

Appendix 2: Draft Eastbourne Parking Strategy – Summary of Consultation Feedback

ID No	Section Paragraph no. and subject	Respondent	Summary of Representation/ Comment	Response	Recommended Change
1(a)	Actions for parking standards for new developments	Stagecoach	Would prefer the previous capped standards to be retained. Although they are not strongly opposed to proposals as long as the policy accounts for central locations to have more limited parking provision as better served by sustainable transport.	<i>The Council welcomes the feedback received from Stagecoach and can confirm the following: East Sussex County Council is currently reviewing the parking standards, which will have regard to the guidance set out in the National Planning Policy Framework (NPPF).</i>	Additional wording has been added to paragraphs 7.1-7.4 of the Parking Strategy. This is order to have regard to the guidance set out in paragraphs 39-41 of the NPPF.
1(b)	Actions for Park and Ride	Stagecoach	Some of the proposed solutions are already in place (buses from Hailsham connect with Polegate to Eastbourne trains, and regular buses between seafront car parks and town centre). Park and ride in Eastbourne is unlikely to be successful as demand does not exceed supply to the extent revenue from town centre parking would subsidise the service.	<i>A review of the potential for the introduction of stand-alone park and ride was featured in the technical reports that inform the Parking Strategy. In addition, the Strategy recommends that there should be further investigation into the potential to extend the temporary park and ride services that serve "Airbourne".</i>	No changes are proposed to the Parking Strategy in response to this representation.
1(c) (i)	Section: "Provision of Parking for Special Requirements"	Stagecoach	Missing elements to the strategy include: Off-street parking should be developed to boost the economy, rather than be	<i>It is considered important to find a balance between car access, parking and sustainable transport modes. Development of some of the off-street car parking supply</i>	No changes are proposed to the Parking Strategy in response to this part of the representation.

			retained as under used parking. Restricting parking would increase demand and attractiveness of sustainable transport.	<i>could lead to a shortfall of parking availability in the future and increased demand for existing facilities(some of which are already oversubscribed).</i>	
1(c) (ii)	Section: "Provision of Parking for Special Requirements"		Paragraph should be added: "It is essential to continue to provide bus stops with shelters close to the key destinations within the town centre. Bus stops should have 31m bus stop clearways operating at all times to ensure buses can pull up to the kerb to ensure disabled access and prevent delays to buses."	<i>Detailed matters relating to facilities for public transport, are not part of this strategy. These matters will, however, form part of any future public realm proposals, such as the current work within the Town Centre.</i>	No changes are proposed to the Parking Strategy in response to this part of the representation.
1(c) (iii)	Section: "Provision of Parking for Special Requirements"		EBC has made good provision for buses although doesn't recognise buses transport a 30% of people to the town centre although causes only 5% of traffic/ congestion. 20-30% have access to a car and use a bus as most convenient.	<i>The Council acknowledges Stagecoach's comment and recognises the significant contribution that bus usage makes to reducing overall congestion. The Strategy supports public transport as a key transport mode and an important part of the sustainable future of the town.</i>	No changes are proposed to the Parking Strategy in response to this representation.
1. Eastbourne Hospitality Association (EHA)					
2(a)	Key Spatial Objectives	Eastbourne Hospitality Association (EHA)	The EHA do not agree with the aims of the Parking Strategy.	<i>The Council welcomes the feedback from the EHA and can confirm the following:</i>	The Council is unable to change Section 3 of the Parking Strategy. However if the policy

	Key Spatial Objective 5 5 high level LTP3 Objective		Inconsistent with desire for new build hotels in the town centre, which they are opposed to. Too generic and non-specific	<i>The context for the Parking Strategy stems from the policy framework, which comprises the Core Strategy, the Town Centre Area Action Plan(TCAAP) and the Local Transport Plan 3 (LTP3). The key spatial objectives and high level LTP 3 objectives referred to by the EHA form part of these policy documents.</i>	documents referred to are amended or updated in the future, the Parking Strategy will be able to be updated accordingly.
2(b)	Visitor/ tourist and conference delegate parking	Eastbourne Hospitality Association (EHA)	Disagree with these groups being grouped together, each has specific parking needs, and there is a need to prioritise which is most important to tourist economy.	<i>It is acknowledged that the parking requirements of visitors, tourists, and conference delegates may differ. However, it is considered that improvements to on and off-street parking facilities will benefit all parking user groups.</i>	No changes are proposed to the Parking Strategy in response to this representation. However, the specific needs of the tourists, visitors and conference delegates can be monitored in the short, medium and long-term as proposed in the Delivery Plan, which accompanies the Parking Strategy.

2(c) (i)	"There is sufficient parking space stock"	Eastbourne Hospitality Association (EHA)	Providing off road visitor parking for hotels will prevent guests coming to Eastbourne as the visitor demographic requires parking close to hotels.	<i>The Council acknowledges the need for convenient parking facilities for visitors. However, limited on-street parking means finding alternative solutions, which can provide secure off-street parking.</i>	No changes are proposed to the Parking Strategy in response to this part of the representation.
2(c) (II)	"There is sufficient parking space stock"		Disagree with the statement, there is insufficient parking.	<i>The technical reports, which informed the Parking Strategy include a review of the supply and demand for parking in the Town Centre. This review found that there was generally sufficient parking space. There is evidence as part of the review, to confirm that there is an adequate supply of parking provided for residents, shoppers, visitors and commuters. However, the mix in the available parking stock needs to be regularly assessed to ensure that the most effective and efficient use is being made of all of the facilities available.</i>	No changes are proposed to the Parking Strategy in response to this part of the representation. However, car parking usage can be monitored in the short, medium and long-term as proposed in the Delivery Plan, which accompanies the Parking Strategy.
2(d)	Development in the "city" centre	Eastbourne Hospitality Association (EHA)	Policy should be put in place to prevent development that will take up the existing parking stock.	<i>Eastbourne Borough Council and East Sussex County Council have controls for managing parking for new developments. In addition, paragraph 5.4 of the Parking Strategy acknowledges that a number of the off-street car parks are not in the ownership of public bodies. A clear contingency plan should be established in the event</i>	No changes are proposed to the Parking Strategy in response to this representation.

				<i>of there being a significant reduction in off-street parking through any future development.</i>	
2(e)	Coach Parking	Eastbourne Hospitality Association (EHA)	Approach to coaches is flawed. Since selling the coach park there are occasions when there are no spaces for coaches. Demand is still high for coaches due to low cost deals.	<i>The Strategy acknowledges that the provision of adequate parking for coaches is vital to Eastbourne's economy and is therefore an important element of the Parking Strategy. In addition, the Strategy confirms that the Council will work with coach operators and the EHA to identify suitable sites for additional overnight coach parking, if the need arises. However, it is noted that in the future, fewer visitors may come to Eastbourne by coach, instead preferring to travel by independent means.</i>	No changes are proposed to the Parking Strategy in response to this representation as this matter is clearly addressed in paragraphs 6.9 to 6.12 of the Parking Strategy and is a key aspect of the Delivery Plan (items 6 and 7).
2(f)	Shared use parking	Eastbourne Hospitality Association (EHA)	Converting more parking spaces to shared use bays will reduce the parking available. Workers and shoppers should be moved into the multi-storey car parks to free up on-street parking spaces.	<i>The strategy sets out a clear approach with suggestions on how to better manage on-street parking, requiring joint working between EBC, ESCC and off-street car park operators.</i>	No changes are proposed to the Parking Strategy in response to this representation as items 15 to 21 of the Delivery Plan deal with this matter.
2(g)	Hotel parking permits	Eastbourne Hospitality Association (EHA)	Policies to encourage hotel guest permits to use off street parking will increase prices and put guests off, this will harm the tourist economy.	<i>At the current time, no decision has been made about introducing permits for hotel guests to use off-street parking and the Strategy acknowledges that this would have to be agreed as part of the Quality Parking Partnership.</i>	No changes are proposed to the Parking Strategy in response to this representation as item 18 of the Delivery Plan deals with this matter

					and it would be for the QPP to ensure fair pricing structures.
2(h)	On street parking	Eastbourne Hospitality Association (EHA)	Can only interfere with on street parking bays if alternatives are offered that are cheaper, but the strategy fails to address this.	<p><i>At the current time, no decision has been made about introducing permits for hotel guests to use off-street parking and the Strategy acknowledges that this would have to be agreed as part of the QPP.</i></p> <p><i>It is expected that the Quality Parking Partnership would agree an approach on controls which includes tariff and permit pricing structures, which makes best use of the overall parking supply in Eastbourne.</i></p>	No changes are proposed to the Parking Strategy in response to this representation as item 17 of the Delivery Plan deals with this matter as it recommends a review of existing arrangements for on-street permits and controls with a view to re-launch.
2(i)	Park and Ride	Eastbourne Hospitality Association (EHA)	Park and Ride was promised with the introduction of the pay to park scheme. Do not agree that it should be reviewed in 5 years time, as implementing it would increase visitor numbers and boost the economy.	<p><i>Park and Ride was reviewed and is included within the technical reports, which have informed this Strategy. The Strategy acknowledges that at the present time, a dedicated out-of-town, park and ride facility is unlikely to be operationally achievable without significant subsidy given the current provision (and under-utilisation) of off-street parking in the Town Centre and the availability of free on-street parking a short distance away. The Strategy therefore recommends that the need for a dedicated Park</i></p>	No changes are proposed to the Parking Strategy in response to this representation as items 13 and 14 of the Delivery Plan deal with this matter.

				<i>and Ride facility should be reviewed in five years. It recommends that in the short term, the potential for a Park and Ride service (that makes use of existing commercial bus services) should be investigated further. It is also recommended that there be further investigation of the potential to extend temporary Park and Ride services that serve "Airbourne".</i>	
2(j)	Short term park and ride	Eastbourne Hospitality Association (EHA)	EHA supported short-term park and ride for the seafront car parks, but due to lack of political will has not been implemented.	<i>The Council welcomes EHA's support for short-term Park and Ride for the seafront car parks. As detailed above, the Strategy recommends that the potential for Park and Ride services that make use of the seafront car parks should be investigated further.</i>	No changes are proposed to the Parking Strategy in response to this representation as item 13 of the Delivery Plan deal with this matter.
2(k)	Parking Strategy	Eastbourne Hospitality Association (EHA)	Offers little but will cause medium to long term damage.	<i>The Council is unsure on what medium to long-term damage is being referred to in this representation. The Parking Strategy provides an approach that seeks to find a balance between the competing demands of all user groups who want/need to park in the Town Centre (paragraph 10.2). The Strategy also suggests ways in which better use of parking supply could be taken forward over the period of the Core Strategy up to 2027.</i>	No changes are proposed to the Parking Strategy in response to this representation. However, the establishment of a QPP (as detailed in paragraph 10.5 of the Strategy) is considered to be fundamental to taking the Delivery Plan forward.

3(a)	Background	Turley Associates (on behalf of Performance Retail Limited Partnership)	A further bullet point should be included: 'under supply of off-street car parking in certain areas of the town which does, and could in the future, lead to congestion within the town'.	<i>The Council welcomes the feedback from Turley Associates and can confirm the following: The bullet points contained in the Background section of the Parking Strategy already include reference to congestion, especially at entrances to popular off street car parks and under-utilisation of off-street car parking and the technical reports that informed the Strategy recognised the impacts on town's highway circulation.</i>	No changes are proposed to the Parking Strategy in response to this representation.
3(b) (i)	Key Issues	Turley Associates (on behalf of Performance Retail Limited Partnership)	This section should highlight: -Significant imbalance in the use of car parks within the town in respect to the uses served, quality of environment within the car park. - Any significant changes to parking supply and demand will have major ramifications on the attractiveness and success of Eastbourne, for retail, leisure and tourism.	<i>These items were raised in the technical reports and the stakeholders' workshops which have informed the Parking Strategy. Furthermore the Strategy recognises the under-utilisation and quality issues associated with some of the off-street car parks</i>	No changes are proposed to the Parking Strategy in response to this part of the representation.
3(b) (ii)	Key Issues	Turley Associates (on behalf of Performance	This section should also highlight: - Poor quality, standard and location of car parks to uses	<i>The surveys undertaken for the draft strategy did not show that people were not coming to Eastbourne because of the quality</i>	No changes are proposed to the Parking Strategy in response to this part

		Retail Limited Partnership	served limit the ability to attract town centre visitors.	<i>of parking and in most cases it was seen as fit for purpose compared to price. It is accepted this is surprising and the Council wants to see an improvement in the quality of the car parks.</i>	of representation. However, the establishment of a Quality Parking Partnership as detailed in paragraph 10.5 of the strategy will address this issue.
3(c)	Strategy aims	Turley Associates (on behalf of Performance Retail Limited Partnership)	Main aims to the strategy also need to include: <ul style="list-style-type: none"> • Need to address under supply of car parking associated with the retail core, to minimise congestion and delay but ensure resilience in the parking supply in the future. 	<i>The technical reviews did not highlight an under supply of parking, rather that there were issues relating to how parking is organised and priced. There is a high demand for the Arndale Centre car park and provision should be maintained where this is appropriate. The Council also recognises other local off-street car parking, which could be improved together with the introduction of variable message signing to support car park and highway operation.</i>	No changes are proposed to the Parking Strategy in response to this representation.
3(d) (i)	Supply and demand of parking		This section needs to: <ul style="list-style-type: none"> • Recognise there is an imbalance of car park use as a result of location and quality and function of the car parks. • Recognise the different demand and supply within the town that leads to this imbalance. 	<i>The points raised are outlined in the technical reviews and appraisal, which have informed this Strategy. There was clear recognition within the workshops about the quality and provision of off-street car parks as well as the limitations of improvements without some form of holistic approach, which encourages operators to invest in the existing</i>	No changes are proposed to the Parking Strategy in response to this part of the representation.

			<ul style="list-style-type: none"> Recognise the quality of car parks, resulting in some car parks being less attractive than others. 	<i>off-street stock.</i>	
3(d) (ii)	Supply and demand of parking	Turley Associates (on behalf of Performance Retail Limited Partnership)	This section also needs to provide additional parking at key locations where insufficient parking is provided.	<i>Provision of additional off-street car parking will depend on land availability and a willingness by the owner to develop the land for parking (such as provision for decked parking at the railway station) or provision of alternatives such as out-of- town Park and Ride. The Council accepts that there are opportunities to improve the locations of car parks and this needs to be balanced with overall demand.</i>	No changes are proposed to the Parking Strategy in response to this representation.
3(d) (iii)	Supply and demand of parking	Turley Associates (on behalf of Performance Retail Limited Partnership)	Conclusions from the Technical Review should be included in the strategy that any significant changes to supply and demand could affect the attractiveness of Eastbourne.	<i>The Stage 2 Technical Review that has informed the Strategy does state that any significant changes to parking supply and demand could affect the attractiveness of Eastbourne and as such the Strategy will be amended to refer to this matter</i>	<p>Add word 'currently' to Paragraph 5.3 of the Strategy.</p> <p>Delete text contained in Paragraph 5.4 of the Strategy and replace with the following text:</p> <p>5.4 With regard to future demand, the existing supply of on- and off-street parking is likely to be sufficient to meet the</p>

					<p>future peak season demand for parking up to 2027 if there is no change to the town centre parking supply. However, any significant reduction in the parking supply (or increased future development) could have ramifications on the attractiveness and therefore continued success of Eastbourne as a destination for retail, leisure and tourism. This is particularly important given that the majority of the town centre off-street parking stock is not controlled by the Council.</p> <p>5.5 Therefore if there is a significant reduction in the existing supply and location of town centre parking in the future, arrangements will need to be made to maintain the accessibility of</p>
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					Eastbourne town centre to users of all modes of transport. In addition, consideration may need to be given to providing additional parking to serve the town centre and ensuring access for public transport, walking and cycling is further improved.
3(e) (i)	Parking standards for new developments	Turley Associates (on behalf of Performance Retail Limited Partnership)	Future parking standards and policy should be flexible in the assessment of the need for parking, priority given to developments that provide additional parking in areas with under provision.	<i>A suggested approach to parking provision is outlined within the Strategy and the technical reports that have informed it. Paragraph 39 of the NPPF also recognises this.</i>	Additional wording has been added to paragraphs 7.1-7.4 of the Parking Strategy. This is in order to have regard to the guidance set out in paragraph 39 of the NPPF.
3(e) (ii)	Parking standards for new developments	Turley Associates (on behalf of Performance Retail Limited Partnership)	The Council should work with developers to agree suitable parking provision for new commercial and retail developments.	<i>This would automatically form part of the normal planning application process, so is not needed as part of the strategy.</i>	No changes are proposed to the Parking Strategy in response to this representation.
4(a)	Key Issue / General	Chamber of Commerce	"Any business planning would seek to minimise a potential loss of revenue to a partner by examining how to offset, say, loss of permit income through better turnover of on-street	<i>The Council welcomes the feedback received from the Chamber of Commerce and can confirm the following: The Council does not control the vast majority of parking whether</i>	No changes are proposed to the Parking Strategy in response to this representation as this would form part of the work of the proposed

			<p>general controlled parking spaces” suggests that revenue generation has a high priority. The current system takes around £2,000,000 a year out of the local economy and we consider reduction in costs should be a priority of this strategy. There are no recommendations as to how the cost of the strategy and its implementation are to be monitored or controlled or what effect cost has on the effectiveness of the strategy or the burden on the local economy.</p>	<p><i>on or off street and therefore do not have control over the revenues raised but can influence how our street revenues are spent and will continue dialogue with the highway authority.</i></p> <p><i>In order to encourage private sector investment in to some of the off-street facilities it is vital that car users are encouraged to use them. . Therefore encouraging longer stay parking in off-street locations through permits and on street controls assists in providing revenue streams for parking providers allowing them to look closer at infrastructure improvements. It will be for the proposed QPP to agree and put in place controls and monitoring.</i></p>	<p>Quality Parking Partnership as detailed in items 15 and 21 of the Delivery Plan to ensure that an equitable system is found to balance revenue and investment.</p>
4(b)		Chamber of Commerce	<p>Anything to improve quality of off-street car parks and their usage is generally welcomed.</p>	<p><i>Improving the quality of off-street parking is a key issue and will continue to encourage and influence the private sector owners..</i></p>	<p>No changes are proposed to the Parking Strategy in response to this representation as this would form part of the work of the proposed QPP and is covered by item 21 of the Delivery Plan.</p>
4(c)		Chamber of Commerce	<p>Very concerned that the cost of implementing the</p>	<p><i>There are concerns that reducing parking controls could increase</i></p>	<p>Paragraph 8.2 of the Parking Strategy has</p>

			<p>parking strategy and the cost to vehicle users in the town receives so little attention. More consideration is needed of economic impact of parking controls on the town centre and deterrent effect of controls on visitors. Whilst admittedly difficult to monitor, anecdotal evidence suggests some visitors are reducing number of visits or going elsewhere as a direct result of the controls.</p>	<p><i>congestion levels and may hinder sustainable modal choice and public transport use, which also provide positively to the local economy.</i></p> <p><i>However, the strategy proposes setting up a Quality Parking Partnership. Part of their initial work would be undertaking regular surveys of car park usage. It is envisaged that the Chamber would be represented on the Quality Parking Partnership.</i></p>	<p>been amended to confirm that the QPP will be formed from local key operators, authorities and representatives of key local interest groups.</p>
4(d)		Chamber of Commerce	<p>Why do parking controls on seafront start at 8.00am and finish at 6.00pm? An hour off each end might encourage more visitors to the seafront at start and end of day.</p>	<p><i>East Sussex County Council is responsible for on-street parking controls along the seafront and are currently reviewing on-street charging in Eastbourne. Officers have passed this detailed question to them and a response will be forwarded.</i></p>	<p>No changes are proposed to the Parking Strategy in response to this representation.</p>