activity. What about the train station? 5. Point 1.3 states that the shopping areas around Little Chelsea give Eastbourne a special quality of shopping experience however it hasn't identified that many of the little boutique shops have had to close including my favourite and is now mainly taken up by restaurants and cafes. Neither does it mention anywhere in this report that Eastbourne has a very high percentage of closed retail units or how you seek to overcome this problem. The view shared by many people in Eastbourne is not an expansion on the Arndale would not be supported unless something is done about these empty retail units both in South Street and the Seafront. Evidence can be provided from town developments in other areas of the impact that a town centre shopping mall has on small retail units that are not in the main area and I would like to express my concern in this area. 6. Page 4 section 1.19 I would suggest that you uppercase retaining and residential. 7. Page 7. I was quite surprised that the word community is missing out of the plan. Again evidence can be provided on our lack of community spirit and a lack of any communications infrastructure within the town centre. 8. Page 8 point 3.2 it states that The centre neighbourhood is at the heart of Eastbourne and is home to principal shopping, employment and tourist attractions. I would suggest that you add in the word some before tourist attractions as the town centre</p>

only does not offer the majority of tourist attractions that are in Eastbourne. 9. In the bullet points under 3.2 I am quite surprised that getting into the town centre is not listed as surely this is a major concern. Local people are already struggling to get into the town centre so a development that encourages more people into the town would only hinder this. I would suggest that unless this is made easier then you will not encourage more people into the town. As someone who lives and works in Eastbourne I personally do not shop in Eastbourne. 10. Page 9 point 3.9. It states that Eastbourne Town Centre is already a focus for many activities If you would like this report to be realistic then I would advise that however it lacks community spirit after this. 11. In the same point it states that One way of enhancing the overall character of the Town Centre is through identifying a number You can identify as much as you like however this wont do any enhancing whatsoever so I would strongly recommend that this is amended. 12. In point 3.11 it states that the towns retail heart focuses on Terminus Road, Sussex Gardens and the Arndale centre is a key destination however having already stated that the Town Centre is the heart of Eastbourne and that Terminus Road and Seaside are the key destinations this really doesn't quite make sense. So far we have 2 hearts and 5 key destinations in and around Eastbourne perhaps you can let us know what these are? 13. Page 10 Little Chelsea it states that Little Chelsea has a vibrant mix of independent retailers and business when because many shops have had to close it is now mainly restaurants and pubs. I am very concerned that Little Chelsea will become desolate as small retail units are unable to sustain their business when more, larger shops that are able to offer similar offerings at competitive prices will be in the development of the Arndale Centre. This has been seen in my towns and I would like to see proof of what you are doing to protect these businesses before buying in to the development. 14. Page 11 point 3.19 it states that "walks and public squares which must be carefully managed to ensure ease of mobility for everyone maximising accessibility however it doesn't mention that this includes people that are not fully able bodied people that have to rely on wheelchairs or other walking instructions to get around. My experience of using a wheelchair in Eastbourne is that it is not easy. Pavements are not flat and there is a limited (if any) amount of eating places that offer room for wheelchairs and pushchairs. It has also been noticed that there aren't any photographs of elderly or disabled people in the photographs which is quite surprising as this is such a concern for many people who live and work in Eastbourne. With the increase of people using the town and the increase of wheelchairs and pushchairs in the town centre I would like to know what facilities you are using as this is already an issue for many shoppers and is one of the main reasons why I don't shop in Eastbourne I got fed up of being bashed! Are you offering a pushchair park, children's crèche, family friendly restaurants, large restaurants for people with wheelchairs to sit at tables in the Town Centre? We can provide evidence of this need if needed. 15. Page 13 point 4.3 it states that The Town Centre is an important neighbourhood within Eastbourne and the natural focus for a range of activities. However, unlike many neighbourhoods which are primarily residential areas of the Town Centre performs an additional function and is used by larger numbers of people who do not necessarily live

there. This seems quite a strange sentence to include and states the obvious surely this is the nature of town centres? 16. Page 14 point 4.7 it states that "These opportunities would complement the existing leisure, tourism and cultural facilities within the Town Centre. I would be interested to know what is meant by leisure here as I am not aware of much happening in the town Centre. 17. In point 4.9 it states that there is a clear desire to ensure that Eastbourne retains and strengthens its retail offer and I'm not sure that you can do both! 18. Unfortunately I don't agree with the bullet points in section 4.11. If you aren't proactively working to ensure that current businesses stay then you won't be expanding the retail you will only be relocating it to the Arndale and making other streets desolate. I would like to know what proactive measures you are putting in place to avoid this (which has been seen in many towns). 19. Neither do I agree with point 4.13 and I would like to see what evidence there is to support the view that non-retail uses will cause harm to the vitality and viability of the primary retail core and diluting to an unacceptable extent the character and identity of the areas as a focus etc I think you may be making a big mistake here! 20. In Page 17 point 4.19 it states that increasing the population of the town centre also benefits local businesses and employers however I would suggest that you add however it will make it more difficult to travel into and around the town. As it already takes me over an hour to drive a mile so therefore don't go into town on a Saturday I really need to know what infrastructures you are putting in place to support the development in the town. 21. In point 4.22 it has been stated that a range of community facilities will also need to be provided to meet the needs of the town centre community and that childcare, GP service has been recognised however much more is needed that this and a few of these are listed above. 22. It states in point 4.25 that the Town Centre supports a range of leisure and I would really love to know what these are. 23. Page 19 point 4.32 states that a mixed and inclusive event and night-time economy will be promoted which then talks about conflicts between other uses within the Town Centre. It might help you to think outside of the box here as there could be other uses of the evening in the town centre that just isn't about restaurants and pubs. Maybe even ask the business community what they could provide? 24. Section 4.34 on page 20 states that The art district focused on the Towner and the congress and Devonshire theatres causes me much concern. There are many local community groups who would like to be involved in the cultural strategy of Eastbourne however these places do not encourage involvement at a local level and therefore by focusing on these you are excluding many local artist groups. 25. In point 4.39 page 21 it states that the Towner has received critical acclaim and has made a positive contribution to the image of Eastbourne. I do not believe this statement to be true and I know many local art groups and individual professionals who do not share this opinion! The Towner has also had a negative impact on the livelihood of many local artists and community groups by excluding them from the resources that they have to offer. 26. Again in point 4.40 it states that by establishing enhanced connectivity through the creation of an arts trail that links the railway station to the arts district only excludes local 25. In point 4.39 page 21 it states that the Towner has received critical acclaim and has made a positive contribution to the image of Eastbourne. I

do not believe this statement to be true and I know many local art groups and individual professionals who do not share this opinion! The Towner has also had a negative impact on the livelihood of many local artists and community groups by excluding them from the resources that they have to offer. 26. Again in point 4.40 it states that by establishing enhanced connectivity through the creation of an arts trail that links the railway station to the arts district only excludes local artists who are unable to be involved in the arts district. There are many local groups that work in and out of the town centre. We really need an infrastructure in place! 27. Again in point 4.41 I do not agree with the statement for reasons described above they are all council owned! 28. Disabled users are not mentioned in point 4.50 on page 22 and point 4.76 on page 29 or on 4.101 on page 36. 29. Point 4.77 of page 30 states that "Eastbourne already has many fine streets and beautiful seafront however this is not the full picture. It also has streets that are not so why don't you state this? 30. Point 4.84 on page 33 actually the key issue is to avoid traffic jams rather than find our way around. 31. Point 4.99 on page 35 states that the quality of parking provision will be improved however unless this is reasonably priced it wont make any difference whatsoever! 32. In the development opportunities have been provided however I would like to raise my concerns if this is all that is being done and not addressing the concerns that I have raised above. Summary After reading the Town Centre Action Plan I would like to question the validity of this report. After working in the community alongside a number of local groups and charities and as a community rep I am certain that the views shared in this report are NOT the view of several people and groups that live and work in Eastbourne. The report is very biased and does not paint the whole picture of Eastbourne or identify the needs that people are expecting with this plan. My concern is that if this report is within the public arena then community buy-in would be very low which would be a big shame as we are hoping that the Town Centre will be developed to the advantage of the majority of people that live and work in Eastbourne. We can provide evidence of the points raised in this response should you wish to see them. artists who are unable to be involved in the arts district. There are many local groups that work in and out of the town centre. We really need an infrastructure in place! 27. Again in point 4.41 I do not agree with the statement for reasons described above they are all council owned! 28. Disabled users are not mentioned in point 4.50 on page 22 and point 4.76 on page 29 or on 4.101 on page 36. 29. Point 4.77 of page 30 states that "Eastbourne already has many fine streets and beautiful seafront however this is not the full picture. It also has streets that are not so why don't you state this? 30. Point 4.84 on page 33 actually the key issue is to avoid traffic jams rather than find our way around. 31. Point 4.99 on page 35 states that the quality of parking provision will be improved however unless this is reasonably priced it wont make any difference whatsoever! 32. In the development opportunities have been provided however I would like to raise my concerns if this is all that is being done and not addressing the concerns that I have raised above. Summary After reading the Town Centre Action Plan I would like to question the validity of this report. After working in the community alongside a number of local groups and charities and as a community rep I am certain that

	the views shared in this report are NOT the view of several people and groups that live and work in Eastbourne. The report is very biased and does not paint the whole picture of Eastbourne or identify the needs that people are expecting with this plan. My concern is that if this report is within the public arena then community buy-in would be very low which would be a big shame as we are hoping that the Town Centre will be developed to the advantage of the majority of people that live and work in Eastbourne. We can provide evidence of the points raised in this response should you wish to see them.
Q5: Y/N to take part in the exam	Yes
Q6 Why do you feel it necessary to partake in examination	For the reasons given in Q4
<p>Comments are noted, although they were received in advance of the formal representations period. The AAP is supported by an Issues and Options report that was extensively consulted upon. The policies and proposals within the AAP reflect the representations made during that consultation. The AAP seeks to build on the many strengths that the Town Centre has and provide an enhanced mix of town centre uses to maintain its role. The fact that many visitors choose to come to Eastbourne each year demonstrates that it must be attractive and vibrant, however more must be done. Diversifying and supporting a mix of uses in town centres is supported through national planning policy as a way of improving economic potential and vibrancy. The AAP identifies a number of Development Opportunity Sites in the Town Centre in order to achieve this objective. Community facilities are identified as part of the mix of uses suitable within the Town Centre. Community facilities provision is a policy requirement in the Core Strategy. Community facilities are also identified as being an acceptable use on a number of the Development Opportunity Sites, and within the Transition Areas. Community facilities include those within Class D1 of the Town and Country Planning (Use Classes) Order 1987 (as amended). The AAP aims to make the Town Centre accessible, easy to get to and move around, with a particular emphasis on pedestrians, those with particular mobility requirements, and public transport users. Parking will continue to be provided within the Town Centre.</p> <p>NO CHANGES are proposed as part of this representation.</p>	

Name/ rep number	Helen McCabe (15)
Q1 A: AAP is/is not legally compliant	Not Legally Compliant
Q1 B: AAP is/is not Sound	Unsound
Q2: The AAP is Unsound Because it is not...	Justified, Effective
Q3: Comments as to why the AAP is not legally compliant or is unsound	Please find the views of many local residents as posted on http://www.facebook.com/pages/Eastbourne-Town-Centre-Area-Action-Plan-APP/175297302541169 . We were informed that all of these views would be represented in the consultation for the Action Plan.

1. Shops and businesses are closing all over Eastbourne making it look shabby and unkempt. Meanwhile there are plans to "improve" The crumbles shopping area in the harbour, renaming it Sovereign Central! Seems like a mad idea, just a total waste of money in these tough economic times. The last thing we want in Eastbourne is to look exactly like every other shopping centre/mall in this country!!! Lets be different, people are bored with this commercial madness.

This comment is by Jan Whiting who has posted on <http://www.facebook.com/pages/Eastbourne-Town-Centre-Area-Action-Plan-APP/175297302541169>

"2. This is just an observation but three things that should be addressed:

1. Security licences not handed out to anyone who applies. Bar and Club security are poor at best.
2. Everywhere outside of town suffers from two problems, lack of waste disposal on the street and lack of public phone boxes that work.
3. No visible help and finance for start up businesses in the area, to help fill the smaller empty shops.
4. No advertising of the French markets on the seafront, it would be better placed in terminus road pedestrian area instead of the fake tattoo and miscellaneous items stall.
5. Stop the charity workers on the pedestrian walkthrough. No one wants to be made felt guilty when shopping. And when you do sign up your number is added o a database of similar companies calling you"

Posted by Simeon David Jones on <http://www.facebook.com/pages/Eastbourne-Town-Centre-Area-Action-Plan-APP/175297302541169>

3. what is the real point most off the shops in the town have closed up so if they build more and so called regenerate the town it will only mean more empty shops standing like soldiers and more for the jobs to smash up on a sat night.

Posted by Sharon Cornford on <http://www.facebook.com/pages/Eastbourne-Town-Centre-Area-Action-Plan-APP/175297302541169>

4. For indi retailers visit the Enterprise Centre all the shops there are owned and run by locals. If EBC continue with the crazy idea of creating more retail space for minimum wage jobs can we have a transport network that allows people to get in and out of the town?

Posted by Peter Watts On [http://www.facebook.com/pages/Eastbourne-Town-Centre-Area-Action-](http://www.facebook.com/pages/Eastbourne-Town-Centre-Area-Action-Plan-APP/175297302541169)

Plan-APP/175297302541169

5. Youth - When I was younger, there was a fair amount to do in the summer in Eastbourne. But in the winter there is not much for youth to do (Cinema or Swimming). A bottle of cider only costs about £3/4 which is much more affordable to youths than other activities. There used to be a snooker club above Kings Nightclub, but that shut down. Possibly in the new Arndale centre have a youth based section that could include cinema, snooker/pool tables, arcade, laser quest, ice skating rink, games consoles for hire, indoor mini golf.

Posted by Michael Gwynne on <http://www.facebook.com/pages/Eastbourne-Town-Centre-Area-Action-Plan-APP/175297302541169>

6. Art - In the action plan there are talks of an art trail. We have already had the new Towner open to mixed reviews. And recently new art installations have opened in Sussex and Kent (including Hastings) which leads me to believe the area may be saturated with art attractions. Possibly find a different niche to attract people. Suggestions: music and music venues, watersports, ice skating, 'real' ski-slope.

Posted by Michael Gwynne.

7. Bikes – I like my bike, and I try not to leave it out in the rain. However, with the British weather as it is, you can never tell. Therefore I never bike into town. If there were some sheltered bike parking (with CCTV) this would encourage people to ride into town, becoming healthier, reducing congestion and reducing the need for making lots of car parking. Posted by Michael Gwynne. 8. How many people use the Enterprise Centre? Support local shops and business's please!

Posted by Pamela Doyle.

9. If you want to save the shops why are you still giving planning permission to places like Tesco. There is supposedly one being fitted out in seaside road next to cash converters, that would make three in less than a mile. You're killing local business. And as for the argument that it will all be the same chain shops and so, the young people in this town want those options, this isn't an old peoples town anymore. Think of the extra revenue at times like Airbourne and the tennis. But mostly think of the jobs it will create, because there are no jobs for people in Eastbourne unless you want to clean.

Posted by Simeon David Jones.

10. I think we should get a theme park because I'm a kid and I always have to travel like 2 hours to get to a theme park it would be great if there was one in Eastbourne with rollercoasters and stuff like that! Posted by Steph Bardon 11. How about an indoor market in what is currently the covered bus/ taxi area on the side of the station. Also a town square around the area of Diesel Alley would be great. I can't see much value in just extending the Arndale to be more of the same and the same kind of shopping centre

	<p>you get in Tunbridge Wells or elsewhere: we need differentiation.</p> <p>Posted by Dave Cousin. 12. How about an indoor market in what is currently the covered bus/ taxi area on the side of the station. Also a town square around the area of diesel alley would be great. I can't see much value in just extending the Arndale to be more of the same and the same kind of shopping centre you get in Tunbridge Wells or elsewhere: we need differentiation.</p> <p>Posted by Keith Gell. 13. Given the shrinking high street share of retail trade , why is this being foisted on us? If we can't let the shops there now , why revamp?? It will be filled with generic chain shops. If this ill-judged development goes ahead please can we ensure that the structures lend themselves to post retail use. the road infrastructure in the centre of Eastbourne is groaning with current traffic levels , if the redevelopment did attract more trade , we will head for gridlock. It is hard to resist the idea that is not about need or demand, but that there is some other reason for the development.</p> <p>Posted by Ricky Malone. 14. The arts should not be focussed around the Towner as local art is not represented here.</p> <p>Posted by Catalyst Arts. 15 Some of the issues raised so far are: - Lack of toilet facilities. - The distance for wheelchair users to get from taxis. - Affect on local businesses not in the expanded Arndale centre or high street. - Lack of community facilities and encouragement of any sense of community... You can view many more opinions on the Facebook page where you will see that the majority of people here are against the plan to develop the Arndale Centre when there are so many empty retail units around Eastbourne.</p>
<p>Q4: Any changes necessary to make the AAP legally Compliant or sound</p>	
<p>Q5: Y/N to take part in the exam</p>	<p>Yes</p>
<p>Q6 Why do you feel it necessary to partake in examination</p>	

Comments noted and welcomed. Supporting retailing and retail diversity in the Town Centre is an important aim of the AAP. This means national multiples as well as smaller independent retailers and providing good linkages, both physical and through improved signage, between the two. The comment relating to the focus should be on filling empty shops rather than building new ones is noted, however it is not as straightforward as this, many retailers have expressed an interest in opening in Eastbourne but at present, the Town Centre does not have enough larger sized units to meet their needs. Therefore the creation of larger units will attract new retailers to the town which in turn will lead to increased footfall and improved viability for smaller shops. The Terminus Road corridor is identified as a public realm priority enhancing the environment between the railway station and the Seafront. New public squares are identified at Langney Place and adjoining the railway station which could provide space for street markets to be held, although the AAP does not identify a location for an indoor market; this was not identified as part of the consultation on Issues and Options. Provision for the design servicing, recycling and refuse storage are included within AAP policy (TC12). A key theme for the AAP is supporting a diverse mix of uses in the Town Centre including community and leisure uses, and the Development Opportunity Sites will support a mix of uses. Making the Town Centre easy to get to and move around is another key theme, and proposals are included for cycle stands, wayfinding, and storage and parking as part of development proposals in the Town Centre. Finally, the proposed Arts Trail has the potential to link up a number of locations in the Town Centre and is not simply focused on the Towner. The AAP does not preclude the establishment or development of arts and cultural facilities in other parts of the Town Centre. Such diversity is to be supported and welcomed.

NO CHANGES are proposed as part of these representations.

Name/ rep number	Mr John Patrick Massey (48)
Q1 A: AAP is/is not legally compliant	Legally Compliant
Q1 B: AAP is/is not Sound	Sound
Q2: The AAP is Unsound Because it is not...	
Q3: Comments as to why the AAP is not legally compliant or is unsound	
Q4: Any changes necessary to make the AAP legally Compliant or sound	Support the proposed submission of Town Centre AAP, but consider retailing in the new and existing Arndale requires some assistance to achieve maximum success. Integrating the car parks surrounding the Arndale thus ensuring full use could be achieved by using High Level Covered Walkway.
Q5: Y/N to take part in the exam	No
Q6 Why do you feel it necessary to partake in examination	

Comments are noted and support is welcomed. Proposals for improving existing parking provision in the Town Centre are contained within the AAP. The AAP allows for the quality of existing parking provision to be improved. New provision where required must be designed to a high standard. The AAP does not seek to actively reduce parking rather ensure existing spaces are better utilised as part of a balanced approach to

arriving at and moving around the Town Centre. High level walkways are unlikely to be economically viable and would be unlikely to be accommodated in a visually acceptable way particularly in relation to the listed railway station building.

NO CHANGES are proposed to the AAP in response to this representation.

General Comments received on the Proposed Submission Version Eastbourne Town Centre Area Action Plan

Miss S Isted (1 L)

The concern I have with a pedestrianised area is the amount of walking expected. Some people can only shop in the Town Centre because the bus drops them in the heart. It may be worth looking at the bus ticket turnover when the bus stop was moved to Gildredge Road while works were being carried out.

I do agree with a proper cycle route along the seafront and recommend the top promenade as the disabled are catered for with ramps to access the middle and lower proms.

Finally, to regenerate the bandstand could we please remove the shields that go up when there is a concert on and open it back up to the "wanderers". Charge a £1 to watch - that would save the empty seats

Key Summary Points

- *Concerned about the pedestrianised areas and the amount of walking that would be expected.*
- *Agree with having a proper cycle route along the seafront. Recommend using the top promenade as the disabled are catered for with access ramps*

Response

The AAP contains policies relating to improving movement around the Town Centre and increasing legibility. The AAP aims to make the Town Centre accessible, easy to get to and move around, with a particular emphasis on pedestrians and public transport users.

NO CHANGES are proposed as a result of this representation.

H Richards (2)

May I express my ideas as a long term resident?

- Get the buses away from diesel alley into a purpose built bus station with information bureau maybe near the station
- Any town buildings should be in the same Victorian style as others, in keeping with the uniqueness of the town
- Wanted- a good ironmonger/DIY store
- A decent sized supermarket- Aldi/Morrisons
- Why not small buses, as in Hailsham, to serve very local areas of the town
- Generally more individual shops and a John Lewis/Ikea, or similar good stores. Not so many teen fashions. There is still a great number of us wanting to purchase classic, good quality clothes. Debenhams is useless now!

Key Summary Points

- *Move buses away from Diesel Alley and provide a purpose built bus station that has an information bureau. Provide smaller buses to serve more local areas as in Hailsham.*
- *Building style should be in keeping with Victorian style of others*
- *Would like to see more individual shops and larger shops such as Ikea/John Lewis. And fewer teen fashion shops. Would also like to have an ironmonger and DIY store as well as a good sized supermarket.*

Response

The AAP recognises the importance of making it easy to access and move around the town centre by all modes. The AAP also recognises that parts of Terminus Road could be given greater pedestrian priority. The re-routing of services away from Terminus Road will be difficult but if a proposal could be made to work and has support then it will be seriously considered. Nevertheless the AAP requires design enhancements to the bus area and Terminus Road that will improve the environmental quality and character of the area whatever solution is found for the bus routes. Improvements to pedestrian crossing facilities at the junction with Terminus Road/Ashford Road/Gildredge Road will also improve pedestrian accessibility.

The AAP contains guidance on design in the Town Centre balancing innovative design solutions with protecting the best existing buildings and heritage assets which are an important part of the character of Eastbourne. Additionally the AAP includes policies to promote a mix of uses in the Town Centre to make sure it is more vibrant and caters for all types of retail. The AAP identifies Development Opportunity Sites where a mix of town centre uses may be accommodated including retail.

NO CHANGES are proposed as a result of this representation.

Mr Malcolm Rasala (3L)

Look at www.zaha-hadid.com. Look at www.fosterandpartners.com; two contemporary Great British architects. And then look at the Eastbourne Town Centre Action Plan pictures/designs. See the difference?

I am sure your planners/designers mean well. But inspiring they are not. Keep looking at Zaha Hadids architecture. Keep looking at Norman Fosters. Are they inspiring? Do they make you proud to be human? Are they 21st century? Again look at the architectural designs of the Town Centre Action Plan. Do they uplift the human spirit. Or do they look much like other dull town centres across Britain? Do they send a tingle down your spine? Are they something you feel future generations will admire you for, like say, we admire Christopher Wren for St Pauls? Do you want to be remembered? Do you want future generations to say of you 'Wow what a Great Man'? Do you want to leave a mark 'I did this'?

You truly have a once in a lifetime chance to be considered a Great Britain. Call in Zaha Hadid. Call in Norman Foster. Set them a low fee competition to come up with something that will truly make Eastbourne an inspiringly wonderful town. We love you dearly but what we are currently being presented with, while well meaning, is truly dull and boring.

Key Summary Points

- *Would like to see more inspirational designs being put forward to make Eastbourne Stand out as an inspiringly wonderful town.*
- *Feels that the current proposals are dull and boring, and that architects such as Norman Foster and Zaha Hadid should be involved and invited to come up with something that will make Eastbourne stand out and be inspirational*

Response

The AAP contains guidance on design in the Town Centre balancing innovative design solutions with protecting the best existing buildings and heritage assets which are an important part of the character of Eastbourne. The AAP also contains policies on the design of built form and the public realm. The aim is to ensure that development proposals are of a high quality.

NO CHANGES are proposed as a result of this representation.

Miss Rachel Bust - The Coal Authority (4L)

Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.

We look forward to receiving your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address planningconsultation@coal.gov.uk, on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website.

Alternatively, please mark all paper consultation documents and correspondence for the attention of Planning and Local Authority Liaison.

Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our direct line (01623 637 119).

Key Summary Points

- *The Coal Authority have no specific comments to make on the AAP document.*

Response

Comments noted and support welcomed.

Mr Paul Lewes (5L)

Retail, particularly with large chain stores, only generates a handful of jobs with the profits going to head office and no doubt off-shore tax arrangements (Mrs Philip Green's billion pound bonus for example) By all means have newly designed spaces for retail and restaurants at ground level, but make sure to include

plenty of great office spaces above which local people can rent or own, employ other local people, which provides far more work than a handful of new large shops, and more importantly, keeps money local.

Key Summary Points

- *Ensure that local jobs are created, for example by providing office spaces above groundfloor retail and restaurant spaces, which can be rented or owned by local people.*
- *This will provide far more work than a handful of new large shops*

Response

Proposals for provision of a mix of uses, including new retail provision, are set out in the AAP, particularly as part of the identified Development Opportunity Sites. The AAP includes policies to promote a mix of uses in the Town Centre to make sure it is vibrant as well as protecting and enhancing opportunities for secondary retail. In addition Policy D2 of the Proposed Core Strategy seeks to support employment uses in Eastbourne.

NO CHANGES are proposed as a result of this representation.

Helen McCabe (6L)

1.2 states 'For the most part the Town Centre is an attractive and vibrant place to work in and visit' and I would like to know what is meant by this (ie. part of the year, geographic part etc.). I would also like to know whose opinion this is and how this opinion was formulated as it isn't the opinion of all people that live or work in Eastbourne.

1.3 states that 'Little Chelsea' gives Eastbourne a special quality of shopping experience' however this is mainly now taken up with cafe's, pubs and restaurants. The residents would like to note that their favourite places have had to close (mainly due to increasing rent from the council).

1.6 states that 'diversifying the overall mix of uses within the town centre, including the provision of new homes, community and employment, would also improve its overall attractiveness' and we would like to disagree with this statement. The town centre doesn't have the infrastructure to support any more people and the only thing that is needed is to not have so many empty retail spaces. I do not agree with expanding the arndale centre with so many empty retail units as we will then have parts of town that become desolate as the council have stated that they will be left up to 'market forces'.

1.7 states that the plan is looking to connect key attractions together which we would like to express our concern over. It is quite obvious that local groups not considered a key attraction by the council will be left out. We do not support this.

Point 2.0 states that 'By 2027 Eastbourne Town Centre will be a place that attracts more shoppers, workers and residents and visitors to spend more time enjoying' and we would like to express our concern! It already takes me 1 hour to drive 1 mile on a Saturday into town and wait for a car park spot. The Town Centre does not have an infrastructure to support this vision.

The town centre objectives on page 9 mention 'community facilities' however we would like to know what these are and how this information is being sourced. Our previous plans for community facilities keep on being ignored!!

I would also like to question why 'community spirit' is not raised as an objective as this has been recognised as a local need.

3.2 states that 'development priorities will maximise the economic potential of the town centre attracting more shoppers, businesses, workers and resident's however we do not believe this to be a recognised need - how about making life better for the people already living and working in Eastbourne by improving the infrastructure and empty units????

3.9 states that the town centre 'lacks a particularly strong image and identity'. We disagree as it actually lacks 'community spirit' but nothing seems to be done about this.

Page 15 states that the arts district is focussed on the congress and Devonshire theatres and we would like to strongly express our concerns with this. as these centres do not support the local art scene. It also states in the retail section that the town's retail heart is focussed on... did you know that the AAP now has 2 hearts which is quite strange. Please make your mind up what the heart is

The points on page 19 don't recognise any need for community spirit

Point 4.22 only recognises a couple of community facilities. Please tell me that there's more????

Point 4.34 states that the art district is focussed on the Towner, Congress and Devonshire theatre however we will like to raise serious concerns of these as you are now saying that local community groups will be excluded!

Point 4.39 states that 'The Towner has received critical acclaim and has made a positive contribution to the image of Eastbourne' and we would like to disagree with this. As the Towner is closed off from any involvement from local artists and local art groups all it has done is upset quite a lot of people!

Page 28 talks about the Town Centre identity however we would really like to know what you are going to do about the lack of community spirit. Until this is address whatever visual improvements you make won't change Eastbourne!

The objectives on page 29 don't have any community objectives!

The images of modern flat buildings with retail units are ugly. They block out natural sunlight and force people to live in too close proximity together with no outdoor space.

Point 4.83 states that Eastbourne has ample car parking and we would like to disagree with this you have not addressed the already congested streets in the accessing the town centre which is already a major concern - if you are then encourage more people to come into the town centre then we would like to raise this as a major concern.

Other issues raised are:

- distance for wheelchair users to transport links are too far.
- Lack of wheelchair imagery in the AAP
- Lack of toilet facilities
- Lack of community facilities
- Lack of community spirit and not recognised
- Affect of secondary and third retail outlets left to market forces
- Number of already empty retail units
- Lack of family facilities

This plan has major holes in it and I would like to see some improvements before community buy-in is given

Key Summary Points

- *Where did the view that for the most part the Town Centre is an attractive and vibrant place to work and visit come from?*
- *Little Chelsea is now made up of cafes, pubs and restaurants rather than shops.*
- *Disagree that diversifying mix of uses in the town centre would improve overall attractiveness. Do not agree with expanding the Arndale Centre as parts of the town will become desolate.*
- *Do not support the plan to connect key attractions together*
- *Concerned that the Town Centre does not have the infrastructure to support additional shoppers*
- *Would like clarification on what is meant by 'community facilities' on page 9, and why has community spirit not been raised as an objective?*
- *Maximising the economic potential of the town centre and attracting more shoppers/businesses etc is not a recognised need*
- *Disagree that town centre lacks a strong image and identity*
- *The AAP claims to have 2 'hearts' which is it?*
- *Disagree that the Towner has made a positive contribution to the image of Eastbourne*
- *Images of modern flat buildings with retail units are ugly*
- *Don't agree that Eastbourne has ample parking*
- *Distance for wheelchair users to transport links is too great, and there is a lack of images of wheelchair users within the document.*
- *Lacking in toilet facilities, community facilities, community spirit, and family facilities.*
- *Concerned about the effect of secondary and third retail outlets left to market forces, already empty retail units.*

Response

Comments are noted, although they were received in advance of the formal representations period. The AAP is supported by an Issues and Options report that was extensively consulted upon. The policies and proposals within the AAP reflect the representations made during that consultation. The AAP seeks to build on the many strengths that the Town Centre has and provide an enhanced mix of town centre uses to maintain its role. The fact that many visitors choose to come to Eastbourne each year demonstrates that it must be attractive and vibrant, however more must be done. Diversifying and supporting a mix of uses in town centres is supported through national planning policy as a way of improving economic potential and vibrancy. The AAP identifies a number of Development Opportunity Sites in the Town Centre in order to achieve this objective. Community facilities are identified as part of the mix of uses suitable within the Town Centre. Community facilities provision is a policy requirement in the Core Strategy. Community facilities are also identified as being an acceptable use on a number of the Development Opportunity Sites, and within the Transition Areas. Community facilities include those within Class D1 of the Town and Country Planning (Use Classes) Order 1987 (as amended). The AAP aims to make the Town Centre accessible, easy to get to and move around, with a particular emphasis on pedestrians, those with particular mobility requirements, and public transport users. Parking will continue to be provided within the Town Centre.

NO CHANGES are proposed as part of this representation.

Helen McCabe (7L)

As a local arts charity that is seeking to encourage a renaissance in the creative arts we would like to strongly disagree with the arts district being focussed on the council's own building and not the community arts. We would also like to represent the view of many local artists that we work with in disagreeing with your plan to close off community arts to those living and working in Eastbourne.

The Towner for instance does not want to work with local art groups and if this area then becomes the arts district then there won't be any chance for groups or individuals like ourselves!

Key Summary Points

- *Disagree with the arts district being focused on the council's own building and not the community arts, and disagree with plan to close off community arts to those living and working in Eastbourne.*

Council Response

The Arts District location was subject to consultation as part of the Issues and Options report. The AAP proposes an Arts Trail for the Town Centre that could include provision of new art works as well as the potential involvement of local artists. The Arts Trail will also link together key arts, heritage and cultural venues across the town. Finally, the proposed Arts Trail has the potential to link up a number of locations in the Town Centre and is not simply focused on the Towner. The AAP does not preclude the establishment or development of arts and cultural facilities in other parts of the Town Centre. Such diversity is to be supported and welcomed.

NO CHANGES are proposed as a result of this representation.

Catalyst Arts – Helen McCabe (8L)

See above comments and response (7L)

John Boyle (38)

Eastbourne Station

1. Eastbourne is in economic decline and has no realistic prospects of recovery without substantial improvements in either road or rail links. No coastal town in the UK or in Europe has achieved economic success without efficient and adequate transport links.
2. The London Brighton and South Coast Railway in 1911 ran some trains faster than today on the Eastbourne/London line. The journey times for car travel to and from London, the Channel port and Lewes have lengthened during the past 50 years.
3. There are no realistic prospects for any substantial improvements to the road links but, upon the award of new rail franchises, there will be prospects for improved and faster train services to London and perhaps comparable with the services which have ensured prosperity for Brighton.
4. A greatly improved rail service may only occur if rail operators can be assured that the planning and infrastructure is, or will be, in place to accommodate a substantial increase in rail passenger traffic.
5. The AAP should therefore plan adjacent to the railway station a bus station interchange, adequate taxi ranks, car parking sufficient for all rail users both day long and short term and areas cars can drive to pick up and collect rail passengers. In short the AAP should provide for an integrated transport system.
6. ***Eastbourne developed from a number of small hamlets only when the railway service first came to the town; it will only achieve*** prosperity when the rail service meets today's needs.

Devonshire Park

1. With a shortage of undeveloped land within the central area, Devonshire Park has suffered many encroachments. The Congress Theatre was built in the Park only when plans for a sea front theatre proved impractical and since then, there have been constructed; a) exhibition halls for conferences. B) two car parks, and an office block (claimed at the time as absolutely necessary for Council employees but now rented to a media company), d) the Towner Art Gallery and, e) the International Lawn Tennis Centre. The threat in the AAP to make the park 'a dynamic, changing place' is the threat to make this once peaceful, beautiful and tranquil park just one more place of commercial development. The AAP gives warning that and one of the town's most distinctive and valued features will finally be lost.

Key Summary Points

- *AAP should plan for a bus station interchange, taxi ranks, and adequate parking adjacent to the railway station.*

- *AAP should plan for integrated transport system*
- *Devonshire Park – the threat in the AAP to make the park a dynamic changing place is the threat to make Devonshire Park is one more place of commercial development.*

Response

Enhancing the area around the railway station and other points of arrival into the Town Centre have been prioritised within the AAP and policies have been included to make it easier to move around. The AAP addresses the needs of pedestrians, public transport users and cyclists through policy proposals and priorities.

The AAP seeks to carefully maintain the predominantly open character of Devonshire Park. The main area of the park will be maintained as an important open space in the Town Centre.

NO CHANGES are proposed as a result of this representation.

Brian Eley – Loco Skates (39)

I have opted to e-mail you direct rather than use the online portal. The reason for that is that my concerns are very specific as the owner of a business affected by the proposals, (does that make me a stakeholder?). So rather than comment on the whole AAP I would like to put forward a very specific representation.

My son (Jake Eley) and I are partners in a retail business, Loco Skates, which is located at 10 Station Parade. That falls into what is described as Development Opportunity Site TC19. Potentially that means that the premises which we occupy will be demolished to be replaced by new development.

Our business, which was started in 2004, is not only a high street shop but also a web based business and has grown rapidly in the last couple of years. My son is very well known in the skating industry, partly because he was UK Champion back in 2002, but also because he is involved in skating events nationwide. Last month he brought a national qualifying event to the seafront skate park, in collaboration with Eastbourne Borough Council, as part of the Eastbourne Extreme weekend. We now have two full time staff and anticipate further employment opportunities as part of continued growth.

Our shop is very specialist and consequently we are used as a source for skating products nationally and internationally. At the United Kingdom Rolling Awards we were voted 'Shop of the Year' in both 2009 and 2010. The 2011 event happens later in the year so we retain hopes of achieving that award 3 years in a row. Jake also received a 'Legacy' award in 2010 for his contribution to the rollerskating industry. Our shop custom has its base in the tremendous support we get from skaters in Eastbourne but we also have many customers who travel to the shop. Our location is very important and was chosen because of its proximity to the railway station, not only for people arriving by public transport, but also as an easy way to identify the location of the shop.

The representation which I would like you to put forward to the Inspector/Secretary of State is:

We believe that small, niche and specialist businesses are an asset to Eastbourne, in terms of reputation, employment and image. They contribute to the shopping experience in retail areas. However their business continuity is threatened by the plans which have now been put forward. In particular both this plan, and the previous plan, regard small local businesses as 'niche' and not deserving of a place in the main (primary retail) shopping areas but as businesses which can be shunted off to 'secondary retail frontage'. Any new development will give priority to national retail outlets, partly because of the size of the units but also because the rents involved will not be affordable to small businesses. Ironically those larger businesses are the very ones which are struggling on the high street, (eg. T J Hughes, HMV, Thorntons etc.). My representation is that the plans should include specific provision to develop a mix of outlets in the primary retail area which includes units reserved for niche and local businesses, at affordable rents, which will also give colour and interest in those retail areas.

Key Summary Points

- *Concerns about the AAP are specific as a local business owner*
- *Premises may be demolished as shop falls into development opportunity site TC19*
- *Small, niche and specialist businesses are an asset to Eastbourne*
- *Business continuity is threatened by the plans. Regard is not given to small and niche local businesses*
- *Plans should make provision to development a mix of outlets in the primary retail area which included units reserved for niche and local businesses at affordable rents*

Response

The AAP contains policies to promote a mix of uses in the Town Centre and support secondary and independent retailing. The AAP recognises the need for a balance between the provision of new national and multiple retailers into the Town Centre and the protection of secondary and independent retailing which contribute significantly to the vitality and identity of the Town Centre. Although the area is identified as a Development Opportunity Site this does not mean that redevelopment will come forward on all or part of the site and would only take place with agreement of all landowners. The AAP seeks to protect and enhance other areas of secondary and independent retailing in the Town Centre.

NO CHANGES are proposed as a result of this representation.

Robert Stiles – Stiles Harold Williams (40)

Dear Sirs

1. We act for Selits Ltd (of which I am a director) which is the freeholder of 21 Terminus Road, Eastbourne.
2. We object to the proposal in the AAP that this property, together with others in this section of Terminus Road, might be included in a comprehensive redevelopment

Our objection is because the proposal

3. This same proposal was made originally 5 or 6 years ago and 'blighted' our client's property for a number of years but then in October 2008 we were advised in a newsletter from the Leader of the Council that the proposal would not proceed.
4. our clients therefore then invested a considerable amount of money in this central Eastbourne property, include complete renovation, enlargement of the shop and the creation of two new separate flats.
5. To revive the same proposal again is unjustified when previous attempts at such a project have failed. If it then proved unviable to purchase all these properties in this section of Terminus Road and demolish, there is little likelihood that it will be justifiable again in the future and, as such, is an unsound proposal.
6. In the meantime, our client's property is again 'blighted' and this causes hardship, making the property difficult to sell or impossible to attract a new tenant if necessary, as long as the proposals remaining place.
7. We applaud many of the proposals to upgrade Eastbourne Town Centre and our clients have invested a significant sum in upgrading their town centre property. It provides a good shop and residential accommodation above and its demolition simply to replace it with different retail space is unjustified and unsustainable.

Response

The AAP identifies a number of Development Opportunity Sites in order to accommodate a mix of town centre uses. As a land use planning document this is appropriate in order to meet the wider vision and objectives for the Town Centre.

The categories of proposal identified in planning law as giving rise to blight are:

- **Land Allocated for public authority functions in a development plan;**
- **New towns and urban development areas;**
- **Clearance and renewal areas (under the housing act);**
- **Highways;**
- **New streets;**
- **General improvement areas (again under the housing act); and**
- **Compulsory purchase.**

None of these apply in this instance therefore blight does not apply to the premises in this instance. The AAP allocates the site for retail led, mixed use redevelopment to meet an identified and clearly justifiable need in the town centre.

NO CHANGES are proposed as part of this representation.

Twitter – daVinciArtHotel @EastbourneBC (41)

Town Centre Area Action Plan looks very full and impressive well worth a read. However, too little comment about tourism.

Response

Comments noted and support is welcomed. Tourism is an important part of the economic prosperity of the town and the AAP aims to support this role. Protecting and promoting tourism is also addressed by Policy D3 of the Proposed Core Strategy. NO CHANGES are proposed as a result of this representation.

Twitter - Robcoleman1892 @EastbourneBC (42)

Love the plans for the town centre looks great on paper but hopefully this time round it will happen.

Response

Comments noted and support is welcomed.

David Cooper (43)

Have any positive plans been put forward with regard to raising the standard of the 'Seaside' area from its present uninviting, and desolate appearance. The vibrant and attractive ' North Lanes' of Brighton should certainly be a template for its successful future.

Will the present road network through the town remain unaltered?

Key Summary Points

- *Any plans to improve the seaside area?*
- *Attractive area of North Lanes in Broughton should be a template*
- *Will town road networks stay the same?*

Response

The Seaside area is outside the boundary of the AAP, however Seaside Road is identified as a 'Transition Area' where support will be given to enhance the character and identity of the area. The AAP also includes a chapter on 'Accessing the Town Centre' and seeks to improve opportunities for a better connected Town Centre.

NO CHANGES are proposed as a result of this representation.

David Cooper (44)

Many thanks for your reply to my emails sent in response to your letter. The plans provide a great deal of information and no sensible comment could be made without consideration. However, I would make one observation. There seems to be no provision for Electric Cars and their charging facility. Since this must be a consideration for the future we should be one of the towns to prepare for this eventual and inevitable demand.

Key Summary Points

- *There seems to be no provision for electric cars or their charging facilities*

Response

The AAP includes a section on 'Accessing the Town Centre', where various possible improvements to the highway network are identified. Charging points for electric cars are not referenced within the AAP. **PROPOSED CHANGE TO AAP: Reference will be added to the supporting text to POLICY TC15 Parking in the Town Centre (Paragraph 4.100).**

Chamber of Commerce Presentation Notes 9th August (45)

Comments:

- *Terminus Road needs to be fully pedestrianised*
- *Will issue of ring road and all town centre traffic be looked at?*
- *Need to consider impacts of having Development Opportunity sites in western end of town on eastern end of Terminus Road*
- *Support for Public Space – 'Langney Place'*
- *Could properties in Seaside Road be converted to residential use? Starter homes/affordable housing units*
- *Support for Transition Areas*
- *Need to improve the rear of properties in Terminus Road backing on to Station Street/Mark Lane*
- *Need to provide better signage*
- *Need to improve links between railway station and seafront*
- *Need to provide pedestrian crossing point from railway station into Grove Road*

Response

Comments noted and support welcomed. The AAP contains policies relating to improving movement around the Town Centre, increasing legibility, and identifies priorities for enhancing the public realm. There are proposals for a 'wayfinding' strategy and for an Arts trail to better link together different parts of the Town Centre. The AAP recognises the importance of making it easy to access and move around the town centre by

all modes. The AAP also recognises that parts of Terminus Road could be given greater pedestrian priority. The re-routing of services away from Terminus Road will be difficult but if a proposal could be made to work and has support then it will be seriously considered. Nevertheless the AAP requires design enhancements to the bus area and Terminus Road that will improve the environmental quality and character of the area whatever solution is found for the bus routes. Improvements to pedestrian crossing facilities at the junction with Terminus Road/Ashford Road/Gildredge Road will also improve pedestrian accessibility.

The AAP identifies Seaside Road as a Transition Area to encourage different uses and reduce vacancy. The AAP also sets out public realm enhancement priorities to include Terminus Road. The AAP identifies locations where new residential development can be brought forward in the Town Centre, and supports mixed used development.

NO CHANGES are proposed as a result of this representation.

Attenborough (46)

My comments and Observations on Town Centre Area Action Plan. I read the full document, the only copy held at the Central Public Library.

I was born in Eastbourne in 1933; except for nine months evacuated to Horam, I experienced all the bombing and the build up of troops before D-Day. I went to school here from the age of six to seventeen, then left the town as a resident until 21 months ago.

I love Eastbourne; the setting is great, sea, downs, and glorious inland countryside in every direction. I, my wife and children have visited it for holidays to visit my mother who retired here thirty five years ago, and to see friends every year of my life except for two.

I care about the town, it only has one monstrosity the block of flats above Holywell. Most of the war damage was replaced by buildings in keeping with the neighbours, this should continue, no tall blocks and no glass clad buildings.

I think we come to Eastbourne, precisely because it doesn't drastically change. We don't go to Sovereign Harbour because it is alien. The Town Centre, Upperton, Old Town, Ocklynge and Meads are essentially the same as they were a hundred years ago. Most of us delight in the Congress Theatre, the new Towner, and the soon to open Birley Centre. What a handsome trio they make, a pleasure to visit them.

I've read the relevant letters in the Heralds of the last three weeks in July, some telling points.

Coming to the plan itself I'd like to comment on various clauses as follows: -
'Pride of Place'

2. A vision.... I agree 2.1 – 8 the following are most important:-

2.9 Integrated approach for all transport, particularly pedestrians and Public Transport.

2.10 High quality contemporary urban design

2.11 pedestrian links, Town Centre, railway station, and seafront (but crossed by buses etc remember). I like the Grove Road photo P.10.

3.6 I agree

3.11 'Little Chelsea', a meaningless and inappropriate name, drop it. Never will be a key secondary retail location. It needs to serve special interests, and world cuisine; above all 'quality'

3.14 – 20 Approaches. I agree except about Gildredge Rd. Visitors by rail to world class exhibitions at the Towner walk this route and College Road direct to the Towner, and thence Carlisle Rd restaurants and seafront. Those to the Tennis too. The only useful bus is route 3 but visitors are unaware of this rather unreliable service which finishes at 6:30pm

Good 3 storey building photo p.19

Ludicrous 2nd floor blob on photo p.20. 2 separate design thoughts stuck together.

4.32 Evening and Night Economy.....'some new bars'. Need to be few and located to cause least disturbance when they close

38-44 I agree. Arts Trail. Good 4 storey building photo p.30.

4.53 A brilliant turn a corner building is the 'Lutyens-esque' Natwest bank, fine ceilings too.

4.59 Careful, the 18-storey block of seafront flats are an eyesore from miles away even. 8 storeys should be the limit, its only 'show off' architects and developers that adore them, limit the buildings to 8 storeys in photo p.32 and yes they're acceptable.

Heritage 4.64 – 67, I agree, and to Sustainable Design 4.68 – 81 I agree. Also to photos on p.35 and p.36

The Memorial roundabout is a nightmare to cross all the roads. Does it have to be a total roundabout? I'm afraid it does as all the roads are important.

4.84 'waymarking' needs to be much clearer

4.85 Lots of bus stops and in both directions can only be unappealing to look at but the position near the railway station and shops is ideal.

4.88 I agree

4.89 – 97 Policy TC14 I agree except, 4.94. I have yet to hear the bus users ever complain of bus noise, nor of air quality. We want our buses there; there is nowhere else that makes any sense so forget pretty drawings of young people walking there with not a care in the world. Pavements alongside the Terminus Road bus stops cannot be widened, buses have to pass each other, its not ideal but the prospect of no buses is stupid.

Town centre Movement 4.101 – 04 I agree

Site One – the sketch on p.47. An inappropriate new corner building. Should be in keeping with the existing stucco or stock bricks; get a majority opinion from passers by of the existing Gildredge. Personally I'd like to see a 4 storey stock brick pub with slate roof.

Site 2 – you said keep the railway station clock tower as the focal point; now a sketch of multi storey flats with a 'sail' roof and acres of glass wall. Car parking and taxis must be retained in this view of the entrance to the station. It is much more pleasant arriving and departing by car or taxi here than at the far side of the station. Also the wrong area for restaurants, too much traffic.

Site 3 - New proposals in sketch are out of scale, should be 4 storey maximum if keeping existing shops etc opposite. Again wrong place for restaurants.

Site 4 – Keep to 4 storeys, the most notable building is the old 1920's picturedome, now Curzon, cinema. Incidentally it never closed during the war. It too has fine original features inside. I agree traffic free there is a big improvement and this is achievable, just means relocating the taxis serving the town centre in Bolton Road.

Site 5 - I agree 5 storey maximum – TC.22

Traffic. With Bolton Rd/Langney Rd pedestrianised you can't put all traffic on the seafront. Already very slow moving in the summer. The carpet gardens must be retained, which means you can't widen the road in front of the Burlington Hotel. So, seaside Road to war memorial has to be 2 way traffic. Controlled by lights at coop corner, but with no traffic from the seafront to this point

Transition Areas 1&2 I agree

Area of change 1&2 I agree

Eastbourne has an identity to be proud of. Namely the Pier, the 1930's bandstand which should never have had purple paint applied over its lovely permanent self finish surface and why is it not listed; and the seafront from Holywell to the Pier with its 3 levels of promenade with attractive planting in between. Shame about the intense blue railings and twee names for paths. The original sea 'turquoise' colour was softer and less in your face, why was it changed? Its lovely round the Wish Tower too.

Buildings of merit include the Lamb Inn, the railway station; the old no longer used G.P.O why? The Town Hall, the Natwest corner Bank, St Saviours Church, the War Memorial, the T.U.C centre on the seafront and the trio of post WW2 Arts buildings. There is nothing wrong with contemporary modern buildings of the right materials for the location. Oh yes, shame the concrete structure of St Elizabeth's Church is failing. I'll be sorry if that nicely detailed red brick building has to be taken down.

It's been a pleasure for me to write the above; should you wish to bin it that's fine with me too.

Key Summary Points

- *Integrated approach to transport, particularly pedestrians and public transport*
- *High quality Urban Design*
- *'Little Chelsea' is a meaningless and inappropriate name –this area needs to serve a special interest*
- *Approaches – agree except about Gildredge Road*
- *Evening Economy – 'some new bars' need to be located to cause least disturbance*
- *Waymaking needs to be clearer.*
- *Lots of bus stops can be unappealing to look at*
- *Agree with policy TC14 except 4.94, want buses there*
- *Sketch on pg 47 – inappropriate new corner building, should be in keeping with existing stucco or stock bricks*
- *Site 2 – car parking and taxis must be retained. Wrong area for restaurants, too much traffic.*
- *Site 3 – new proposals in sketch are out of scale, should be 4 storey max and wrong place for restaurants.*
- *Site 4 – keep to 4 storeys. 1920's old picturedome has fine original feature. Traffic free is a big improvement and is achievable*
- *Site 5 – 5 storey max*
- *Can't put all traffic on the seafront already slow moving in summer.*
- *Agree with transition areas 1 and 2 and area of change 1 and 2.*
- *Eastbourne should be proud of its identity with lots of key features e.g. the pier and 1930's Bandstand.*
- *Nothing wrong with contemporary modern buildings of the right materials for the location.*
- *Will be sorry if St Elizabeth's Church is taken down.*

Response

Comments noted and support is welcomed. The AAP aims to make the Town Centre accessible, easy to get to and move around, with a particular emphasis on pedestrians and public transport users. This includes proposals for a waymarking strategy. Detail design policies are set out within the AAP for built form and public realm to ensure that high design standards may be applied to proposals within the Town Centre. The illustrations are for information only and do not represent fully worked up design proposals. Opportunity Site 2 retains a significant element of car parking. Storey heights are expressed as a maximum and detail development proposals will be subject to the design policies in the AAP.

NO CHANGES are proposed as a result of this representation.

TCMI Group – Tony James (47)

Whilst we are pleased with the Proposed Submission Town Centre Area Action Plan overall there are some sections that we consider unsound.

Section 4 – Town Centre Policies

We have strongly held views that Policy TC14 in particular is unsound. This also therefore impacts on Policy TC 4 which we also consider to be unsound for the following reasons:

Policies TC4 defines primary retail frontages as:

The Arndale Centre

11 to 155 Terminus Road

96 to 170 Terminus Road

1 to 3 Langney Road

2 to 4 Langney Road

We believe this policy to be unsound as it is likely to restrict the viability of the town centre primary retail area and should be amended to include 46 – 94 Terminus Road. This will provide opportunity for further retail only led expansion of the high street prime retail offer and further increase connectivity to the secondary areas of little Chelsea and Cornfield Road as defined in the Objectives in the Town Centre Vision of the AAP and as stated in 4.9 Retail Development in the Town Centre:

*There is a clear desire to ensure that Eastbourne retains and strengthens its retail offer and consolidates and enhances its position as a shopping destination so that it can compete effectively with other nearby shopping destinations including Brighton and Hove and Royal Tunbridge Wells. This is reflected in **Policy D4** of the Core Strategy.*

Section 4 – Arriving in the Town Centre

We believe that Policy TC14 is unsound as buses should be separated from pedestrians if this area is to maximise its potential to increase the economic viability of the town centre. 4.89 states:

‘At present the experience for many people arriving into the town centre is either ambivalent or poor. Approaches and gateways, including the external environment of the railway station, Town Centre car parks, and the bus stops on Terminus Road, are not well defined and the onward journey from the point of arrival does not always portray a positive message about the Town Centre and its attractions’.

The strong likelihood of increasing bus movements as their use increases during the period of this AAP also will limit or negate the required improvements to noise and air quality as defined in 4.94 of the AAP.

We suggest that policy TC14 should be amended to read:

“Policy TC14 Public Transport Interchange

The Council will bring forward measures to relocate the present Terminus Road Public Transport Interchange as part of a comprehensive, design-led scheme in conjunction with proposals at the Development Opportunity Sites on Terminus Road and the railway station. The scheme for the public transport interchange will include to measure to:

- Implement full pedestrianisation of Terminus Road from its junction with Ashford Road to its junction with Cornfield Road;
- Relocate the bus stands into an integrated quality transport interchange adjacent to the Railway Station exploring options for other locations within close walking distance;
- Co-ordinate the design of street furniture and signage which will be finished to a high standard befitting a key gateway into the Town Centre;
- Provision of improved cycle parking, signage and routing;
- Improve the availability and reliability of real time information.

In addition the council will explore the potential to provide an attractive and welcoming passenger waiting facility with real time information available as part of redevelopment proposals that may come forward in the area.”

We formally request that our submissions be incorporated in this document.

Key Summary Points

- *Consider some sections of the AAP to be unsound*
- *Policy TC14 in particular is unsound which impacts on Policy TC4.*
- *Policy TC4 – unsound as it will likely restrict viability of the town centre primary retail areas and should be amended to include 46 – 94 Terminus Road.*
- *TC14 unsound – buses should be separated from pedestrians if this area is to max its potential for increased economic viability of the Town Centre.*
- *Strong likelihood of increasing bus movement as their use increase will limit or negate the required improvements to noise and air quality as defined in 4,94 of the AAP*
- *Suggest amendments for Policy TC14, to be incorporated into the AAP*

Response

Comments are noted. The extent of the primary retail area in the Town Centre has been carefully considered having regard to the quality of existing retail and proposals being put forward as part of the Development Opportunity Sites. At present 46 to 94 Terminus Road functions as a secondary retail location. The area behind in Station Street and Mark Lane has a further distinctive character and the AAP therefore identifies that whole location as a Transition Area where a mix of uses will be supported. This will be complementary to the wider aims and objectives of the AAP to support a mix of uses in the Town Centre in addition to primary and secondary retail.

The AAP recognises the importance of making it easy to access and move around the town centre by all modes. The AAP also recognises that parts of Terminus Road could be given greater pedestrian priority. The re-routing of services away from Terminus Road will be difficult but if a proposal could be made to work and has support then it will be seriously considered. Nevertheless the AAP requires design enhancements to the bus area and Terminus Road that will improve the environmental quality and character of the area whatever solution is found for the bus routes. Improvements to pedestrian crossing facilities at the junction with Terminus Road/Ashford Road/Gildredge Road will also improve pedestrian accessibility.

NO CHANGES are proposed as part of this representation.

Multiple residents (49)

As residents of the Town Centre we wish to comment upon the soundness of the document 'Eastbourne Town Centre Area Action Plan', as allowed under Para 1.20. It is believed that a few matters, vital to the well-being of Town Centre residents, have been over-looked or are ambiguous.

Page 25, Evening and Night-time Economy – this section causes great concern. It is alarming that these two very different economies are dealt with as one

The Evening Economy is one of warmth, friendship, family run, leisure activities, arts and entertainment and forms a large part of many tourists' and residents' happy memories. It should be available to all and enjoyed by all. The vitality and vibrancy it brings to our town is welcomed. Within the Plan it is good to see so much positive attention is paid to encourage and strengthen it.

Conversely, the Night-time Economy is a culture carried out in darkness. It is one of noise, drunkenness, rowdy-ism, violence, vandalism and anti-social behaviour. It demands excessive use of the Police, hospital services and voluntary resources well beyond the reasonable needs of any other social group. It is fuelled by alcohol and carries on beyond 4.00am. The fall-out from this directly impacts adversely on the lives of residents throughout the town centre and discourages many tourists and residents from using the town centre during this time. Any promotion or encouragement of this economy is anathema to us and it is regrettable that there is nothing in the Plan to facilitate the control of this economy or ameliorate its effects.

It is alarming that these two very different economies are dealt with as one instead of identifying the requirements of each.

Within the Plan

1. Pages 14/15 – Character Areas: this chapter notes that currently areas are home to both of these activities and that both economies will be promoted. It seems to indicate that they will be treated as one. Is there to be no specific area or any off-limits for the Night-time Economy? Is the assumption to be that night-clubs, pubs, bars, etc can be inflicted on any neighbourhood? If the latter is so, these circumstances will be unacceptable.

2. Page 16 – Approaches, Gateways, etc: there are to be ‘pathways’ between the day-time and evening culture areas but there is nothing mentioned about pathways, which can be monitored and provided with appropriate facilities, for wandering night-time drunks for their eventual dispersal beyond the town centre.
3. page 25 – Evening & Night-Time Economy: 4.30/31/32/33. It is evident that here the two economies are named and treated as one although the two economies are separate with no commonality and are not inter-related. It appears that this section and much within it indicates a lack of understanding or experience of the workings of Eastbourne at night. It is suggested that it should be looked at again, revised and care taken to avoid the current ambiguities.
4. Page 19: - Mix of Uses: 4.5 This paragraph is inexplicable. It is simply that a full mix of use, including the night-time economy, will (a) ‘*provide informal policing*’, (b) ‘*encourage families, holiday makers and many residents to use the town centre at night*’ and (c) have any role other than a negative one, in ‘*Crime Prevention*’ or the reduction in the ‘*fear of crime*’.
5. Page 19: - Mix of Uses: 4.6 (and 2.2.6) – it is claimed ‘...*everyone should feel safe and welcome at all times of the day and evening*’. Everyone has the Right to expect to be safe 24 hours a day and the Right to live a peaceful life. Again this statement suggests a lack of understanding of what the night-time economy involves, who participates and in what condition.

There is much within the Plan which inspires and meets with full approval. Town Centre residents – by definition, are happy to share their ‘realm’ with the public – but this should not mean that they must approve a plan for decades ahead for the continuation of the wide-spread blight on their lives caused by the excessive consumption of alcohol. This is particularly important when bearing in mind the future economic and financial restraints and the inevitable cost-cutting in public services currently attempting to control these effects.

Therefore you are urged to consider amending the Plan to encompass three economies within Eastbourne – (i) day-time tourism, retail and commercial, (ii) evening social environment, and (iii) the night-time economy which starts around 11pm and finishes about 4.00am; and include what may be necessary to manage the last. Residents will be keen to learn what is planned for future nights in the town centre.

Two further points relating to other matters need consideration:

- 1) Page 17 and 27 – Policy TC2 & 8 – HOWARD SQUARE appears to have been overlooked. It should be included and brought up to the standard of Wilmington Square. It is also an alternative access to the theatres, Arts Trail and a route to the Memorial Roundabout.
- 2) Page 41 – Policy TC14 – This is an opportunity to move the Bus Terminals away from ‘Diesel Alley’ and it should not be lost. It is suggested that a new terminal should be located in Ashford Road adjacent to the rail terminus. With the focus on pedestrians, the enlargement of pavement areas and thus the narrowing of roads, a one way system should be considered from West to East. Public Transport could then move in a circular system along Terminus Road, Cormfield Road, Trinity Trees. Incoming traffic would be East to West and move along Memorial Roundabout, South Street, Gildredge Road to Ashford Road terminus. This would link in with the enhancement specified under TC13.

Thank you for the opportunity to comment upon the Plan.

Key Summary Points

- *Matters vital to wellbeing of the Town Centre have been overlooked or are ambiguous*
- *Evening and Night- time economy section causes great concern*
- *Evening and Night – Time are very different. Evening economy is good and positive and it is good to see so much positive attention is paid to encourage and strengthen it.*
- *Night – Time is a culture carried out in darkness; one of noise, drunkenness etc. Fall out directly impacts adversely on lives of residents and discourages tourists and residents using the Town Centre. Promotion of this economy is regrettable*
- *Is the assumption to be that night clubs, pubs, bars etc can be inflicted on any neighbourhood (pg14/15)*
- *Pg 16 – appropriate gateways – nothing mentioned about pathways which can be monitored and provided with appropriate facilities.*
- *Appears to be a lack of understanding of how Eastbourne operates at night*
- *Pg 19 mix of uses 4.5 para is inexplicable. 4.6 reinforces apparent lack of understanding of what night – time economy involves.*
- *Much of the plan inspires and meets with approval*
- *Urge plan to be amended to encompass 3 economies*
- *Policy TC14 – opportunity to move the Bus terminal away from Diesel Alley suggest new terminal to be located in Ashford and adjacent to the rail terminus*
- *One way system should be considered from west to east, public transport could then move in a circular system along Terminus Road, Cornfield Road, Trinity Trees.*

Response

Comments are noted and support is welcomed. The AAP carefully considers the evening and night time together in order to provide a more balanced approach to diversifying activities and attractions to appeal to a much wider group. Issues of potential disturbance between different uses are considered as part of the AAP and policies set out against which proposals will be assessed. Licensing issues are acknowledged as part of the AAP and an amendment is proposed.

PROPOSED CHANGE TO AAP: amend first sentence of paragraph 4.33, page 25 to read “Within these areas later opening will be considered subject to the cumulative impact of proposals in order to minimise the potential for noise and disturbance. All licensing applications or variations will be considered in line with the relevant legislation existing at the time”.

The AAP recognises the importance of making it easy to access and move around the town centre by all modes. The AAP also recognises that parts of Terminus Road could be given greater pedestrian priority. The re-routing of services away from Terminus Road will be difficult but if a proposal could be made to work and has support then it will be seriously considered. Nevertheless the AAP requires design enhancements to the bus area and Terminus Road that will improve the environmental quality and character of the area whatever solution is found for the bus routes. Improvements to pedestrian crossing facilities at the junction with Terminus Road/Ashford Road/Gildredge Road will also improve pedestrian accessibility.

Highways Agency (50)

Thank you for your correspondence inviting the Highways Agency (HA) to comment on the Eastbourne Town Centre Area Action Plan (AAP).

The Highways Agency, on behalf of the Secretary of State for Transport, is responsible for managing and operating a safe and efficient Strategic Road Network (SRN) i.e. the Trunk Road and Motorway network, in England as laid down in Department for Transport (DfT) Circular 02/2007 (*Planning and The Strategic Road Network*).

Although there are no trunk roads in Eastbourne Borough, it may be that the cumulative effect of development in the borough could have an impact on the A27 to the north and more specifically the Cophall roundabout and A27/A2270 junction. The A27 currently experiences congestion to the west of Polegate and stress is expected to increase throughout the plan period. We will, therefore, be looking for the AAP to be promoting sustainable access to the town centre to help reduce the impact of development trips on the SRN.

In correspondence dated 21 July 2010, we provided comments on the Issues and Options Town Centre AAP. We will be looking to ensure that our comments have been taken into consideration within the final AAP and that the AAP reflects the vision of the town centre detailed in the Core Strategy.

5.0 Site Specific Proposal

Development opportunity sites

Five development opportunity sites have been identified in the Town Centre AAP and have been described in Policies TC17 – TC22. The sites are all mix use and are located in close proximity to the railway station and bus stops. The location of the development sites in relation to the public transport interchanges is welcomed and in accordance with the principles of PPG13 and should help to reduce the impact of development trips on the SRN.

The Core Strategy identifies the town centre as providing 436 dwellings as part of the wider Eastbourne strategy. The monitoring framework summarised in Table 2 indicates that the target for the five development sites is 450 dwellings. We are, therefore, satisfied that there is adequate consistency between the Core Strategy and the vision outlined in the AAP, this is in accordance with PPS12. It will be important that as planning applications come forward for the development sites that the site specific criteria is taken into account to allow the correct quantum of development to be permitted.

6.0 Implementing and Monitoring

In order for the AAP to be classified as sound it must be deliverable in accordance with PPS12. A range of delivery mechanisms have been identified to implement the proposal outlined in the AAP. We are satisfied with the range of mechanisms particularly those relating to the proposed development sites where a master planning approach is identified.

Evidence Base

Although not mentioned within the AAP, the level of development outlined within the Core Strategy and AAP has been assessed as part of the South Wealden and Eastbourne Transport Study (SWETS). Having reviewed the SWETS outputs as part of the Core Strategy we are content that the impact of development in the town centre is unlikely to have a material impact on the SRN. The HA are keen to ensure that future development in Eastbourne does not have a detrimental impact on the SRN outside of the Eastbourne boundary.

I hope the above information has been useful, please do not hesitate to contact me if you have any queries.

Key Summary Points

- *Although no trunk roads in Eastbourne borough, it may be that the cumulative effect of development in the borough could have an impact on the A27 to the North and the Cophall Roundabout and A27/A2270 junction.*
- *Looking to the AAP to be promoting sustainable access to the Town Centre help impact of development trips on the SRN.*
- *Looking to see if comments made on the issues and options have been taken into consideration within final AAP.*
- *Location of development sites in relation to public transport interchanges is welcomed*
- *Satisfied that there is adequate consistency between the AAP and the Core Strategy*
- *Satisfied with the range of mechanisms of delivery, implementation and monitoring, particularly those relating to the proposed development sites.*
- *Having reviewed the South Wealden and Eastbourne Transport Study, content that the impact of development in the town centre is unlikely to have a material impact on the SRN.*

Response

Comments noted and support is welcomed.

Environment Agency (51)

Thank you for your consultation on the above document. We have only one recommendation with regards to your Town Centre Objective 12, 'Sustainable development'. While you have set no specific sustainable development policy requirements within the AAP relating to this objective, we are satisfied that the reference to your Core Strategy Policy D1 *Sustainable Development* will achieve this objective. To add clarity and strength to this objective in your AAP we recommend that you make specific reference to Core Strategy Policy D9, *Natural Environment*. This will mean that requirements relating to biodiversity and flood risk issues are fully taken into account through the implementation of your AAP. Please contact me if you have any questions regarding the above points.

Key Summary Points

- *Recommend making a specific reference to Core Strategy policy D9 Natural Environment; will mean biodiversity and flood risk issues are fully taken into account through implementation of the AAP to Town Centre Objective 12.*

Response

Comments noted and support is welcomed.

PROPOSED CHANGE TO AAP: Reference to be added to Town Centre Objective 12.

Natural England (52)

Thank you for your consultation on the proposed submission version of the Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA) report for the Eastbourne Town Centre Area Action Plan (AAP). The report and Non Technical Summary are clearly presented. Natural England concurs with the key environmental sustainability issues identified in Section 3.25 and the SA objectives listed in Table 2 (Section 3) against which the AAP policies have been appraised. We are pleased to note the AAP will seek to protect and enhance biodiversity where possible, eg through implementation of green roofs and encouraging development to incorporate biodiversity enhancement (Paragraph 5.4). In addition, the use of sustainable drainage systems (SuDS) to address flood risk can contribute to this. This is in accordance with Local Biodiversity Action Plan (LBAP) objectives. We also commend the inclusion of policies to seek reducing carbon dioxide emissions and local air and water pollution, encourage sustainable design in new development and improve access to open spaces.

Key Summary Points

- *concur with the key environmental sustainability issues identified in section 3.25 and the SA objectives listed in table 2 (section 3)*
- *Pleased the AAP will seek to protect and enhance biodiversity where possible.*
- *In accordance with Local Biodiversity Action Plan objectives*
- *Commend inclusion of policies to seek to reduce Carbon Dioxide emissions and local air and water pollution and encourage sustainable design in new developments*

Response

Comments noted and support is welcomed.

Jonas Elsen-Carter (53)

Introduction

Eastbourne definitely needs an updated town centre. At the present time, it still has certain 1980s aspects to it, which to some degree makes the town little outdated, especially since the current town centre is limited in space within the ring road boundary. The town now having a population that is bordering, if not just exceeding, the one hundred thousand mark, is quite restricted in terms of size where new development is concerned. If the town centre is to be modernised and improved, it requires that definitive edge that would draw people here rather than wanting to go to nearby towns such as Brighton, Tunbridge Wells or Hastings where visitors are concerned. For this to happen, major retailers such as H & M, John Lewis, River Island and Gap need to be encouraged / persuaded to open stores in Eastbourne. Eateries should include names such as TGI Fridays and Nandos. Naturally, local businesses should also be encouraged to locate into the new improved town centre, as without them, Eastbourne would be just another town like any other.

The local population (Eastbourne, Seaford, Hailsham, Willingdon and Polegate, plus immediate surrounding villages) should have a major town centre to be proud of, both in architectural design and environmental planning. It may even go as far as visitors coming to Eastbourne because of the new cutting edge architecture with the environment in mind. The plan should not just include the area of forty properties in Ashford Road. All the properties behind the existing Arndale Centre in Longstone Road and Tideswell Road should also be included in the plan, and thus you are also including the shops in Susans Road and (re)vitalise that part of town, too. When increasing the town centre retail development by 50%, it should be considered that the new larger improved shopping centre be given a new overall name. One of the obvious choices may be 'Devonshire Place Shopping Centre' in view of the ties that Eastbourne has with the House of Devonshire.

Railway Station, Bus Terminal and New Public Square

The proposed new town centre should also include re-siting the railway station back to the corner of Ashford Square and Susans Road, with a new purpose built modern station in architecture similar to Hastings station or Stansted Airport Terminal. This will need to be in co-operation with Network Rail. The move of the railway station to this location would then create a public open square where the platforms of the existing station and rail lines are at present. Immediately in front of the new station there should be a purpose built bus terminal, thus integrating bus and rail in one location. The square that is created in between the new railway station / bus terminal and the old station building could then be tastefully created similar in style as shown above for Dundrum Town Centre. The new square would then be able to be used for a variety of events, such as open air exhibitions, continental markets and a weekly / twice weekly market. It would also become an open space where cafes could line the perimeter. Tree and shrub planting would add to the environmental aspect of the square

New Purpose for the Old Station Building

The old station, due to being a listed building could be redeveloped, without spoiling the architecture, into a large indoor market hall to the calibre matching the Saluhall in Östermalm, Stockholm, which is a mix of high class food retailers, cafes and restaurants. The old station building could also be joined to the Enterprise Centre to extend the market hall experience.

Café and Restaurant Quarter

Mark Lane and Station Street should be combined with Hyde Gardens and create a café and restaurant quarter, similar to that of the Lanes and North Laine in Brighton. The existing cafes, public houses and restaurants in Station Street and Hyde Gardens should remain if possible and be joined by others, while establishments currently facing the bus terminal in Terminus Road, should also have entrances in Station Street. The three streets ought to be paved or cobbled in order to create a more relaxed and pedestrianised atmosphere.

New Framework for Environmentally Friendly Architecture

All new buildings or refurbishment/replacement of buildings should be subject to an environmental building code, making use of energy saving technology and environmentally friendly building materials. Prime examples are the New England Quarter in Brighton and retail units with accommodation above in Tallaght, in the west of Dublin, Ireland.

Additional Comments received

Introduction

Further to my previous submission from 5 September 2010 (copy attached) this is an appendix to that document that has arisen, since 5 September 2010.

Ring Road

The ring road should be redefined as follows, in order to increase the development potential within the ring road boundary for retail and leisure. The Avenue, Upper Avenue, Cavendish Place, Seaside Road, Trinity Trees, South Street, Gildredge Road, Terminus Road, Upperton Road. By extending the boundaries, the area inside the ring road would increase the possible development area.

Thinking outside the box

So far, all ideas that have been presented in the past were limited.

Nobody has been 'thinking outside the box'. For instance, the retail area could extend over the railway station, onto the present railway car park. The exist of the Arndale Centre onto Ashford Road, by Sainsbury's would lend itself perfectly for this idea. Here a second shopping centre could be appended, with an escalator up one level, and taking the new added shopping complex above the railway station. This new shopping development could then take the name 'Railway Plaza' to give an example. It could have escalators down onto the platforms 1, 2 and 3 on Eastbourne railway station, as well as a further escalator with a covered 'platform like' area for the bus terminal. See examples (source: Utrecht, The Netherlands)

Also, by having redefined the ring road to go via The Avenue rather than Ashford Road, the additional shopping development (e.g. Railway Plaza) could border up onto St Leonard's Road and Commercial Road

Open Public Spaces with Restaurant and Café Quarter

There is a need for more open public spaces, such as Hyde Gardens, where car parking* should be totally eliminated and the area turned into a green public space, with shrubbery and tree planting, benches, two or three kiosk style cafés with outside seating (covered or not covered). Add Cornfield Road to the open space at Hyde Gardens as a pedestrianised street.

Develop Station Street, Mark lane, as well as Hyde Gardens as a restaurant and café quarter, by cobbling or tiling the surface of the roads, to give a more village feel. See example (source Meersburg town centre, Germany).

New car parking could be allocated elsewhere within the ring road area, e.g. the existing coach station in Junction Road could be incorporated into the new bus station alongside the railways under the covered 'platform like'.

The green planting, as indicated for a greener Hyde gardens, could then also be extended into Terminus Road, and thus turning that part, which is currently known as 'Diesel Alley' into a lush and attractively paved pedestrian area. The section of Terminus Road between the Wetherspoon London & County public house and HSBC Bank could then also be renamed to, for instance, Railway Street.

Likewise, with additional planting added to the existing pedestrian precinct of Terminus Road (from NatWest to Nationwide) could then officially become Sussex Gardens and drop the name of Terminus Road altogether. The 'square like' area created by the three streets (the aforementioned renamed Railway Street, Sussex Gardens and Cornfield Road) joining together at the banks could be given the name of either Bank Square or Cornfield Square, whilst Cornfield Road, having become part of the pedestrianised area, would be renamed from Cornfield Road to Cornfield Row.

Access Into the Town Centre

Improved access to the town centre should also be secured. The ideal way would be to complete the road building programme that had been planned previously in the late 1980's whereby a new road (dual carriageway) would come off west of Lottbridge Drive just north of Caffyns, going across the railway line, over the land at Tutts Barn lane down towards the Upper Avenue, where Whitley Road and Bedfordwell Road join.

Land would need to be set aside for this, before other plans to build on that site (where currently a disused council depot is) are to go ahead.

Planning Regulations

Eastbourne Borough Council should adopt a green approach to planning application, Sustainability, environment and ecologic ethics should become standard. This way Eastbourne could be the leader in the South East, if not the whole country, in green building code.

Key Summary Points

- *If town centre is to be modernised and improved it requires a definitive edge that would draw people in*
- *Major retailers such as H&M, John Lewis etc need to be encouraged to open stores in Eastbourne*
- *Local businesses should be encouraged to locate into new improved town centre*
- *Local population should have a Town Centre to be proud of. Plan should not just include the area of 40 properties in Ashford Road, all the properties behind the existing Arndale centre in Longstone Road and Tideswell Road should also be included in the Plan*
- *Should be considered that the new larger improved shopping centre be renamed – e.g Devonshire Place Shopping Centre*
- *Proposed new Town Centre should include re siting of the railway station back to corner of Ashford Square and Susans Road – moving the station could create a public square which could be used for a variety of events.*
- *Old station should be redeveloped without spoiling architecture*
- *Mark Lane and Station Street should be combined with Hyde Gardens and create a café and restaurant quarter similar to the Lanes in Brighton.*
- *All new building/refurb should be subject to environmental building codes.*

Key Summary points of additional comments submitted

- *Ring Road should be redefined to increase the development potential within the ring road boundary for retail and leisure.*
- *No one is thinking outside of the box. E.g. retail areas could extend over the railway station onto the present railway car park and a shopping centre created*
- *There is a need for more public space, such as Hyde Garden where car parking should be totally eliminated and the area turned into green public space*
- *Development Station Street, Mark Lane as well as Hyde Gardens as restaurant and café quarter.*
- *Green Planting indicated for a greener Hyde Gardens could be extended to Terminus Road.*
- *Could rename section of road between Terminus Road and the Weatherspoons Pub and HSBC to 'Railway Street'*
- *Additional planting on pedestrian precinct of Terminus Road could become 'Sussex Gardens'*
- *Improved access to the town centre should be secured*
- *Council should adopt a green approach to planning applications.*

Response

Comments noted and support is welcomed. The AAP does not propose any alterations to the ring road. A balanced movement strategy is promoted with priority given to sustainable transport including public transport, walking and cycling. The AAP also identifies 5 Development Opportunity Sites which will accommodate a mix of town centre uses including extensions to the Arndale Centre. Moving the railway station and the incorporation of overhead walkways are noted, but these are unlikely to be financially viable or feasible proposals. The AAP includes measures for sustainable development supported by Policy DC1 of the Proposed Core Strategy. The AAP also includes policies to support and promote high quality design as part of proposals for buildings and the public realm.

NO CHANGES are proposed as part of this representation.

Andrew Keer ESCC (54)

The County Council considers the Proposed Submission Eastbourne Town Centre Area Action Plan to be legally compliant and sound and provides the following comments in support of the following policies within the Plan.

Policy TC14 Public Transport Interchange

The County Council welcomes and supports this policy. The measures outlined for Terminus Road accord with our Local Transport Plan Strategy approach for making bus travel an attractive and realistic alternative to the private car, providing sustainable access to services, local facilities and employment opportunities for all resident. The wider measures around the public transport interchange such as improved crossing facilities between bus stands and the railway station will help deliver improved accessibility for pedestrians, cyclists and public transport users within Eastbourne town centre and accords with our LTP strategy approach for Eastbourne.

Policy TC15 Parking in the Town Centre

The County Council supports this policy which accords with our Local Transport Plan Strategy approach for Eastbourne, in particular the development and implementation of a parking strategy for on and off street parking in the town. The incorporation of cycle parking in the design of public realm at key locations and in new development schemes is supported.

Policy TC16 Town Centre Streets

The County Council supports this policy. The proposals for pedestrian crossing facilities and simplified junction arrangements in the town centre accords with our Local Transport Plan strategy approach for Eastbourne, namely to focus on improvements to and safety of key walking routes and corridors of movement. The County Council acknowledges the potential benefits of returning town centre roads to two-way operation but is pleased to note that any potential impacts on the wider operation of the Town Centre ring road will need to be considered as part of any detailed design process.

Key Summary Points

- *County Council considers the AAP to be legally compliant and sound*
- *Policy TC14 – welcome this policy. Measures outlined for Terminus Road accord with Local Transport Plan Strategy for making bus travel an attractive alternative.*
- *Policy TC15 – support policy, is in accordance with Local Transport Plan Strategy – implementation of a parking strategy for on and off street parking in particular.*
- *Policy TC16 – support policy. Council acknowledges the potential benefit of returning Town Centre roads to two way operation but pleased to note that any impacts on wider operation of the Town Centre ring Road will need to be considered as part of detailed design process.*

Response

Comments noted and support is welcomed.

Linda Sherlock (55)

It all looks good on paper and I wish the Council luck in fulfilling its ambitions. Can I please make a suggestion? That the Council, if it hasn't already done so, might care to contact the likes of the John Lewis Partnership in the hope of securing them as an anchor store for the proposed new development. The presence of such a store would help ensure that the leases on all the smaller retail outlets in town would be taken up to enjoy the benefits of the increased footfall that the anchor store would undoubtedly attract.

Response

Comments noted and support is welcomed.

Bob Gough. Neighbourhood Management Action Group (56)

As discussed on behalf of the above group wish to make representation in respect of the above on the grounds of soundness. It refers to section one, page 25, paragraph 4.33, in relation to Evening and night time economy.

The first sentence can be interpreted that later opening hours would be considered and of course there is already premises open until at least 3am. This has caused some concern especially in the light of current antisocial behaviour and public place violent crime resulting from the night time economy. It would be less contentious perhaps if the first sentence was changed to something like "All licensing applications or variations will be considered in line with the relevant legislation existing at the time". Thereafter leaving the remaining paragraph the same.

Response
Comments noted.

PROPOSED CHANGE TO AAP: amend first sentences of paragraph 4.33, page 25 to read "Within these areas later opening will be considered subject to the cumulative impact of proposals in order to minimise the potential for noise and disturbance. All licensing applications or variations will be considered in line with the relevant legislation existing at the time".

Amend last sentence of Policy TC7 to read "The individual and cumulative impact of proposals will also be carefully considered in order to minimise the potential for noise, nuisance and disturbance."

Southern Water - Chris Kneale (57)

Thank you for the opportunity to comment on the Eastbourne Town Centre Area Action Plan. Southern Water is the statutory sewerage undertaker in Eastbourne and we note that the Council will use the AAP to provide a framework for discussions and agreements with utility providers to ensure that capacity constraints are identified early in the process and the plans of utility providers are coordinated with development requirement.

There is currently no local sewerage capacity available to accommodate the developments proposed in policies TC18, TC19, TC20, TC21 and TC22. New development should therefore connect to a point on the network where there is adequate capacity or the nearest sewer should be upgraded before the development connects to it. Sewerage companies are regulated by the Water Services Regulation Authority (also known as Ofwat), who determines water and sewerage charges. Ofwat takes the view that sewerage companies should seek to finance this work through securing contributions from developers. This reduces the financing burden on existing customers, who would otherwise have to pay through increases in general charges. The formal requisition procedures set out in the Water Industry Act 1991 provide a legal mechanism for developers to provide the necessary infrastructure to service their site. Southern Water will look to the Council to support this approach to ensure that development does not take place until infrastructure with adequate capacity is provided. Development that takes place before adequate sewerage infrastructure is available may lead to service failures such as flooding of property and environmental pollution. Developers should therefore undertake drainage studies to determine the flows arising from the sites and consult Southern Water with drainage proposals.

Sites TC18 and TC19 have existing sewerage infrastructure crossing the sites. Where existing infrastructure is identified within the site it may be possible for it to be abandoned. However, this would require an agreement between Southern Water and the developer under S185 of the Water industry Act.

Key Summary Points

- *No local sewerage capacity to accommodate the development proposed in policies TC18, TC19, TC20, TC21 and TC22.*
- *New development will need to connect at appoint where there is adequate capacity or the nearest sewer should be upgraded.*
- *Southern Water will look to the council to support the approach of securing contributions for work though contributions from developers and to ensure that adequate infrastructure is in place before development take place.*
- *Developers should undertake drainage studies to determine the flows arising from development.*
- *Sites TC18 and TC19 have existing sewerage infrastructure. It may be possible for it to be abandoned, but would require an agreement with Southern Water and the Developer.*

Response

Comments noted. These matters will be appropriately dealt with as part of the planning application process.

NO CHANGES are proposed as part of this representation.

Rose Freeman - Theatres Trust (58)

Thank you for the email from Limehouse of 22 July consulting The Theatres Trust on the submission of the Eastbourne Town Centre Area Action Plan.

The Theatres Trust is The National Advisory Public Body for Theatres. The Theatres Trust Act 1976 states that 'The Theatres Trust exists to promote the better protection of theatres. It currently delivers statutory planning advice on theatre buildings and theatre use through the Town & Country Planning (General Development Procedure) (England) Order 2010 (DMPO), Articles 16 & 17, Schedule 5, para.(w) that requires the Trust to be consulted by local authorities on planning applications which include 'development involving any land on which there is a theatre.'

Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and expect to see policies relating to cultural facilities.

We support this excellent document, especially Policy TC7, as it recognises the important contribution that buildings for performance arts make to the vitality of the town centre.

With regard to Policy TC15 on Parking, we urge that any planning policies concerned with parking provision should consider the presence of theatres, cinemas and evening leisure facilities in the locality. These attract families, young people, disabled patrons, and older people who can be discouraged to

attend if the costs of travelling and parking make the price tag of the evening out too high. Also 'receiving' theatres frequently take delivery of multiple truckloads of equipment simultaneously, or are required to wait for long periods of time before being filled or emptied while other trucks come and go. The needs of 21st century touring shows and orchestras should be accommodated otherwise lack of turning space for lorries could seriously affect the economic viability of performance buildings and what they are able to stage.

We look forward to being consulted on further planning policy documents in due course.

Key Summary Points

- Support the document especially Policy TC7
- Policy TC15 – urge that any planning policies concerned with parking provision should consider the presence of theatres, cinemas and evening leisure facilities in the locality. Cost of parking and travelling can discourage people from visit the local leisure facilities.
- The requirements of deliveries to theatres and the touring companies need to be considered, e.g turning space for lorries and this can seriously effect the economic viability of performance buildings.

Response

Comments noted and support is welcomed. The AAP supports a mix of uses within the Town Centre and includes policies to ensure that the Town Centre is readily accessible with appropriate parking facilities.

NO CHANGES are proposed as part of this representation.

John Edgerton (59)

We congratulate the officers concerned with the above document and are pleased to have the opportunity to comment on its proposal.

The Area Action Plan provides a once in a lifetime opportunity to make significant improvements to the town centre and it is vital that the Council get it right – particularly with regard to transport and pedestrian comfort and safety. Whilst we broadly agree with the objectives in the document there are policies which we believe fall short of what is required to achieve the regeneration and beneficial improvements that the Town requires. These are referred to below:

Policy No. TC14 (Public Transport)

Whilst the problem of buses in Terminus Road has been recognised over a period of many years, the proposals for dealing with 'Diesel Alley' do not in our opinion go anywhere near far enough. To improve the shopping experience in this location it will be necessary to pedestrianise Terminus Road and stop buses using this area completely. The enclosed photographs clearly demonstrate the problems that currently exist ie. Congestion, pollution and danger to pedestrians.

It is probable that the next twenty years will see significant growth in public transport including the use of buses and we, therefore, believe that the Town Centre Action Plan should seek ways of accommodating this growth. The current arrangement does not work and the idea of 'squeezing' buses into a restricted pedestrianised area does not provide for growth – indeed buses will be more restricted and shopping in this part of Terminus Road will continue to suffer and be secondary.

The question, therefore, is what is the alternative solution is. Our ideas for consideration by the Council are as follows:

- a) Instead of town centre bus stops and 'laying over' for brief periods taking place in one location as currently, there should be in our opinion 3-4 locations for buses to stop to drop off their passengers from the North, The West and East of the town centre. Suggested locations for consideration by the Council are shown on the attached plan. The advantages of such an approach are the avoidance of a concentration of buses in one location and the opportunity for future growth in passenger numbers which a pedestrianised Terminus Road cannot provide.
- b) Where possible at each 'dropping off' location an attempt should be made to provide bus shelters with café facilities and real time information. The café facilities could help to 'fund' the cost of building and maintaining these shelters. Turntables could be provided if necessary in restricted locations.
- c) Consideration should be given to a shuttle bus service between the station and the seafront with appropriate vehicles for a pedestrianised location e.g. a 'superior' type of dotto train. This service could be extended along the seafront which would benefit holiday makers and hoteliers alike.

Policy No TC14 (Ashford Road)

The closure of Ashford Road as a through road has been the subject of much debate over many years and traffic calming at this junction has been under construction in recent times. The importance of restricting traffic from this location is improved pedestrian flow between the town centre, the station and Grove Road. Pedestrianisation therefore, of the area from the junction to alongside the station building and possibly down to a new entrance into the Arndale Centre is in our opinion, a priority and should not be compromised. Existing traffic flows should therefore be revised to achieve this important objective. Although paragraph 5.11 refers to the benefit of closing Ashford Road there is no commitment to do so.

Policy No TC5

The pressure on secondary retailing has been enormous in recent years and there are many secondary shops or locations that no longer have a future in retailing. Conversely the housing shortage has never been greater. Without specifying particular shops or locations within the Town Centre boundary we believe that every encouragement possible should be provided by the Council to convert secondary shops with no future into housing which is where many of these shops originated from.

Key Summary Points

- *Broadly agree with the objectives in the document but believe there are policies which fall short of what is required to achieve the regeneration the town requires.*
- *Policy TC14 – The proposals for dealing with Diesel Alley do not go far enough. To improve shopping in this area, necessary to pedestrianise Terminus Road and stop buses completely.*

- *The AAP should find ways to accommodate the likely growth of public transport in the next 20 years. The current arrangement does not provide for growth.*
- *A range of alternative ideas have been offered for the council to review.*
- *Policy TC14 (Ashford Road) Pedestrianisation of the area from the junction to alongside the station building and possibly down to a new entrance into the Arndale Centre is a priority. Existing traffic flows should be revised to achieve this*
- *Policy TC5 – Every encouragement should be provided by the council to convert Secondary shops with no future into housing which is where many of those shops originated from.*

Response

Comments are noted and support is welcomed. The extent of the primary retail area in the Town Centre has been carefully considered having regard to the quality of existing retail and proposals being put forward as part of the Development Opportunity Sites. At present 46 to 94 Terminus Road functions as a secondary retail location. The area behind in Station Street and Mark Lane has a further distinctive character and the AAP therefore identifies that whole location as a Transition Area where a mix of uses will be supported. This will be complementary to the wider aims and objectives of the AAP to support a mix of uses in the Town Centre in addition to primary and secondary retail. The AAP does not preclude the continued use of this section of Terminus Road for retailing and the designation could be reviewed over the AAP period.

The AAP recognises the importance of making it easy to access and move around the town centre by all modes. The AAP also recognises that parts of Terminus Road could be given greater pedestrian priority. The re-routing of services away from Terminus Road will be difficult but if a proposal could be made to work and has support then it will be seriously considered. Nevertheless the AAP requires design enhancements to the bus area and Terminus Road that will improve the environmental quality and character of the area whatever solution is found for the bus routes. Improvements to pedestrian crossing facilities at the junction with Terminus Road/Ashford Road/Gildredge Road will also improve pedestrian accessibility.

NO CHANGES are proposed as part of this representation.

Lucy Richardson (60)

I'm not sure if my comment would come under the title of legal compliance and/or soundness, so I thought I'd pass on my concerns to you; I want to make a comment about one of the areas for proposed development, that of Devonshire Park, where I'm sure you are aware they host, the Tennis competitions and that it is also home to a tennis club, the Tennis is not just held for one week before Wimbledon, but also on various weekends for both the men's and women's vets tennis, these times, provide much needed revenue for the town as many people visit Eastbourne at these times not just the players themselves who travel from all over the country, those living in the west of Scotland can not commute but also the many who travel to our town to watch it, enjoying our Hotels and Guest Houses as well as utilising the many restaurants in the town. I feel that the Tennis hosted here is a great asset to the town and that it would

be a great shame to give it up only for another town to prosper on it as we do presently, might I also add that a number of people who wouldn't normally visit Eastbourne do so for this event, many also returning in subsequent years, to explore more of the town and surrounding area, please consider this as there are many of us who really do enjoy the tennis here and would be very sad to see it go.

Key Summary Points

- *Tennis hosted at Devonshire Park is a great asset to Eastbourne Town and it would be a shame to give up on it.*
- *Would be very sad for the tennis club to go.*

Response

The Town Centre Area Action Plan identifies the site as a 'Potential Area of Change' and acknowledges that the hosting of international tennis is one of the events that Eastbourne is best known for. It also states that 'the Council will continue to work closely with the Lawn Tennis Association in order to maintain the International Lawn Tennis Centre ensuring a future for an important Town Centre asset. The Council will safeguard the strategic importance of the site. The green space at Devonshire Park will also be maintained as a key open space in the Town Centre.'

NO CHANGES are proposed as part of this representation.

David Newham (61)

The Town Centre AAP designates the International Lawn Tennis Centre at Devonshire Park as an area of Potential Change. Is this a change from The Eastbourne Borough Plan - Saved Policies (2007) policy in particular the Ch.12: Leisure and Community Facilities Policy LCF6: which designates Devonshire Park as a Significant Area for Sport. Does the new AAP mean that significant changes will be carried out and/or that lawn tennis will no longer be played there, or is the park set to disappear altogether. I would appreciate your comments on this as I am sure many local residents will be concerned.

Response

The AAP recognises the importance of the tennis centre and confirms that the Council will continue to work with the Lawn Tennis Association in order to maintain the Centre. The green space at Devonshire Park will also be maintained as a key open space. The Council is currently undertaking a review of the whole of Devonshire Park to ensure it becomes a distinctive, visually inspiring and high value cultural destination that can accommodate a diverse set of visitor and user needs for the lifetime of the Plan (up to 2027).

NO CHANGES are proposed as part of this representation.

Jonathan Ridley (62)

Are there any plans to give grants to property owners to improve the facades of buildings within the town centre- specifically The Avenue? Also, if the development of the station car park goes ahead, where are people going to park if they want to get on a train? Car parking is already very scarce in Eastbourne.

Response

Improvement grants are not dealt with as part of the AAP as they are not material planning issues. Development Opportunity Site 2 requires the provision of car parking as part of any redevelopment proposals.

NO CHANGES are proposed as part of this representation.

Jonathan Ridley (63)

As many trees as possible please. Sorry but I do not like the futuristic designs and feel that new architecture should not clash with the buildings already there. Do not like the futuristic 'soul less' buildings as on the plan. Town centres always feel nicer with lots of trees.

Response:

The AAP contains guidance on design in the Town Centre balancing innovative design solutions with protecting the best existing buildings and heritage assets which are an important part of the character of Eastbourne. Policies and design principles for enhancing the public realm in the Town Centre are included in the AAP including opportunities for new tree and landscape planting.

NO CHANGES are proposed as part of this representation.

Irene Runayker (64)

Q5: Terminus Road (Station to end) pedestrianised and planted with flowering/or producing cherry trees to blossom at the time of East Sussex Open a Towner and the Eastbourne Arts Festival.

Response:

Comments are noted. Policies and design principles for enhancing the public realm in the Town Centre are included in the AAP including opportunities for new tree and landscape planting.

NO CHANGES are proposed as part of this representation.

Charlotte Papworth (65)

Really excited and positive about proposals. Re evening and night-time economy, this does need work as few good restaurants or venues offering alternative or younger preferences. Needs greater emphasis on environmental sustainability.

Response

Comments noted and support welcomed. Policies for promoting an inclusive evening and night-time economy are included. The Core Strategy sets out the Council's approach to climate change and sustainable development. This is reflected in the Town Centre AAP maximising opportunities within a sustainable and accessible location. Objective 12 supporting the Town Centre Vision sets out how the AAP will address the issue of sustainable development.

NO CHANGES are proposed as part of this representation.

Suzie West

As a very new arrival in Eastbourne, the overall plan and approach seems spot on for areas and methods of improvement. The once facility which feels lacking to me is fine dining, of a healthy sophisticated type, especially for evening enjoyment. Fish restaurants highlighting locally caught fresh fish, or a Jamie Oliver style Italian restaurant would in my view be great assets. I feel there aren't enough places for the 50-60s- not too noisy and not rich food, of good quality.

Response:

Comments have been noted. The AAP includes policies to promote a mix of uses in the Town Centre to make sure it is more vibrant. A mix of uses within the Development Opportunity Sites will provide opportunities for new uses, including restaurants, to be accommodated within the Town Centre.

NO CHANGES are proposed as part of this representation.