

COMMITTEE	CABINET
DATE	14 December 2011
SUBJECT	Submission Eastbourne Town Centre Area Action Plan
REPORT OF	Senior Head of Development & Environment

Ward(s)	Devonshire, Meads & Upperton
Purpose	For Members to approve the Submission Eastbourne Town Centre Area Action Plan and Sustainability Appraisal
Contact	Lisa Rawlinson, Principal Implementation Officer, 1 Grove Road, Eastbourne Tel no: (01323) 415250 E-mail: lisa.rawlinson@eastbourne.gov.uk
Recommendations	That Members consider and approve the Submission Eastbourne Town Centre Area Action Plan and Sustainability Appraisal and authorise submission to the Secretary of State early next year

1.0 Introduction

1.1 On 13 July 2011, Cabinet approved the Proposed Submission Eastbourne Town Centre Area Action Plan to be published for the community and stakeholders to make final representations, in preparation for formal submission of the document to the Secretary of State. This stage in the process of preparing the Area Action Plan is in accordance with Regulation 27 of the statutory Town and Country Planning regulations.

1.2 A 9 week period in which the community and stakeholders could make representations began on 21 July and finished on 22 September 2011. At this final stage in the preparation of the Plan before the formal process of submission to the Secretary of State, representations can only be made on matters of 'soundness' and/or 'legal compliance'.

'Soundness' relates to whether the document is 'justified, effective and consistent with National Policy.' Justified means that the document must be:

- Founded on robust and credible evidence
- The most appropriate strategy when considered against the reasonable alternatives.

To be effective, the document must be:

- deliverable

- flexible and
- able to be monitored.

The draft National Planning Policy Framework sets out an additional test of 'soundness', which requires a Local Plan (in this instance an Area Action Plan) to have been "positively prepared".

'Legal compliance' relates to the way in which the Plan has been prepared.

2.0 Publicity and Consultation Techniques

2.1 The Proposed Submission Eastbourne Town Centre Area Action Plan was publicised widely by the following:

- Letters
- Summary leaflet and posters
- Dedicated page on the Council's website
- Social networking website (Facebook)
- External media - press releases, articles in local newspapers and newsletters
- Permanent exhibition
- Roving exhibition
- Presentations to stakeholders
- Public surgery

The full Consultation Report is a background paper to this report, a copy of which is available for viewing in the Members Room and on the Council's website.

2.2 At the end of the representation period, 66 comments had been received from 38 individuals or organisations.

Responses to all of the comments received during the representation period are detailed in a background paper to this report, which is available for viewing in the Members Room and on the Council's website.

The representations received included comments on the following:

- Need to provide improved pedestrian and disabled access
- Need to ensure quality of design for new developments
- Need for office space and community facilities in the Town Centre
- Need to protect specialist independent retailers
- Need for new major retailers
- Support for public spaces, improved signage and better links between the station and the seafront
- Buses should be removed from Terminus Road
- Need for enhanced provision for cycling in Eastbourne.

2.3 Out of the 66 representations received, only 15 related to matters of soundness and two of these also considered that the document was not legally compliant.

These representations are as follows:

- Policy TC4 Primary Retail Area is likely to restrict the viability of the Town Centre and should include 46-94 Terminus Road. Policy TC14 Public Transport Interchange – buses should be separated from pedestrians in Terminus Road (unsound)
- The Evening and Night-time Economy – these are very different economies and should not be dealt with as one (unsound)
- The Plan does not solve the problem of buses in Terminus Road which should be removed and relocated to Hyde Gardens (unsound)
- Need for open air markets in pedestrianised streets (unsound)
- Need for entertainment on open spaces (unsound)
- All households in Eastbourne should have all their plastic waste collected as part of the weekly refuse collection rounds (unsound)
- There are no street billboards or information boards along the seafront to advise tourists and locals not to feed seagulls (unsound)
- Views in report are not shared with groups that live and work in the Town Centre (unsound and not legally compliant)
- Various comments posted on Facebook (unsound and not legally compliant)
- There is concern that later opening hours associated with the night-time economy could lead to anti-social behaviour (unsound)
- There should be a clear plan for improving safety and access for cyclists in the central part of Eastbourne (unsound)
- Regarding the Evening and Night-time Economy – insufficient emphasis is given to the cumulative impact policy in order to minimise the potential for noise and disturbance (unsound)
- A policy that limits building heights in the Town Centre to 3-5 storeys is not justified and allows insufficient flexibility to ensure the most appropriate development is brought forward. Taller buildings may be acceptable in some locations (unsound)
- Policy TC22 (Development Opportunity Site 5 (Co-op)) – the requirement to provide retail floorspace at ground floor level may prevent other appropriate Town Centre uses to ensure the site does not remain vacant in the long term (unsound)
- 21 Terminus Road might be included in a comprehensive

redevelopment. The same proposals were made 5-6 years ago and after being advised development would not proceed the owner invested considerable amounts of money in the property which will remain 'blighted' as long as the proposals remain in place.

Responses to the above representations and whether they have resulted in proposed changes to the Area Action Plan are attached as an appendix to this report.

Of the individuals and organisations that made representations on matters of soundness and/or legal compliance, only two people wish to be heard by the Inspector at the Examination in Public.

These representations relate to the following matters and it is considered that none of them are so significant as to prevent the Submission Version of the Eastbourne Town Centre Area Action Plan being submitted to the Secretary of State:

- The Plan does not solve the problem of buses in Terminus Road which should be removed and relocated to Hyde Gardens
- Need for open air markets in pedestrianised streets
- Need for entertainment on open spaces
- All households in Eastbourne should have all their plastic waste collected as part of the weekly refuse collection rounds
- There are no street billboards or information boards along the seafront to advise tourists and locals not to feed seagulls
- Views in report are not shared with groups that live and work in the Town Centre
- Various comments posted on Facebook
- 21 Terminus Road might be included in a comprehensive redevelopment. The same proposals were made 5-6 years ago and after being advised development would not proceed the owner invested considerable amounts of money in the property which will remain 'blighted' as long as the proposals remain in place.

A further person who has not questioned the soundness or legal compliance of the Plan has also made a request to appear at the Examination.

- 2.4 Natural England was the only organisation to make a representation on the Sustainability Appraisal (SA) that accompanied the Proposed Submission Town Centre Area Action Plan. They confirmed that the Report and Non Technical Summary were clearly presented and concurred with the key environmental sustainability issues and the SA objectives. They were also pleased to note that the AAP will seek to protect and enhance biodiversity where possible.

Natural England also commended the inclusion of policies to seek to reduce carbon dioxide emissions and local air and water pollution, encourage sustainable design in new development and improve access to public spaces.

2.5 A schedule of changes that the Council would wish to make to the Proposed Submission Town Centre Area Action Plan, after seeing the representations, has been prepared and is attached as an appendix to this report. A copy of the Sustainability Report is available for viewing in the Members Room and on the Council's website.

2.6 The AAP has now reached its final stage before being formally submitted to the Secretary of State in early 2012 alongside the Core Strategy, with an Examination expected late summer/early autumn.

3.0 Financial Implications

3.1 There are no adverse financial implications. The costs associated with next year's Examination in Public can be met from within the existing service budget.

4.0 Human Resource Implications

4.1 Officers in the Planning Policy Team will prepare the necessary documentation for submitting the Area Action Plan to the Secretary of State.

5.0 Other Implications

5.1 There are no adverse implications on the community safety, youth, anti poverty or human rights as a direct result of this report. In fact the outcome is designed to have a positive impact on all these aspects. With regard to the environmental implications, these have been fully considered as part of the sustainability assessment of the document.

6.0 Conclusion

6.1 This report is the culmination of major work aimed at putting the regeneration of the Town Centre back on track with a new policy direction.

6.2 Cabinet are requested to approve the Submission Eastbourne Town Centre Area Action Plan and accompanying Sustainability Appraisal and authorise submission of the document to the Secretary of State early next year.

6.3 Full Council will be asked to endorse the Submission Eastbourne Town Centre Area Action Plan at its meeting on 22 February 2012.

Background Papers:

- Submission Eastbourne Town Centre Area Action Plan (October 2011) (Proposed Submission Eastbourne Town Centre Area Action Plan with Schedule of Proposed Changes)
- Sustainability Appraisal (October 2011)
- Consultation Report - Regulation 27- Representations on Eastbourne Town Centre Area Action Plan Proposed Submission Version (October 2011)
- Responses to representations received

To inspect or obtain copies of the background paper, please refer to the contact officer listed above.

APPENDIX 1

RESPONSES TO REPRESENTATIONS RECEIVED THAT RELATE TO MATTERS OF SOUNDNESS AND/OR LEGAL COMPLIANCE

Comments received relating to Soundness

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	<ul style="list-style-type: none">- Concerned about safety and pollution associated with buses on Terminus Road.- The issue is not properly addressed in the AAP and needs to be resolved.
Q4: Any changes necessary to make the AAP legally Compliant or sound	<ul style="list-style-type: none">- Terminus Road needs to be pedestrianised and buses relocated to Hyde Gardens.
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 recognises the ongoing role of Terminus Road as an important public transport corridor. The re-routing of services away from Terminus Road is not a viable option. The AAP instead proposes design enhancements to the interchange and Terminus Road that will improve the environmental quality and character of the area. Improvement 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 farmers/open air markets for sale of local produce.
Q4: Any changes necessary to make the AAP legally Compliant or sound	- Pedestrianised streets should have areas allocated for local farmers/market traders. - Minimum charge should be made to stall holders so they are 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 information boards along the seafront that indicate to people that they should not feed the Seagulls.

Q4: Any changes necessary to make the AAP legally Compliant or sound	- Create billboards to inform people that they should not feed the Seagulls.
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.</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	<ul style="list-style-type: none"> - There is little mention of improved access to the Town Centre for cyclists. - There needs to be a clear plan for improving safety and access for cyclists.
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 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 plan period of the AAP.</p>	

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

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	<ul style="list-style-type: none"> - Need more activities for youngsters such as free open air movies/shows to prevent anti social behaviour and poor health caused by drinking.
Q4: Any changes necessary to make the AAP legally Compliant or sound	<ul style="list-style-type: none"> - Screens at Western Lawn should show non violent films. - Performance stage could be set up on the east of the Pier to encourage youngsters away from places selling alcohol.
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	

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.

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

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	<ul style="list-style-type: none"> - Plan fails to give sufficient emphasis to using planning as an instrument to reinforce the cumulative impact policy. - 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	<ul style="list-style-type: none"> - Replace the first two sentences of 4.33 '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.'
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</p>	

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.”

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	<ul style="list-style-type: none">- Limiting buildings heights within the town centre to 3-5 storeys is not justified and insufficiently flexible.- Each application for development should be judged on its merits, on a case-by-case basis.- 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	<ul style="list-style-type: none">- The policy should be reworded to allow greater flexibility.
Q5: Y/N to take part in the exam	No
Q6 Why do you feel it necessary to partake in examination	

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.

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

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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 is not collected for recycling.
Q4: Any changes necessary to make the AAP legally Compliant or sound	- Plastic waste should be 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. 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: 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	<ul style="list-style-type: none"> - Cooperative Group supports identification of the site as a Development Opportunity Site. - However feel that wording does not allow sufficient flexibility in terms of building height and mix of uses, to ensure the most appropriate development within the town centre comes forward and reduce vacancy rates. - Consider that a requirement to provide retail floorspace at ground level may prevent other town centre uses being promoted on this site. - Typographical error as D2 uses are mentioned twice. - 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 meet the tests set out in Circular 05/05.
Q4: Any changes necessary to make the AAP legally Compliant or sound	<ul style="list-style-type: none"> - It is suggested that the policy is reworded to allow greater flexibility omitting reference to specific building heights and building use. - Correct the typographical error and amend where it says D2 community uses to read D1 community uses to avoid any confusion.
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. 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</p>	

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.

PROPOSED AAP CHANGES to Policy TC22:

“Storey heights: New development up to 6 storeys above street level.”

“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.”

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	<ul style="list-style-type: none"> - Suggest addition of a map in the Introduction to define the Town Centre - What is meant by Town centre is an 'attractive place'? - Arndale has not been identified as main area for activity. - Concerned about Little Chelsea and the future of retailers here. - Would not support expansion of Arndale Centre unless other unused retail units are used. - Word 'community' is missing from the plan. - Not only the Town Centre that offers retail attractions. - Getting into the Town Centre is a concern; more development will make this worse. - 2 hearts and 5 destinations are identified in and around Eastbourne – this is unclear. - Not enough consideration given in the Plan to Wheelchair users and those with

	<p>reduced mobility, and there are no photographs.</p> <ul style="list-style-type: none"> - What 'leisure' in the Town Centre is being referred to? - Concerned about existing businesses. How will streets being left desolate be prevented? - Don't agree that non retail uses will cause harm to the primary retail core. - What infrastructure will be put in place to support new development? - Could be alternative use of the Town Centre in the evening other than pubs and restaurants. - Focusing the art district on the Towner and the Congress and Devonshire Theatres is a concern. These places do not encourage community involvement. Feel that the Towner has had a negative impact on the livelihood of many local artists and community groups. - Need to state that not all streets in Eastbourne are 'beautiful'. - Improved parking will not make a difference unless sit is reasonably priced. - Feel that the views shared in the report are NOT the views of several people and groups that live and work in Eastbourne.
<p>Q4: Any changes necessary to make the AAP legally Compliant or sound</p>	<p>Comments are the same as above.</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>	<p>For the reasons given in Q4</p>
<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 chose 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</p>	

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.

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	<ul style="list-style-type: none"> - Views of many local residents as posted on http://www.facebook.com/pages/Eastbourne- Town-Centre-Area- Action-Plan- APP/175297302541169. - Shops and businesses are closing all over Eastbourne making it look shabby and unkempt. - Plans to "improve" The crumbles shopping area in the harbour, renaming it Sovereign Central, is poor use of money. - Don't want Eastbourne to look exactly like every other shopping centre/mall in the country. <p>Comment from Jan Whiting</p> <ul style="list-style-type: none"> - Security licences should not be handed out to anyone who applies. Bar and Club security are poor at best. - Everywhere outside of town suffers from lack of waste disposal on the street and lack of public phone boxes that work. - No visible help and finance for start up businesses in the area, to help fill the smaller empty shops. - 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.

- Stop the charity workers on the pedestrian walkthrough.

Comment from Simeon David Jones

- Focus should be on filling empty shops rather than building new ones.

Comment from Sharon Cornford

- Need an improved transport network that allows people to get in and out of the town.

Comment from Peter Watts

- Lack of youth based activities is resulting in young people drinking.
- 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.

Comment from Michael Gwynne

- Art - In the action plan there are talks of an art trail. 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. E.g. music and music venues, watersports, ice skating, 'real' ski-slope.

Comment from Michael Gwynne.

- Would like to see sheltered bike parking (with CCTV). Would encourage people to ride into town, becoming healthier, reducing congestion and reducing the need for lots of car parking.
- Enterprise Centre underutilised.

Comment from Pamela Doyle.

- Three Tescos in less than a mile is too much competition for local businesses.
- Young people in this town want those options of chain shops, this isn't an old people's town anymore.
- No jobs for people in Eastbourne apart from cleaning jobs.

Comment from Simeon David Jones.

- I think we should get a theme park.

Comment from Steph Bardon.

- An indoor market in what is currently the covered bus/ taxi area on the side of the station.
- A town square around the area of diesel alley would be great.
- Little value in just extending the Arndale to be more of the same shopping you get in other areas of the country.

Comment from Dave Cousin.

- An indoor market in what is currently the covered bus/ taxi area on the side of the station.
- A town square around the area of diesel alley would be great.
- Little value in just extending the Arndale to be more of the same and the same kind of shopping centre you get in other areas of the country.

Comment from Keith Gell.

- Why provide more units when the current ones cannot be filled.
- High street will be filled with generic chain shops.
- If 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 currently under pressure, further development will need to address this issue.
- Feel that there is some other reason for the development.

Comment from Ricky Malone.

- The arts should not be focussed around the Towner as local art is not represented here.

Comment from Catalyst Arts.

- Concerned about:
- Lack of toilet facilities.

	<ul style="list-style-type: none"> - 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... <ul style="list-style-type: none"> - Against the plan to develop the Arndale Centre when there are so many empty retail units around Eastbourne.
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	
<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 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.</p> <p>NO CHANGES are proposed as part of these representations.</p>	

Robert Stiles – Stiles Harold Williams (40)

- Objection made on behalf of Seltis Ltd – freeholder of 21 Terminus Road.
- Objection is because the proposal is unsound and unjustified.
- Our clients invested a considerable amount of money in his property.
- 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.
- 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.
- 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.

TCMI Group – Tony James (47)

- Pleased with the Proposed Submission Town Centre Area Action Plan.
- However, 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.
- Increased use and movement of buses, will cancel out the required improvements to noise and air quality.
- 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 ongoing role of Terminus Road as an important public transport corridor. The re-routing of services away from Terminus Road is not a viable option. The AAP instead proposes design enhancements to the interchange and Terminus Road that will improve the environmental quality and character of the area.

NO CHANGES are proposed as part of this representation.

Multiple residents (49)

- 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.
- Approaches and gateways – 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
- Appears to be a lack of understanding of how Eastbourne operates at night.
- 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 (daytime, evening and night-time 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 railway station.
- 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 ongoing role of Terminus Road as an important public transport corridor. The re-routing of services away from Terminus Road is not a viable option. The AAP instead proposes design enhancements to the interchange and Terminus Road that will improve the environmental quality and character of the area.

Bob Gough. Neighbourhood Management Action Group (56)

- Evening and night time economy – concern about later opening hours.
- Concern especially in the light of current antisocial behaviour and public place violent crime resulting from the night time economy.
- Suggested amendments: "All licensing applications or variations will be considered in line with the relevant legislation existing at the time".

**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."

APPENDIX 2

SCHEDULE OF PROPOSED CHANGES TO PROPOSED SUBMISSION EASTBOURNE TOWN CENTRE AREA ACTION PLAN

2.0 A Vision for the Town Centre: Town Centre Objectives

Objective 12 Sustainable Development

Add reference to Objective 12 relating to Policy D9 of the Proposed Core Strategy to read:

"12. Sustainable Development: enhance the sustainable performance of development proposals coming forward within the Town Centre by utilising a balance of resource efficiency measures and improving biodiversity having regard to Policy D9 of the Proposed Core Strategy."

4.0 Town Centre Policies: Policy TC7

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."

4.0 Town Centre Policies: Policy TC15 Parking in the Town Centre

Reference to electric charging points for cars will be added to the supporting text (Paragraph 4.100) to read: "Finally, where required provision will be made for charging points for electric vehicles within the Town Centre."

5.0 Site Specific Policies: Policy TC22 Development Opportunity Site Five

Amend third sentence of policy TC22 to read:

"Storey heights: New development up to 6 storeys above street level."

Amend fifth sentence of Policy TC22 to read:

"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.”