Statement from Bespoke 9.5.13

Matter 7.1   **Have any of the public realm projects listed in Policies TC2 and TC13 been costed?**

Matter 7.3   **Policy TC2: are the projects listed here deliverable?**
They are shown on table 1 as "aspirational" and as being delivered in the last year of the plan period. Table 2 shows some as being delivered in the short/ medium term. Is there any evidence that these projects will be delivered at all?

Matter 7.4   **Policy TC13: Table 2 contains some useful information which links projects to DO sites. Does the delivery of the public realm projects align with development of the DO sites?**

TC2   = Town centre structure
TC13   = Public realm Quality and Priorities

What part of the Town Centre Local Plan (TCLP) is unsound?
The TCLP is unsound as it has not adequately realised its major role in bringing to fruition the Eastbourne Cycling Strategy and national, regional and local priorities in enhancing active transport.

RE TC2: The approaches and gateways do not clearly give priority to creating safe cycle routes and providing facilities for those who might cycle to or through the area. It does not mention the continuous seafront cycle route that is priority 1 on the Eastbouren Cycling strategy. This would bring in residents from other parts of Eastbouren into the twon centre and would enhance tourism.

RE: TC2: There has been some feasibility work on the seafront cycle route.

RE: TC2: Costings: The TCLP fails to mention the recent successful bids:
   -   From the Local Sustainable Transport Fund – for infrastructure for cycling in Eastbourne
   -   To Southern railway to create a "cycling hub" at Eastbourne station (£300,000). This is in DO area 2, TC19. This need shared working with partners to develop this area well.

- Funding is available from the South Downs National Park to promote access to the Park which is ½ mile or 2 miles from the station (DO areas 1 and 2)

RE: TC13: The public realm projects need to be planned such that cycle routes are continuous, and that cycle parking and signage is vital. The public realm projects need to state clearly that "pedestrianisation" includes cycle routes, whether shared use or segregated. It is understandable that finances need to come from adjacent building works, but the vision needs to include the best routes for bicycles. It should be noted that some of the DO sites are on very dangerous junctions for cyclists, and these need to be given priority.

Which soundness tests in paragraph 182 of National Planning Policy Framework (NPPF) are failed and why?

Most below, i.e.:

NPPF, 2012:
http://www.environment-agency.gov.uk/static/documents/Business/NPPF_published_27Mar2012.pdf

Para 182:
- *Duty to Cooperate*
- ***Positively prepared*** *–based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development*
- ***Justified…****most appropriate strategy*
- ***Effective***
- ***Consistent with national policy*** *– should enable the delivery of sustainable development in accordance with the policies in the Framework.*

OTHER:
4. Promoting sustainable transport
8. Promoting healthy communities
10. Meeting the challenge of climate change...
"presumption in favour of sustainable development"

Para 171: re: Public Health and ensuring healthy communities
Para 172: include information on traffic hazards".

Re: not "justified" and not consistent with other policy, in particular:

1. **Eastbourne cycling strategy**
   http://www.eastsussex.gov.uk/NR/rdonlyres/1AAEFF70-D088-4550-8BCB-
   D1A2591DCF9B/29989/LMETE26March2012item7EastbourneCyclingStrateg
   y.pdf
2. It fails the NFFP presumption on sustainable development as safe cycle
   routes and cycle infrastructure are not integral to the plan.
3. **Transport assessment** This did not mention cycling
   *http://www.eastbourne.gov.uk/EasysiteWeb/getresource.axd?AssetID=14211
   2&type=full&servicetype=Inline*
4. **Local Transport Plan 2011-2026**, ESCC:
   http://www.eastsussex.gov.uk/roadsandtransport/localtransportplan/ltp3/down
   loadltp3.htm
5. **South Downs:** http://present.brighton-
   hove.gov.uk/Published/C00000707/M00004048/AI00032128/$201301281533
   15_003404_0013341_Appendix3MemorandumofUnderstanding.docA.ps.pdf
6. **Local Sustainable Transport Fund:**
   http://www.eastsussex.gov.uk/NR/rdonlyres/6E0D8294-5999-4D02-8A26-
   039D6F93BE4D/0/lstf_east_sussex_coastal_towns.pdf

ADDITIONAL wording suggestions (same as response to 4 and 5)

1. INTRO: "The TCLP is fundamental to achieving the objectives in the
   Eastbourne Cycling strategy; firstly, there is a commitment to create a
   safer, more attractive and accessible cycling network, with supporting
   infrastructure, to encourage more people to cycle to and within
   Eastbourne; secondly, to reduce dependence on the car by encouraging a
   shift to cycling; and, thirdly by raising the profile of cycling for residents
   and visitors."

2. INTRO: "this TCLP capitalises on the proximity of the South Downs
   National Park. The Park's eastern-most boundary forms two "prongs" one
   along the seafront by Bede's school and one by the Eastbourne golf
   course. Both are therefore within ½ to 1 mile of the Town Centre
   boundary. A memorandum of agreement between local authorities and
   the South Downs National Park Authority agreed to prioritise the access to
   the South Downs National Park, with clear links on foot or by bicycle to the
   railway station, along the seafront and to link with other cycle routes from
   areas in Eastbourne and beyond."

3. There should be reference to Local Transport Plan, as in "active travel is a key way to ensure individuals of all ages achieve the 30 minutes five times a week recommended as the minimum for a health."

4. Throughout: Only ONE cyclist pictured in the whole 96 page document. It needs more.

5. It needs more facilities for cyclists pictured (eg cycle parking).

6. All references to "pedestrianisation" should make it clear that this is pedestrianisation with integral cycle routes:

    a. Page 43 "with clear cycle route incorporated…safer and more attractive to pedestrians and cyclists."

    b. 4.104: "Opportunities for additional pedestrianisation, with integral route for cyclists will be explored. The Eastbourne Cycling Strategy approved in 2012 states that a clear route for cycling from the railway station to the town centre and to the seafront is a priority."

    c. Policy TC16: "…a comprehensive waymarking strategy for the Town Centre to improve legibility and increase pedestrian and cyclist accessibility…clear safe cycle routes...A seafront cycle route is the first priority of the Eastbourne Cycling Strategy, 2012."

    d. 5.50: "Consideration will also be given to the potential for pedestrianisation; with an integral cycle route…This will enhance the ability for people to access these areas by bicycle."

7. Cycling as integral:

    a. 1.7"…including the ability to cycle to and within the town centre"

    b. 1.9 "..and Eastbourne cycling strategy"

    c. 1.12 please add "incorporating of the new Cycling strategy, the agreement with South Downs National Park, Local Sustainable Transport fund successful bid and national health imperatives suggesting active transport as fundamental to planning have shaped further amendments"

    d. 2.2.9 "and those cycling to and within the town centre"

    e. 2.2.11 "for those who may cycle to and within the town centre"

    f. 2.2.12 "and having regard to the Eastbourne Cycling Strategy and Local Transport Plan"

    g. 3.0 "and the ability to access the town centre and move within it safely by bicycle"

8. 1.4 "the Eastbourne cycling strategy identified a safe continuous seafront cycle route as the number 1 priority"

9. Figure 1:

    a. Maps should be changed to clearly include the planned cycle routes as in the Eastbourne cycling Strategy. See the map appended.

      b. Maps should include the boundaries (as two prongs) of the South Downs National Park

10. 1.7 "Eastbourne railway station has recently been granted funding to become a 'cycling hub'. We will build upon this and plan for a network of safe continuous cycle routes through the town centre and beyond as in the Cycling Strategy. This will enhance tourism and local resident access"

11. 3.14 "and continuous cycle routes with safe junctions"

12. 3.15 "We will ensure that all gateways cater to those accessing the town centre by bicycle, or those hiring bicycles at the railways station's new "cycling hub"

13. 3.15: "Eastbourne has been identified as a gateway to the South Downs National Park. Routes to the two entrances (seafront and golf course) will be highlighted and signposted, with clear safe routes for cyclists and walkers"

14. 3.20 "pedestrian and cyclist movement"

15. Policy TC2 Add: "ample visible safe cycle parking will be provided around buildings and amenities"

16. 4.8 "We will ensure that there are safe cycle routes and adequate cycle parking for those who wish to access the town centre by bicycle are catered for"

17. Policy TC5: "Public realm enhancements will include infrastructure to realise the vision of Eastbourne town centre as a safe place to travel to and within by bicycle. For example, all development will be expected to provide adequate cycle parking for staff, customers and visitors, including sufficient to accommodate expected rises in the numbers of people cycling for health, pleasure or economic necessity"

18. 4.22 "Additional infrastructure will be needed to support people cycling to and within the town centre"

19. 4.26 "It is noted that the employment opportunities need to include the ability to travel to the workplace by sustainable means, and good cycle routes are needed to and within Eastbourne town centre"

20. 4.36 "We will create clear routes for cyclists and walkers to the South Downs National Park, which is a key visitor attraction"

21. 4.42 "encourages people to walk and cycle"

22. 4.51 Principle 2: "development proposals must allow access by active transport and linking of cycle routes. Sufficient cycle parking must be incorporated"

23. TC9: ""development proposals must allow access by active transport and linking of cycle routes. Sufficient cycle parking must be incorporated"

24. Policy TC10: "We encourage the visible placing of cycle parking to denote that arriving by bicycle is normal for staff, customers and visitors"

25. 4.60 "in addition, landmark buildings should be linked by clearly visible cycle routes and there should be ample visible placing of cycle parking to denote that travel by bicycle is normal for staff, customers and visitors"

26. Policy TC12: "Although some facilities for cycle storage should be secure, there should be adequate visible on-street accessible cycle parking"

27. 4.70 add "or accessible by bicycle"

28. 4.72: "to ensure that active travel options are incorporated at an early stage of design"

29. 4.78 Objective 2: Add: "and safe for cycling within the town centre. We will ensure that pavement widening does not put cyclist in danger"

30. Objective 3: "We will make continuous cycle routes to key destinations a priority"

31. 4.80: "The seafront has been identified as the priority for a seafront cycle route in the Eastbourne Cycling Plan and we will ensure this is realised. This also links the South Downs National Park to those who live in the Eastern parts of Eastbourne"

32. 4.83: Grove Road: "We will create a safe cycle route, thus linking this to the station and the South Downs route (via the golf course entrance) and to the university -a key priority in the Eastbourne Cycling Strategy."

33. 4.83 Seaside Road: "traffic direction will consider cyclists' needs, but may allow different flows on the seafront which is the priority for a cycle path"

34. 4.83: "All junctions will be evaluated for their safety for cyclists, as and our vision is to make cycling safer and more normal"

35. **To ALL the public realm priorities:** "we aim to make Eastbourne into a cycling town, as in the successful bid to the Local Sustainable Transport Fund. All of the areas and routes will have a cycling safety and usability assessment, aiming to make a network of good safe cycle routes." Also "no carriageways will be reduced in size, nor pavements widened, nor one-way streets opened to two-way traffic if this would make cycling more difficult in that route."

36. MAP Figure 4: This needs clear cycle routes drawn onto it.

37. TC13: "please add "safe and continuous" cycle routes

38. 4.87: "the railway station has recently received funding to operate as a "cycling hub" we want to enhance this by building a network of cycle routes across town and linking to other routes across Eastbourne and beyond"

39. 4.94: "any proposal to reintroduce two-way streets will have a clear cycle safety assessment and involvement of local cycle groups to ensure that cyclists' safety is not compromised."

40. 4.94: "Please note that where there is reintroduction of 2-way streets, cyclists need to be considered first. Some streets are wide enough to have one-way traffic with a contra-flow cycle lane, but if made two-way,

the cyclists tend to be squeezed out unless the traffic moves so slowly that they are in the body of the traffic. It is apparent that nervous cyclists, women, children and the elderly usually prefer segregated cycle facilities: routes need to cater for all potential cyclists, not just those brave enough to cycle now."

41. 4.94 "Department for transport's Hierarchy of provision will apply such that vulnerable road users have greater priority"

42. Policy TC14: "The ability for people to use different modes of transport should be catered for. For example, some people may cycle to the station and take their bike on the train, or may choose to hire a bike at the station. There needs to be adequate provision for both."

43. 4.100 "cycle parking is important"

44. 4.104 "Manual for Streets 2 has: a clear hierarchy with cyclists encouraged ahead of cars; also states: infrastructure allows many journeys under 5km can be made by bike"

45. 4.105: "**Pedestrianisation**. There is ample scope for cyclists and pedestrians to share space, as happens in other cities."

46. Policy TC16: please make it clear that safe continuous cycle routes are needed throughout the town.

47. Policy TC18: Please add "cycle routes" not just signage to other routes.

48. DO site 1: needs "cycle routes will be incorporated into this key area"

49. DO site 2: 5.24 needs "we plan to enhance Eastbourne station as a "cycling hub"

50. Policy TC19: "We also plan to develop the land beside the railway as a route into Eastbourne town centre for bicycles, shared use with pedestrians and other users"

51. DO site 3: "We acknowledge that this is a major entry point for Eastbourne residents on bicycles, and will enhance the safety and routes, including provision of Advanced Stop Lines at junctions."

52. TC20: "clear cycle routes will be prioritised"

53. DO site 4: 5.36: "there is potential to create a good safe cycle route in this area"

54. TC21: "clear cycle routes will be identified. Shared use routes may work well."

55. DO site 5: 5.43: "there is potential to create a good safe cycle route in this area"

56. TC22: "clear cycle routes will be identified. This is a key route linking the railways station to the seafront."

57. Transition areas: "these are key routes into and out of the town centre, and require careful consideration of access by bicycle to enhance our commitment to active travel"

58. 5.46: Transition Area One: Seaside Road and Terminus Road East: "There have been a large number of cycling casualties in this area, so a priority is to enhance the safety of cyclists. This will involve better provision for them on Seaside Road, and opening of a seafront cycle route as envisaged in the Eastbourne Cycling strategy"

59. 5.48 "It should be noted that if the cycle routes were perceived to be safer both within the town centre and on its approaches, more people would cycle. Provision should be made for increased numbers of cyclists, including those unable to afford to run a car."

60. 5.50 (change as for: 4.94)

61. Policy TC23: "continuous safe cycle routes will be required in this area"

62. Potential area of change 5.58: "this includes Eastbourne College with a number of buildings and thousands of road crossings daily. Traffic calming for safety and potential for cycle routes will be prioritised in keeping with statutory duties to enable safety and sustainable travel by schoolchildren."

63. 5.59: "This is a key gateway for cycle access to the town centre"

64. Policy TC24: "Access to and through these areas by bicycle will be prioritised at all stages".

65. 6.2: "pre-application discussions will focus on: linking sites on continuous cycle routes and on cycle facilities for staff, customers and visitors"

66. 6.2 Partnership working: "we will design cycle routes with local cyclists"

67. 6.2: "external funding may be available through initiatives for access to the South Downs National Park and through initiatives to promote active travel"

    Table:

68. TC2: "priority will be given to safe continuous cycle routes in these key areas" this is already an ESCC priority in its Local Transport Plan 2011-2026."

69. TC2 King Edward's Parade: "priority will be given to creating a continuous seafront cycle route as per the Eastbourne Cycling Strategy"

70. TC2 Upperton: "Priority will be given to ensuring safe access by cyclists at this point"

71. TC13: Public realm Terminus Road: "there is a clear priority to creation of a cycle route from station to town centre to the seafront as in the Cycling Strategy"

72. TC13: Grove Road: "Consideration will be given to creating a usable cycle route hence joining the railway station with the university, South Downs Park, theatres and Eastbourne College"

73. TC14: "This will link with Southern railway's plans for a Cycling Hub"

74. TC18-TC24: "All developments should help to create a network of usable safe routes for cyclists to and through the town centre. All planning decisions should insist on accessibility by bicycle, and cycle parking"

Monitoring

75. TC13: "monitor number of cyclists using the routes"

76. TC13: "monitor the number of cyclists killed or seriously injured in the town centre area"

77. TC15: "monitor the number of bicycles parked at key locations on different occasions"

78. TC16: "Monitor the number of cyclists killed or seriously injured on the streets

79. TC16: "monitor the number of cyclists using the seafront cycle path"

80. TC16: "Survey people using the area to ask why they have not arrived by bicycle, with an option of 'the roads are not safe for cycling' to assess perceptions of safety"

81. Glossary: "Active travel = cycling, walking, using non-motorised scooters or similar means to travel. This has been recognised as the most efficient way for people to achieve the 5 times a week of 30-minutes of exercise necessary to reduce the risks of heart disease/dementia/osteoporosis/diabetes/some cancers by 30-80% Reference www.bma.org.uk/transport"
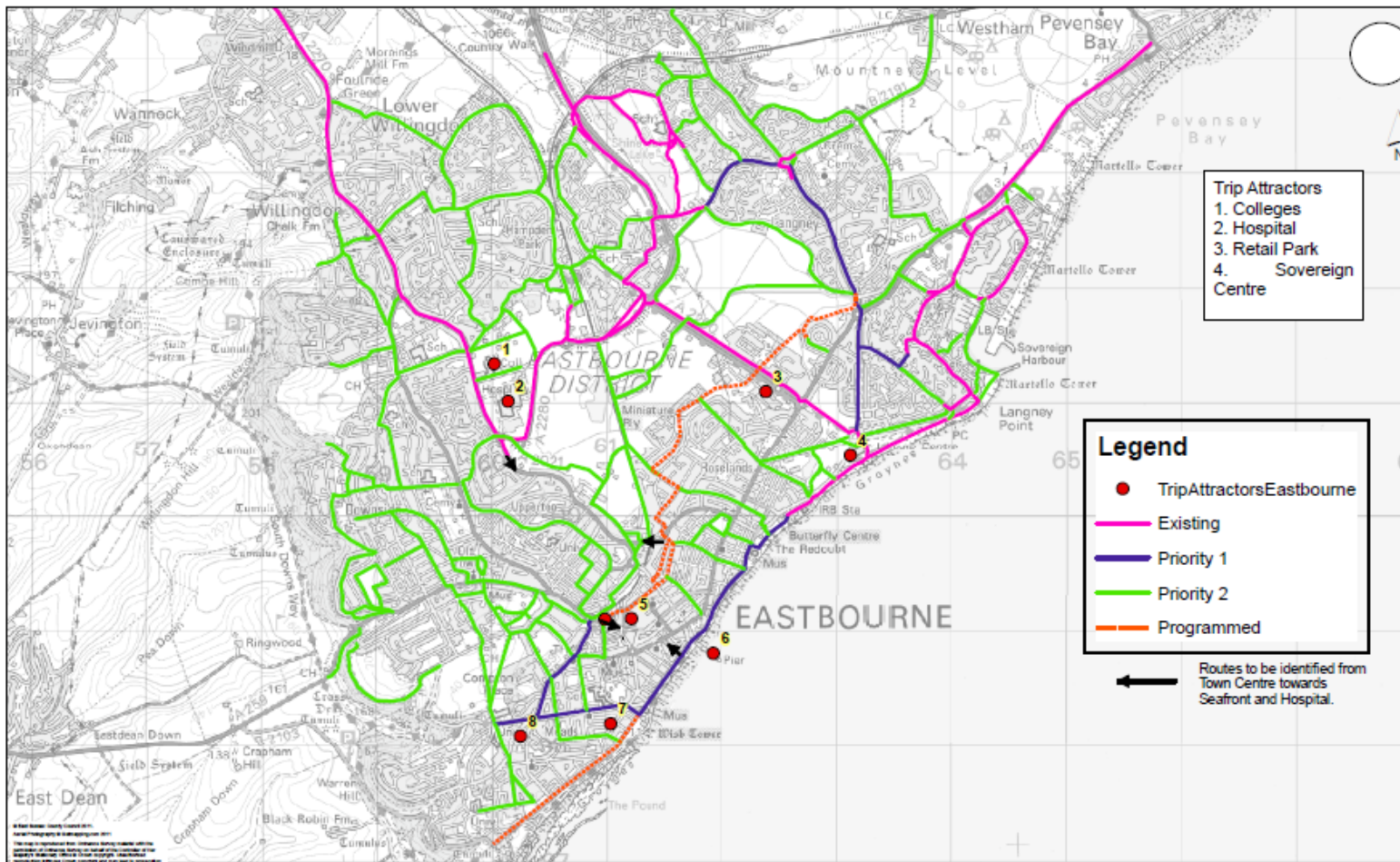
Map of potential cycle routes from Eastbourne Cycle Strategy 2012