

City Plan Part Two Scoping Report Statement of Consultation

January 2017 (Updated June 2018)



Brighton & Hove
City Council

Statement of Consultation – City Plan Part Two Scoping Consultation

Statement of Representations Made and Main Issues Raised

(Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations
2012

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1. Introduction

1.1 Role of the Document

Brighton & Hove City Council has prepared a Consultation Statement ¹ in relation to consultation undertaken on the **City Plan Part Two Scoping Paper**. This statement sets out how the city council notified relevant stakeholders of the start of the preparation of the City Plan Part Two; of the opportunity to make comments on the scope of the document and to put forward sites for consideration. Consultation was carried out in accordance with the council's adopted Statement of Community Involvement (SCI) and the Town & Country Planning (Local Planning) (England) Regulations 2012. This statement shows that the requirements set out in the adopted SCI and government regulations have been met. The statement also outlines the consultation undertaken and provides a summary of comments from the consultation events and the number of formal representations received and provides a summary of the key issues raised in those representations.

Copies of the original representations made in at the Regulation 18 stage are available electronically from the council's website as a separate document.

This document sets out:

- i) How the general and specific consultation bodies were notified and invited to make representations (under regulation 18) to the Scoping Report for the City Plan Part Two;*
- ii) How and within what period the representations had to be made;*
- iii) the details of the consultation events that were organised and meetings attended during the consultation; and*
- iv) The number of representations received and a summary of main issues raised as a result of the representations and consultation events.*

1.2 Compliance with Statement of Community Involvement

The council adopted its revised Statement of Community Involvement in March 2015. The SCI is a statutory document that formally sets out the policy and standards for engaging residents, local groups, stakeholders and statutory consultees in preparing development plans and how the council will consult on planning applications.

For the early stage of plan preparation (Regulation 18), the council recognises the importance of engaging people at the early stages of preparing our local plan documents, at the point in the process when there is the greatest opportunity to influence the shape of strategies and policies.

Consultation was extended to 12 weeks in accordance with the SCI in recognition of the summer holidays to ensure everyone has the opportunity to become involved including those who may be away at these times.

¹ In accordance with Regulation 22 of the Town and Country Planning (Local Planning) England Regulations 2012

2. City Plan Part Two Scoping Consultation

2.1 Background

The role of the City Plan Part Two is to support the implementation and delivery of the adopted City Plan Part One; to build on the strategic policy framework; to identify and allocate additional development sites and to set out a detailed development management policy framework to assist in the determination of planning applications. Once adopted, the policies in the City Plan Part Two will replace the remaining 'saved' policies from the 2005 Local Plan.

2.2 City Plan Part Two Scoping Paper

i) When the Scoping Paper was published

Following approval at the 16 June Economic Development & Culture Committee 2016, the Scoping Paper was published for a twelve week period of consultation starting Thursday 30th June and ending Thursday 22 September 2016.

ii) The Consultation Documents

The **City Plan Part Two Scoping Paper** (June 2016) was arranged by 12 policy topic areas. Each topic area identified key policy issues and had a series of consultation questions which sought views on the scope and content of the City Plan Part Two. There were also questions which sought to check that the shaping document had identified all the relevant issues or whether there were other issues that would also need addressing through the City Plan Part Two. There was also a 'call for sites' where respondents were invited to put forward sites for consideration as potential site allocations.

Alongside the City Plan Part Two Scoping Paper, the following accompanying documents were also made available as part of the consultation;

- **Sustainability Appraisal (SA) Scoping Report** – the scoping report was also published for consultation
- **SA Summary Leaflet**
- **City Plan Part Two Scoping Paper Summary Leaflet** - a 4 page leaflet that provided an overview of the Scoping Report.
- **Formal Notification notice** - which indicated that work had started on the City Plan Part Two; the role and scope of the document; the availability of the document and how to make comments. This is included in Appendix 3.
- **Call for sites** - In addition to the questions set out in the Scoping Consultation Report there was a general call for site that could be allocated for specific uses in the City Plan Part Two.

iii) Where the consultation documents were made available

The City Plan Part Two Scoping Paper, accompanying consultation documents, including the formal notification of start of work on City Plan Part Two were made available on the dedicated City Plan Part Two section of the council's website: www.brighton-hove.gov.uk/cityplan-part2 and could also be accessed via the council's consultation portal (<http://consult.brighton-hove.gov.uk/portal>) and paper copies were made available at the following public deposit points:

- Customer Service Centre (Brighton),
- Customer Service Centre (Hove),
- Jubilee Library (Brighton),
- Hove Library
- All other city libraries - Coldean Library, Hangleton library, Hollingbury Library, Mile Oak Library, Moulsecoomb Library, Patcham Library, Portslade Library, Rottingdean Library, Saltdean Library, Westdene Library, Whitehawk Library and Woodingdean Library.

The 8 smaller libraries had only a summary version of the SA Scoping Report. The documents were made available from the 30th June 2016.

iv) Notification of Consultation

A press release was published on the council's website on the 16th June 2016.

Emails or letters were used to notify organisations and individuals who were logged as relevant consultees on the council's City Plan database. The database includes statutory and general consultees bodies and also the organisations and individuals in accordance with Regulation 18.

The City Plan database is continuously updated with new consultees that engage during or between consultation periods being added to the database.

Around 1,000 City Plan database consultees were notified by email or letter of the start of the preparation of the City Plan Part Two and the opportunity to comment on the Scoping Report (see Appendix 1). The notification email included a website link to the council's website where the documents could be read or downloaded and the consultation portal. Letters were sent if there was no recorded email address. The letter advised of the availability of consultation documents online and at the public deposit points. Copies of the letter and email are included in Appendix 3.

Consultees received full details of the duration of the representation period, where documents could be viewed and how to make comments.

Respondents were able to respond:

- Electronically via the council's Consultation Portal (<http://consult.brighton-hove.gov.uk/portal>). This is directly linked to the consultation section on the

council's website and gave respondents an opportunity to respond to the response form online and gave the option to provide more detailed written responses.

- By requesting a word copy of the response form and sending this to the council by email or by post or by hand
- Written representations (not using form) were also accepted via post and by hand.

In addition to consulting those on the City Plan database, stakeholders were consulted through a series of presentation and workshop events which are detailed in section vii).

Wide-ranging media publicity was also undertaken which is detailed in section v).

v) Media

The council issued a press release on its web page. Appendix 3 of this document details the city council media press release. This was followed up by notifications uploaded onto the council's Twitter and facebook pages. Reminders of the consultation were uploaded onto the council's Twitter page.

There were also press articles related to the City Plan Part Two published in the local media including the Brighton & Hove Independent News, Brighton & Hove News, and the Brighton & Hove Argus. These are included in Appendix 3. Some local organisations/ groups chose to put details of the consultation on their webpages, emailed to their members or re-tweeted the news feed. This allowed details of the CPP2 consultation to reach a wider audience.

vi) Publicity

As well as the press releases, a poster publicising the City Plan Part Two Scoping Consultation was also produced and sent to the public deposit points as well as large supermarkets, community centres and GP surgeries as an additional way to ensure that residents were aware that work had started on preparing the City Plan Part Two and Scoping Consultation. A copy of the poster is included at Appendix 3.

vii) Workshops and Attendance at Existing/Planned Meetings

In accordance with the SCI a range of methods, including pro-active engagement, were used recognising that at the early stage in the CPP2 preparation there was greater scope for influencing and shaping the document. A comprehensive schedule of stakeholder events were held during the consultation period. The details are set out in the table below. The table illustrates that there were a range of specific consultation events including a stakeholder event (with representatives from amenity and resident groups and Local Action Teams), a Professional Forum event (with representatives from developers, architects planning and commercial agents); a sustainability and environment workshop (with representative of sustainability organisations, environmental groups and transport organisations) a bespoke event organised by the Brighton & Hove Economic Partnership and a Construction Voice Question Time event.

The City Plan was also discussed at a number of existing planned meetings for example the Conservation Advisory Group and the Strategic Housing Partnership. Over 400 people attended these events.

Workshops and Attendance at Existing/ Planned Meetings		
Date	Meeting/ Event	Purpose/Attendance
30 June 17:45 - 19:45 Boundary Room, Cricket Ground	Construction Voice: City Plan Part Two – aspirational and achievable?	Chamber of Commerce Event Panel of experts on hand to direct questions on certain elements of the Council’s City Plan Part Two and to guide the wider debate from the audience. The discussion focused on five key areas of: <ul style="list-style-type: none"> • Employment space • Tourism, retail and culture • Housing • Students and education • Smart and sustainable cities • 92 attendees
5 July 2016 16:00 to 18:00 Suite 1, The Jury's Inn, 101 Stroudley Road, Brighton, BN1 4DJ	Brighton & Hove Connected (LSP)	<ul style="list-style-type: none"> • Attendees from a cross section of the business; public, arts and community sectors • Raised awareness of CPP2 consultation as part of wider discussion about future developments and their impacts. • Summary leaflets provided for members to take away • 22 attendees
Wednesday, 6 July 2016 from 16:00 to 18:00 Brighton & Hove Chamber of Commerce	Chamber of Commerce -The Big Debate: 'Work space: How do we meet the demand?'	<ul style="list-style-type: none"> • Chamber of Commerce organised event • Panel of experts discussed issues around availability of office space, types of office space office delivery and role of council. • Raised awareness of CPP2 consultation • Summary leaflets provided for attendees to take away • 91 attendees
Friday 8 July 10am-12 noon, Kings House Hove	Councillor Training Seminar – City Plan Part Two	Training Seminar on City Plan Part Two offered to all councillors. <ul style="list-style-type: none"> • Presentation on City Plan Part Two • Question & Answer session • 7 attendees
12 July 2 p.m. at Probation Trust HQ, Invicta House, Trafalgar	Strategic Housing Partnership	<ul style="list-style-type: none"> • 10 minute presentation on City Plan Part Two • Question & Answer session

Workshops and Attendance at Existing/ Planned Meetings		
Place, Brighton		<ul style="list-style-type: none"> • Summary leaflets provided • 8 attendees
12 July 4p.m.	Health and Wellbeing Board	<ul style="list-style-type: none"> • City Plan Part Two Consultation was raised under Chairs communication. • Summary leaflets made available at meeting • 15 attendees
13 July 10 a.m. Conference Room, Hove Town Hall	B&H Affordable Housing Delivery Partnership	<ul style="list-style-type: none"> • Raised awareness of City Plan Part Two Consultation • Summary leaflet provided • 12 attendees
1 August 6.15 pm Kings House	Conservative Group Briefing	<ul style="list-style-type: none"> • Presentation Q&A • c.15 attendees
2 August 10.30am Cttee room 1, Brighton Town Hall	CAG	<ul style="list-style-type: none"> • City Plan Part Two Consultation Agenda item • Presentation Q&A • 13 attendees
Thurs 8 Sept am Room 122 Kings House 9am to 1.30	Internal Stakeholder Meeting	<p>Bespoke Event. A working group of officers from across the council – development management, housing, transport, environmental health, regeneration.</p> <ul style="list-style-type: none"> • Presentation • Workshop • 33 attendees
Thurs 8 Sept pm Boundary Room, County Cricket ground, 5-7 pm	City Plan Stakeholder Workshop (LATs; Residents; Amenity)	<p>Bespoke event. Invitations were sent to a range of resident and amenity groups across the city as well as Local Action Team LATS).</p> <ul style="list-style-type: none"> • Presentation • Workshops • 48 attendees
9 Sept BME Community Partnership, Fleet Street Brighton 10 -12	Environment and Sustainability Focused Event	<p>Bespoke event targeted at a range of transport, environmental and sustainability stakeholders</p> <ul style="list-style-type: none"> • Presentation Q&A • Workshops • 38 attendees
13 September 8.30 – 11.30 Brighthelm Centre, Brighton am	Professionals Forum	<p>Bespoke Event with the Professional Forum, an established group of planning agents, consultants and architects in the city</p> <ul style="list-style-type: none"> • Presentation • Round table Presentations • 22 attendees
13 September – 2	Strategic Housing	<ul style="list-style-type: none"> • 10 minute follow on presentation on City

Workshops and Attendance at Existing/ Planned Meetings		
– 4pm, Probation Trust HQ, Invicta House, Trafalgar Place, Brighton	Partnership	Plan Part Two <ul style="list-style-type: none"> • Question & Answer session • 7 attendees
13 September 5-7 pm Entrepreneurial Spark, NatWest Building Preston Road.	Economic Partnership meeting	Bespoke event arranged by the Brighton & Hove Economic Partnership for their members. <ul style="list-style-type: none"> • Presentation • Round table discussions • 18 attendees
14 September Hove Town Hall	Property Services	Internal meeting with colleagues in Property Services <ul style="list-style-type: none"> • Presentation • Q&A • 7 attendees
20 September 6 - 9pm Deal Crescent Hollingdean	LAT Forum	Forum is made up of c.12 residents associations in the five Lewes Road wards included in the Article 4 Direction area plus ward councillors <ul style="list-style-type: none"> • Presentation Q&A • c.25 attendees

3. Issues Raised at Consultation Events

Notes were taken of the debates/ issues raised at the events. These are included in Appendix 4.

The summary of key issues raised are also collated by policy topic area and included in analysis of representations in Appendix 5.

4. The Number of Formal Representations Received.

A total of 197 respondents formally commented on the Scoping Report. A summary of the number by type of respondent is summarised in the table below;

Type of Respondent	Number of respondents
Business	2
Civic and Amenity Group	28
Community & Voluntary Sector	4
Developers, landowners and consultants	26
Environmental, Transport & Wildlife Groups	14
Government Agency	3
Individual	109
Public Sector / Local Authority	5
Utilities	1
Unknown	5
Total	197

A full list of respondents is shown in Appendix 2.

The 197 respondents, who formally commented on the Scoping Document either by letter, email or via the consultation portal made a total of 2,901 representations. The table below indicates the number of representations by consultation topic. The summary of key issues raised to each consultation questions is included at Appendix 5 and this also details the number of representations per topic question.

Consultation Topic	Number of Respondents	Total Number of Representations
Housing	131	1,078
Economy and Employment	24	87
Retail & Town Centres	30	130
Tourism	27	45
Transport and Travel	55	372
Biodiversity and Open Space	72	350
Addressing Pollution Water and Energy Resources – QP1 – P12	37	134
Addressing Pollution Water and Energy Resources – QP13 – P21	20	94
Design and Amenity	30	102
Heritage	35	177
Community Facilities	27	74

Consultation Topic	Number of Respondents	Total Number of Representations
Purpose Built Student Housing	36	177
Traveller Accommodation	16	37
General Comments	35	35
SA Scoping Report	11	9
		2,901

Late representations

No representations were received after the close of consultation (5pm Thursday 22 September 2016).

5. Petitions

During the Scoping stage of the City Plan Part Two the following relevant petitions were submitted to the council for consideration:

i) St Aubyn’s Playing Field

We the undersigned petition Brighton & Hove Council to (a) resolve to use all reasonable endeavours to achieve the designation (or equivalent status protection) of St Aubyns Playing Field, Rottingdean as a Local Green Space at the earliest opportunity; and (b) advise SAFE (Rottingdean) whether its policies and procedures permit one of its unelected officers to procure or initiate a significant amendment to a Full City Council resolution and, if not, whether these policies and procedures were adhered to in the case of the FE (Rottingdean) petition to have the field designated as a Local Green Space which was passed to the Economic Development and Cultural Committee meeting on 17 September 2015.”

Lead Petitioner – L Moss

1764 signatures

ii) Family Homes Not HMOs

We the undersigned petition Brighton & Hove Council to prohibit the issuing of any future HMO certificates in the Bevendean/Moulsecoomb ward.

Over 800 'Houses In Multiple Occupation' (HMO) certificates have been currently issued in the Bevendean/Moulsecoomb ward, the ward includes Coombe road. Families that have lived in this area all their lives are being out-priced of the housing market by HMO developers. That's the loss of over 800 affordable family homes that have been converted into HMOs. With the vast majority being exclusively let to University Students. We believe it is the biggest threat to our community and to the affordable family homes housing market in the City of Brighton. There are, at present over 800 family homes that

have been lost to HMOs in the Bevendean & Moulsecomb ward alone. With another 4 HMO proposals as I write. Sign this Petition and join us in calling for a halt to this practice.

Petition from B Gandey
1295 people signed this ePetition.

The petition was presented to the full Council meeting on the 20th October 2016 and referred to the 17th November 2016 Economic Development Culture Committee

These petitions will be considered during the preparation of the draft City Plan Part Two.

6. How the responses and representations will be taken into account

In preparing the draft City Plan Part 2, the local planning authority must take into account any representation made to them in response to invitations under Regulation 18 (1).

All responses have been collated and analysed. A summary of key issues raised in the written responses by topic and question order are set out in Appendix 5. The responses and the comments received at consultation events will also inform the preparation of the draft City Plan Part Two.

Sites put forward for consideration during the Scoping consultation stage will be assessed as part of the plan preparation process.

There will be a further round of consultation to allow for comments on the draft City Plan Part Two detailed development management policies and proposed site allocations (this is sometimes referred to as preferred options stage). The timetable for the next stages is published on the City Plan webpages on the council's website and will be kept updated.

Appendix 1 List of Consultees for the City Plan Part Two Scoping Consultation

Specific Consultees

Local Authorities

All Ward Councillors B&HCC	Mid Sussex District Council
Adur & Worthing Council	Newtimber Parish Council
Arun District Council	Poynings Parish Council
Chichester District Council	Pyecombe Parish Council
Crawley Borough Council	Rodmell Parish Council
Ditchling Parish Council	Rother District Council
Eastbourne Borough Council	Rottingdean Parish Council
East Sussex County Council	South Down National Park Authority
Falmer Parish Council	Sussex Police Authority
Fulking Parish Council	Telscombe Town Council
Hastings Borough Council	Upper Beeding Parish Council
Horsham District Council	Wealden District Council
Kingston Parish Council	West Sussex County Council
Lewes District Council	

Gov Organisations

Brighton & Sussex University Hospitals	Natural England
NHS Trust	Network Rail
Brighton & Hove Clinical	NHS Brighton & Hove
Commissioning Group	NHS England
B&H Integrated Care Service	NHS Property Services
Brighton & Hove Public Health	SEEDA
County Archaeology	South Downs Health NHS Trust
County Ecologist	South East Coast Ambulance Service
CABE	Sussex Partnership NHS Trust
Civil Aviation Authority	Sussex Community NHS Foundation
East Sussex Fire and Rescue Service	Trust
English Heritage - SE Region	Sussex Police Authority
Environment Agency (Solent & South	Southeast Region Design Panel
Downs)	South Downs National Park Authority
Homes and Communities Agency	Sport England
Highways England	The Secretary of State for Transport
Historic England	Mike Weatherley MP
Homes & Communities Agency	
Marine Management Organisation	

Utilities

British Telecommunications plc	EDF Energy
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Mobile Phone Operators Association
(O2, 3, Orange, Vodafone, T-Mobile)
Openreach BT
Virgin Mobile
Renewable UK
Scottish Power Corporate
Communications

Southern Water
The Coal Authority
UK Power Networks (Infrastructure
Planning South)

Landowners

University of Brighton
University of Sussex
South East Coast Ambulance Service NHS Foundation Trust
Shoreham Port Authority

Consultees General

Other Public Bodies

BACA
Brighton & Hove Arts Council
Brighton Aldridge Community Academy
CABE
City Clean BHCC
City Neighbourhood Co-ordinator
Coast to Capital Local Enterprise Partnership
Command Agri Property
County Landscape Architect
Dorothy Stringer High School
England Cricket Board
England Hockey
ESCC (The Keep Project)
H Brocklebank
J Cheston
MP S Kirby

NerI Safeguarding
Patcham High School
Planning Aid South East
Planning Policy Chichester
Private Sector Housing BHCC
Railway Heritage Trust
S Deacon
Safeguarding Wind MOD
Social Care and Health BHCC
St Bartholomews C E School
Sussex County Football Association Ltd
Sussex Football Association
Sussex Partnership NHS Trust
The Kent, Surrey & Sussex Comm Rehab
Tourism South East

BME

Actually CIC
Al Medina Mosque
All Sorts
Amaze B&H
Asian Society
B&H Chinese Society
B&H Inter Faith Contact Group
B&H Jewish Housing Association

B&H Muslim Forum
Be As one Foundation
Black & Minority Ethnic Resource Centre
Black & Minority Ethnic Young Peoples Project
Black & Minority Ethnic Young Peoples Proj
Black History Project
Blue Bird Society for the Disabled
BME Champion

Brighton & Hove Reform Synagogue
 B&H ASSOC OF GAMBIAN CITIZENS
 B&H Black History
 B&H Inclusion Project
 B&H Jewish Representative Council
 Brighton and Hove Jewish Welfare Board
 B&H Muslim Women
 B&H World Development Movement
 Brighton Gems
 Children's Music Play House
 Chinese Educational Development Project
 Chinese Information Pilot
 City Synergy
 Clare Project
 Ethnic Minorities Representative Council
 Ethnic Minorities Visibility Initiative
 FTm Brighton
 G Scene
 GIRES
 Gujarati Culture Centre
 Gujaraticultural Society
 Gujerati Cultural Society
 Indian Punjabi Society

LESBIAN, GAY, BISEXUAL & TRANSGENDER HEALTH & INCLUSION
 LGBT Community Safety Forum
 Mermaids
 Migrant Helpline
 Mosaic
 Rainbow Families
 Rwandan Youth Information Community Orgn
 Safe in the City
 SIERRA LEONE BRIGHTON ASSOCIATION
 Sikh society
 Sompriti
 Southeast Interpreting Services
 Sudanese Coptic Association
 Sudanese Women and Children Group
 Sussex Interpreting Services
 SUSSEX KURDISH COMMUNITY
 Sussex Polish Women's Group
 SUSSEX RUSSIAN CENTRE KALINKA (SRC KALINKA)
 The Race Project
 Trans Pride Brighton
 Transformers
 Traveller Law Reform Project
 Voices in Exile

Lesbian Link

Business

B&H Hotels Association	Komedia
Brighton & Hove Chamber of Commerce	miles broe architects
BRIGHTON & HOVE CHAMBER OF COMMERCE	North Laine Traders Association
Brighton & Hove Hotels Association	Oriental Hotel
Brighton & Hove Hotels Association	Roedean Miniature Golf Course
B&H District Leaseholders Association	St Peter's Church Traders
Brighton and Hove Hoteliers Association	Sussex Chamber of Commerce
Brighton BID Manager	Telereal Trillium
Brighton Business Forum	The Lanes Traders Assoc
Brighton Media Centre	Tourism Alliance
CBI - SE Region	Under the Bridge Studios
Churchill Square Shopping Centre	University of Sussex
Community Stadium Ltd	University of Sussex Student Union
George Street Traders Association	Wired Sussex
Herandi Management Ltd	
Hove Business Association	
Kent, Surrey & Sussex Local Education & Training Board	

LATS

Bevendean LAT
Bevendean Local Action team
Brighton & Hove City Council
Bristol Estate Community Association / Community
Interest Company
Coldean Community Forum
Coombe Road Local Action team
Craven Vale Community Assoc
FED Online City Connect
Friends of Bedford Square
Friends of Brunswick Residents
Goldsmid Local Action Team
Hanover and Elm Grove Local
Action team
Hollingbury LAT
Hollingdean LAT
LAT Network Vice Chair
London Road Local Action Team
Marina LAT
North Laine Community Assoc (NLCA)
Patcham LAT
Preston park & Fiveways LAT
Queens Park LAT
Queens Park Local Action Team
St James Street Community Action Group
Tarnier Area Partnership & Community
Safety Action
Whitehawk Crime Prevention Forum
Withdean & Westdene LAT
Woodingdean TRA and LAT
Written Word
Portslade LAT
E Daniel
A Wealls
D Ward
Cllr O Sykes
M Strong
C Moonan
Cllr P McCafferty
H Joyce

LEP/LSP

Coast to Capital LEP
G Rustell
Arts & Creative Industries Commission
B&H Federation of Disabled People
Brighton & Hove Bus & Coach Company Ltd
Brighton & Hove Economic Partnership
Brighton Housing Trust
Federation of Small Businesses
Metamorphosis Art Group

Community & Voluntary Services

A Band of Brothers
ABC Fund
Action for Bevendean Community
Action for Happiness in Brighton
Active Light Works
Active Student Volunteering Service
Adventure Unlimited
Advice Centre Brighton Housing Trust
Age Concern Brighton Hove Portslade
AKWAABA
Albion in the Community
All for Love and Love for all (ALALA)
Alzheimers Society, B&H Branch
Artiste
Artspace
Aspire
Association of Harbour Communities
B&H City Mission
B&H Impetus
BANDBAZI
Barnados B&H Supported Lodgings
Blatchington Court Trust
Bridge Community Education Centre
Bridge Community Education Centre
Bright Exchange
Brighthelm Church & Community Centre
Brighton & Hove City Council
Brighton & Hove Impetus
Brighton & Hove Pensioners Association
Brighton & Hove Progressive Synagogue

Brighton & Hove Speak Out	Family Support Work
Brighton & Hove YAP	Federation of Disabled People (FED)
B&H & District Samaritans	First Base
B&H Community Radio	Fishersgate Community Assoc
B&H Faith in Action	Forward Facing
B&H Foster Care Assoc	Free University Brighton
Brighton and Hove Local Access Forum	Fresh Start
B&H Shopmobility	Friends of Brighton & Hove Hospitals
B&H Women Against the Cuts (BHWAC)	Friends, Families & Travellers
Brighton Dome & Brighton Festival Ltd	Future Proof Consulting Solutions CIC
Brighton Housing Trust	Get Involved Group
Brighton Little Theatre	Glass Bridges
BRIGHTON OASIS PROJECT	Good Life for All CIC
BRIGHTON OFFENDER SUPPORT SERVICE	Good Money CIC
Brighton Old Town Local Action Team	Grace Eyre
BRIGHTON PEACE AND ENVIRONMENT CENTRE	Hailsham Trust
Brighton Pebbles	Hangleton & Knoll Project
Brighton Rock Housing Coop	Hangleton Community Association
Brighton YMCA	Hangleton Food Bank
British Red Cross	Hanover Community Centre
Brunswick Community Development Project	Heath Know How
Centre For Eco therapy	Health Watch Brighton & Hove CIC
CHIBAH: Co-operative Housing in Brighton and Hove	Hollingbury Local Action Team
Churches Together in B&H	Hollingdean Development Trust
City Gate Community Projects	Hollingdean Programme
City-Gate Centre	Homeopathy in the Sussex Community
Clifton, Montpellier, & Powis Community Alliance	Homity Trust
Community Association of Portslade South	Hope
Community Base	Hove Hebrew Congregation
Community dialogue for change	Hove YMCA
Community Land Trust Steering Group	Impact Initiatives
Community Transport B&H and Area	INTERACT
Community works	Leading the Change
Core	Lost Property CIC
Cornerstone Community Centre	Magnetic Ideals
Crew Club	Marina Local Action Team
Deans Youth Project	Marlborough Productions CIC
Ditch the Label	Meadowview and Tenantry Community Action Group
DueEast Brighton	Mindout LGB & T Mental Health Project
East Central Moulsecoomb Tenants & Residents Association	National Association of Gypsy & Traveller Officers
EBRA	National Federation of Gypsy Liaison Groups
East Sussex Strategic Partnership	National Pensioners Conv, B&H Group
Engage	Neighbourhoods Network c/o BHCVSF
Experience in Mind	Old Boat Corner Community Centre

Older Peoples Council
Patcham Local Action Team
People Who Share
Phoenix Arts Association
Phoenix Brighton
Phoenix Community Centre
Poets Corner Community Society
Portslade Community Forum
Portslade Purple People Foodbank
Portslade Youth Forum
Prestonville Community Association
Purple Dot CIC
Quest South East
Somerset Day Centre
South Portslade Community Group
St James Community Action Group

St Johns Older Peoples Centre and Cafe
Sussex Diocesan Association for the Deaf
Terrence Higgins Health Impact Project
The Carers Centre, Brighton & Hove
The Pensioner Magazine
The Trust for Developing Communities
The Women's Centre
Triangle Community Group
The Level Communities Forum
Trust for Developing Communities
Vallance Community Centre
Valley Social Centre
Volunteer Centre, Brighton & Hove
Westdene and Withdean Local Action Team
Women's Institute
Youth Advice Centre

Civic & Amenity

20th Century Society
Ancient Monuments Society
Another London Road
Arundel St/Arundel Road Residents Assoc
Assoc of Harbour Communities
B&H Albion Supporters Club
B&H Athletic Club
Bates Estate Tenants Residents Association
BETTER FUTURES
Bridge Community Centre
Brighton & Hove Community Works
Brighton and Hove Hoteliers Association
Brighton Area Buswatch
Brighton Festival & Dome
Brighton Hove and District Leaseholders Association (BHDLA)
Brighton Marina Residents Assoc
Brighton Society (Sub)
Bristol Estate Community Association
British Toilet Association
Brunswick & Regency Residents Group & Lansdowne Area Residents Association
CAG (Chair) and Regency Society
Campaign for Real Ale
Campaign to Save Toads Hole Valley
CAMRA
Clarendon & Ellen Residents Assoc

Clifton, Montpelier & Powis Community Alliance
Craven Vale Community Association
Deans Preservation Group
Ditchling Rise Area Residents Assoc
Ditchling Rise Area Residents Association
Downland Court Residents Assoc
East Central Moulsecoomb Tenants and Residents Association
East Moulsecoomb Tenants Assoc
Easthill Park Group
English Heritage
Fabrica
Family Home's not HMO's
Friends of Bev Fest
Friends of Bevendean Down
Friends of Blakers Park
Friends of Brunswick Sq & Terrace
Friends of Devil's Dyke
Friends of Hollingbury & Burstead Woods
Friends of Palmeira & Adelaide
Friends of Preston Park
Friends of Queens Park
Friends of Sheepcote Valley
Friends of St Anns Well Gardens
Friends of Stoneham Park
Friends of Turner Park
Friends of Three Cornered Copse

Friends of Victoria Park	North Laine Traders Association
Friends of Waterhall	North Portslade Community Newspaper
Friends of West Blatchington Windmill	North Portslade Residents Association
Friends of William Clarke Park	North Moulsecoomb Tenants & Residents Asso
Friends of Withdean Park	Old Boat Corner Community Association
Garden History Society	Our Lady of Lourdes Church
Georgian Group	Ovingdean Residents & Preservation Society
Goldstone Valley Residents Association	Philip Court Residents Association
Gregory Gray Associates	Phoenix Athletic Club
Guinness Estate Assoc Whitehaw	Preston and Old Patcham Society
Hampshire Court Residents Association	Prestonville Community Association
Hangleton and Knoll 50+ steering group	Queens Park / Craven Road Action Group
Hangleton Community Centre	Queens Park Community Association
Hangleton Harbinger	Regency Square Area Society
Hangleton Residents Association	Regency Town House Guest House
Hanover Action	Resident Involvement Team
Hazel McKay Consultancy, Campaign to Save The Bods Hale Valley	Rodley Residents Association
Highden, Westmount & Crown Hill Residents Association	Rottingdean Parish Council
Hollingbury Hawks Youth Football Club	Rottingdean Preservation Society
Hollingdean News	Roundhill Society (sub)
Hollingdean Tenants Assoc	SAFE Rottingdean
Horsdean Community Sports Association	Saltdean Residents Association
Horsdean Recreation Sports Club	Saltdean Swimmers
Hove Civic Society	Save Brighton
Hove Civic Society (Chair)	Save our Deans
HPRA	saveHOVE
Ingram Crescent	Society for the Protection of Ancient Buildings
KAWRWA	Southdown Rise Residents' Association
Keep Sussex Skating	St George's R C Church
Keep the Ridge Green	St James Action Group
Kemp Town Carnival Assoc	St James House Community Assoc
Kemp Town in Bloom	Stanmer Preservation Society
Kemp Town Society	Surrenden Park Residents Association
Kingscliffe Society	Sussex Central YMCA
Leach Court Tenants Association	Sussex County Cricket Club
London Road Area LAT	Sussex Industrial Archaeological Society
London Road Station Partnership	Sylvan Hall Tenants Association
Longhill Woodland Group	The Brighton Society
Marine Gate Action Group	The Friends of Brunswick Square & Terrace
Marmion Road Residents Assoc	THE HALL GET INVOLVED
Marmion Road YMCA	The Hangleton and Knoll Project
Montpelier & Clifton Hill Association	The Herberts Leaseholders Association
Moulsecoomb Community Forum and Newsletter	The Kemp Town Society
National Landlords Association	The Kingscliffe Society
NLCP	The Regency Society
North Laine Community Association	The Round Hill Society

The Saltdean Zone
The Theatres Trust
The Vale Residents Committee
Transition Town Shoreham by Sea
Triangle Community Group
TWEACK
Vicar Parish of St Peter's
Victorian Society
Warwick Mount Residents Association

West Hill Community Association
West Hove Cycling
Western Esplanade Management Co (Hove) Ltd
Whistler
Wilbury Area Residents Assoc
Withdean Park Dog Walking Community
Woods House Residents Association
Rottingdean Preservation Society

Environmental, Transport & Wildlife Groups

BHAF (Brighton & Hove Allotment Federation)
Brighton & Hove Allotment Federation
B&H Allotment Federation
Brighton & Hove Allotments Federation
Craven Vale & Whitehawk Hill
Allotment Society
Craven Vale Allotments
Aqualor Energi
B&H Environmental Action Group
B&H Food Partnership
Benfield Wildlife and Conservation Group
Benfield Wildlife & Conservation Group
Bevendean Community Garden
BHESCo
Bike Train
Bioregional
Bricycles
Brighton & Hove Archaeological Society
Brighton & Hove Buses
Brighton & Hove CPRE
Brighton & Hove Friends of the Earth
Brighton & Hove Wildlife Forum
B&H Community Supported Agriculture
B&H Energy Services Co Operative
B&H Fair trade Steering Group
B&H Food Partnership
Brighton Climate Action Network
Brighton Conservation Volunteers
Brighton Energy Co-Op
Brighton Green Homes
Brighton Peace & Environment Centre
Brighton Permaculture Trust
British Geological Survey
Bus Users UK

Bus Users UK Central Sussex Group
Butterfly Conservation Sussex Branch
Campaign for the Protection of Rural England
Chair Brighton Area Bus Watch
City in Bloom
Clear Sky Sustainable Homes
Co Create Consulting
Community Works
Council for British Archaeology
CPRE
CPRE (Brighton & Hove)
Cycling Support Services
Earthwise Construction
Earthy Women and Kids
Eco technology Show
Eco-logically
Environment Agency
Food Matters
Freegle
Friends of Withdean Park
Gatwick Airport
Green Building Partnership
Green Cycle Sussex
Green Growth Platform
Green Growth Platform
Hanover Action For Sustainable Living
Harvest Brighton and Hove
Highways Agency - Network Strategy
HK Hedghogs
Keep the Ridge Green
Leave our Green Spaces (L.OG.S) Mile Oak
Left Unity, Brighton Branch
Level
Low Carbon Trust

Maggie Environmental Trust	Sussex County Playing Fields Assoc
Marine Management Organisation	Sussex Gardens Trust
Moulsecomb Forest Garden & Wildlife Project	Sussex Inshore Fisheries & Conservation Authority
National Trust	Sussex Past (Sussex Archaeological Society)
Network Rail	Sussex Wildlife Trust
Open Spaces Society	SUSTRANS
Railfuture	Sustrans
RSPB	Sustrans B&H Area Volunteers Group
Save Toads Hole Valley	Tall Trees
Shoreham Port Authority	The Carers Garden
South Downs Land Managers	The Woodbourne Meadow Project
South Downs Society	Transition Brighton & Hove
Southern Landlords Association	Transition Energy Group
SPRU Science Policy Research Unit	University of Brighton
St Nicholas Green Space Association	Woodland Trust
Stagecoach South	M Robinson
Stratus Environmental Limited	Dr K Corbett
Sussex Archaeological Society	

Developers, Agents and Consultants

Andrea Herrick	Futureform Global Investments Ltd
Barton Willmore LLP	GL Hearn (Standard Life 2016)
Batcheller Monkhouse	Hopegar Properties
BDP	Indigo Planning
Bonetts Estate Agents	K Belton
Brighton & Hove Professional Forum	Kendrick Property Services
B&H Seaside Community Homes	Koru Architects
Brighton Lions Club	LCE Architects
British Engineerium	Linden Homes and Cothill Educational Trust
Building Design Partnership	M Stimpson
C Brace	Matsim Properties
CBRE Global Investors	Mishon Mackay
Chartplan Ltd	Montagu Evans
Chris Thomas Ltd	Morgan Carn Partnership
City College	N Gilson
Community Works	National Grid
Costco Wholesale UK Ltd	National Grid & Scotia Gas Networks
Crest Nicolson	NHS Property
DMH Stallard	NLP
DP9	Palace Street Developments Ltd
DP9 Ltd	Papworth Research & Consultancy
East Sussex County Council	Pegasus Group
Enterprise Holdings	Planning Division Arcus Consultancy
Flude Commercial	Services Ltd

Planning Potential
QUOD
Regen-Nation
Rotary Club Brighton
Sainsburys Supermarket
Sanctuary Supported Housing
Savills
Southdown Housing Assoc
Southern landlords Assoc
SSA Planning Limited
St William Homes
STARLINGS HOUSING CO-OP
Starlings Housing Co-operative

Stiles Harold Williams
Strategy and Action
Sussex Co Housing
Turley Associates
University of Brighton
University of Sussex
University of Sussex Student Union
Vail Williams Property Consultants(Mayfield
Market Towns Ltd)
Varndean College (C/o NTR Planning)
Winkworth Estate Agents
Wyevale Garden Centres Ltd.

Landowners

A Brace
ABIR Architects
Adams Integra Housing Consultancy
Adenstar Developments
AEGON UK Property Fund Ltd
Affinity Sutton
Alaska Group
Alder King Planning Consultants
Alliance Environment & Planning Ltd
AmicusHorizon Group
Anchor Housing Trust
APEC (Art Producing Economic Community)
ASB Law
Ashley House plc
ASP
Austin Gray Commercial & Property
Auctions
B&H Estate Agents Association
BACA
Baron Homes Corporation Ltd
Barton Willmore
Beetham Organisation Ltd
Benfield Investments Ltd
Bowden Property Consulting
Brighton & Hove Albion Football Club Ltd
Brighton and Hove City Council
Brighton i360
Brighton West Pier Trust
Broadway Malyan (City College)
Brunswick Developments Group PLC

Building Design Partnership
BUPA
C Brace
C Brindley
C Haigh
Carr & Priddle
Cathedral Group PLC
Centurion Group
Chartered Surveyor
Church Commissioners
City College
Cliff Walsingham & Co
Clifford Dann LLP
Cluttons
Collins Planning Services
Co-operative Group
Costco
Crest Strategic Projects Ltd
Crickmay Chartered Surveyors
Cross Stone Urban Regeneration
Development Focus
DevPlan
Discovery Properties Ltd (Signet Planning)
DMH Stallard
DowsettMayhew Planning Partnership
DPDS Consulting Group
Drivers Jonas Deloitte
DTZ (Roedean School)
DW Planning and Benfield Investments Ltd
Engleharts Solicitors

Evolution Architects	MacConvilles
Felce & Guy	Management
Firstplan	Maplebright Llp and C Brewer & Sons Ltd
Firstplan (Waitrose)	Maritime Atlantic Ltd
Flude Commercial	Matsim Properties
Fulbeck Land Ltd	Mayfield Market Towns c/o QUOD
G L Hearn	Mayfield Market Towns Ltd
Genesis Town Planning (Braybon Holdings)	Mile Oak Farm
Gleeson Strategic Land	Miles Broe Architects Ltd
Graves Jenkins	Miller Bourne Partnership
Graves Son & Pilcher	MOAT
HCA	Moat Housing
Hemsley Orrell Partnership	Moat Housing Assoc
Hilton Metropole	Montagu Evans LLP (Standard Life)
Home Builders Federation Ltd	Morgan Carn Partnership
Hopegar Properties c/o L K Robinson, Robinson	Moat MacDonald
Humberts Leisure	N Thomas
Hyde Housing	Nathaniel Lichfield and Partners
Hyde Martlet	(Amex, Explore Living, Tesco)
Hyde Plus - Sussex & Surrey	Nathaniel Lichfield and Partners
Infinity Foods	(Cathedral Ltd)
Insite Planning Ltd	Nathaniel Lichfield and Partners
J Watts	(Co-operative Group)
James Breckell Architect	NCP Ltd
Jones Day	Nivea Sun Yellowwave
Jones Lang LaSalle Ltd	NLP Planning (Tesco)
JW Cook & Pecla	Oakley Commercial
K Lawton	Palace Pier (Electric Bars LTD)
Karis Holdings/Karis Developments	Parsons Son & Basley Commercial
Khalil & Kane	Parsons Sons & Basley
Kirkwells	Peacock & Smith (Wm Morrison Plc)
Land Securities	Pegasus Planning
Landlord Association	Periworld Ltd
LaSalle Investment Management	Persimmon Homes South East
Legal & General	Planning Potential (Asda Stores Ltd)
Lewis and Co Planning (Newtown Ventures	Planware Ltd
Ltd, The Hyde Group, Infinity Foods,	PRP Architects
Harbour View Developments Ltd)	QED (Quoin Estates and Developments Ltd)
Lewis Planning (Urban Student Life,	R H Partnership
WP Properties Ltd Teale and	Rapleys LLP
Brindley Families,	Rapleys LLP (WM Morrison)
Cherrywood Investment Ltd,	Retirement Housing Group
(Thornton Properties)	RHPC (Costco)
Lightwood Strategic Ltd	Royal Mail Group Limited
Linden Homes & Cothill	RPS Planning & Consultancy
Educational Trust	Sainsbury's Supermarkets

Savills Ltd
Scottish Widows
Select Property Group
Shoreham Airport
Shoreham Port Authority
Smiths Gore
Southern Housing
Southern Housing Group
St James Investments Ltd
St Johns Building Co
St William
Standard Life Investments c/o GL Hearn
Stewart Ross Associates
Stiles Harold Williams
Stonebridge Brighton Ltd
Study Group
Sussex Cricket
Sussex FA
T Oliver
Taylor Wimpey Strategic Land
Taylor Wimpey UK Ltd
Tesco Property Enquiries

The Crown Estate
The Grand Hotel
The Guinness Partnership
The Home Builders Federation
Topland Group
Town and Country Planning
Trust for Future Health
Turner Associates
Two Piers Housing Co-operative Ltd
University of Brighton
University of Brighton c/o GVA Grimley LTD
University of Sussex
Urban Splash
Varndean School
Wilks Head & Eve (E Sussex Fire & Rescue Service)
Wilson Bowden Developments
Woodwych Housing Co-op
X Leisure Ltd (c/o NLP)
Your Student Room Ltd

Neighbourhood Forums

Brighton Marina Neighbourhood Forum
Hove Park Neighbourhood Forum
Hove Station Neighbourhood Forum
Portslade Community Forum

Utilities

Amec Foster Wheeler (National Grid 2016)
British Telecommunications plc
DPM
EDF Energy
EE
National Grid
Openreach BT
Renewable UK
Scotia Gas Networks (SGN)
Scotland Gas Network
Scottish Power Corporate Communications
South East Ambulance Foundation
Trust (SECAmb)
South East Coast Ambulance
Southern Water
The Coal Authority
Three
UK Power Networks
(Infrastructure Planning South)
Vodafone and O2

Individuals

Consultation information was sent to 432 individuals. Their names have been removed from this document in light of the new GDPR data protection law.

City Plan Part Two Scoping Paper

Statement of Consultation

Appendix 2 - List of Respondents

Respondent Number	Respondent Type	Organisation	Name
1	Individual	n/a	
2	Individual	n/a	
3	Individual	n/a	
4	Individual	n/a	
5	Individual	n/a	
6	Individual	n/a	
7	Individual	n/a	
8	Business	Gatwick Airport Limited	
9	Individual	n/a	
10	Individual	n/a	
11	Individual	n/a	
12	Statutory Consultee	National Grid	Amec Foster Wheeler
13	Individual	n/a	
14	Individual	n/a	
15	Individual	n/a	
16	Individual	n/a	
17	Individual	n/a	
18	Individual	n/a	
19	Environmental	Brighton & Hove Allotment Federation	
20	Individual	n/a	
21	C&VS	Friends, Families and Travellers	
22	Individual	n/a	
23	Individual	n/a	
24	Statutory Consultee	University of Sussex	
25	Statutory Consultee	Southern Water	
26	Individual	n/a	
27	Individual	n/a	
28	Developer	Hyde Group	
29	Landowner	n/a	
30	Individual	n/a	
31	Individual	n/a	
32	Individual	n/a	
33	Civic and Amenity	Bates Estate TRA	
34	Individual	n/a	
35	Individual	n/a	
36	Individual	n/a	
37	Individual	n/a	
38	Individual	n/a	
39	Individual	n/a	
40	Individual	n/a	
41	Individual	n/a	
42	Individual	n/a	
43	C&VS	NLCA	
44	Individual	n/a	
45	Individual	n/a	
46	Individual	n/a	
47	Individual	n/a	
48	Individual	n/a	
49	Individual	n/a	
50	Individual	n/a	
51	Civic and Amenity	n/a	
52	Individual	n/a	
53	C&VS	Our Lady of Lourdes Church	
54	Individual	n/a	
55	Individual	n/a	
56	Developer	n/a	WD Carr Partnership
57	Gov	Sport England	
58	Individual	n/a	
59	Individual	n/a	
60	Individual	n/a	
61	Individual	n/a	
62	Individual	n/a	
63	Civic and Amenity	Hove Civic Society	
64	Individual	n/a	
65	Individual	n/a	
66	Civic and Amenity	Saltdean residents association	
67	Environmental	RSPB	

68	Civic and Amenity	Patcham CAT	
69	Individual	n/a	
70	Individual	n/a	
71	Environmental	Surfers Against Sewage	
72	Individual	n/a	
73	Individual	n/a	
74	Individual	n/a	
75	Individual	n/a	
76	Environmental	Keep the Ridge Green	
77	Individual	n/a	
78	Individual	n/a	
79	Individual	n/a	
80	Civic and Amenity	Saltdean Swimmers	
81	Individual	n/a	
82	Individual	n/a	
83	Civic and Amenity	Kingsway and West Hove Residents Association	
84	Individual	n/a	
85	Civic and Amenity	Friends of Hollingbury & Burstead Woods	
86	Individual	n/a	
87	Environmental	Aqualor Energi	
88	Individual	n/a	
89	Individual	n/a	
90	Civic and Amenity	Surrenden Park Residents Association	
91	Individual	n/a	
92	Individual	n/a	
93	Individual	n/a	
94	Individual	n/a	
95	Individual	n/a	
96	Individual	n/a	
97	Civic and Amenity	Ovingdean Residents & Preservation Society	
98	Individual	n/a	
99	Individual	n/a	
100	Individual	n/a	
101	Individual	n/a	
102	Individual	n/a	
103	Civic and Amenity	Roedean Residents Association	
104	Individual	n/a	
105	Civic and Amenity	Brighton & Hove Archaeological Society	
106	Individual	n/a	
107	Individual	n/a	
108	Civic and Amenity	Deans Preservation Group	
109	Local Government	Conservative Group	
110	Developer	Palace Street Developments Ltd	
111	Developer	The Community Stadium Limited	
112	Individual	n/a	
113	Individual	n/a	
114	Developer	University of Sussex Students' Union	
115	Civic and Amenity	Family Homes not HMO's	
116	Developer	Vardean College	
117	Civic and Amenity	Kemp Town Society	
118	Individual	n/a	
119	Statutory Consultee	Natural England	
120	Civic and Amenity	Regency Society	
121	Individual	n/a	
122	Developer	Ovingdean Estates Limited	
123	Civic and Amenity	Triangle Community Group	
124	Local Government	n/a	Cllr D Yates
125	Civic and Amenity	Rottingdean Parish Council	
126	Individual	n/a	
127	C&VS	Brighton Housing Trust	
128	Individual	n/a	
129	Developer	Futureform Global Investments Ltd	
130	Local Government	South Downs National Park Authority	
131	Developer	U+I Plc	
132	Local Government	n/a	Cllr T Janio
133	Individual	n/a	
134	Environmental	Brighton & Hove Food Partnership	
135	Civic and Amenity	Brighton Society	
136	Individual	n/a	
137	Environmental	Woodland Trust	

138	Individual	n/a	
139	Individual	n/a	
140	Developer	National Grid and Southern Gas Networks	
141	Civic and Amenity	Montpelier and Clifton Hill Association	
142	Transport	Bricycles	
143	Individual	n/a	
144	Developer	X-Leisure (Brighton II) Ltd and Land Securities	Nathaniel Lichfield & Partners
145	Individual	n/a	
146	Individual	n/a	
147	Individual	n/a	
148	Individual	n/a	
149	Individual	n/a	
150	Individual	SAFE Rottingdean	
151	Environmental	CPRE Sussex	
152	Individual	n/a	
153	Individual	n/a	
154	Civic and Amenity	The Level Communities Forum	
155	Civic and Amenity	Brighton and Hove Allotment Federation	
156	Developer	SCOTIA GAS NETWORKS (SGN)	c/o Quod
157	Developer	Standard Life Investments Shopping Centre Trust (SLI)	c/o GL Hearn
158	Agent	RPS CgMs	
159	Individual	n/a	
160	Developer	University of Brighton	(Bilfinger GVA)
161	Individual	n/a	
162	Individual	Chair of Craven Vale and Whitehawk Hill Allotments Society	
163	Individual	n/a	
164	Developer	City College	c/o ECE Planning
165	Civic and Amenity	Kingscliffe Society Committee	
166	Environmental	Sussex Wildlife Trust	
167	Individual	n/a	
168	Civic and Amenity	Saltdean Countryside	c/o Magenta Planning
169	Environmental	Brighton and Hove's Wildlife Forum	
170	Developer	Select Property Group	c/o Deloitte
171	Developer	Hopegar Properties Ltd	c/o Robinson & Co chartered Surveyors
172	Transport	Network Rail	
173	Developer	Linden Homes and Cothill Educational Trust	Boyer Planning
174	Developer	Mr Peter McDonnell	Enplan
175	Government Agency	Highways England	
176	Government Agency	Environment Agency	
177	Environmental	Brighton & Hove Friends of the Earth	
178	Local Government	East Sussex County Council	
179	Developer	St William Homes	
180	Agent	LCE architects	
181	Developer	Crest Nicolson	
182	Civic and Amenity	The Vale Residents Committee	
183	Individual	n/a	
184	Civic and Amenity	HMO Forum	Cllr T. Hill
185	Individual	n/a	
186	Individual	The Regency Town House?	
187	Civic and Amenity	Longhill Woodland Group	
188	Individual	n/a	
189	Business	Brighton & Hove Economic Partnership	
190	Unknown	n/a	Unknown respondent 1
191	Unknown	n/a	Unknown respondent 2
192	Unknown	n/a	Unknown respondent 3
193	Unknown	n/a	Unknown respondent 4
194	Civic and Amenity	Bevendean LAT	
195	Unknown	Unknown Respondent 5	Unknown Respondent 5
196	Individual	n/a	
197	Individual	n/a	

City Plan Part Two Scoping Paper

Statement of Consultation

Appendix 3 - Adverts



**Brighton & Hove
City Council**

Commencement of Preparation of Brighton & Hove City Plan Part Two

Notification under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Brighton & Hove City Council wishes to hear from local communities, individuals, commercial businesses and anyone with an interest in the area, as the Council is about to start preparing the City Plan Part Two.

Scope and Role of the City Plan Part Two

The City Plan Part One was adopted in March 2016 and is part of the statutory Development Plan for Brighton & Hove. It sets out the strategic policy framework to guide the new development required across the city to 2030 and overall amounts of development to be planned for (e.g. housing, employment and retail). It identifies the broad locations and Development Areas where new development will take place and identifies key strategic sites as well as a number of strategic city-wide policies.

The City Plan Part Two will contain the remaining site allocations and development management policies. It will follow the vision, strategy and objectives and strategic policies set out in the adopted City Plan Part One. It will cover the period up to 2030.

The City Plan Part Two will cover the administrative area of the city council that is not within the South Downs National Park (the National Park Authority has commenced preparation of its own local plan with a view to adoption by 2017).

The City Plan Part Two will;

- Contain additional site allocations (e.g. for housing and mixed use sites) so that the City Plan Part One Strategy for accommodating development needs can be implemented;
- Contain amended/ updated or new shopping centre boundaries and heritage/ nature conservation designations;
- Contain a suite of development management policies that will replace some of the retained 2005 Local Plan policies and delete others to ensure there is a more streamlined and straightforward set of policies;
- Conform with the National Planning Policy Framework.

The Policies Map (March 2016) will also be updated and published to include site allocations and identify new and/ or updated policy designations related to the City Plan Part Two

City Plan Part Two Scoping Consultation

A **Scoping Paper** and **Sustainability Appraisal (SA) Scoping Report** have been prepared. The Scoping Paper outlines the role and scope in terms of policy issues. The Sustainability Appraisal Scoping Report is also published for consultation and sets out the proposed assessment framework that will be used to consider all the likely significant effects that the City Plan Part Two may have on various environmental, economic and social factors.

Part of this notification process is also to enable sites to be submitted to the Council for consideration whether for housing, employment, retail or any other uses.

The Council considers that by including the matters referred to above in the City Plan Part Two the Plan, together with Part One, will provide comprehensive planning policy coverage for the city up to 2030.

How the City Plan Part 2 will be prepared and the timetable

The table below sets out the main stages of preparation for the City Plan Part Two:

City Plan Part Two stage of plan preparation	Date
Scoping Document (Regulation 18)	June 2016
Draft Plan and SA (Regulation 18)	Autumn 2017
Publication stage (Regulation 19)	Summer 2018
Submission stage	Autumn 2018
Examination	Winter 2018
Adoption of City Plan Part Two	Spring 2019

How to view the Consultation Documents

More details and the consultation documents are available on the council's website: www.brighton-hove.gov.uk/cityplan-part2. Consultation Documents can also be viewed at the Customer Services Centres at Bartholomew House, Brighton and Hove Town Hall, Hove as well as all city libraries* during normal opening hours.

How to get involved and how to make comments

You are invited to comment on the matters you think should be included in the City Plan Part Two; particularly any topics which have not been identified in the Scoping Paper, or any particular issues you consider important to have policies for. Please also let us know if you have any sites you wish us to consider allocating for development in the Plan.

We recommend you make your comments using the council's online consultation portal: <http://consult.brighton-hove.gov.uk/portal>. This will help us handle your comments quickly and efficiently.

Or email: planningpolicy@brighton-hove.gov.uk

Or write to: Planning Policy Team
Brighton & Hove City Council
Room 201 Kings House
Grand Avenue,
Hove BN3 2LS

Comments and/ or potential site suggestions should be received no later than 5pm Thursday 22 September 2016.

If you would like to receive further information about the City Plan Part Two, you can also have your details added to our City Plan consultation database. Please use the contact details above.

We look forward to hearing from you.

** Please note that, due to its size, the Sustainability Appraisal Scoping Report is only available to view at the Customer Service Centres, Hove, Jubilee and Portslade Libraries.*





Planning & Building Control
Brighton & Hove City Council
Kings House
Grand Avenue
Hove
BN3 2LS

Date: 30 June 2016
Phone: (01273) 292505
e-mail: planningpolicy@brighton-hove.gov

Dear City Plan Consultee,

City Plan Part Two – Scoping Consultation, have your say

I am writing to advise you that Brighton & Hove City Council has started work on Part Two of the City Plan and has published a Scoping Paper for consultation.

The City Plan Part Two will identify and protect smaller development sites for housing and other uses such as community facilities. The Plan will also include detailed planning policies which will be used to assess planning applications, in line with the overall approach set out in the recently adopted City Plan Part One.

The Scoping Consultation is an important early stage in preparing the plan. You are invited to comment on the matters you think should be included in the City Plan Part Two and to also let us know if you have any sites you wish us to consider allocating for development in the Plan.

The Scoping Paper and accompanying Sustainability Appraisal Scoping Report are available to view and download from the Council's website at: www.brighton-hove.gov.uk/cityplan-part2 where the formal notification of the start of the preparation of the City Plan Part Two, further information and a summary of the Scoping Paper can also be found.

We recommend that you make your comments using the council's online consultation portal: <http://consult.brighton-hove.gov.uk/portal>. This will help us handle your comments quickly and efficiently (word versions of the response form are available on request).

Responses can also be submitted:

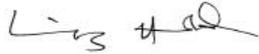
By email to planningpolicy@brighton-hove.gov.uk

By post to Planning Policy Team, Brighton & Hove City Council, Room 201 Kings House, Grand Avenue, Hove BN3 2LS

The City Plan Part Two Scoping Document and accompanying consultation documents are also available to view at the customer service centres at Hove Town Hall and Bartholomew House, and all city Libraries¹, during normal opening hours.

All comments must be received by the Council no later than 5pm on Thursday 22 September. We look forward to hearing from you.

Yours faithfully,



Liz Hobden
Planning Policy Manager

Email

From: PlanningPolicy
Sent: 30 June 2016 11:43
Subject: City Plan Part Two - Scoping Consultation

City Plan Part Two – Scoping Consultation 30 June – 22 September 2016



Dear City Plan Consultee,

City Plan Part Two – Scoping Consultation

I am writing to advise you that Brighton & Hove City Council has started work on Part Two of the City Plan and has published a Scoping Paper for consultation.

The City Plan Part Two will identify and protect smaller development sites for housing and other uses such as community facilities. The Plan will also include detailed planning policies which will be used to assess planning applications, in line with the overall approach set out in the recently adopted City Plan Part One.

The Scoping consultation is an important early stage in preparing the plan. You are invited to comment on the matters you think should be included in the City Plan Part Two and to also let us know if you have any sites you wish us to consider allocating for development in the Plan.

The Scoping Paper and accompanying Sustainability Appraisal Scoping Report are available to view and download from the Council's website at: www.brighton-hove.gov.uk/cityplan-part2 where the formal notification of the start of the preparation of the City Plan Part Two, further information and a summary of the Scoping Paper can also be found.

We recommend that you make your comments using the council's online consultation portal: <http://consult.brighton-hove.gov.uk/portal>. This will help us handle your comments quickly and efficiently.

Responses can also be submitted:

- By email to planningpolicy@brighton-hove.gov.uk
- By post to Planning Policy Team, Brighton & Hove City Council, Room 201 Kings House, Grand Avenue, Hove BN3 2LS

The City Plan Part Two Scoping Document and accompanying consultation documents are also available to view at the customer service centres at Hove Town Hall and Bartholomew House, Brighton and at all city libraries*, during normal opening hours.

All comments must be received by the Council no later than 5pm on Thursday 22 September.

We look forward to hearing from you.

Planning Policy Team

** Please note that, due to its size, the Sustainability Appraisal Scoping Report is only available to view at Bartholomew House and Hove Town Hall Customer Service Centres, Hove, Jubilee and Portslade Libraries.*

If you wish to unsubscribe from the City Plan email alerter please contact us via planningpolicy@brighton-hove.gov.uk

**have
your say**



City Plan Part Two

We will need to identify development sites and include policies which will be used to help assess planning applications.

You are invited to have your say on what the City Plan Part Two should cover.

You can view the consultation and have your say at:
www.brighton-hove.gov.uk/cityplan-part2

**Consultation runs from
30 June to 22 September 2016**



**Brighton & Hove
City Council**



Planning

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City Plan Part Two

Workbench Access: Planning Policy

Revision state: Published

Most recent revision: No

City Plan Part Two Scoping Paper Consultation (30 June to 22 September 2016)

The council has started the preparation of Part Two of the City Plan which will contain the remaining development sites and detailed planning policies.

The City Plan Part Two scoping paper was agreed for consultation at the [16 June 2016 Economic Development and Culture Committee \(PDF 3.8MB\)](#).

The consultation will run for 12 weeks from 30 June to 5pm on 22 September 2016. [The scoping paper is available as a complete document and also as separate topic papers.](#)

Respond to the Scoping Paper Consultation

Share your views on the consultation

Use our online consultation portal

Word versions of the form are available on request to planningpolicy@brighton-hove.gov.uk

Documents & Links

- [City Plan Part Two Scoping Paper \(full version\) \(PDF 874KB\)](#)
- [A Summary document \(PDF 70KB\)](#) is also available

Sections of the City Plan Part Two Scoping Paper by Topic Area:

- [1. Introduction \(PDF 278KB\)](#)
- [2. Housing Scoping Paper \(PDF 58KB\)](#)
- [3. Economy and Employment Scoping Paper \(PDF 83KB\)](#)

Website feedback

- [4. Retail and Town Centre Uses Scoping Paper \(PDF 48KB\)](#)
- [5. Tourism Scoping Paper \(PDF 287KB\)](#)
- [6. Transport and Travel Scoping Paper \(PDF 48KB\)](#)
- [7. Biodiversity and Open Space Scoping Paper \(PDF 47KB\)](#)
- [8. Addressing pollution, water and energy resources Scoping Paper \(PDF 68KB\)](#)
- [9. Design Scoping Paper \(PDF, 30KB\)](#)
- [10. Heritage Scoping Paper \(PDF 35KB\)](#)
- [11. Community Facilities Scoping Paper \(PDF 65.5KB\)](#)
- [12. Student Accommodation Scoping \(PDF 23KB\)](#)
- [13. Traveller Accommodation Scoping Paper \(PDF 35KB\)](#)

The Sustainability Appraisal Scoping Report is also published for consultation and sets out the proposed assessment framework that will be used to consider all the likely significant effects that the City Plan Part Two may have on various environmental, economic and social factors. You can respond to the Sustainability Appraisal via the [online consultation portal](#). (A word version of the form is available on request to planningpolicy@brighton-hove.gov.uk)

- [Sustainability Appraisal Scoping Report \(PDF 2.1MB\)](#)
- [Sustainability Appraisal Appendix D Map \(PDF 10.5MB\)](#)

The City Plan Part Two Scoping Document and accompanying consultation documents are also available to view at the customer service centres at [Hove Town Hall](#), Hove and [Bartholomew House](#), Brighton and at [Jubilee](#), [Hove](#) and [Portslade](#) libraries.

Role of City Plan Part Two

The role of the City Plan Part Two is to support the implementation and delivery of [City Plan Part One](#); to build on the strategic policy framework; to identify and allocate additional development sites and to set a detailed policy framework to assist in the determination of planning applications. The policies in City Plan Part Two will replace the remaining 'saved' policies from the [2005 Local Plan](#).

The scoping stage is the first stage in the preparation of the City Plan Part Two, and people are invited to comment on the matters they think should be included in the document. [Formal notification of the start of the preparation \(PDF 88KB\)](#).

Timetable

Scoping Document (Regulation 18)	June 2016
Draft Plan and SA (Regulation 18)	Autumn 2017
Publication stage (Regulation 19)	Summer 2018
Submission stage	Autumn 2018
Examination	Winter 2018
Adoption	Spring 2019

Useful Links

- City Plan Part Two [Background Studies](#)

Friday, June 24, 2016

City Plan: Have your say on development

Bex Bastable

bex.bastable@jpress.co.uk
@BexBastable

Residents and businesses will get a chance to have their say on future developments in Brighton and Hove as part two of the City Plan gets underway.

The City Plan sets out the council's policy and strategy for growth in the city over the next decade and beyond, and will set out how the city will deliver the 13,200 homes needed by 2030.

A citywide consultation on the second part of the City Plan, which identifies development sites, begins on June 30. It follows on from the recently adopted City Plan Part One which set out the over-arching planning strategy for accommodating growth in the city.

Councillor Julie Cattell, lead member for planning strategy, said: "This first part of the consultation is to gauge people's views

about the scope of the document, whether there are any particular issues that people consider important to be addressed by planning policies and a 'call for sites'. It's important that people take part because their contributions will feed into the draft City Plan Part Two that will be published next year.

"We have not identified specific sites at this stage but people can put forward sites for inclusion. City Plan Part Two will provide greater certainty and include local policies to address local issues such as how to secure family-sized housing and how best to address the further demand for purpose built student accommodation. Sites put forward during this consultation stage will be assessed by the council as part of preparing the draft Plan and will be subject to further consultation."

The initial round of consultation will be asking

people what planning matters they think should be included in the City Plan, from how to make sure housing sites deliver a good mix of housing; how best to manage the range of retail uses in shopping centres so they remain attractive places to shop and visit; or to how to ensure new development helps create well designed places.

It will be asking people if they have sites they wish the council to consider allocating for development in the Plan.

City Plan Part Two will take around three years to complete. The first consultation will run for 12 weeks.

To take part in the consultation, visit: www.brighton-hove.gov.uk/cityplan-part2 or write to City Plan Part 2, Scoping Document Planning Policy, Brighton and Hove City Council, Room 201, Kings House, Grand Avenue, Hove, BN3 2LS.

Brighton and Hove City Council | Brighton & Hove City Council | https://www.brighton-hove.gov.uk

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> [City Plan Part Two](#)

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July 2016

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- Tue 05 Zumba
- Tue 05 English conversation club at The Level
- Tue 05 Seated Exercise at St Barnabas Church
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Website feedback

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Website feedback

Work starts on the City Plan Part Two - have your say

Release date: Friday, 17 June 2016

Residents, businesses and developers will be able to take part in a citywide consultation on Part Two of the City Plan, **starting 30 June**.

Part Two follows on from the recently adopted City Plan Part One which set out the overarching planning strategy for accommodating growth in the city, including the city's housing target and employment land requirements to 2030.

The City Plan Part Two will contain the remaining development site allocations to meet the identified development needs and detailed policies that will be used to assess planning applications in the city.

This initial round of consultation will be asking people what planning matters they think should be included in the Plan, from how to make sure housing sites deliver a good mix of housing; how best to manage the range of retail uses in shopping centres so they remain attractive places to shop and visit; to how to ensure new development helps create well designed places. It will be asking people if they have sites they wish the council to consider allocating for development in the Plan.

City Plan Part Two will take around three years to complete. The aim is to streamline the number of development management policies, making them easier to understand and simplifying the process for those applying for planning permission. For example, at the moment there are six policies relating to shop fronts and it is suggested that these will be combined into one policy.

The City Plan Part Two Scoping Paper is divided into 12 topic areas, so people will be able to go straight to the area they are interested in. These are housing; economy and employment; retail and town centre uses; tourism; transport

and travel; biodiversity and open spaces; pollution, water and energy resources; design; heritage; community facilities; student accommodation and traveller accommodation.

Councillor Julie Cattell, lead member for planning strategy, said: “This first part of the consultation is to gauge people’s views about the scope of the document, whether there are any particular issues that people consider important to be addressed by planning policies and a ‘call for sites’. It’s important that people take part because their contributions will feed into the draft City Plan Part Two that will be published next year.

“We have not identified specific sites at this stage but people can put forward sites for inclusion. City Plan Part Two will provide greater certainty and include local policies to address local issues such as how to secure family-sized housing and how best to address the further demand for purpose built student accommodation. Sites put forward during this consultation stage will be assessed by the council as part of preparing the draft Plan and will be subject to further consultation.”

The draft plan will set out in more detail how to provide the 13,200 homes that are needed in the city.

Consultation will run for 12 weeks. From 30 June you can take part online at <http://www.brighton-hove.gov.uk/cityplan-part2> by email planningpolicy@brighton-hove.gov.uk or by writing to City Plan Part 2, Scoping Document Planning Policy, Brighton & Hove City Council, Room 201, Kings House, Grand Avenue, Hove, BN3 2LS.

Website feedback

Contact or visit the council



Website feedback

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The Argus

Brighton 16°C



Crackdown on shared houses on the cards in Brighton and Hove



Residents in Bernard Road, Brighton, including Chris Roberts are unhappy about the proliferation of houses in multiple occupation in their road.

8 hrs ago / Neil Vowles

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TOUGHER restrictions on shared houses could be introduced as part of new planning rules.

Residents in Brighton and Hove will be asked whether more should be done to convert houses in multiple occupancy (HMOs) back to family homes or reduce the negative impact of clusters of shared houses.

The policy would build on existing restrictions to halt the disproportionately high number of HMOs in the city which has around 3 per cent of all the HMOs in England and Wales with almost 6,500.

Other proposals going out to consultation as part of the City Plan Part 2 will be moves to protect the city's dwindling office spaces from residential conversion and proposals for more public open spaces.

The first part of the City Plan, which sets out the broad detail of how the city's housing target of 13,200 homes by 2030 will be met, was adopted in March.

Work is now underway on Part 2 to identify precise locations and housing numbers - although it is not expected to be adopted until spring 2019.

As part of the scoping project, consultees will be asked their opinion on ways to preserve and create more office space in the city.

The first part failed to identify sufficient sites to meet expected future demand for employment space, with a shortfall of almost 34,000 square metres.

Consultees will be asked their opinion on extending city centre restrictions of permitted development rights which allows office space to be converted to residential without planning permission.

The city could also see new open spaces, although council officers concede the authority may not be able to manage or maintain new sites, instead relying on community, trusts or private owners, and further protections for sensitive sites Benfield Valley, Three Cornered Copse off Dyke Road Avenue, Ladies' Mile Open Space and Hollingbury Park.

Bernard Road resident Chris Roberts welcomed the proposals to revert HMOs back to family homes.

He said: "The council has just started its policies quite well with unlicensed HMOs being turfed out and they've started refusing planning permission and having appeals turned down.



"But there's still about four times the number of HMOs in Bernard Road than the maximum allowed so having some way to turn them back is critical."

Green convenor [Phelim MacCafferty](#) said spring 2019 might be optimistic for an adoption because of the level of public consultation required for the process.

He said: "If we don't do that, our plan could be found unsound by an inspector, there are numerous examples of that happening round the country.

"I would expect Part 2 to have strong provisions on HMOs not least because all the amenity and resident groups want us to deal with that issue."

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Promoted stories



Let B&HCC Have Your Say!

This entry was posted on August 5, 2016 by Lynne Moss



HAVE YOUR SAY ABOUT OPEN GREEN SPACES, TRANSPORT, AIR POLLUTION, HOUSING AND MORE!

We would like to draw your attention to the B&HCC City Plan Part 2 Scoping Document. This scoping exercise gives the opportunity for residents to comment on housing, transport & travel, pollution, heritage, design, open green spaces, community facilities and sustainability. All of which are considerations when making a planning decision. Indeed, the planning application to build on the St Aubyns School site and playing field was refused on the basis of all these points.



Linden Homes/Cothill Educational Trust developers) want to meet with B&HCC to discuss the reasons for refusal of the recent planning applications to develop the school site and playing field. Rottingdean Parish Council are to be invited to the meeting. Pre-application meetings such as these are not open to the public. There is no date set as yet. SAFE will keep you posted as we learn more.

HOW TO COMMENT ON THE CITY PLAN PART 2 SCOPING PAPER

The City Council would like to know what issues you think the City Plan Part Two should address. Questions are asked throughout the scoping document to help you to tell B&HCC what you think. You do not have to comment on everything in the paper. They want to hear your views on those aspects that are of most interest to you. Please add your comments using the council's online consultation portal: [click here](#).

Please also see the following scoping explanation document: [click here](#).

This is a great way to voice your concerns directly to B&HCC. Please take a moment to add your voice to the areas that interest you and remember, the City Plan, when adopted will become set in stone until 2030.

Leave a comment

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News - 12 July 2016

Construction Voice: City Plan Part 2 - aspirational and achievable?



If there's one thing that unites the residents of our city, it's caring about the future of Brighton and Hove.

Email this
to a friend

What that future – and our city – may look like is possibly a little less united, with hundreds if not thousands of different ideas, opinions, hopes, designs and ambitions.

Much of that future, in terms of the built environment, lies with Brighton and Hove City Council, who have to listen to those myriad opinions and try to shape a strategy that takes account of competing needs and desires. They have to think about the need for housing but balance it with the shortage of workspaces, or the ambitions of our two universities to grow and expand balanced with the general populations ambivalent (at best) views on living cheek by jowl with yet more students.

The latest **Construction Voice** event (organised jointly by The Brighton and Hove Chamber of Commerce and event partners Haydon Consulting, Graves Jenkins and Robinson Low Francis) played host to the unveiling by the City Council of City Plan Part 2 – the latest part of a major document that will map out the future city and the city's future up to 2030 and possibly beyond.

Part 2 will involve some of the hardest decisions for the council and all local stakeholders as this part of the plan looks at site allocations and development management policies, i.e. determining what gets built – and where. For example, we've got to find space for 13,200 new homes in the city and spaces for the additional residents to work and study.

A key discussion topic at the event was whether the plan would deliver the amount of workspace to meet the requirements of a growing economy and identify sufficient land for this purpose. If not, both employers and workers would be obliged to leave the city as they grew. We asked whether land owned by the council could be better used and utilised and whether there should be a bid to make coordinated and strategic use of all public assets in the city region.

For the full summary see

www.businessinbrighton.org.uk/events/construction-voice

Edited from longer article by the chair Steve Bustin.

Photos by Vervate.com

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Construction Voice: City Plan Part 2 – aspirational and achievable?

 Google

The most recent Construction Voice event looked at the City Plan Part 2 and whether it is aspirational and achievable. [Steve Bustin](http://www.stevebustin.com/) (<http://www.stevebustin.com/>), Chair of the event, gives us a breakdown of the discussions that took place.

If there's one thing that unites the residents of our city, it's caring about the future of Brighton and Hove. What that future – and our city – may look like is possibly a little less united, with hundreds if not thousands of different ideas, opinions, hopes, designs and ambitions.

Much of that future, in terms of the built environment at least, lies with Brighton and Hove City Council, who have to listen to those myriad opinions and try to shape a strategy that takes account of competing needs and desires. They have to think about the desperate need for housing but balance it with the shortage of workspaces, or the ambitions of our two universities to grow and expand balanced with the general populations ambivalent (at best) views on living cheek by jowl with yet more students.



The panel, chair and sponsor

The latest Construction Voice event (organised jointly by The Brighton and Hove Chamber of Commerce and event partners [Haydon Consulting](http://www.haydon-consulting.com/) (<http://www.haydon-consulting.com/>), [Graves Jenkins](http://www.gravesjenkins.com/) (<http://www.gravesjenkins.com/>) and [Robinson Low Francis](http://www.rfc.co.uk/) (<http://www.rfc.co.uk/>)) played host to the unveiling by the City Council of City Plan Part 2 – the latest part of a major document that will map out the future city and the city's future up to 2030 and possibly beyond.

The City Plan is arguably the most important part of Brighton & Hove City Council's Local Development Framework, setting out the overall strategic and spatial vision for the future of Brighton & Hove through to 2030. City Plan Part 1 was adopted at Full Council on 24th March this year.

Part 2 will involve some of the hardest decisions for the council and all local stakeholders as this part of the plan looks at site allocations and development management policies, i.e. determining what gets built – and where. For example, we've got to find space for 13,200 new homes in the city and spaces for the additional residents to work and study.



Phil Graves and Rob Fraser

The event was kicked off by Acting Executive Director for Economy, Environment and Culture and Head of City Regeneration for [Brighton and Hove City Council](https://www.brighton-hove.gov.uk/) (<https://www.brighton-hove.gov.uk/>), Nick Hibberd. Nick gave a brief overview of progress of both Part 1 and the new Part 2 of City Plan.

Nick asked whether the city's spatial policy could ever keep up with our economic aspirations for Brighton and Hove, and how we can keep all the diverse stakeholders on board, without leaving anyone behind.

Nick was followed by Liz Hobden, Planning Policy Manager for the City Council, who gave a summary of how City Plan Part 2 will impact on 5 key areas: employment space; retail, culture and tourism; housing; students and education and finally the development of smart and sustainable cities.

Liz identified many challenges, not least of which was the issue of demand far outstripping land identified as available for housing or business use. She also raised the idea that perhaps the council should look at underdevelopment as an issue as much as over-development when examining plans and proposals, to ensure that the land is used to its capacity (although not over-capacity) for its designated use.

Liz talked in some detail through all five areas but raised questions and discussion points rather than announcing firm plans, as the whole plan is now up for the first stage of consultation – with the event forming the first element of that consultation process.

The event then turned to a panel of experts for their comments on each area up for discussion. This part of the evening was opened by Tony Mernagh, Managing Director of [Brighton & Hove Business Forum \(https://www.eventbrite.co.uk/e/construction-voice-city-plan-part-two-aspirational-and-achievable-tickets-24838372240\)](https://www.eventbrite.co.uk/e/construction-voice-city-plan-part-two-aspirational-and-achievable-tickets-24838372240) and a former chair of the City's Local Strategic Partnership and Executive Director of the Economic Partnership. Tony addressed the Employment and Workspace part of Liz's presentation.

Tony suggested that the plan would not deliver what the city needs, i.e. the required amount of workspace to meet the requirements of a growing economy because it does not identify sufficient land for this purpose. As a consequence, both employers and workers would be obliged to leave the city as they grew. He also posited that currently there is too much emphasis on maintaining land and property for retail, pointing out that time spent in 'bricks and mortar' shops has dropped as retail moved online and our current over-supply of retail space is not sustainable, although he recognised the lure of specialist shops in the Lanes and North Laine for tourists and visitors.

Tony also asked whether land owned by the council could be better used and utilised and whether there should be a bid to make coordinated and strategic use of all public assets in the city region.

The discussion then moved on to look at retail, tourism and culture, with Associate Director of [Blue Sail \(http://bluesail.com/\)](http://bluesail.com/) and former Head of Tourism at Brighton & Hove City Council, Adam Bates, addressing the points raised in City Plan 2.

Adam emphasized the need for tourism development to support the businesses in that sector, especially those in the 'inverted T' tourist route from the station to the beach then along the seafront in both directions. He said the city was in need of more outdoor spaces for events, to build on the tradition of Brighton as a place with a variety of events and attractions.

Debra Humphris, the new Vice-Chancellor of [The University of Brighton \(https://www.brighton.ac.uk/index.aspx\)](https://www.brighton.ac.uk/index.aspx), was the next expert speaker, reflecting on the draft plans in City Plan Part 2 for students and education.

Debra stressed the importance of being able to offer halls of residence for first year students, ideally in the vicinity of the campus. This is now an important selling point for new applicants and entrants and one that is vital for the long-term success of either of Brighton's universities – but it requires new development. Debra also 'cross-referenced' some of the comments that had been made during the earlier discussion about workspaces about the need for co-working and incubator spaces for new businesses and recently graduated entrepreneurs. Many graduate businesses are in need of somewhere to start-up and grow, and Debra talked about plans by The University of Brighton to create co-working spaces on campus, available to both student/graduate businesses and to other businesses in the city, to encourage cross-fertilisation and collaboration.

The final expert panellist to speak was distinguished town planner, built environment expert and specialist advisor to The House of Commons Communities and Local Government Select Committee, Kelvin MacDonald, who address the topic of housing.



Kelvin MacDonald speaking during the panel debate

In a stirring and clearly heartfelt statement, Kelvin stressed that the City Plan only makes provision for 44% of the identified housing needs in the city and that setting such a low target (13,200 homes) is wrong, as this is the absolute minimum the city will need. He also suggested that focusing purely on the number of new homes is only addressing part of the problem and that affordability was a huge issue in the city with average household income being substantially below what is required to buy or rent an average priced home in Brighton & Hove. He also highlighted the problems with homelessness in the city and requested that they plan should also set out what happens next when the stated objectives or targets are met.

The panel were then asked to respond to the topic of building a smart and sustainable city and while all agreed that this should be an important part of City Plan 2, there were few concrete suggestions beyond a comment from Martin Harris of Brighton and Hove City Buses that they were already exploring new technologies and hoped to see those widely adopted across all sectors of the city.

Speaking after the event, Sean Clemons of event partner Robin Low Francis said he wanted to see the City Council take a more innovative approach to development:

“It was excellent to have the City Plan, Part 2 launched by Brighton and Hove City Council at Construction Voice. Construction Voice has clearly established itself as the forum for dialogue within the construction and development sector of the city.

“The council set out just how big a challenge we face in meeting the targets of 13,600 new homes and 900,000 sq ft of new workspace over the next 14 years. Both the expert panel and audience were sceptical over the City’s ability to meet these targets given the construction output over the last 5 years. We shouldn’t let this challenge defeat us, but need to be determined and creative when it comes to unlocking development in the city. This will only be possible if the City Council takes the lead in being more innovative in its approach and openness to development.”

Ed Allison-Wright of event partner Haydon Consulting said collaboration was likely to be the key to making the City Plan work:

“The City Plan, Part 2 is arguably going to be harder to solve than Part 1. It will rely upon strong and enhanced collaborative working and also a flexible perspective of what our city’s requirements are and what they might be, by 2030.

“It was fantastic to have such a high caliber of experts and audience members present, giving the scoping document an important platform to the local development and construction industry.

“This event also marks the retirement of Rob Fraser, Head of Planning, who has played an integral role in the adoption of City Plan, Part 1; the Council must now focus urgently on ensuring that our planning team is adequately resourced and benefitting from inspirational leadership, in order to be up to the challenge of this new chapter of the City Plan.”

Phil Graves of event partner Graves Jenkins said he was pleased with the response in the room at the event but worried about how achievable the plan actually was:

“The positive response tonight didn’t surprise me at all, I think there’s plenty of room for further discussion and I think everyone will take the initial ideas away with them and think about them, in order to return their ideas back into the system, whether it’s through the planning system or whether it’s through private practice and professionals who are able to advise on such matters.

“As one of the planners in the room has said, however, in theory it all sounds fantastic but in practice it’s the delivery of the city plan that really counts – can we find the homes, can we find the employment space? History tells us we can’t - there is a massive doubt as to whether we can fulfil that plan.”



Asked for their response to what they’d heard during the event, a couple of the panellists felt that it was broadly positive but there were challenges that had yet to be addressed. Adam Bates of Bluesail highlighted what he saw as two challenges that hadn’t been raised:

“I think for me there are two unspoken challenges for the plan. One is about being able to predict, somehow, what the future is going to be like in 2030 and to have a plan that enables the opportunities for developments that we’re going to need in 2022, 2024 and so on. The plan shouldn’t be so rigid that it restricts some of those opportunities that we can’t predict today.

“The other thing is that this needs to be focused spatially. This isn’t a uniform city so the challenges and opportunities are not the same across all 34 square miles of it. This plan DOES have spatial elements to it, which is really important, but they must take account of the nature of the city.”

Debra Humphries of The University of Brighton thinks the main challenge is moving from discussion to action:

“There are challenges in the development of any city and I think the point about actually getting traction with a real plan to make real change is the piece that is going to be the ‘unlocker’ and start movement for the city.

“Talk is easy, it’s action that matters and we need to take action. What was really interesting tonight is that everyone seems to be in a similar place and everyone is passionate about taking the city forward. We’re not blind to the challenges but I got a real sense of a desire for movement, which is great.”

[DMH Stallard \(http://www.dmhstallard.com/\)](http://www.dmhstallard.com/), sponsored this Construction Voice event. Partner and Head of Planning, Heidi Copland said “We are delighted to have sponsored this very interesting event. The importance of the City Plan in providing the planning framework to support the growth of the City is clear. It was evident from the debate in the room that there are a number of challenges to be overcome.

The event provided a useful forum for discussion with some thought provoking data and suggestions being put forward. A very worthwhile event for all involved in shaping the future of the City.”

Written by [Steve Bustin \(http://www.stevebustin.com/\)](http://www.stevebustin.com/), who compered the event. He would like to acknowledge the help of [Helmut Lusser \(http://www.hovecivic.org.uk/\)](http://www.hovecivic.org.uk/) in producing a written account of the event, without which this post could not have been written.

The photos were taken by [Vervate \(http://vervate.com/\)](http://vervate.com/), award winning professional photographers who specialise in commercial and PR photography.

The Construction Voice events are created and run by [Brighton Chamber \(https://www.businessinbrighton.org.uk/\)](https://www.businessinbrighton.org.uk/) with our event partners [Haydon Consulting \(http://www.haydon-consulting.com/\)](http://www.haydon-consulting.com/), [Graves Jenkins \(http://www.gravesjenkins.com/\)](http://www.gravesjenkins.com/) and [Robinson Low Francis \(http://www.rlf.co.uk/\)](http://www.rlf.co.uk/).

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Construction Voice: City Plan Part Two – aspirational and achievable?

Start Date

Thursday, June 30, 2016 - 17:45

End Date

Thursday, June 30, 2016 - 19:45



Construction Voice: City Plan Part Two – aspirational and achievable?

Thursday 30th June 17:45 - 19:45

The City Plan is arguably the most important part of Brighton & Hove City Council's Local Development Framework, setting out the overall strategic and spatial vision for the future of Brighton & Hove through to 2030. After much anticipation and a number of revisions, 'Part One' of the City Plan was adopted on 24th March 2016, at Full Council.

Focus now turns to the production of 'Part Two' of the City Plan, which will arguably involve some of the hardest decisions for the Council and all stakeholders, locally. This part of the plan looks at site allocations and development management policies, essentially determining where and to what extent, development goes.

On 30th June, Construction Voice is going to feature one of the first presentations of 'Part Two', by BHCC's Liz Hobden, Planning Policy Manager and Nick Hibberd, Acting Executive Director Economy, Environment & Culture and Head of City Regeneration. In order to determine how these plans will influence and affect the property and construction industry, there will be a panel of experts on hand to direct questions on certain elements of the Council's plan and to guide the wider debate from the audience.

The discussion will focus on five key areas of:

- Employment space
- Tourism, retail and culture
- Housing
- Students and education
- Smart and sustainable cities

Our expert panel includes:

- **Kelvin MacDonald** FAcSS FRTPI MCIH FRSA

A distinguished Town Planner, Built Environment Expert, Specialist Advisor to the House of Commons Communities and Local Government Select Committee and Senior Visiting Fellow at Cambridge University's Department of Land Economy.

- Tony Mernagh

Managing Director of [Brighton & Hove Business Forum \(http://www.brightonbusiness.co.uk/\)](http://www.brightonbusiness.co.uk/) and previous Chair of the City's Local Strategic Partnership, Strategic Housing Partnership, City Employment and Skills Steering Group and Economic Partnership.

- Adam Bates

Associate Director of [Blue Sail \(http://bluesail.com/\)](http://bluesail.com/), and previously Head of Tourism at BHCC

- Professor Debra Humphris

Debra was appointed Vice-Chancellor of the [University of Brighton \(https://www.brighton.ac.uk/index.aspx\)](https://www.brighton.ac.uk/index.aspx) in December 2015 after three years at Imperial College in London. Debra is responsible for leadership and management of the university.

Chaired by award-winning former BBC news journalist and Public Relations consultant, [Steve Bustin \(http://www.stevebustin.com/\)](http://www.stevebustin.com/), we expect a lively and informative discussion.

If you can't be there on the day, join us on Twitter #constructionvoice and see past event blogs [here \(https://www.businessinbrighton.org.uk/events/construction-voice\)](https://www.businessinbrighton.org.uk/events/construction-voice).

Construction Voice is attended by the key players within the property and construction sector and with the bar staying open after the event there it is a great opportunity to network.

So if you want your voice to be heard by those in the know, and would like the opportunity to network with the movers and shakers in the property sector of Brighton and Hove, confirm your place now and have your say.

Please note that this event is for businesses whose main work is in the property and construction sector.

Thank you to our sponsor:

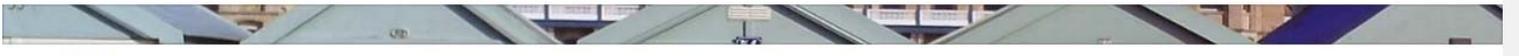


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City Plan Part Two

From Brighton & Hove Council –

City Plan Part Two – Scoping Consultation

I am writing to advise you that Brighton & Hove City Council has started work on Part Two of the City Plan and has published a Scoping Paper for consultation.

The City Plan Part Two will identify and protect smaller development sites for housing and other uses such as community facilities. The Plan will also include detailed planning policies which will be used to assess planning applications, in line with the overall approach set out in the recently adopted City Plan Part One.

The Scoping consultation is an important early stage in preparing the plan. You are invited to comment on the matters you think should be included in the City Plan Part Two and to also let us know if you have any sites you wish us to consider allocating for development in the Plan.

The Scoping Paper and accompanying Sustainability Appraisal Scoping Report are available to view and download from the Council's website at: www.brighton-hove.gov.uk/cityplan-part2 where the formal notification of the start of the preparation of the City Plan Part Two, further information and a summary of the Scoping Paper can also be found.

We recommend that you make your comments using the council's online consultation portal: <http://consult.brighton-hove.gov.uk/portal>. This will help us handle your comments quickly and efficiently.

Responses can also be submitted:

By email to planningpolicy@brighton-hove.gov.uk

By post to Planning Policy Team, Brighton & Hove City Council, Room 201 Kings House, Grand Avenue, Hove BN3 2LS

The City Plan Part Two Scoping Document and accompanying consultation documents are also available to view at the customer service centres at Hove Town Hall and Bartholomew House, Brighton and at all city libraries*, during normal opening hours.

All comments must be received by the Council no later than 5pm on Thursday 22 September.

We look forward to hearing from you.

Planning Policy Team

This entry was posted in Communications, Planning and tagged Brighton and Hove City Council, City Plan on 30/06/2016 [<https://southdownrise.wordpress.com/2016/06/30/city-plan-part-two/>].



the Business Forum and the Economic Partnership in Brighton & Hove



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City Plan Part Two - Have Your Say

Work has started the preparation of Part Two of the City Plan and Brighton & Hove City Council needs your input.



Inward investment information

The council will need to identify development sites e.g. housing sites and include policies which will be used to help assess planning applications.

Browse our business **Knowledgebase** or search by keyword



Licensee Forum



Workforce development

There are 12 topic areas including economy and employment, retail and town centre uses, tourism and travel and transport.



Transport

Consultation runs from 30 June to 22 September 2016 You are invited to have your say on what the City Plan Part Two should cover.



Business & climate change

You can view the consultation and have your say at: www.brighton-hove.gov.uk/cityplan-part2

[Click here to download the abbreviated leaflet](#)



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Business leaders wrestle with workspace problems at Brighton and Hove Chamber of Commerce big debate

Posted On 06 Jul 2016 at 6:09 pm By : Frank le Duc Comment: 0

Almost 100 business leaders wrestled with some of the issues around workspace at a big debate organised by the [Brighton and Hove Chamber of Commerce](#) this afternoon (Wednesday 6 July).

They listened and debated with an expert panel in the debate at [City College Brighton and Hove](#), in Pelham Street, Brighton, chaired by the college's chief executive Nick Juba.

The debate took place against the backdrop of the City Plan, a strategic blueprint drawn up by planners working for [Brighton and Hove City Council](#).

The broad overview – [City Plan Part 1](#) – was approved in March after years of work. The more detailed allocation of sites and land use – [City Plan Part 2](#) – will look at things such as housing, leisure, shops, offices and tourism. That work is just getting under way.

Gayle Mann, from [Entrepreneurial Spark](#), the free business accelerator hub for early stage and growing business, spoke about workspace and affordability.

Phil Jones, chief executive of [Wired Sussex](#), the membership and support organisation for the digital sector, said that the sector was still growing at a double-digit rate.



Demand for space was biggest from firms with a turnover of between £1 million and £3 million but options were limited.

He said that estate agent Phil Graves estimated that the city had lost almost 750,000 sq ft of workspace partly because of changes to permitted development rights.



He said that while it was ok for disused factory space to be turned into housing in the north, here it was “the road to hell, paved with good intentions”.

Too many developers who come to the city have no idea about the city and what it’s about – or what the digital sector needs, such as short-term leases.

“They come here and they only have pound signs in their eyes,” he said. “We should resist their blandishments.”

Brighton-born and bred property agent Chris Oakley, who started out as an office agent, said that it was all about a sense of space and place.

In the 33 years he had spent in the profession, he said, everything had changed but nothing had changed, adding: “Brighton is a fantastic place to work. The demand exists. Why can’t create business space?”

Steve Pette – space needs have change. “With just a laptop and a mobile phone, you can start a global business. You can do more with less.”

Mr Pette praised the way that some banks were adapting to the new ways in which businesses were working.



Mike Hollingbery, director of creative digital agency Bozboz, said that his web design business had bought premises close to St Peter's Church.

He said: "Over the past eight years we've grown a lot and had to move four times."

He said that he felt that he had inadvertently become a property developer.

Former council leader Jason Kitcat, from Crunch accountants, spoke about the changes brought about by permitted development rights. He said: "Any offices vacated now can be turned into flats."

Property owners can often double their money by selling homes rather than letting office space, he said.



Fast-growing Crunch had even looked at moving to the Gatwick and Crawley area because it had found it so hard to find premises locally.

But being in Brighton and Hove was one of its attractions when recruiting.

He said that Brighton and Hove had probably lost some poor office space – and he had seen some very poor office space – but the rules were now affecting the prospects for growing businesses.

The council won an exemption – known as an article 4 exemption – for part of the area which is still in force.

Planning policy officer Liz Hobden, who works for the council, explained some of the

practical issues that prevented viable office development in the area.

She said asked for input as the council developed Part 2 of the City Plan and signalled a willingness to talk to those who could help build workspaces of the future.



Nick Juba

In his introductory remarks Nick Juba said: “I saw a fantastic presentation at a meeting yesterday showing all of the current and planned developments taking place in the city – Circus Street, Churchill Square, Black Rock, the Seafront arches, [University of Brighton](#), [University of Sussex](#), Preston Barracks, the Marina.

“We have our own plans for the campus here at City College. This list goes on – and you can’t help but get a little bit excited about this amazing city that we live and work in and what it might look like in ten years’ time.

“One of the things that struck me was the emphasis that was put on establishing the city as a ‘magnet’ – as a destination – and the potential impact this might have on our population which is estimated to grow around 7 per cent in the city and by three quarters of a million across the Greater Brighton city region within ten years.

“This growth – welcome as it is – will, however, put pressure on the city’s infrastructure and much of the emphasis at the moment appears to be on housing.

“And you can see why, because the city’s assessed housing need is 30,120 by 2030. And yet even if we realise all the developments I mentioned above we will only build 13,200 or circa 45 per cent of the new homes required.

“The reason I raise this is that this will likely create even bigger pressures on good quality workspace.



An artist's impression of how Anston House may look

“Is there a risk that in the legitimate drive to generate more housing we overlook the essential role that workspace has in driving economic growth and development? After all, people need somewhere to work, right?”

“There are a whole range of issues that sit beneath the question of how we meet the demand for workspace in the city

- What do businesses want and need?
- What about the modern working style? Collaboration and networks? Can we learn from other cities?
- What’s the situation really like in Brighton? Is it full? Or is it just underutilised?
- Are there limited suitable buildings?
- What’s the answer?
- Do we need to look further afield? Can we move out? Are transport links preventing this?

“I suppose the point I am trying to make is that the issues – and therefore probably the solutions – facing workspace in the city are integrated and complex.”



Eeva Paasiaro

He introduced development manager Eeva Paasiaro, from property business **First Base**, one of the firms behind new proposals for Anston House, the derelict office building opposite Preston Park.

She said that plans to transform the site, developed with **Hyde Housing** and designed by **Conran and Partners** architects, had been submitted to the council.

As well as 229 homes, the plans include the sort of flexible workspace that was spoken about during the debate. She urged people to look at the plans and give their feedback.

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News - 1 July 2016

City Plan Part Two - Have Your Say

Work has started the preparation of Part Two of the City Plan and Brighton & Hove City Council needs your input.

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The council will need to identify development sites e.g. housing sites and

include policies which will be used to help assess planning applications.

There are 12 topic areas including economy and employment, retail and town centre uses, tourism and travel and transport.

Consultation runs from 30 June to 22 September 2016 You are invited to have your say on what the City Plan Part Two should cover.

You can view the consultation and have your say at: www.brighton-hove.gov.uk/cityplan-part2

[Click here to download the abbreviated leaflet](#)

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Have your say
City Plan Part Two Scoping Document
Quick guide

The council has started work on the City Plan Part Two (CPP2) and is consulting on a Scoping Paper - consultation runs 30 June to 22 September 2016.

This quick guide provides a summary of all the topics and policy issues covered in the full Scoping Document. Responses to this consultation will help shape the content of the plan.

The City Plan Part Two follows on from the current adopted City Plan. The City will include the following development sites, especially sites for new housing, and consider policies against which planning applications for all types of development will be assessed.

The City Plan Part Two Scoping Paper

The Scoping Paper is organized around 12 topics: (a) housing, (b) heritage and community facilities, (c) a number of policies to provide for comments and views.

You can view and download the full City Plan Part Two Scoping Paper and related documents please visit www.brighton-hove.gov.uk/cityplan-part2

Topics covered in CPP2 Scoping Paper

Housing

The council wants to improve the supply of housing in the city and particularly the supply of more affordable housing and housing for less affordable or in need of repair and other issues. The aim is to reach a target of 13,000 new homes to be provided by 2030.

The key issues for the CPP2 are:

- The need to identify and attract further housing sites.
- The need to ensure full and effective use of the city's brownfield sites for new housing but to address some other strategic sites, which will also need to be allocated for housing in CPP2.
- How to make sure that new housing development meets local needs for housing - particularly in terms of a mix of housing types and types and locations for particular groups in our communities e.g. family housing or housing for older people.
- Introducing open standards and elements for access and adaptability in new housing and
- How to manage the mix in multiple locations (sites) across the city and how to address some of the negative impacts associated with new housing at sites.

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Residents Asked To Shape Brighton's Future

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A major consultation on the future of Brighton & Hove's planning policies starts this coming Thursday.

Residents, businesses and developers will be able to take part in a citywide consultation on Part Two of the City Plan.

Part Two follows on from the recently adopted City Plan Part One which set out the overarching planning strategy for accommodating growth in the city, including the city's housing target and employment land requirements to 2030.

The City Plan Part Two will contain the remaining development site allocations to meet the identified development needs and detailed policies that will be used to assess planning applications in the city.

This initial round of consultation will be asking people what planning matters they think should be included in the Plan, from how to make sure housing sites deliver a good mix of housing; how best to manage the range of retail uses in shopping centres so they remain attractive places to shop and visit; to how to ensure new development helps create well designed places. It will be asking people if they have sites they wish the council to consider allocating for development in the Plan.

City Plan Part Two will take around three years to complete. The aim is to streamline the number of development management policies, making them easier to understand and simplifying the process for those applying for planning permission.

For example, at the moment there are six policies relating to shop fronts and it is suggested that these will be combined into one policy.

The City Plan Part Two Scoping Paper is divided into 12 topic areas, so people will be able to go straight to the area they are interested in.

These are housing; economy and employment; retail and town centre uses; tourism; transport and travel; biodiversity and open spaces; pollution, water and energy resources; design; heritage; community facilities; student accommodation and traveller accommodation.

Councillor Julie Cattell, lead member for planning strategy, said:

“This first part of the consultation is to gauge people’s views about the scope of the document, whether there are any particular issues that people consider important to be addressed by planning policies and a ‘call for sites’. It’s important that people take part because their contributions will feed into the draft City Plan Part Two that will be published next year.

“We have not identified specific sites at this stage but people can put forward sites for inclusion. City Plan Part Two will provide greater certainty and include local policies to address local issues such as how to secure family-sized housing and how best to address the further demand for purpose built student accommodation. Sites put forward during this consultation stage will be assessed by the council as part of preparing the draft Plan and will be subject to further consultation.”

The draft plan will set out in more detail how to provide the 13,200 homes that are needed in the city.

Consultation will run for 12 weeks.

Article Published: 9:20am 29th June 2016

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Suggested Stories

Work starts on the City Plan Part Two - have your say

Residents, businesses and developers will be able to take part in a citywide consultation on Part Two of the City Plan, which started 30 June.

Part Two follows on from the recently adopted City Plan Part One which set out the overarching planning strategy for accommodating growth in the city, including the city's housing target and employment land requirements to 2030.

The City Plan Part Two will contain the remaining development site allocations to meet the development needs that will be used to assess planning applications in the city.

This initial round of consultation will be asking people what planning matters they think should be included in the Plan, from how to make sure housing sites deliver a good mix of housing; how best to manage the range of retail uses in shopping centres; to how to ensure new development helps create well designed places.

It will be asking people if they have sites they wish the council to consider allocating for development in the Plan.

City Plan Part Two will take around three years to complete. The aim is to streamline the number of development

management policies, making them easier to understand and simplifying the process for those applying for planning permission. For example, at the moment there are six policies relating to shop fronts and it is suggested that these will be combined into one policy.

The City Plan Part Two is divided into 12 topic areas, so people will be able to go straight to the area they are interested in. These are housing; economy and employment; retail and town centre uses; tourism; transport and travel; biodiversity and open spaces; pollution, water and energy resources; design; heritage; community facilities; student accommodation and traveller accommodation.

The draft plan will set out in more detail how to provide the 13,200 homes that are needed in the city.

Consultation will run for 12 weeks. From 30 June you can take part online at <http://www.brighton-hove.gov.uk/cityplan-part2>

by email planningpolicy@brighton-hove.gov.uk or by writing to

City Plan Part 2, Scoping Document Planning Policy, Brighton & Hove City Council, Room 201, Kings House, Grand Avenue, Hove, BN3 2LS.

Zip wires could replace Brighton Wheel

Two 300 yard-long zip wires could replace the Brighton Wheel now it is removed from the seafront.

The wheel's operator Paramount Entertainment has applied to replace it with the zip wires running from a 65ft tower to a landing area on the beach.

Planning permission for the wheel, which opened in 2011, ran out at the end of May ahead of the proposed opening of the i360 tower further along the promenade.



The Brighton Wheel, sited east of the pier, opened in 2011

The council said the £1.7m Brighton Zip would be the largest such ride in Sussex. Operators hope to open this summer.

"Now we have a proposal with much less visual impact for the neighbours. An attraction on that site is desirable because it brings life to the area" said council leader Warren Morgan.

'Brighton Belle' to be launched in early 2017

The 'Brighton Belle' restoration project is being undertaken by the 5BEL Trust.



The Belle is still on target to return to the British mainline and will see the all-important mainline running tests being

carried out in the final quarter of this year. However, a decision has been taken to delay the train's entry into passenger-carrying service until early 2017.

The principal issue has been the discovery that sharp knives in the core of galvanised wiring conduits had fouled the densely-packed cable runs. For safety and reliability reasons, the work had to be carried out again using a different mounting method.

There have also been lengthy delays in the delivery of wheel sets, as well as an unsuccessful search for a gas water boiler to complete the kitchen in car 85.

Altogether, this has added four months to the restoration schedule as well as extra expense.

Bus companies help to tackle air pollution

One of England's first Low Emission Zones has made progress thanks to cooperation between Brighton & Hove City Council and local bus companies.

Local bus firms are spending millions upgrading their vehicle fleets, with brand new cleaner buses.

Air quality in Brighton's most polluted streets was improving – down 21 per cent since 2012. However the worst areas, around North Street and Western Road, still breach EU law. Those two roads have, since 2015, formed a bus-based low emission zone. Most air pollution there comes from buses because other vehicle movements are heavily restricted.

Bus companies have been buying new cleaner vehicles or upgrading existing ones with cleaner-emission technology.



www.rottingdean.pc.gov.uk

Planning Report – 4 July 2016

- **BH2016/ 00320: 67 Falmer Road:** decision awaited on the appeal against the refusal of BHCC to grant planning permission for 9 dwellings.
- **BH2014/03394:** Land adjacent 6 Falmer Avenue- refusal of 32 dwellings. A local inquiry is expected to last 3 days from **29 November 2016**. RPC reiterated its strong objections contained in two submissions made in 2014 and 2015. The Saltdean Countryside Alliance is a main party for the appeal under Rule 6 of Local Inquiries procedures.
- **BH2015/03108 St Aubyns School:** No further update.

Peer review of BHCC Planning Service: RPC contributed to this exercise with BHCC's Planning Department. Please find a link to the updates on the BHCC website which give feedback from the Peer Review and what is happening in the planning service.

<https://www.brighton-hove.gov.uk/content/planning/planning-applications>

Brighton & Hove City Plan Part Two: the City Council has started work on Part Two of the City Plan and has published a Scoping Paper for consultation. This will identify and protect smaller development sites for housing and other uses such as community facilities. The Plan will also include detailed policies which will be used to assess planning applications, in line with the overall approach set out in the recently adopted City Plan Part One. The Scoping Paper and accompanying Sustainability Appraisal Scoping Report are available to view at:

www.brighton-hove.gov.uk/cityplan-part2. Comments can be made using the council's online consultation portal: <http://consult.brighton-hove.gov.uk/portal>. And also

- By email to planningpolicy@brighton-hove.gov.uk
- By post to Planning Policy Team, Brighton & Hove City Council, Room 201 Kings House, Grand Avenue, Hove BN3 2LS

The City Plan Part Two Scoping Document and accompanying consultation documents are also available to view at the customer service centres at Hove Town Hall and Bartholomew House, Brighton and at all city libraries*, during normal opening hours. **All comments must be submitted no later than 5pm on Thursday 22 September.**

Lewes District Local Plan Part 1: Joint Core Strategy: The South Downs National Park Authority adopted the Lewes District Local Plan Part 1: Joint Core Strategy as part of the development plan for Lewes district at its full Authority meeting of 23 June 2016.

Clerk: Nicky.jackman@rottingdean-pc.gov.uk

City Plan Part Two Scoping Paper

Statement of Consultation

Appendix 4 - Workshop Notes

City Plan Part Two

**Brighton & Hove Economic Partnership
Workshops – Conference Centre University of
Sussex**

13th September 2016

Workshop Notes and attendance list

Brighton & Hove Economic Partnership – CPP2 Workshop

13th September 2016, 5pm – 7pm, Sussex University Conference Centre

Attendees:	Dean Orgill	MWB [Chair]
	Ed Allison-Wright	Haydon Consulting [Vice Chair]
	Patrick Warner	B&H Buses
	Martin Lawrence	HBA
	Gavin Stewart	BHEP/Brighton BID
	Judith Badger	University of Brighton
	Sascha Koehler	Brighton Metropole
	Gary Peters	Love Local Jobs.com
	Julian Caddy	Brighton Fringe
	Andrew Sirs-Davies	University of Brighton
	Alison Addy	Gatwick Airport Ltd
	Martin Searle	Federation of Small Business
	Graham Precey	Legal & General
	Paul Spruce	Stiles Harrold Williams
	Simon Lambor	Matsim
	Phil Jones	Wired Sussex
	Fleur Newton-Edwards	Legal and General

In attendance:	Cllr Joe Miller	BHCC
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Speakers/ Facilitators:

Nick Hibberd	BHCC
Helen Gregory	BHCC
Liz Hobden	BHCC
Sandra Rogers	BHCC
Carly Dockerill	BHCC
Steve Tremlett	BHCC

City Plan Part 2 Scoping Consultation – Event Log

Event	Brighton & Hove Economic Partnership –
Date and Location	13 September 2016 Sussex University Conference Centre
Attendance	BHEP membership (see separate sheet for attendance)
Key Issues Raised	
<p>Workshop 1 - Economy and Employment</p> <ul style="list-style-type: none"> • Employment Land forecasts underpinning the City Plan Part 1 – are they still accurate; has job growth been as anticipated and how that translates into the need for employment floorspace? • Business demand – are we clear what businesses want in terms of sites and premises? • If there is more space in neighbouring authorities does it matter if businesses move out within the Greater Brighton area if they need more space eg. to Burgess Hill? • Is there an appetite from neighbouring authorities to work together to get these sites going for the wider area? • Still have enquiries for space in the city centre • Example of London Road regeneration – innovative development; tall building, need to get going with delivering new employment space on other projects. • Issue for existing city centre businesses is that when leases are coming to and end, the rents are now increasing. • Co-working, creative space – will not be for all sectors; works well for start-ups and those self-employed but better to sure flexibility in type of employment floorspace. • Speculative office development is still a risk; enabling development can be a help. • There is a demand for industrial space; lack of space mean rents have gone up by 20 -30%. Seeing this in the Hove area • Issue for businesses who are in the £1m - £3m businesses; challenging to find employment floorspace that meets their needs. Move-on accommodation • Consider the shortfall of space does matter, will constrain businesses who want to grow; infrastructure constraints also an issue. • Permitted Development Rights – real issue for business, kicked out of business space to make way for residential conversions. Suggestion that the floorspace coming forward does not make up for the loss of existing space through prior approval. • Recognise the role of article 4 direction. • Role of the council – using its assets; what can the council do to bring forward employment floorspace? Example of Industrial House, Hove Station area – owned by the council and retained for affordable business space but occupied at very low job densities. Is that the best approach? • Should not the strategy be for space hungry uses to be moved out to the edge of the city? • Crawley has been releasing some of its sites in managed way to encourage 	

regeneration.

- Need to join up the different departments within the council – planning seems to be focused on place; property services on buildings and ED on businesses. Feels disjointed.
- Need to tie up the discussion with active travel – making it easier to get around the city by bike – better linked and better coverage of cycle paths.

Event	Brighton & Hove Economic Partnership
Date and Location	13 September 2016, Sussex University Conference Centre
Attendance	BEHP membership – see separate attendance list
Key Issues Raised	
<p>Workshop 2 – Economy and Employment</p> <ul style="list-style-type: none"> • What types of businesses are we trying to attract? Importance of a balanced economy – a range of corporate and larger corporates; strength of start-up companies, small businesses. Need to understand what support they need – may be space needs but may also be other issues such as business support. • Start-up businesses – when they get to the stage of move on accommodation they often look for joint space together. Entrepreneurial Spark may be able to provide greater insight on what they need – turning out 60 high growth businesses every 6 months. • Bringing forward office floorspace through mixed use development in the city centre may not be so much of an issue as there are shops/ café/ leisure uses on their doorstep. • Eagle Lab, Barclays – emergence of micro space and maker space – mixed use small scale businesses. Expanding across UK mixes creative, product design and manufacturing – make the products – have 3D printers and cutters. • Need to look to the Greater Brighton area to accommodate future industrial floorspace needs and to free up sites for higher density B1 a uses – industrial uses could better be directed to warehouses in Newhaven and Burgess Hill; • Scale-up hubs – businesses like interaction and to be able to communicate with other businesses. • Importance of flexibility of business space – use control that it is B1a use but also ensure that offices are designed as office space but future proofed so that the space can be used/ sub-divided in different ways depending on the changing needs of businesses. Good example of flexible space is New England House – small businesses often move onto to larger space. • Avoid being reactive – new office builds should be easy to adapt in the future – the possibility of adding additional floors; to be used as single floorplate occupiers or sub-divided space. Avoid them being designed to turn into residential use. • Links to the PAS review – policies should not be too rigid in requiring particular types of business space • Often why pdr doesn't work is that the original building was not designed to be converted to residential use. • Workspace is used differently now and will be used differently in the future. • Space can be small but still achieving high job density; need to consider the wider economic benefits and acknowledge the different ways of working. • Speculative office development – starting to see this happening again. May be viability issues on some sites but intervention not necessarily about what planning can do - inward investment activities speak to businesses and potential occupiers. • Site Match exercises - should the council be targeting businesses? Issue is 	

that the city is constrained in the sites it can offer – a number of projects already in pipeline (e.g. Preston Barracks) – remains sites such as Patcham Court Farm in council ownership.

- With Patcham Court Farm – ensure the policy is broad enough to encourage developers come forward – the developer then can produce a more detailed masterplan.
- Need to encourage vacant floors above shops in central Brighton to be used by small businesses. Can be difficult to get ground floor occupiers to let out the redundant upper space. Some of them may be council owned.
- Allow change to happen above shops.
- Can see there may still be an issue about protecting certain types of employment floorspace outside the A4D – is there a role for business groupings/ commercial agents to advise on loss of employment floorspace applications?
- Need to think about hubs – is there a benefit to indicate certain space/ areas for certain sectors? However can be difficult to predict – analysis tends to be backwards looking. Talk to business and target sectors.
- Example of Netherlands – old industrial workspace used by fashion designers, rehearsal space and 3D printers. Need for more NEH space – multi-sector occupiers. More support for creative arts and digital sector.
- Example of Rodhus – a successful small scale multi-sector space.
- Brighton Economic Board – research underway by both Universities looking at sector specialisms.
- Cross collaboration/ cross sectors is a growing trend and big data.
- Need for supportive infrastructure – e.g. parking.
- Should large employees contribute towards housing provision in the city?
For x amount employment floorspace, should they contribute to a provision of housing for their employees – Peabody/ Cadbury type examples. Could be difficult to calculate the relocation element and could impact on viability.

City Plan Part 2 Scoping Consultation – Event Log

Event	Brighton & Hove Economic Partnership Meeting
Date and Location	13 September 2016, Sussex Conference Centre
Attendance	BHEP – see separate attendance sheet
Key Issues Raised	
<p>Workshop 1 - Housing and Student Accommodation</p> <ul style="list-style-type: none"> • Support need for more PBSA and the need to allocate additional sites in the city. Do not support dispersed locations in city. However, locations further east (e.g. Lewes) might work as more accessible. • Site suggestions – retained land at the Keep; field behind Falmer Campus • Need tougher policy to control concentrations of HMOs – extend the Article 4 Direction and increase % in policy. • Space standards – some concern around introduction of nationally described space standard – will this stifle some forms of development? Could it reduce capacity on sites? Need for some flex / exceptions in policy to allow for innovative housing products e.g. modular housing. Could also affect housing delivery. • Second homes? What evidence do we have about scale of second home ownership in the city? <p>Workshop 2 – Housing and Student Accommodation</p> <ul style="list-style-type: none"> • Mixed use developments – acknowledge need more housing but don't want to lose out on employment floorspace – support no net loss in terms of job provision. • Need for innovation and a range of housing delivery options to boost supply and help provide different models for affordable housing. • Modular building may be part of the solution for helping to boost housing delivery and provide more affordable housing. Construction takes half the time traditional new build takes and economies of scale can be achieved through modular production. • Role for bigger institutions, pension funds, the universities, etc to invest in housing e.g. private rented sector new build and student accommodation – funding and returns over longer timescales (30 years). • Impact of not having enough student accommodation – students get put off coming to the city and the universities lose out. • Support for more dispersed locations for PBSA – city is compact and there are opportunities away from Lewes Road area – need to change perceptions. Provided transport is good and affordable students don't need to be just in the Lewes Road area. • How can we look after locals – what's the scale of second home ownership and can policy restrict second home ownership? Need some data on this. • Consider toughening of HMO policy – e.g. only allowing an HMO on one side of a C3 dwelling. 	

- Student village concept works well in Bournemouth – cluster of PBSA located in city centre away from campus, also separated from residential area. Supports related businesses and creates jobs in the area.

Event	Brighton & Hove Economic Partnership Meeting
Date and Location	13th September 2016 Sussex University Conference Centre
Attendance	BHEP – see separate attendance sheet
Key Issues Raised	
<p>Retail & Tourism workshop 1</p> <p>Air B&B</p> <ul style="list-style-type: none"> • Air B&B/party houses having adverse impacts on local B&B/hotel economy • Diminishing quality of visitors associated with these types of accommodation • Vacancy rates increasing in traditional B&Bs/hotels due to increased choice/competition • Concern around a refresh of the Hotel Futures Study – we do not need to this identify a need for more rooms in the city. • Lower quality guest-houses particular suffering – owners not making enough money to fund staff or carry out improvements on their properties • Restrictions set out in CPP1 on change of use from hotel to other uses too restrictive and not responding to fast changing markets • Hotel industry issues - relocation of the conference centre and transport, how to attract visitors which stay overnight <p>Event Space</p> <ul style="list-style-type: none"> • Lack of outdoor event space in CPP1, Valley Gardens, event space on the seafront. Would like sites allocated for outdoor event space to be used by various events such as Fringe/Pride etc • Sites should have water, waste and electricity connections, and have hard-standing • Uncertainty over sites earmarked near the i360 – what will these be used for? • Any ability to influence development on Madeira Drive/seafront? <p>Retail</p> <ul style="list-style-type: none"> • Need for a good mix of different types of shops. In particular, need to prevent/discourage certain types of shops e.g. betting shops/charity shops from becoming too commonplace in shopping centres • Potential for Article 4 Direction to address this in certain locations? • Portland Road improved over recent years, compared to George Street which has suffered from the concentration of betting shops and charity shops • Some centres need stimulation during the week, and benefit from other uses that bring people into the area, so that they aren't so reliant on weekend trade • retail mix, parking issues, conflicts between increasing housing and loss of employment/leisure to C3. 	

Event	Brighton & Hove Economic Partnership Meeting
Date and Location	13th September 2016 Sussex University Conference Centre
Attendance	BHEP – see separate attendance sheet
Key Issues Raised	
Retail & Tourism workshop 2	
Retail	
<ul style="list-style-type: none"> • BID area Vacancy rates are low • Issues of perceived over dominance of A3 units in areas of the North Laine such as Gardner Street. Tables and chairs obstructing A1 units on pedestrianized Saturdays. Economic Development and Highways have been involved with a survey of traders regarding this. • Worries on the impact of other pedestrianisation schemes such as East Street and whether similar issues will become apparent in the future. • Pedestrianisation needs to be of a decent quality which is key for areas working well. • North Laine needs some protection with a special policy – recognising smaller unit sizes. • Churchill Square has a stronger presence more recently. • John Lewis in the City will be good news • Some larger units on Western Road such as HMV still not occupied by permanent retailer • Preston Street falls out of any retail designation. Discussion around whether any designation as a restaurant area in the plan will help the areas receive any future investment particularly from the Local Transport Plan. • Good news about investment planned for West St sites. • No apparent tensions between independent and multiple stores in the BID area. All working together well. • Old Town area – smaller premises hard for retailers to have decent delivery times as hard for them to dictate to suppliers as independent stores. This coupled with refuse deliveries makes things difficult in the laines area. 	
Tourism	
<ul style="list-style-type: none"> • Events in the city such as Marathon, Pride, Fringe tend to get a negative response from retailers who do not welcome crowds blocking their shop entrances and not spending money. • Discussion around design codes and permeability, way finding. A Way Finding Strategy would be really useful in central Brighton to see how people find their way to the shops when arriving in the city i.e from the train station. • East of the Pier looking a poor environment with removal of the Wheel and 	

scaffolding up on the terraces needs some investment and further attractions.

Markets

- Disappointment at how London Road Market operates. Vision should be more like Camden with more eateries – possibly down to the market operator and the licensing or proximity to residential uses. Really a missed opportunity here. Market has great links to North Laine and the Level.
- Should be looking at permitted development and how to future proof spaces to evolve into different uses.

Event	Brighton & Hove Economic Partnership Event
Date and Location	13 th September 2016, Sussex University Conference Centre
Attendance	See separate list
Key Issues Raised	
Transport, Travel and Community Facilities Workshop 1	
<p>Transport and Travel:</p> <ul style="list-style-type: none"> • Bus lanes cause traffic jams as reduced amount of carriageway for cars • Buses are able to take a lot of cars off the roads and in the long term bus lanes should help to reduce congestion – with more promotion, more attractive. • All sustainable modes of travel represent active travel – as you have to walk to and from bus stops and stations • University of Sussex – have undertaken research based on information available on social media and this indicates that there are significant concerns about safety on bikes. To promote more uses of sustainable transport with students the recommendations are to find ways of introducing behavioural change, provide better facilities and restricting parking permits. • Concerns that there is insufficient parking to allow a major business in the city to grow (Legal and General). Potentially there will be 600 jobs brought to the city from 50 miles away – people need to drive but there is insufficient parking. Support is needed to bring these additional jobs into the city in terms of parking and there are additional concerns about a controlled parking zone soon to be introduced in the surrounding area. • Is there scope to introduce travel by sea • Can Public Transport Access Levels (PTALs) be introduced in Brighton & Hove to determine how much parking can be allowed for certain types of development 	

Event	Brighton & Hove Economic Partnership Meeting
Date and Location	13th September 2016 Sussex University Conference Centre
Attendance	BHEP – see separate attendance list
Key Issues Raised	
<p><u>Transport, travel & community infrastructure workshop session 2</u></p> <p>Transport/travel:</p> <ul style="list-style-type: none"> • Travel to work by car difficult for those traveling from outside Brighton – particularly access from Worthing/Eastbourne • Bus network already at capacity – little capacity on North Street for additional bus-routes and customers like the fact they don't have to change buses to travel across the city • Need better access into the city, via rail and bus to encourage car-drivers out of cars • Concerns regarding capacity of Brighton railway – recent instances of station being shut during very busy periods • Has the CPP1 growth been considered by Southern Rail • Congestion charge could be used to encourage people to travel more sustainably however only if alternative viable options are available • Interventions should be positive rather than punitive • High parking charges acts as a congestion charge already • Need to transport infrastructure to link Brighton to Black Rock area for conferences in the future • Inconsistent prices for parking across the city: both in car-parks and on-street • Churchill Square car-park clogs-up the seafront • Invest in technology that facilitates parking – e.g. smart phone app that shows you where the car-park spaces are • Need to increase and improve the cycle network with supporting cycle parking infrastructure, signs etc • Incentivise people to use zero emission vehicles • Promote car-clubs • Use bus-depots for coach-parking during the day • Use bus-depots as park & ride destination with improved links to bus networks • Make use of existing car-parks: Amex Stadium, The Bridge for park & ride <p>Community infrastructure:</p> <ul style="list-style-type: none"> • Use supermarkets as a hub for other services, e.g. GPs, opticians • Increase mixed use sites with community facilities incorporated • Public buildings, e.g. schools should incorporate other community infrastructure • Make use of Article 4 Directions to protect existing community facilities • Promote mobile services to areas lacking provision, e.g. mobile GP • Increase school places • Ensure community infrastructure is in place before development is completed in order to meet the increased demand on time • Release council-owned land by stream-lining services and use for community 	

infrastructure

City Plan Part Two

**Environment and Sustainability Workshops - BME
Community Partnership, Centre, Brighton**

9th September 2016

Workshop Notes and attendance list

City Plan Part 2 Scoping Consultation – Event Log

Event	<p>CPP2 Environment & Sustainability Focussed Workshop Event</p> <p><u>WORKSHOP: BIODIVERSITY AND OPEN SPACE</u> Attendee post-it note comments and facilitator notes of round table discussions (combined notes of workshop 1 & 2) Facilitators: Rebecca Fry & Rich Howorth</p>
Date and Location	<p>Friday 09/09/16, 10.30-12.30, BME Community Partnership premises, 10 Fleet Street, Brighton</p>
Attendance	<p>Workshop 1:</p> <ul style="list-style-type: none"> • Nick Lomax(BH Professionals Forum – architect) • Chloe Rose (RSPB) • Maureen Winder (Allotment Federation) • Chloe Clarke (BH Food Partnership) • Bryn Thomas (Brighton Permaculture Trust) • Laura Brook (Sussex Wildlife Trust) • Maureen Holt (BH Wildlife Forum) • Maria Hawton-Mead (Green Building Partnership) • Peter Clarke (Community Land Trust Steering Group) • Tracie Parker (BH Wildlife Forum) <p><u>Workshop 2:</u></p> <ul style="list-style-type: none"> • Ben Earl (Southern Water) • Andrew Coleman (Local Resident) • Hannah Packwood (Environment Agency) • Katharine Stuart (SDNPA) • Sean Ashworth (Sussex Inshore Fisheries & Conservation Authority) • Rebecca Pearson (Natural England)
Key Issues Raised	
<p><u>POST IT NOTES:</u> (nb. Green Infrastructure abbreviated to GI)</p> <p><u>Landscape Scale Approach</u></p> <ul style="list-style-type: none"> • Comms and policy around allowing verges to grow: add wildflowers; easy way to create green corridors. • Encourage citizen action; green corridors map; join up green spaces. • Support continuation of work to identify and deliver green links, as part of the wider GI network, from the heart of the city and out to the SDNP. • GI - Multiple benefits; links to the water (section?) SUDS where possible for example. • Support the Green Infrastructure landscape scale approach idea for CPP2. • Green links from SDNP through into the city and clear requirements in policy for how development should enhance this. 	

- Encourage a landscape scale approach to planning policy to go beyond boundaries of Brighton and Hove: bigger and better and more joined up; Biodiversity 2020.
- Increase links to National Park for people to access the National Park
- Opportunities through development to safeguard biodiversity; increase habitat links and GI links to national park.
- Need to ensure the value of biodiversity to feed aquifer is recognised – especially when developing fringe sites.
- Open space: include landscape approach and GI in local plan; include education land and highway land in GI.
- GI policy should be adopted to ensure new development delivers net gains connectivity / climate change adaptation.
- Developments in NIA should be required to include food growing spaces – needs to be enforced, guidance could come in form of new SPD on food growing (food partnership).
- Allotments are natural elements of green infrastructure and should move to a new designation to protect their role as urban benefits; protect from pollution and chemical use.
- Greater engagement with local people to support and understand the value of green spaces. Opportunity to protect and consider and create.
- How are policies accounting to the Beachy Head West Marine Conservation Zone?
- CP10 – one objective is to conserve, restore, etc., LBAPs but concern that BHCC have no resources to manage/monitor them.
- Baseline policies required to reduce impact on wildlife, avoid chemical use and lessen overall pollution for health of species.
- Brighton and Hove should look at calculating Natural Capital Resources.
- Marine water quality: policy to protect and enhance water quality by reducing surface water run-off (including from highways).

Nature Conservation, Geodiversity and Landscape Sites

- LWS sites need to be looked at in conjunction with GI network as may have been important connecting sites.
- LWS process should be published as part of CPP2 as evidence base.
- If SNCIs are to be updated will this include new marine SNCIs?
- Policy to protect and enhance marine recreation, especially east of Brighton Marina, King Alfred, Peter Pan playground, Ovingdean, Rottingdean and Saltdean.
- How are we linking marine water quality, marine commercial fisheries and the marine environment through Planning?

- How do terrestrial policies take account of impacts on the marine environment (habitats and species)?
- Can policies encourage sustainable marine fisheries?
- Swifts – can we implement into the policy where all new builds have to have a specific number of swift bricks installed (Chloe Rose, RSPB).

Open Space and Local Green Space

- Dual use: schools; council owned.
- Access to open space and downland: encourage access to open space and SDNP by foot and bike.
- Get the balance right between a green space being a SUD and local amenity.
- Playing fields recognised as local green spaces, due to community value and provide connections for wildlife.
- Allotments designated as local green spaces due to benefits to community, health and recognised as having wildlife value.
- How will these local green spaces be managed? Is not improving access to the National Park more important?
- Local greenspace: how does this benefit a site above what designations that site already has ie SNCIs; LNRs; or National Plan.

FACILITATOR NOTES:

- Points raised at start to be of particular interest to attendees:
 - Local Green Space (LGS)
 - Allotments and LGS
 - Marine Environment
 - Local Wildlife Sites (LWS) (how they can be designated and how can people get involved)
 - Natural Capital and GI
 - Housing and biodiversity – 40% of the Local Authority lies within the National Park, how do we plug into the downs; Gateway issues and A27 barrier
 - Community based land issues
 - Integration of biodiversity and meeting the needs of people
 - Open Space, beaches and Inshore Waters
- Swift boxes – incorporate within development
- Link to the Marine Environment and consider how the city impacts upon the marine environment (control/protect)
- Create a Green Lung through the heart of the City to restore it
- Have proper corridors
- Important for peoples welfare
- Communicate the benefits of leaving verges to grow, engage the public eg potato mile initiative (food partnership project I think?)

- Promoting and using green space: Dual use - green space/SUDs; placemaking
- Urban Fringe – can be a step to the get to the National Park/Downs
- Potentially CP10 and CP16 address biodiversity adequately however no enforcement so gaps
- School playing fields provide an important asset where currently open shouldn't be fenced off

City Plan Part 2 Scoping Consultation – Event Log

Event	Biosphere Board CPP2 Event
Date and Location	Fri 09/09/2016 BMECP
Attendance	<p><u>Workshop 1</u> Andrew Coleman Ben Earl - Southern Water Diane Smith – BHESCo Hannah Packwood – Environment Agency Sean Ashworth – Sussex Inshore Fisheries & Conservation Authority Cat Fletcher - Freegle</p> <p><u>Workshop 2</u> Abigail Dombey – University of Brighton Anthony Probert Bioregional Helen Russell – Community Works Maria Hawton-Mead – Green Building Partnership Mark Pellant – Koru Architects Matthew Arnold – University of Sussex Mike Clark – University of Brighton Mischa Hewitt – Low Carbon Trust</p> <p>Facilitators – Francesca Iliffe, Maggie Moran and Paula Goncalves</p>
Key Issues Raised	
<p><u>Sustainable Drainage</u></p> <p>Given the existing national guidance and approach, is it necessary to have an updated policy on sustainable drainage in the City Plan Part Two?</p> <p><i>Feedback: Workshop 1</i></p> <ul style="list-style-type: none"> • Specific policy around the worst affected areas. • Awareness campaign with local nurseries, parent and toddler groups and schools re flushing wet wipes down toilets. • Strategy/policy for existing built areas that flood. • Is 1 in 200 years a robust assessment methodology? Should we consider planning for higher severity? • Is 50% attenuation from a site high enough? Map flow rates and paths from different surface types. • Policy should not be too prescriptive about the types of SUDS that could be used in new development HP (EA). • SUDS – Policy in Local Plan: <ul style="list-style-type: none"> ○ Hierarchy ○ Policy should require compliance with law on porous paving limits. ○ Identify particular parts of city where particular SUDS are required, e.g. 	

London Road.

- Need to consider the impact on groundwater quality, i.e. SUDS.
- How to address the removal of trees and hard landscaping that increase flooding and cause water problems in developments other than new development. Better communications?
- Strategy/advice to use bigger gutters on new/old homes.

Feedback: Workshop 2

- Guide for developers on flood solutions is a great idea.
- Yes to SPD on drainage, etc.
- Yes to more guidance on surface water and drainage.
- Is there a policy link between drainage and flood risk with marine water quality that protects marine habitats and species and designated sites?
- Stipulations on rainwater harvesting on all new developments.
- Encourage green walls and green roofs to achieve increased water attenuation, low carbon and visual attractiveness.
- Transcribe best practice into policy (to front end development design).
- Underground water storage: always integrate with 'brown water' sanitation, etc.

Low carbon and renewable energy

Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

Feedback: Workshop 1

- Develop community energy strategy.
- Community energy policy should be included.
- Encourage mixed development (residential and commercial) and appropriate community scale renewables and heat network.
- Support and encourage community energy.
- Encourage installation of renewables rather than gas.
- Need a community energy strategy for the city.
- Encourage community heating and energy.
- Identify sites for renewable energy, major housing and employment.
- Link it back to the legal requirement for the plan to have a strategy for climate change mitigation and adaptation.
- Encourage PV and solar thermal on private housing through grant or other incentive.
- District heating: strengthen policy and build in as standard renewable energy generation.
- Encourage district heating with customer price protection plan.
- Demand renewable energy.

Feedback: Workshop 2

- No brainers: yes! PV policy, etc.
- Support energy loop renewables.

- Support for community energy.
- There are potential opportunities to link marine aquaculture (seaweed farms) to biomass energy production (discussed at Biosphere).
- Air quality action plan requires lower NOx or no combustion go further than BREEAM in AQMA.
- All new housing developments: integrated PV roofs!
- PV: issues - roof condition; planning; electrical infrastructure; DNO approval.

Energy efficiency

Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?

Feedback: Workshop 1

- Energy efficiency policy for conversions of commercial buildings.
- Need to apply strict standards to commercial and residential development.
- Should have a policy for converting commercial to residential such as minimum EPC rating.
- Include residential conversions from commercial in residential property.
- Link EPC to residential conversions.
- If EPC is to be used as a measure of low CO2 efficiency, minimum must be D rating for all commercial buildings.
- Passivhaus standard as minimum.
- Future proof existing and new buildings, e.g. for future climate: bigger gutters; better drainage design; waterproof facades.
- Design to prevent overheating: solar shading; cross ventilation; reduce excessive glazing.
- Should have a policy to encourage small commercial developments to attach an accredited certification.
- Evidence should be required at building control stage that additional energy target (20% better) has been achieved.
- Investigate how you apply the policy to retrofit/existing housing?
- Local authorities need greater resource for enforcement.

Feedback: Workshop 2

- Lean, clean, green? No! should be Lean, green, clean.
- Prioritise zero carbon over low carbon.
- Lean, clean, green.
- Fabric first approach then renewables.
- Use DEC's for all buildings.
- Home Quality Mark – encourage it.
- Design out inefficiencies.

Design

Should the Place Making Policy seek to incorporate guidance on new and emerging

design issues such as expert review and integrated infrastructure design?

Feedback: Workshop 1

- How can we connect various placemaking around the city.
- We need to include placemaking in large projects to improve the space.
- Community have an important role for the decisions in placemaking.
- Joining up existing 'city centre areas': green corridors or art to join them up?
- Building protected from heat in future? Shade.
- Green links: increase biodiversity / habitat and adaptation to climate change.
- Vertical spaces? Rooftops?
- Expert design review for large redevelopment.

Feedback: Workshop 2

- Concern for street scene should *not* mean pastiche design.
- Place making policy? If yes, must be from grassroots, not led by 'experts, academics'.
- Talk to Brighton & Hove Community Land Trust initiative: info@bhclt.org.uk
- Timber frame new builds.
- Walter Segal design build approach. Grass roofs.
- Reed beds; can be scaled up – e.g. Hockerton.

City Plan Part Two Scoping Consultation - Event Log

Event	<p>CPP2 Environment & Sustainability Focussed Workshop Event</p> <p><u>WORKSHOP:</u> Sustainable Energy, Sustainable Drainage and Environmental Design</p>
Date and Location	09 th September 2016, BMECP Centre, Brighton
Attendance	<p><u>Workshop 1</u></p> <p>Andrew Coleman Ben Earl - Southern Water Diane Smith – BHESCo Hannah Packwood – Environment Agency Sean Ashworth – Sussex Inshore Fisheries & Conservation Authority Cat Fletcher - Freegle</p> <p><u>Workshop 2</u></p> <p>Abigail Dombey – University of Brighton Anthony Probert Bioregional Helen Russell – Community Works Maria Hawton-Mead – Green Building Partnership Mark Pellant – Koru Architects Matthew Arnold – University of Sussex Mike Clark – University of Brighton Mischa Hewitt – Low Carbon Trust</p> <p>Facilitators – Francesca Iliffe, Maggie Moran and Paula Goncalves</p>
Key Issues Raised	
<p>DESIGN</p> <ul style="list-style-type: none"> • Talk to people in the area to see what they want their place to be. Ensuring communities have a say and influences outcomes could lead to more ownership. • Seafront is our city square and needs to be improved to reflect this status. • Make sure policy is joined up to avoid overlapping and ensure efficient delivery of infrastructure. • Link up green spaces and places that people like in the city, using spaces in between buildings as connections from one place to another. • City needs protection from heat effect. • Wildlife and climate change. • Policy should enable for innovative design. Why follow what has been there? A mixture of new and existing should be welcomed. <p>Workshop Notes</p>	

GROUP 1

INTERESTS

- Water supply, treatment and quality in B&H
- Energy, water and marine coastal
- SW sustainable water, chair Biosphere Board
- Place making
- Renewable community energy
- Energy and sustainability
- Waste, energy and design
- Energy efficiency and renewable energy
- Pushing forward building standards
- Servers against sewers (Andrew contact?)

WATER

- SPD/guidance on water management in development?
- Things going down the toilet are a problem causing blockages
- Stronger policy to ensure water management is properly addressed in the face of loss of teeth of national policy?
- Does policy need strengthening in this area? If so, how?
- Policy has more weight than SPD. SPP1 provides enough of a hook to develop an SPD.
- Not being too prescriptive.
- Set targets. These are set in SFRA
- Just related to new developments? Removal of trees and paving back gardens have an impact right?
- Cumulative, collective impact can be significant and should be addressed.
- Need for specific policies in London road valley for instance.
- Reduction of consumption of water would help in a water stressed area.

ENERGY

- Standards for new build but not existing.
- Could we use EPC for monitoring, requesting of existing/renovations?
- Community energy: facilitate more in a city where this is already strong? How?
- PV remains increasing
- Energy study
- District heating? Gov. supporting still.

DESIGN

- Seize opportunities to use the top of buildings.
- Making sure community is involved in what is build, know what is happening and influence outcomes, leading to more ownership. Community should have a big say. Skate Park at The Level is a good example of how that works.
- City square: we don't have one, only small ones. Seafront is our city square and needs to be improved.
- Make sure policy is joined up to avoid overlapping and ensure efficient

delivery of infrastructure.

- Linking up and connectivity of green spaces and existing hotspots (places that people like in the city). Use spaces in between buildings as connections from one place to another.
- We need protection from heat.
- Wildlife and climate change.

GROUP 2

INTEREST

- Marine environment
- Sustainable energy and design
- Community land trust
- Energy and environment performance
- Renewable energy
- Sustainable design

WATER

- SFRA sufficient? Quality soakaways, drainages that are difficult to maintain these issues could be addressed via an SDP.
- Idea is to frontload information on water management. At the moment it is an afterthought.
- Recommendation is currently on the web but it is not prescribed.
- Height of electric plugs to avoid damage?
- Underground storage?

ENERGY

- Yes to all things.
- Fabric first approach always. PVs on the roof should be an additional option.
- Should we include renewable target? London has one.
- Zero carbon options should be promoted above low carbon.
- Have the right technology in the right place.

DESIGN

- Community engagement is key.
- Have to talk to people in the area to see what they want their place to be.
- Concern LPA has a lot of control of the street scape already. Policy should not be an excuse to have the same design as existing everywhere in the city. Why follow what has been there? A mixture of new and existing should be welcomed.

City Plan Part 2 Scoping Consultation – Event Log

Event	<p>CPP2 Environment & Sustainability Focussed Workshop Event</p> <p><u>WORKSHOP</u> : Transport and Pollution (Workshop 1)</p>
Date and Location	9 th September 2016, BMEP Centre, Brighton
Attendance	<p>Abigail Dombey University of Brighton Chris Todd Community Works Mark Greening Brighton & Hove Motorcycle Action Group Mathew Arnold University of Sussex Roger Blake Rail Future Peter Elvidge Brighton & Hove Bus Watch Sam Rouse – BHCC Mita Patel – BHCC Facilitators: Liz Hobden and Helen Gregory</p>
Key Issues Raised	
<p>Transport and Pollution – Workshop 1</p> <p><u>Post it Notes</u></p> <ul style="list-style-type: none"> • Improve access routes to and from train stations, to enable more use of rail; to encourage walking and cycling to and from stations; to help accommodate extra travel demand on sustainable mode including active travel for access. Measures to include way-finding, fully-accessible walking routes, secure cycle-parking. • Reducing the need to travel. • Madeira Drive to King Alfred Corridor: fast track transport solutions to reduce congestion and acknowledge / accommodate new developments. • Nottingham: 33% reduction in CO2 since 2005. 8% drop in motor traffic. • Minimise impact of development and seek opportunity for improvement. <p><u>Transport/Travel and air quality</u></p> <ul style="list-style-type: none"> • Urgency compliance (dioxides) – diesel – Nox - particulate levels – transport sources • Spatial dimension: <ul style="list-style-type: none"> ○ AQMA (quite likely to stay same) ○ Potential in 2016/17 reduce the size of AQMA ○ Most of B& H has good air quality • Recent improvements and actions – progress • Manage and mitigation • DEFRA: <ul style="list-style-type: none"> ○ clean air zone – consultation will come out soon – relevant LEZ 	

- low emission zone currently (buses) and taxi; should it include freight and trucks?
- Need to consider the location of major new development and how these will impact on air quality
- Red flag areas:
 - London Road and North Street; Preston Circus; Vogue Gyratory; Lewes Road
 - New England Street junction; South Portslade freight route;
 - Rottingdean High Street
- Boris Bike? Encourage switch to cycle. Tender being assessed B&HCC.
- Low carbon zones: London example.
- Technology: hybrid cars / electric bikes – how can we support this? Infrastructure – charging points.
- Public awareness and appetite for electric cars – engagement – campaign B&HCC use it as exemplar.
 - Need to sell the benefits; raise awareness of charging point locations; how they are used;
 - Still prohibitive costs; can't pass them on to users.
- GLA consultation on congestion: one of concerns as technology moves on; e-vehicles, etc.; tackling pollution won't tackle numbers / congestion.
- Attractive destination: better quality public realm, less car transport orientated.
- Congestion not always related to pollution? Eg. Seafront is congested but not air quality issue.
- Congestion charges?
 - Clarity about policy objectives;
 - attractive Brighton and Hove;
 - more space for people rather than motor cars;
 - How to manage demand? Price demand.
 - Churchill Square area a no car zones but bus congestion
- Language should be more positive rather than talking about: "controlled" parking or "no car zones".
- Reallocation space: pedestrian/cyclist – this could impact on buses
- Euro 6 should be rolled out.
- Space efficient travel within Brighton and Hove; car = space resource hungry
- We need to manage congestion – accept always be element of congestion.
- Workplace parking level. Nottingham: fund active travel, etc.
- Positive benefits:
 - Active travel

- Reduce cost to the NHS, mental wellbeing benefits
- Stronger words; to reduce parking provision in city.
- SMART technology: that can advise people travelling into city where parking is available; better use of such technology.
- CPPI policy around no additional public car parks but what is the definition of public car parks?
- Private car park? Is Churchill Square a public or private car park?
- Preston Park: proposals indicate 600 spaces – are they being required to have that many?
- SPD is due to be adopted shortly which sets out maximum standards.
- Low carbon preference – parking
- Withdean – rapid charging point.
- University of Sussex: car parking programme 50% charging; internal fleet of vehicles are electric.
- Bus policy:
 - Need to be clear about bus priorities/lanes
 - Accessible bus stop; bus shelter
 - Need to think about bus frequency and cost
 - Role of CIL
 - Planning gain
 - Reduce need to travel: does large development mean large car parking (London, etc.)? Link cycle lanes.
 - Valley Gardens design: single lane will impact on bus congestion.
- Preston Barracks: University of Brighton development; 600 spaces? Is that what the council requires from the university? Maintaining what they have? No net gain; better no net gain but reduced.

City Plan Part 2 Scoping Consultation – Event Log

Event	<p>CPP2 Environment & Sustainability Focussed Workshop Event</p> <p><u>WORKSHOP</u> : Transport and Pollution (Workshop 2)</p>
Date and Location	9 th September 2016, BMECP Centre, Brighton
Attendance	<p>David Brookshaw - Brighton & Hove Local Access Forum Diane Smith - Brighton & Hove Energy Services Company Patrick Warren – Brighton & Hove Bus Company Trevor Beeston - South Downs Society Gordon Mackerron - University of Brighton Mark Buchanan- Smith - Churchill Square</p> <p>Facilitators – Liz Hobden and Helen Gregory</p>
Key Issues Raised	
<p>Transport and Pollution – Workshop 2</p> <p><u>Post it Notes</u></p> <ul style="list-style-type: none"> • Park and Ride for tourist and business community for north, east and west corridors. • Oyster card scheme. • Incentives for cycling and walking. • Better walking routes. • Increase train capacity, e.g. carriages. • Boris Bike scheme. • Integrated transport that includes pedestrians, cycles, motorbikes, cars, buses and trains. • Increase pedestrian and cycle thoroughfares. • Put more resources into walking and cycling and cutting pollution (less motorised transport). • More trains east and west – north is well served – at peak times. • Further pedestrianisation of the city centre. • Risk of Park and Ride: need to price it to discourage increased in car journeys. Location will also be an influence – increased in car journey if too close to city centre. • Are there pedestrianisation plans for city centre? <ul style="list-style-type: none"> ○ Station to Churchill Square ○ East to West ○ Controversial ○ Need to keep bus flows 	

- 120 buses/hour North Street, etc. – impact on attractiveness of bus routes if pedestrianize key bus stop routes.
- Encourage reduction in traffic:
 - Car parking is at capacity;
 - Reduce burden – alternatives offered
- Manage demand in key sites, e.g. Churchill Square, etc.
- Trains: capacity issue mainline.
- SMART VMS – letting visitors know about main routes; alternatives; help reduce queuing.
- Sustainable Travel - walking, cycling - relationship with improving air quality.
- Energy issues
- Impact on National Park
- Air quality improvements – sustainable modes
- Park and ride: north, east west, not just tourist/shoppers but workers part to get into city centre.
- Bus company:
 - Trying to bring forward park and ride north of city
 - 16 minute journey
 - High frequency network
 - Deliver choice
 - Commercially viable, potential for investment
- Investment in bus fleet:
 - vehicle delivery Euro 6 engines; smaller diesel engine;
 - has had improvements in air quality;
 - smaller, cleaner engines;
 - technology – zero emissions.
- Urban fringe development sites:
 - Saltdean (100 houses)
 - Encourage car
 - As a resident not happy about UF sites allocated CPPI when they feel sufficient brownfield sites exist in city.
- 6 mile bus route to city centre from Saltdean.
- Encourage bus and cycle use.
- Need more Lewes Roads style improvements
- Encourage walking; pedestrianisation improvement.
- Reducing traffic is important.
- East to west railway network less frequent. Need more frequency to support commuters.
- Congestion charge? Discourage car journeys.
- Difficulty of finding sites for park and ride; bus infrastructure but not

greenfield.

- Right of Way: need to look at improving routes out of city to the National Park.
- Do we have an integrated transport plan, e.g. Leicester, Aberdeen.
 - Integrated pricing; key card technology
 - All bus operators (except Stagecoach) – although due - use key card
 - Soon be able to link up to train
 - Cycle hire also available for that?

City Plan Part 2 Scoping Consultation – Event Log

Event	<p>CPP2 Environment & Sustainability Focussed Workshop Event</p> <p><u>WORKSHOP:</u> Urban Fringe Development and the Setting of the National Park</p>
Date and Location	<p>09/09/16</p>
Attendance	<p>Workshop 1:</p> <ul style="list-style-type: none"> • Mike Clarke (University of Brighton) – Varley Halls site • David Brookshaw (Local Access Forum) – impacts of development on green infrastructure • Trevor Beeston – (South Downs Society) - impacts of dev on GI, conservation of UF sites • Anthony Probert (Bioregional) – quality of dev on UF sites; access & transport • Mark Pellhant (Koru Architects) – appropriate development on UF • Nicola Thomas (architect) – opportunities for good development on UF • Andrew (Brighton & Hove buses) – transport and ensuring bus network serves UF development • Helen Russell (Community Works) – on “community land trust” – steering group, appropriate dev on UF sites • Katherine Stuart (SDNPA) – impacts of UF dev on the setting of the SDNP, opportunities for GI • Rebecca Pearson (Natural England) – GI, linking the UF to the SDNP <p><u>Workshop 2:</u></p> <ul style="list-style-type: none"> • Roger Blake (Rail future) – sustainable transport • Chris Todd (FoE) – safeguard green spaces, good development that makes the best use of UF sites • Maureen Winder (Allotment Federation) – incorporation of allotments into green space • Chloe Clarke (BH Food Partnership) – incorporation of food growing space • Bryn Thomas (Brighton Permaculture Trust) – increasing access to green space, the use of the UF as a connection between urban and rural areas • Laura Brook (Sussex Wildlife Trust) – achieving net gains in biodiversity, role of biodiversity in decision making

	<ul style="list-style-type: none"> • Nick Lomax (BH Professionals Forum – architect) – delivery on UF sites, connections to SDNP • Marueen Holt (BH Wildlife Forum) – biodiversity on UF sites • Peter Eldridge - connections between new development and existing bus routes • Mischa Hewitt (Low Carbon Trust) – promoting self-build and high standards of design on UF sites • Peter Clarke (Community Land Trust) – community-led building on UF sites • Chloe Rose (RSPB) – “swifts” project into planning policy requirements • Tracie Parker (BH Wildlife Forum) – UFA based on out of date evidence, some sites should be removed
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Key Issues Raised

Notes of round table discussions:

Workshop 1:

Notes from discussion:

- Clarification sought regarding the types of additional assessments on UF sites that have been carried out; whether the indicative amounts for each UF sites are still relevant; whether all sites with development potential will come forward.
- Recent applications on UF sites have been **over-development**. Not sustainable/appropriate
- Important to make the **best use of green infrastructure**.
- There should be some **influence over the types of house-builders who develop the sites** (e.g. not the volume house-builders which only use a standard design).
- Concern that **Design Panel may not influence** applicants and planning applications with **sub-standard design** will get approved.
- **Council owned sites should prioritise “community-led” housing.**
- There is a need to **define appropriate development** for UF sites.
- Housing should **blend into UF sites** and **be sensitive** to surroundings.
- Should develop **brownfield sites** first however **developers prefer greenfield** sites.
- Development on UF sites will lead to an **increase in car-use on existing congested roads**.
- There is a need for **more bus-lanes, improved cycle routes and improvements to the pedestrian network**.
- **Bus services** are looking at provision for new areas however there is **no public subsidy** for this.
- To enable bus services to serve a new location, there **needs to be enough development to make the route sustainable**, or development needs to be well connected to existing centres of population. **Small pockets of housing are difficult to serve.**

- Council should have a **business car-parking levy** (Nottingham example – whereby employers that provide workplace parking have to apply for a license and pay a fee for it).
- Bus lanes adding to pollution by resulting in more cars standing still in certain places.
- Different types of **design standards and buildings should be encouraged on UF sites.**
- **How development is procured** will have the greatest influence on the types of housing that is brought forward in UF sites.
- Clarification on how planning applications for UF development will be brought forward before Part 2 adopted.
- **Specific conditions** regarding materials **must be applied to all developers of UF sites** (e.g. UoB had to meet certain requirements in order to gain permission).

Post it notes:

- The site specific policies for urban fringe sites should give clear requirements for 1) GI links, 2) design to minimise impact on and conserve and enhance the setting of the SDNP and key views.
- Opportunity to encourage alternatives forms of ownership and D&B
- Improved design standards for UF sites (mitigating extra impacts)
- Can we enforce/encourage good space standards , low energy standards e.g. Passivehouse
- Strong policies required to guide any development on UF sites e.g. a DPD?
- Make sure UF sites consider: full LVIA, setting of SDNP including light pollution, ecological value of sites, and ensuring local people can retain access to open space.
- Need to ensure any fringe sites that come forward for development have strict criteria re: wildlife corridors, maximise GI, links to the SDNP, do not detriment the setting of the SDNP, enhance biodiversity, consider hydrological issues
- Better access to SDNP and protect green space
- Integrate housing and green space with fluid edges between them, e.g. gardens, allotments, open space.
- New housing needs new local shops, and employment
- How feasible are shared surfaces on a large scale in the city
- GI strategy with specific requirements for urban fringe sites
- How do UF sites fit in with the GI network? What opportunities for enhancement are there?
- Very clear lines of engagement! Green space vs housing. Need to collaborate.
- Modern methods have to lead the way, so volume developers learn from us.
- Future “peak oil”. Combined heat and power (microgeneration) in all possible housing developments.

Workshop 2:

Notes from discussion:

- Clarification around whether Hollingbury Park is still included as having potential
- **Development should respect aims of the Biosphere** and educate people regarding

the environment

- **Access to SDNP is difficult. Access needs improving.**
- UF sites include designated green space.
- **Access to SDNP should be throughout the city**, not just through UF sites or separate “gateways”
- **Older style developments** in fringe locations tend to be cul-de-sac designs which **stops pedestrians accessing the countryside** behind the housing.
- Design in UF locations will be very important to meet various needs and requirements.
- There should be a **mechanism for disposing of sites which should be included in the Plan**. E.g. self-builders can't compete with major volume house-builders.
- **Useful to map access points** around the city and **improve/upgrade existing access** (e.g. allow cycle access on existing pedestrian only bridges).
- **Green spaces should be mapped** to show the population they serve.

Post it notes:

- Possibility of using S106 money to provide a green bridge to the SDNP at the THV site
- Any development within the urban fringe should have food growing incorporated due to value to biodiversity, communities, mental health etc. Food Partnership has evidence to support this.
- Concerned that latest LUC assessment did not visit the Meadow Vale site and did not take into account its biodiversity. Up to date information has not been taken into account. How can this be addressed?
- Importance of mapping to grow sense of value at fringe of the city to avoid land grab and to enhance and use for health and mental health benefits.

City Plan Part 2 Scoping Consultation – Event Log

Event	<p>CPP2 Environment & Sustainability Focussed Workshop Event</p> <p><u>WORKSHOP</u> : Sustainability Appraisal Sustainability Appraisal Framework feedback</p>
Date and Location	9 th September 2016, BMECP
Attendance	Post it notes were gathered from all attendees
Key Issues Raised	
<p><u>SA1 Biodiversity</u></p> <ul style="list-style-type: none"> • DCM should include protection and enhancement of a wider range of sites, including allotments. • Net gains in biodiversity need to be more creative, and not just bat/bird boxes. Need to think about all supporting features. <i>(nb. No examples provided)</i> • DCM should include enhancements to habitats or linear features to ensure connectivity and reduce breaks • Non severance of linear features such as hedgerows of great importance to biodiversity <i>(put under 2 but also of relevance here)</i> • Designations need to be linked with up to date information • Add protect and enhance marine water quality <i>(nb. Was put under SA2 but also of relevance here)</i> <p><u>SA2 Open Space / GI</u></p> <ul style="list-style-type: none"> • DCM (2) Improve the quality <u>and /</u> or make better use of existing open space • Add protect and enhance marine water quality • Add protect and enhance marine recreation • Extra assessment required for urban fringe sites – LVIA, dark night skies, GI opportunities • Open space needs to include community food growing and allotments • Non severance of linear features such as hedgerows of great importance to biodiversity • Add reference to landscape scale approach and green infrastructure <p><u>SA3 SDNP</u></p> <ul style="list-style-type: none"> • Extra assessment required for urban fringe sites – LVIA, dark night skies, GI opportunities <i>(was put under SA2 but also of relevance here)</i> <p><u>A4 Heritage</u></p> <ul style="list-style-type: none"> • No comments 	

SA5 Travel reduction

- SA Objective – why do we need to “reduce the need to travel”?
- Provide material incentives for people to use sustainable forms of travel
- Well designed, fit for purpose bus stops (*under 15 but of relevance here*)
- Reduce the need to travel (*under 15 but of relevance here*)
- Reduce car parking, stop car-parking in the city centre and highly accessible locations (*under 13 but of relevance here*)
- *BHCC school admissions policy is at odds with the DCM “encourage the location of development close to where use of sustainable transport can be maximised”*
- Current proposals which encourage bus use are poor. The following measures would encourage bus use e.g. signal priority, bus lanes, accessible bus stops and bus shelters
- Reduce car-parking
- Increase permeability for pedestrians and cyclists

SA6 Air and Noise Quality

- Reduce motor traffic, particularly private cars in and around the city centre and bus corridors
- Less trucks and cars will result in air pollution being minimised, however business wants more cars
- Increasing congestion is increasing pollution but also making buses unreliable and therefore undermines one of the alternatives to the car

SA7 Water quality

- Comment of support for this objective
- Amend the words of DMC from “encourage” to “ensure”
- Under “reduce water consumption” we should insist on higher water efficiency standards that building regulations
- We’re in an area of water stress
- Add DCM on reducing marine litter
- Add DCM on meeting and exceeding Bathing Water Directive and River Basin Management Plan objectives
- DCM wording “Does not result in contamination of water resources” should be strengthened to ensure the water quality (groundwater) is protected and enhanced (in line with the Water Framework Directive)
- SUDS techniques must be suitable if we want to protect the GSPZ

SA8 flood risk

- The wording “considers the potential risks” should be strengthened to include “mitigates” the potential risks (*put under 10 but also relevant here*)
- Permeable infrastructure needs to be embedded
- Need for further guidance on reducing flood risk

SA9 Greenhouse gas reduction

- Ensure all new developments are carbon neutral, energy efficient fabric construction and use energy efficiency technology (*under 14 but of relevance here*)
- Low energy fabric for all new housing development (*under 14 but of relevance here*)
- BHCC needs a community energy strategy
- Need to enforce renewable energy generation through planning consents

SA10 Adapt to climate change

- The wording “considers the potential risks” should be strengthened to include “mitigates” the potential risks
- Add “contributes to BHCC Carbon Reduction strategy
- Legal duty to have a mitigation and adaptation strategy
- Need to require a maintenance budget for all development to ensure long term costs of up-keeping sustainable infrastructure
- Include DMC regarding reducing demand for water and increasing water efficiency under this objective

SA11 Soil Quality

- No comments

SA12 Waste

- How do we measure/report waste prevented or reused?
- Ensure development has integrated infrastructure –e.g for food waste recycling
- Considers scope and a place for re-use within development

SA13 Best use of land

- Reduce car parking, stop car-parking in the city centre and highly accessible locations
- All land should have a clear designation to gain community support and sense of identity

SA14 housing

- Ensure all new developments are carbon neutral, energy efficient fabric construction and use energy efficiency technology
- Do we need to re-examine wording around “affordable”
- Low energy fabric for all new housing development
- Is there potential for new SPD on flood growing on new housing development that has more detail than the PAN?

SA15 Access to services

- Well designed, fit for purpose bus stops
- Reduce the need to travel
- Build local community support and engagement
- DCM – improve access to all facilities/service by sustainable transport (*under 16 but of relevance here*)
- Importance of maintaining local parades; e.g. not allowing 2 shops to be knocked through into a tesco express (*put under 19 but also of relevance here*)
- Access to healthy affordable food (*put under 19 but also of relevance here*)

SA16 Health & wellbeing

- Recognise the health benefits of gardening and food growing as a core activity
- Links to community food growing space and allotments – have proven benefits of improved mental health
- DCM – improve access to all facilities/service by sustainable transport

SA17 Community Safety

- DCM add – encourage a sense of positive commitment to valuing the local environment

SA18 Equality

- No comments

SA19 Economy and employment

- Importance of maintaining local parades; e.g. not allowing 2 shops to be knocked through into a tesco express
- Access to healthy affordable food
- The conversion of industrial areas, with easy access to bus services, into housing will force people to drive to work in outlying areas (Rayner, Sackville Ind Est)

City Plan Part Two

**Environment and Sustainability Workshops - BME
Community Partnership, Centre, Brighton**

9th September 2016

Workshop Notes and attendance list

City Plan Part 2 Scoping Consultation – Event Log

<p>Event</p>	<p>CPP2 Environment & Sustainability Focussed Workshop Event</p> <p><u>WORKSHOP:</u> BIODIVERSITY AND OPEN SPACE</p> <p>Attendee post-it note comments and facilitator notes of round table discussions (combined notes of workshop 1 & 2)</p> <p>Facilitators: Rebecca Fry & Rich Howorth</p>
<p>Date and Location</p>	<p>Friday 09/09/16, 10.30-12.30, BME Community Partnership premises, 10 Fleet Street, Brighton</p>
<p>Attendance</p>	<p>Workshop 1:</p> <ul style="list-style-type: none"> • Nick Lomax(BH Professionals Forum – architect) • Chloe Rose (RSPB) • Maureen Winder (Allotment Federation) • Chloe Clarke (BH Food Partnership) • Bryn Thomas (Brighton Permaculture Trust) • Laura Brook (Sussex Wildlife Trust) • Maureen Holt (BH Wildlife Forum) • Maria Hawton-Mead (Green Building Partnership) • Peter Clarke (Community Land Trust Steering Group) • Tracie Parker (BH Wildlife Forum) <p><u>Workshop 2:</u></p> <ul style="list-style-type: none"> • Ben Earl (Southern Water) • Andrew Coleman (Local Resident) • Hannah Packwood (Environment Agency) • Katharine Stuart (SDNPA) • Sean Ashworth (Sussex Inshore Fisheries & Conservation Authority) • Rebecca Pearson (Natural England)
<p>Key Issues Raised</p>	
<p><u>POST IT NOTES:</u> (nb. Green Infrastructure abbreviated to GI)</p> <p><u>Landscape Scale Approach</u></p> <ul style="list-style-type: none"> • Comms and policy around allowing verges to grow: add wildflowers; easy way to create green corridors. • Encourage citizen action; green corridors map; join up green spaces. • Support continuation of work to identify and deliver green links, as part of the wider GI network, from the heart of the city and out to the SDNP. • GI - Multiple benefits; links to the water (section?) SUDS where possible for example. • Support the Green Infrastructure landscape scale approach idea for CPP2. • Green links from SDNP through into the city and clear requirements in policy for how development should enhance this. 	

- Encourage a landscape scale approach to planning policy to go beyond boundaries of Brighton and Hove: bigger and better and more joined up; Biodiversity 2020.
- Increase links to National Park for people to access the National Park
- Opportunities through development to safeguard biodiversity; increase habitat links and GI links to national park.
- Need to ensure the value of biodiversity to feed aquifer is recognised – especially when developing fringe sites.
- Open space: include landscape approach and GI in local plan; include education land and highway land in GI.
- GI policy should be adopted to ensure new development delivers net gains connectivity / climate change adaptation.
- Developments in NIA should be required to include food growing spaces – needs to be enforced, guidance could come in form of new SPD on food growing (food partnership).
- Allotments are natural elements of green infrastructure and should move to a new designation to protect their role as urban benefits; protect from pollution and chemical use.
- Greater engagement with local people to support and understand the value of green spaces. Opportunity to protect and consider and create.
- How are policies accounting to the Beachy Head West Marine Conservation Zone?
- CP10 – one objective is to conserve, restore, etc., LBAPs but concern that BHCC have no resources to manage/monitor them.
- Baseline policies required to reduce impact on wildlife, avoid chemical use and lessen overall pollution for health of species.
- Brighton and Hove should look at calculating Natural Capital Resources.
- Marine water quality: policy to protect and enhance water quality by reducing surface water run-off (including from highways).

Nature Conservation, Geodiversity and Landscape Sites

- LWS sites need to be looked at in conjunction with GI network as may have been important connecting sites.
- LWS process should be published as part of CPP2 as evidence base.
- If SNCIs are to be updated will this include new marine SNCIs?
- Policy to protect and enhance marine recreation, especially east of Brighton Marina, King Alfred, Peter Pan playground, Ovingdean, Rottingdean and Saltdean.
- How are we linking marine water quality, marine commercial fisheries and the marine environment through Planning?

- How do terrestrial policies take account of impacts on the marine environment (habitats and species)?
- Can policies encourage sustainable marine fisheries?
- Swifts – can we implement into the policy where all new builds have to have a specific number of swift bricks installed (Chloe Rose, RSPB).

Open Space and Local Green Space

- Dual use: schools; council owned.
- Access to open space and downland: encourage access to open space and SDNP by foot and bike.
- Get the balance right between a green space being a SUD and local amenity.
- Playing fields recognised as local green spaces, due to community value and provide connections for wildlife.
- Allotments designated as local green spaces due to benefits to community, health and recognised as having wildlife value.
- How will these local green spaces be managed? Is not improving access to the National Park more important?
- Local greenspace: how does this benefit a site above what designations that site already has ie SNCIs; LNRs; or National Plan.

FACILITATOR NOTES:

- Points raised at start to be of particular interest to attendees:
 - Local Green Space (LGS)
 - Allotments and LGS
 - Marine Environment
 - Local Wildlife Sites (LWS) (how they can be designated and how can people get involved)
 - Natural Capital and GI
 - Housing and biodiversity – 40% of the Local Authority lies within the National Park, how do we plug into the downs; Gateway issues and A27 barrier
 - Community based land issues
 - Integration of biodiversity and meeting the needs of people
 - Open Space, beaches and Inshore Waters
- Swift boxes – incorporate within development
- Link to the Marine Environment and consider how the city impacts upon the marine environment (control/protect)
- Create a Green Lung through the heart of the City to restore it
- Have proper corridors
- Important for peoples welfare
- Communicate the benefits of leaving verges to grow, engage the public eg potato mile initiative (food partnership project I think?)

- Promoting and using green space: Dual use - green space/SUDs; placemaking
- Urban Fringe – can be a step to the get to the National Park/Downs
- Potentially CP10 and CP16 address biodiversity adequately however no enforcement so gaps
- School playing fields provide an important asset where currently open shouldn't be fenced off

City Plan Part 2 Scoping Consultation – Event Log

Event	Biosphere Board CPP2 Event
Date and Location	Fri 09/09/2016 BMECP
Attendance	<p><u>Workshop 1</u> Andrew Coleman Ben Earl - Southern Water Diane Smith – BHESCo Hannah Packwood – Environment Agency Sean Ashworth – Sussex Inshore Fisheries & Conservation Authority Cat Fletcher - Freegle</p> <p><u>Workshop 2</u> Abigail Dombey – University of Brighton Anthony Probert Bioregional Helen Russell – Community Works Maria Hawton-Mead – Green Building Partnership Mark Pellant – Koru Architects Matthew Arnold – University of Sussex Mike Clark – University of Brighton Mischa Hewitt – Low Carbon Trust</p> <p>Facilitators – Francesca Iliffe, Maggie Moran and Paula Goncalves</p>
Key Issues Raised	
<p><u>Sustainable Drainage</u></p> <p>Given the existing national guidance and approach, is it necessary to have an updated policy on sustainable drainage in the City Plan Part Two?</p> <p><i>Feedback: Workshop 1</i></p> <ul style="list-style-type: none"> • Specific policy around the worst affected areas. • Awareness campaign with local nurseries, parent and toddler groups and schools re flushing wet wipes down toilets. • Strategy/policy for existing built areas that flood. • Is 1 in 200 years a robust assessment methodology? Should we consider planning for higher severity? • Is 50% attenuation from a site high enough? Map flow rates and paths from different surface types. • Policy should not be too prescriptive about the types of SUDS that could be used in new development HP (EA). • SUDS – Policy in Local Plan: <ul style="list-style-type: none"> ○ Hierarchy ○ Policy should require compliance with law on porous paving limits. ○ Identify particular parts of city where particular SUDS are required, e.g. 	

London Road.

- Need to consider the impact on groundwater quality, i.e. SUDS.
- How to address the removal of trees and hard landscaping that increase flooding and cause water problems in developments other than new development. Better communications?
- Strategy/advice to use bigger gutters on new/old homes.

Feedback: Workshop 2

- Guide for developers on flood solutions is a great idea.
- Yes to SPD on drainage, etc.
- Yes to more guidance on surface water and drainage.
- Is there a policy link between drainage and flood risk with marine water quality that protects marine habitats and species and designated sites?
- Stipulations on rainwater harvesting on all new developments.
- Encourage green walls and green roofs to achieve increased water attenuation, low carbon and visual attractiveness.
- Transcribe best practice into policy (to front end development design).
- Underground water storage: always integrate with 'brown water' sanitation, etc.

Low carbon and renewable energy

Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

Feedback: Workshop 1

- Develop community energy strategy.
- Community energy policy should be included.
- Encourage mixed development (residential and commercial) and appropriate community scale renewables and heat network.
- Support and encourage community energy.
- Encourage installation of renewables rather than gas.
- Need a community energy strategy for the city.
- Encourage community heating and energy.
- Identify sites for renewable energy, major housing and employment.
- Link it back to the legal requirement for the plan to have a strategy for climate change mitigation and adaptation.
- Encourage PV and solar thermal on private housing through grant or other incentive.
- District heating: strengthen policy and build in as standard renewable energy generation.
- Encourage district heating with customer price protection plan.
- Demand renewable energy.

Feedback: Workshop 2

- No brainers: yes! PV policy, etc.
- Support energy loop renewables.

- Support for community energy.
- There are potential opportunities to link marine aquaculture (seaweed farms) to biomass energy production (discussed at Biosphere).
- Air quality action plan requires lower NOx or no combustion go further than BREEAM in AQMA.
- All new housing developments: integrated PV roofs!
- PV: issues - roof condition; planning; electrical infrastructure; DNO approval.

Energy efficiency

Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?

Feedback: Workshop 1

- Energy efficiency policy for conversions of commercial buildings.
- Need to apply strict standards to commercial and residential development.
- Should have a policy for converting commercial to residential such as minimum EPC rating.
- Include residential conversions from commercial in residential property.
- Link EPC to residential conversions.
- If EPC is to be used as a measure of low CO2 efficiency, minimum must be D rating for all commercial buildings.
- Passivhaus standard as minimum.
- Future proof existing and new buildings, e.g. for future climate: bigger gutters; better drainage design; waterproof facades.
- Design to prevent overheating: solar shading; cross ventilation; reduce excessive glazing.
- Should have a policy to encourage small commercial developments to attach an accredited certification.
- Evidence should be required at building control stage that additional energy target (20% better) has been achieved.
- Investigate how you apply the policy to retrofit/existing housing?
- Local authorities need greater resource for enforcement.

Feedback: Workshop 2

- Lean, clean, green? No! should be Lean, green, clean.
- Prioritise zero carbon over low carbon.
- Lean, clean, green.
- Fabric first approach then renewables.
- Use DEC's for all buildings.
- Home Quality Mark – encourage it.
- Design out inefficiencies.

Design

Should the Place Making Policy seek to incorporate guidance on new and emerging

design issues such as expert review and integrated infrastructure design?

Feedback: Workshop 1

- How can we connect various placemaking around the city.
- We need to include placemaking in large projects to improve the space.
- Community have an important role for the decisions in placemaking.
- Joining up existing 'city centre areas': green corridors or art to join them up?
- Building protected from heat in future? Shade.
- Green links: increase biodiversity / habitat and adaptation to climate change.
- Vertical spaces? Rooftops?
- Expert design review for large redevelopment.

Feedback: Workshop 2

- Concern for street scene should *not* mean pastiche design.
- Place making policy? If yes, must be from grassroots, not led by 'experts, academics'.
- Talk to Brighton & Hove Community Land Trust initiative: info@bhclt.org.uk
- Timber frame new builds.
- Walter Segal design build approach. Grass roofs.
- Reed beds; can be scaled up – e.g. Hockerton.

City Plan Part Two Scoping Consultation - Event Log

Event	<p>CPP2 Environment & Sustainability Focussed Workshop Event</p> <p><u>WORKSHOP:</u> Sustainable Energy, Sustainable Drainage and Environmental Design</p>
Date and Location	09 th September 2016, BMECP Centre, Brighton
Attendance	<p><u>Workshop 1</u></p> <p>Andrew Coleman Ben Earl - Southern Water Diane Smith – BHESCo Hannah Packwood – Environment Agency Sean Ashworth – Sussex Inshore Fisheries & Conservation Authority Cat Fletcher - Freegle</p> <p><u>Workshop 2</u></p> <p>Abigail Dombey – University of Brighton Anthony Probert Bioregional Helen Russell – Community Works Maria Hawton-Mead – Green Building Partnership Mark Pellant – Koru Architects Matthew Arnold – University of Sussex Mike Clark – University of Brighton Mischa Hewitt – Low Carbon Trust</p> <p>Facilitators – Francesca Iliffe, Maggie Moran and Paula Goncalves</p>
Key Issues Raised	
<p>DESIGN</p> <ul style="list-style-type: none"> • Talk to people in the area to see what they want their place to be. Ensuring communities have a say and influences outcomes could lead to more ownership. • Seafront is our city square and needs to be improved to reflect this status. • Make sure policy is joined up to avoid overlapping and ensure efficient delivery of infrastructure. • Link up green spaces and places that people like in the city, using spaces in between buildings as connections from one place to another. • City needs protection from heat effect. • Wildlife and climate change. • Policy should enable for innovative design. Why follow what has been there? A mixture of new and existing should be welcomed. <p>Workshop Notes</p>	

GROUP 1

INTERESTS

- Water supply, treatment and quality in B&H
- Energy, water and marine coastal
- SW sustainable water, chair Biosphere Board
- Place making
- Renewable community energy
- Energy and sustainability
- Waste, energy and design
- Energy efficiency and renewable energy
- Pushing forward building standards
- Servers against sewers (Andrew contact?)

WATER

- SPD/guidance on water management in development?
- Things going down the toilet are a problem causing blockages
- Stronger policy to ensure water management is properly addressed in the face of loss of teeth of national policy?
- Does policy need strengthening in this area? If so, how?
- Policy has more weight than SPD. SPP1 provides enough of a hook to develop an SPD.
- Not being too prescriptive.
- Set targets. These are set in SFRA
- Just related to new developments? Removal of trees and paving back gardens have an impact right?
- Cumulative, collective impact can be significant and should be addressed.
- Need for specific policies in London road valley for instance.
- Reduction of consumption of water would help in a water stressed area.

ENERGY

- Standards for new build but not existing.
- Could we use EPC for monitoring, requesting of existing/renovations?
- Community energy: facilitate more in a city where this is already strong? How?
- PV remains increasing
- Energy study
- District heating? Gov. supporting still.

DESIGN

- Seize opportunities to use the top of buildings.
- Making sure community is involved in what is build, know what is happening and influence outcomes, leading to more ownership. Community should have a big say. Skate Park at The Level is a good example of how that works.
- City square: we don't have one, only small ones. Seafront is our city square and needs to be improved.
- Make sure policy is joined up to avoid overlapping and ensure efficient

delivery of infrastructure.

- Linking up and connectivity of green spaces and existing hotspots (places that people like in the city). Use spaces in between buildings as connections from one place to another.
- We need protection from heat.
- Wildlife and climate change.

GROUP 2

INTEREST

- Marine environment
- Sustainable energy and design
- Community land trust
- Energy and environment performance
- Renewable energy
- Sustainable design

WATER

- SFRA sufficient? Quality soakaways, drainages that are difficult to maintain these issues could be addressed via an SDP.
- Idea is to frontload information on water management. At the moment it is an afterthought.
- Recommendation is currently on the web but it is not prescribed.
- Height of electric plugs to avoid damage?
- Underground storage?

ENERGY

- Yes to all things.
- Fabric first approach always. PVs on the roof should be an additional option.
- Should we include renewable target? London has one.
- Zero carbon options should be promoted above low carbon.
- Have the right technology in the right place.

DESIGN

- Community engagement is key.
- Have to talk to people in the area to see what they want their place to be.
- Concern LPA has a lot of control of the street scape already. Policy should not be an excuse to have the same design as existing everywhere in the city. Why follow what has been there? A mixture of new and existing should be welcomed.

City Plan Part 2 Scoping Consultation – Event Log

Event	<p>CPP2 Environment & Sustainability Focussed Workshop Event</p> <p><u>WORKSHOP</u> : Transport and Pollution (Workshop 1)</p>
Date and Location	9 th September 2016, BMEP Centre, Brighton
Attendance	<p>Abigail Dombey University of Brighton Chris Todd Community Works Mark Greening Brighton & Hove Motorcycle Action Group Mathew Arnold University of Sussex Roger Blake Rail Future Peter Elvidge Brighton & Hove Bus Watch Sam Rouse – BHCC Mita Patel – BHCC Facilitators: Liz Hobden and Helen Gregory</p>
Key Issues Raised	
<p>Transport and Pollution – Workshop 1</p> <p><u>Post it Notes</u></p> <ul style="list-style-type: none"> • Improve access routes to and from train stations, to enable more use of rail; to encourage walking and cycling to and from stations; to help accommodate extra travel demand on sustainable mode including active travel for access. Measures to include way-finding, fully-accessible walking routes, secure cycle-parking. • Reducing the need to travel. • Madeira Drive to King Alfred Corridor: fast track transport solutions to reduce congestion and acknowledge / accommodate new developments. • Nottingham: 33% reduction in CO2 since 2005. 8% drop in motor traffic. • Minimise impact of development and seek opportunity for improvement. <p><u>Transport/Travel and air quality</u></p> <ul style="list-style-type: none"> • Urgency compliance (dioxides) – diesel – Nox - particulate levels – transport sources • Spatial dimension: <ul style="list-style-type: none"> ○ AQMA (quite likely to stay same) ○ Potential in 2016/17 reduce the size of AQMA ○ Most of B& H has good air quality • Recent improvements and actions – progress • Manage and mitigation • DEFRA: <ul style="list-style-type: none"> ○ clean air zone – consultation will come out soon – relevant LEZ 	

- low emission zone currently (buses) and taxi; should it include freight and trucks?
- Need to consider the location of major new development and how these will impact on air quality
- Red flag areas:
 - London Road and North Street; Preston Circus; Vogue Gyratory; Lewes Road
 - New England Street junction; South Portslade freight route;
 - Rottingdean High Street
- Boris Bike? Encourage switch to cycle. Tender being assessed B&HCC.
- Low carbon zones: London example.
- Technology: hybrid cars / electric bikes – how can we support this? Infrastructure – charging points.
- Public awareness and appetite for electric cars – engagement – campaign B&HCC use it as exemplar.
 - Need to sell the benefits; raise awareness of charging point locations; how they are used;
 - Still prohibitive costs; can't pass them on to users.
- GLA consultation on congestion: one of concerns as technology moves on; e-vehicles, etc.; tackling pollution won't tackle numbers / congestion.
- Attractive destination: better quality public realm, less car transport orientated.
- Congestion not always related to pollution? Eg. Seafront is congested but not air quality issue.
- Congestion charges?
 - Clarity about policy objectives;
 - attractive Brighton and Hove;
 - more space for people rather than motor cars;
 - How to manage demand? Price demand.
 - Churchill Square area a no car zones but bus congestion
- Language should be more positive rather than talking about: "controlled" parking or "no car zones".
- Reallocation space: pedestrian/cyclist – this could impact on buses
- Euro 6 should be rolled out.
- Space efficient travel within Brighton and Hove; car = space resource hungry
- We need to manage congestion – accept always be element of congestion.
- Workplace parking level. Nottingham: fund active travel, etc.
- Positive benefits:
 - Active travel

- Reduce cost to the NHS, mental wellbeing benefits
- Stronger words; to reduce parking provision in city.
- SMART technology: that can advise people travelling into city where parking is available; better use of such technology.
- CPPI policy around no additional public car parks but what is the definition of public car parks?
- Private car park? Is Churchill Square a public or private car park?
- Preston Park: proposals indicate 600 spaces – are they being required to have that many?
- SPD is due to be adopted shortly which sets out maximum standards.
- Low carbon preference – parking
- Withdean – rapid charging point.
- University of Sussex: car parking programme 50% charging; internal fleet of vehicles are electric.
- Bus policy:
 - Need to be clear about bus priorities/lanes
 - Accessible bus stop; bus shelter
 - Need to think about bus frequency and cost
 - Role of CIL
 - Planning gain
 - Reduce need to travel: does large development mean large car parking (London, etc.)? Link cycle lanes.
 - Valley Gardens design: single lane will impact on bus congestion.
- Preston Barracks: University of Brighton development; 600 spaces? Is that what the council requires from the university? Maintaining what they have? No net gain; better no net gain but reduced.

City Plan Part 2 Scoping Consultation – Event Log

Event	<p>CPP2 Environment & Sustainability Focussed Workshop Event</p> <p><u>WORKSHOP</u> : Transport and Pollution (Workshop 2)</p>
Date and Location	9 th September 2016, BMECP Centre, Brighton
Attendance	<p>David Brookshaw - Brighton & Hove Local Access Forum Diane Smith - Brighton & Hove Energy Services Company Patrick Warren – Brighton & Hove Bus Company Trevor Beeston - South Downs Society Gordon Mackerron - University of Brighton Mark Buchanan- Smith - Churchill Square</p> <p>Facilitators – Liz Hobden and Helen Gregory</p>
Key Issues Raised	
<p>Transport and Pollution – Workshop 2</p> <p><u>Post it Notes</u></p> <ul style="list-style-type: none"> • Park and Ride for tourist and business community for north, east and west corridors. • Oyster card scheme. • Incentives for cycling and walking. • Better walking routes. • Increase train capacity, e.g. carriages. • Boris Bike scheme. • Integrated transport that includes pedestrians, cycles, motorbikes, cars, buses and trains. • Increase pedestrian and cycle thoroughfares. • Put more resources into walking and cycling and cutting pollution (less motorised transport). • More trains east and west – north is well served – at peak times. • Further pedestrianisation of the city centre. • Risk of Park and Ride: need to price it to discourage increased in car journeys. Location will also be an influence – increased in car journey if too close to city centre. • Are there pedestrianisation plans for city centre? <ul style="list-style-type: none"> ○ Station to Churchill Square ○ East to West ○ Controversial ○ Need to keep bus flows 	

- 120 buses/hour North Street, etc. – impact on attractiveness of bus routes if pedestrianize key bus stop routes.
- Encourage reduction in traffic:
 - Car parking is at capacity;
 - Reduce burden – alternatives offered
- Manage demand in key sites, e.g. Churchill Square, etc.
- Trains: capacity issue mainline.
- SMART VMS – letting visitors know about main routes; alternatives; help reduce queuing.
- Sustainable Travel - walking, cycling - relationship with improving air quality.
- Energy issues
- Impact on National Park
- Air quality improvements – sustainable modes
- Park and ride: north, east west, not just tourist/shoppers but workers part to get into city centre.
- Bus company:
 - Trying to bring forward park and ride north of city
 - 16 minute journey
 - High frequency network
 - Deliver choice
 - Commercially viable, potential for investment
- Investment in bus fleet:
 - vehicle delivery Euro 6 engines; smaller diesel engine;
 - has had improvements in air quality;
 - smaller, cleaner engines;
 - technology – zero emissions.
- Urban fringe development sites:
 - Saltdean (100 houses)
 - Encourage car
 - As a resident not happy about UF sites allocated CPPI when they feel sufficient brownfield sites exist in city.
- 6 mile bus route to city centre from Saltdean.
- Encourage bus and cycle use.
- Need more Lewes Roads style improvements
- Encourage walking; pedestrianisation improvement.
- Reducing traffic is important.
- East to west railway network less frequent. Need more frequency to support commuters.
- Congestion charge? Discourage car journeys.
- Difficulty of finding sites for park and ride; bus infrastructure but not

greenfield.

- Right of Way: need to look at improving routes out of city to the National Park.
- Do we have an integrated transport plan, e.g. Leicester, Aberdeen.
 - Integrated pricing; key card technology
 - All bus operators (except Stagecoach) – although due - use key card
 - Soon be able to link up to train
 - Cycle hire also available for that?

City Plan Part 2 Scoping Consultation – Event Log

Event	<p>CPP2 Environment & Sustainability Focussed Workshop Event</p> <p><u>WORKSHOP:</u> Urban Fringe Development and the Setting of the National Park</p>
Date and Location	<p>09/09/16</p>
Attendance	<p>Workshop 1:</p> <ul style="list-style-type: none"> • Mike Clarke (University of Brighton) – Varley Halls site • David Brookshaw (Local Access Forum) – impacts of development on green infrastructure • Trevor Beeston – (South Downs Society) - impacts of dev on GI, conservation of UF sites • Anthony Probert (Bioregional) – quality of dev on UF sites; access & transport • Mark Pellhant (Koru Architects) – appropriate development on UF • Nicola Thomas (architect) – opportunities for good development on UF • Andrew (Brighton & Hove buses) – transport and ensuring bus network serves UF development • Helen Russell (Community Works) – on “community land trust” – steering group, appropriate dev on UF sites • Katherine Stuart (SDNPA) – impacts of UF dev on the setting of the SDNP, opportunities for GI • Rebecca Pearson (Natural England) – GI, linking the UF to the SDNP <p><u>Workshop 2:</u></p> <ul style="list-style-type: none"> • Roger Blake (Rail future) – sustainable transport • Chris Todd (FoE) – safeguard green spaces, good development that makes the best use of UF sites • Maureen Winder (Allotment Federation) – incorporation of allotments into green space • Chloe Clarke (BH Food Partnership) – incorporation of food growing space • Bryn Thomas (Brighton Permaculture Trust) – increasing access to green space, the use of the UF as a connection between urban and rural areas • Laura Brook (Sussex Wildlife Trust) – achieving net gains in biodiversity, role of biodiversity in decision making

	<ul style="list-style-type: none"> • Nick Lomax (BH Professionals Forum – architect) – delivery on UF sites, connections to SDNP • Marueen Holt (BH Wildlife Forum) – biodiversity on UF sites • Peter Eldridge - connections between new development and existing bus routes • Mischa Hewitt (Low Carbon Trust) – promoting self-build and high standards of design on UF sites • Peter Clarke (Community Land Trust) – community-led building on UF sites • Chloe Rose (RSPB) – “swifts” project into planning policy requirements • Tracie Parker (BH Wildlife Forum) – UFA based on out of date evidence, some sites should be removed
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Key Issues Raised

Notes of round table discussions:

Workshop 1:

Notes from discussion:

- Clarification sought regarding the types of additional assessments on UF sites that have been carried out; whether the indicative amounts for each UF sites are still relevant; whether all sites with development potential will come forward.
- Recent applications on UF sites have been **over-development**. Not sustainable/appropriate
- Important to make the **best use of green infrastructure**.
- There should be some **influence over the types of house-builders who develop the sites** (e.g. not the volume house-builders which only use a standard design).
- Concern that **Design Panel may not influence** applicants and planning applications with **sub-standard design** will get approved.
- **Council owned sites should prioritise “community-led” housing**.
- There is a need to **define appropriate development** for UF sites.
- Housing should **blend into UF sites** and **be sensitive** to surroundings.
- Should develop **brownfield sites** first however **developers prefer greenfield** sites.
- Development on UF sites will lead to an **increase in car-use on existing congested roads**.
- There is a need for **more bus-lanes, improved cycle routes and improvements to the pedestrian network**.
- **Bus services** are looking at provision for new areas however there is **no public subsidy** for this.
- To enable bus services to serve a new location, there **needs to be enough development to make the route sustainable**, or development needs to be well connected to existing centres of population. **Small pockets of housing are difficult to serve**.

- Council should have a **business car-parking levy** (Nottingham example – whereby employers that provide workplace parking have to apply for a license and pay a fee for it).
- Bus lanes adding to pollution by resulting in more cars standing still in certain places.
- Different types of **design standards and buildings should be encouraged on UF sites.**
- **How development is procured** will have the greatest influence on the types of housing that is brought forward in UF sites.
- Clarification on how planning applications for UF development will be brought forward before Part 2 adopted.
- **Specific conditions** regarding materials **must be applied to all developers of UF sites** (e.g. UoB had to meet certain requirements in order to gain permission).

Post it notes:

- The site specific policies for urban fringe sites should give clear requirements for 1) GI links, 2) design to minimise impact on and conserve and enhance the setting of the SDNP and key views.
- Opportunity to encourage alternatives forms of ownership and D&B
- Improved design standards for UF sites (mitigating extra impacts)
- Can we enforce/encourage good space standards , low energy standards e.g. Passivehouse
- Strong policies required to guide any development on UF sites e.g. a DPD?
- Make sure UF sites consider: full LVIA, setting of SDNP including light pollution, ecological value of sites, and ensuring local people can retain access to open space.
- Need to ensure any fringe sites that come forward for development have strict criteria re: wildlife corridors, maximise GI, links to the SDNP, do not detriment the setting of the SDNP, enhance biodiversity, consider hydrological issues
- Better access to SDNP and protect green space
- Integrate housing and green space with fluid edges between them, e.g. gardens, allotments, open space.
- New housing needs new local shops, and employment
- How feasible are shared surfaces on a large scale in the city
- GI strategy with specific requirements for urban fringe sites
- How do UF sites fit in with the GI network? What opportunities for enhancement are there?
- Very clear lines of engagement! Green space vs housing. Need to collaborate.
- Modern methods have to lead the way, so volume developers learn from us.
- Future “peak oil”. Combined heat and power (microgeneration) in all possible housing developments.

Workshop 2:

Notes from discussion:

- Clarification around whether Hollingbury Park is still included as having potential
- **Development should respect aims of the Biosphere** and educate people regarding

the environment

- **Access to SDNP is difficult. Access needs improving.**
- UF sites include designated green space.
- **Access to SDNP should be throughout the city**, not just through UF sites or separate “gateways”
- **Older style developments** in fringe locations tend to be cul-de-sac designs which **stops pedestrians accessing the countryside** behind the housing.
- Design in UF locations will be very important to meet various needs and requirements.
- There should be a **mechanism for disposing of sites which should be included in the Plan**. E.g. self-builders can't compete with major volume house-builders.
- **Useful to map access points** around the city and **improve/upgrade existing access** (e.g. allow cycle access on existing pedestrian only bridges).
- **Green spaces should be mapped** to show the population they serve.

Post it notes:

- Possibility of using S106 money to provide a green bridge to the SDNP at the THV site
- Any development within the urban fringe should have food growing incorporated due to value to biodiversity, communities, mental health etc. Food Partnership has evidence to support this.
- Concerned that latest LUC assessment did not visit the Meadow Vale site and did not take into account its biodiversity. Up to date information has not been taken into account. How can this be addressed?
- Importance of mapping to grow sense of value at fringe of the city to avoid land grab and to enhance and use for health and mental health benefits.

City Plan Part 2 Scoping Consultation – Event Log

Event	<p>CPP2 Environment & Sustainability Focussed Workshop Event</p> <p><u>WORKSHOP</u> : Sustainability Appraisal Sustainability Appraisal Framework feedback</p>
Date and Location	9 th September 2016, BMECP
Attendance	Post it notes were gathered from all attendees
Key Issues Raised	
<p><u>SA1 Biodiversity</u></p> <ul style="list-style-type: none"> • DCM should include protection and enhancement of a wider range of sites, including allotments. • Net gains in biodiversity need to be more creative, and not just bat/bird boxes. Need to think about all supporting features. <i>(nb. No examples provided)</i> • DCM should include enhancements to habitats or linear features to ensure connectivity and reduce breaks • Non severance of linear features such as hedgerows of great importance to biodiversity <i>(put under 2 but also of relevance here)</i> • Designations need to be linked with up to date information • Add protect and enhance marine water quality <i>(nb. Was put under SA2 but also of relevance here)</i> <p><u>SA2 Open Space / GI</u></p> <ul style="list-style-type: none"> • DCM (2) Improve the quality <u>and /</u> or make better use of existing open space • Add protect and enhance marine water quality • Add protect and enhance marine recreation • Extra assessment required for urban fringe sites – LVIA, dark night skies, GI opportunities • Open space needs to include community food growing and allotments • Non severance of linear features such as hedgerows of great importance to biodiversity • Add reference to landscape scale approach and green infrastructure <p><u>SA3 SDNP</u></p> <ul style="list-style-type: none"> • Extra assessment required for urban fringe sites – LVIA, dark night skies, GI opportunities <i>(was put under SA2 but also of relevance here)</i> <p><u>A4 Heritage</u></p> <ul style="list-style-type: none"> • No comments 	

SA5 Travel reduction

- SA Objective – why do we need to “reduce the need to travel”?
- Provide material incentives for people to use sustainable forms of travel
- Well designed, fit for purpose bus stops (*under 15 but of relevance here*)
- Reduce the need to travel (*under 15 but of relevance here*)
- Reduce car parking, stop car-parking in the city centre and highly accessible locations (*under 13 but of relevance here*)
- *BHCC school admissions policy is at odds with the DCM “encourage the location of development close to where use of sustainable transport can be maximised”*
- Current proposals which encourage bus use are poor. The following measures would encourage bus use e.g. signal priority, bus lanes, accessible bus stops and bus shelters
- Reduce car-parking
- Increase permeability for pedestrians and cyclists

SA6 Air and Noise Quality

- Reduce motor traffic, particularly private cars in and around the city centre and bus corridors
- Less trucks and cars will result in air pollution being minimised, however business wants more cars
- Increasing congestion is increasing pollution but also making buses unreliable and therefore undermines one of the alternatives to the car

SA7 Water quality

- Comment of support for this objective
- Amend the words of DMC from “encourage” to “ensure”
- Under “reduce water consumption” we should insist on higher water efficiency standards that building regulations
- We’re in an area of water stress
- Add DCM on reducing marine litter
- Add DCM on meeting and exceeding Bathing Water Directive and River Basin Management Plan objectives
- DCM wording “Does not result in contamination of water resources” should be strengthened to ensure the water quality (groundwater) is protected and enhanced (in line with the Water Framework Directive)
- SUDS techniques must be suitable if we want to protect the GSPZ

SA8 flood risk

- The wording “considers the potential risks” should be strengthened to include “mitigates” the potential risks (*put under 10 but also relevant here*)
- Permeable infrastructure needs to be embedded
- Need for further guidance on reducing flood risk

SA9 Greenhouse gas reduction

- Ensure all new developments are carbon neutral, energy efficient fabric construction and use energy efficiency technology (*under 14 but of relevance here*)
- Low energy fabric for all new housing development (*under 14 but of relevance here*)
- BHCC needs a community energy strategy
- Need to enforce renewable energy generation through planning consents

SA10 Adapt to climate change

- The wording “considers the potential risks” should be strengthened to include “mitigates” the potential risks
- Add “contributes to BHCC Carbon Reduction strategy
- Legal duty to have a mitigation and adaptation strategy
- Need to require a maintenance budget for all development to ensure long term costs of up-keeping sustainable infrastructure
- Include DMC regarding reducing demand for water and increasing water efficiency under this objective

SA11 Soil Quality

- No comments

SA12 Waste

- How do we measure/report waste prevented or reused?
- Ensure development has integrated infrastructure –e.g for food waste recycling
- Considers scope and a place for re-use within development

SA13 Best use of land

- Reduce car parking, stop car-parking in the city centre and highly accessible locations
- All land should have a clear designation to gain community support and sense of identity

SA14 housing

- Ensure all new developments are carbon neutral, energy efficient fabric construction and use energy efficiency technology
- Do we need to re-examine wording around “affordable”
- Low energy fabric for all new housing development
- Is there potential for new SPD on flood growing on new housing development that has more detail than the PAN?

SA15 Access to services

- Well designed, fit for purpose bus stops
- Reduce the need to travel
- Build local community support and engagement
- DCM – improve access to all facilities/service by sustainable transport (*under 16 but of relevance here*)
- Importance of maintaining local parades; e.g. not allowing 2 shops to be knocked through into a tesco express (*put under 19 but also of relevance here*)
- Access to healthy affordable food (*put under 19 but also of relevance here*)

SA16 Health & wellbeing

- Recognise the health benefits of gardening and food growing as a core activity
- Links to community food growing space and allotments – have proven benefits of improved mental health
- DCM – improve access to all facilities/service by sustainable transport

SA17 Community Safety

- DCM add – encourage a sense of positive commitment to valuing the local environment

SA18 Equality

- No comments

SA19 Economy and employment

- Importance of maintaining local parades; e.g. not allowing 2 shops to be knocked through into a tesco express
- Access to healthy affordable food
- The conversion of industrial areas, with easy access to bus services, into housing will force people to drive to work in outlying areas (Rayner, Sackville Ind Est)

City Plan Part Two

Stakeholder Consultation – County Cricket Ground, Hove

8th September 2016

Workshop Notes and attendance list*

*The workshop attendance list was taken from the sign in registration form.

City Plan Part 2 Scoping Consultation – Event Log

Event	Stakeholder Workshop
Date and Location	8 th September 2016, County Cricket Ground, Hove
Attendance	<p>Annie Gilbert - Ovingdean Residents & Preservation Society (Urban Fringe site 43)</p> <p>Clare Tikly (Vice-Chair)- Hove Civic Society</p> <p>John Craddock - Ovingdean Residents & Preservation Society (Urban Fringe site 41)</p> <p>Kia Trainor - CPRE Sussex</p> <p>Paul Norman - Hanover Action</p> <p>Graham Oldfield - Brighton & Hove Wildlife Forum</p> <p>Mark Jones - Brighton & Hove Hotels Association</p> <p>John Richards - Deans Preservation Group</p> <p>Tracie Parker - Deans Preservation Group</p> <p>Roger Amerena - Montpelier & Clifton Hill Assoc</p> <p>Facilitators: Francesca Illiffe & Rebecca Fry</p>
Key Issues Raised	
<p>Biodiversity, Open Space, Pollution, Water and Energy – Workshop 1 (only one workshop on this topic ran)</p> <p><i>Facilitators asked attendees to each name one issue they wanted to discuss</i></p> <ul style="list-style-type: none"> • LGS • Open Space • SNCIs/LWS (some mentioned specific sites: Wanderdown Road, Longhill) • Protecting environment from wrong development • How to protect areas of connectivity between protected areas • Sustainability • Health and Wellbeing • Air Pollution • Noise Pollution • Urban environment and inclusion of biodiversity within it • Community groups – eg green roofs: how do groups take ownership • Encouragement of tree planting <p>Post-it note comments:</p> <p><i>Local Green Space related:</i></p> <ul style="list-style-type: none"> • Elm Grove as LGS Elm trees • Can we designate LGS at Ovingdean as pre the OPS suggestion • Be clear as to the protection given to designated LGS; is it strong enough to control developers • Yes to designated as LGS: <ul style="list-style-type: none"> ○ Benfield Valley ○ 3 Cornered Copse 	

- Ladies Mile
- Hollingbury Park
- Local green space Wanderdown Rd open space Site 41. Already has SNCI status. City Plan 1 identified a small PDA which was subsequently reduced. The remainder of the site should be LGS
- Designate as LGS - Land East of Longhill Close, Ovingdean – due to protected species living on this site
- LGS - Brighton Borough Cemetery + Preston. + Downs Cemeteries (in Hanover & Elm Grove)

GI, Open Space, Biodiversity designations, SNCI/LWS related:

- Yes to landscape scale approach for green infrastructure reflecting joint work with SDNPA
- Green Infrastructure in urban environment linked to SDNPA extending Corridors via trees + planning on loft conversion (green roofs)
- Green Infrastructure / wildlife corridors v. important – please link to National Park
- Unpaved front gardens as wildlife corridors
- Protect wild life link between sea / Downs
- The Wildlife Corridor that connects Beacon Hill with Happy Valley should be protected/designated a LGS due to wildlife travel between these 2 protected areas of SDNP
- How can SNCIs be protected from developer cutting down trees before submitting a planning application?
- Please regulate the unnecessary cutting down trees with no planning permission or supervision + destroying green space
- LWS/LGS Destroyed by developers
- Any developer who destroys a site before submitting a planning application should be refused planning for a period of X years.
- Could there be a review of SNCI/Local Wildlife Sites – can we add to them please
- Designation a site as LWS, SNCI or LGS is useless if you cannot stop developers destroying it.
- Urban Fringe sites assessment – will each potential development site be assessed on its own merit, not relying on LUC assessment
- Private potential Green Spaces eg gardens and car parks. What authority does the Planning department have?
- Management of existing of designation open spaces
- Meadow Vale, Longhill Woodland, Badgers Wood, Beacon Hill, Beacon Hills (Ovingdean & Rottingdean) (*no context given?*)
- BHCC has address their s40 obligation in the production of the LBAP, I'm concerned that they are being ignored
- How will LBAPs be included? No tracking at the moment. No money.

SUDS & Aquifer related:

- Protection of aquifers from development

- Protection of all major aquifers of city
- Protect aqua flows
- Recognise Brighton is built on hills need new drainage system to deal with torrential rainfall
- Ensure Infrastructure for drainage
- Ensure adequate land drainage
- Loss of front gardens to car parking
- Concreting over gardens + 'garden grabbing' should be addressed
- Gardens paved over – standing water – impact on drainage – alteration to flood zones
- Would like strengthening of sustainable drainage system
- Better SUDs hierarchy to promote green roofs / swales etc not rec soakaways
- Surface water + SUDS – hills in urban environment of Hanover – Rain Gardens to mitigate flooding + green roof (loft conversion)
 - Lower Bevendean Grassed urban opportunity Moulsecoomb Place

Pollution related:

- Concentrations of “Holiday Let” party houses – raise pollution eg Charles St in Kemptown
- Air B.B – Some blocks of flats are managed by shareholders, each of whom owns flats but not all live in them. What authority does the Board of Directors have to regulate these short term lettings? (Clare Tikly, HCS)
- Night Bus Routes – noise pollution for residents and staying visitors
- Refrigeration units on lorries when delivering at stores

Energy related:

- Please introduce renewables policy and strengthen CP8
- Can we ensure energy efficiency is addressed through tighter policy
- Energy - use energy bricks in development
- Policy for solar PV slates in heritage buildings
- P13 - Solar PV onto loft conversions – into planning policy
- P13 – Local Carbon Energy. Planning policy disposition to (a) green roof – water or (b) Solar PV – energy. Best practice policy in London to mitigate storm water – can we lean / adopt the same
- P13 – Solar PV on Council owned Hanover Community Centre (and other community sites)
- District Heating and storage on high density developments
- Seafront developments to include heat storage reservoirs to utilize power (tidal, wind, solar) generated nearby

(no facilitator notes taken because high level of involvement in discussion/responding to questions)

City Plan Part 2 Scoping Consultation – Event Log

Event	Stakeholder workshop – Cricket Ground
Date and Location	09/09/2016, Hove Cricket Ground
Attendance	<p><u>Design and Heritage Workshop 1</u> Barry Leigh - North Laine Community Assoc (NLCA) Derek De Young - Kemp Town Society Helen Walker - Regency Society / Uni of Btn Course leader Jon Stanley- Hove Seafront Residents Association Ron de Witt- Brunswick Town Group Robert Edwards - Kingscliffe Society Committee Sandy Crowhurst - North Laine Community Assoc (NLCA) Valerie Paynter - SaveHOVE Cllr Robert Nemeth - Conservative Group Ann Menhinick - Portslade Purple People Kitchen Foodbank Richard Hawkes- The Friends of Palmeira and Adelaide Residents Association within the Brunswick Town Association</p> <p><u>Design and Heritage Workshop 2</u> Juilette Hunting - Brunswick Town Association Helmut Lusser - Hove Civic Society Sue Moffatt - Vice Chairman Kingsway & West Hove Residents' Association Nicky Jackman - Rottingdean Parish Council Cllr Heather Butler - Rottingdean Parish Council Paul Phillips - Kemp Town Society Carolyn Candish - Ovingdean Residents and Preservation Society Steve Wedd -Ovingdean Residents and Preservation Society Roger Amerena - Montpelier & Clifton Hill Assoc</p> <p>Facilitator: Paula Goncalves and Tim Jefferies</p>
Key Issues Raised	<p>HERITAGE</p> <ul style="list-style-type: none"> • Write better policies for better architecture. Poor quality design is encroaching on conservation areas. – e.g. white render boxes. • Need to reference conservation area character statements in policy. • Conservation-based policy approach can obstruct other policies. • CPP2 should review conservation areas. • Conservation areas are different in type and level of importance. Policy should distinguish between them. • Character statements: shouldn't the policy say that development should be in keeping with statements? • Setting of heritage assets needs to be better addressed in CPP2. <p>DESIGN</p> <ul style="list-style-type: none"> • Streetscape approach in Conservation Areas: people in the area should have a say in what they want their place to be. Ensuring communities have a say could lead to more quality of incoming design.

- Materials: maintenance is important.
- Danger that if policy is too prescriptive it can hinder new, good design coming into an area.
- Policies should focus on performance aspects rather than style when it comes to delivering quality in design.
- Seafront is a heritage asset and should be treated as such.

Workshop Notes

Workshop 1

- Attention needs to be given to enforcement. Is CPP2 part of enforcement?
- Placemaking is a fashionable term that alienates the human factor. Corporate objectives are a menace when it comes to place (Park House).
- Planning system has no power. Things are subsidiary to planning.
- We have to go by policy to guide development.
- Write better policies for better architecture. Poor quality design is encroaching on conservation areas.
- White render boxes are awful. How can we design a policy that we can say if you come into our area bring quality?
- Streetscape approach. The rest of the street should influence the style of new builds.
- We need to build on existing policies.
- There are elements of design that transcend policies that do not have to do with fashion and taste. Could be much stronger in terms of materials palette. If it is good and easily maintained then it can look a lot better than something more trendy.
- Difficult balance between putting something in that is pastiche or obviously new. Fit it. NEQ ambition was for good architecture but that has not been realised.
- Ideas of what types of things will work rather than latest fashion or sound bites like live work units which were the flavour of the month in the Local Plan.
- Too many proposals for landmarks.
- Danger that if one becomes too prescriptive it can hinder new, good design coming in. There needs to be space for creativity.
- External wall insulation guidance – there is a section on render. Need to account for materials for challenging marine environment that are capable to dealing with this environment specifically.
- You need to know where to get to each location.
- Worst kind of architecture is bland and fake pastiche. But what is pastiche? If it is a re-creation of what is in the area: what is a good re-creation?
- What kind of buildings would we like the policy to churn out?
- Medina House Planning brief. Now there is a proposal to demolish it. New design is a ghost replica of the old buildings.
- Traditional buildings styles?

- Parameters for quality?
- Policies should talk about performance rather than style. Performance of materials in a marine environment.
- If going into conservation areas consult with local people.
- Need to reference conservation area character statements in policy.
- Stop paving gardens and removing front walls.
- Upland flood control.
- Large, intact conservation areas Brunswick and ????
- Tall buildings, Pavilion and surrounds – Aspects of SPGs
- Seafront is a heritage aspect.
- Graffiti problems. Why is the ‘norm’ in the North Laine?

Workshop 2

- Scope of UDF: CP12 says areas of the city unlikely to change and those that might see incremental development and those that need more proactive change. More detail on DAs and tall building areas. Could aspects of that could be in CPP2?
- Constantly confronted with some excellent as well as some meagre stuff. Proposals with impact on conservation area are being considered when it shouldn't. Conservation-based policy approach can obstruct other policies.
- Boundaries of conservation areas are drawn too widely and liberally. Some areas are acting too much as a constraint (e.g. Hove Station CA).
- Review of conservation areas in CPP2 or UDF? Other comparable cities have more conservation areas – e.g. Plymouth.
- If LPA is more focused we could get better development. At the moment the lowest level denominator applies.
- Conservation areas are different in type and level of importance. Policy should distinguish between them.
- Character statements: shouldn't the policy say that development should be in keeping with statements?
- Link between policy and statements: not just about conservation areas. Other areas need that too. Not to end up with the wrong building in the wrong area. Maintaining the characteristics of the other areas of the city. Need to understand the need of each individual area.
- Character Statements: Black Rock impact - the conservation area study is mute as there is no statement for that part of the conservation area. Vulnerability to other policies taking precedence over protection. Main buildings are protected but the wider built environment not in this instance.
- The question of setting is not treated as it should be. Policy issue is that we should apply to existing and future CAs. Setting needs to be better addressed in CPP2.
- Black Rock: Is the council poacher or game keeper? 20,000m2 development
- Seek reassurance that CPP2/UDF will look at review of Conservation Areas. Some have changed and others have no Management Plans for the CAs. Old Town CS was paid for by the community. Council has not the resources and it

is up to community to help produce these statements. There are groups willing to draw investors in to improve the space in between. At the time they were built the public realm was given the same importance as the buildings. Via Neighbourhood Plans? Documents produced and not taken into account by the council.

- Seafront protection in Brighton, not in Hove. Seafront should be viewed as one CA and have greater protection. East at Rottingdean where narrows, erosion is a highway problem.
- Place making a bit of a cliché. New England Street a good example?
- Consultation document full of nice clichés.
- Setting: insufficient attention given to this in conservation e.g. Brunswick Town – abuse of The Lawns by over-use.
- No policy on enforcement over street furniture.
- Need for different approach to various CAs. Some need to be completely protected, others can go.
- Areas protected need an investment strategy – to be used for s106.
- Good places outside conservation areas must be considered.
- Protection of parts of south Portslade, St Andrew's Road and Old Police Station.
- Heritage groups to be quasi agents to BHCC – Article 4s, Regulation 7s, new CAs, writing of CA character statements.
- If the Kemp Town Society paid for a characterisation study would BHCC adopt it?
- There is conflict between Ovingdean Character Assessment and proposals for the development of Ovingdean farm.
- Very well to talk about design and conservation but how about keeping the city clean.

City Plan Part 2 Scoping Consultation – Event Log

Event	Stakeholder Consultation
Date and Location	8 th September 2016, County Cricket Ground, Hove
Attendance	<p>Councillor Lynda Hyde Councillor Mary Mears Councillor Penny Gilbey Mark McCullough Brighton & Hove Hoteliers Association Jeremy Mustoe Brighton Society (Chairman) Juliette Hunting Brunswick Town Association</p> <p>Facilitators: Helen Gregory and Andrew Motley</p>
Key Issues Raised	
<p>Economy, Retail and Tourism Workshop 1</p> <p>Visitor Accommodation and Tourism</p> <ul style="list-style-type: none"> • 800 properties listed on Airbnb (according to Visit Brighton) • Don't need to wait for national guidance • FOI or court order to get information from businesses such as Airbnb, • By Laws? • Impacts other things – some may just be rooms but also situations where landlords using permanently built and selling as short term lets on airbnb rather than as housing • Impacts Tourism- New rooms on Air bnb affecting those rooms available in hotels (Air bnb not necessarily cheaper) • All hotels are full – need more hotels • Average occupancy e.g. Kemp Town, Broad St 50% for the year; • Citywide- at best average occupancy 70%- kept afloat by conference trade. • Hotel Futures Study 2006 update – need to understand the impact on visitor accommodation from invisible competition. Include air bnb in scope. • Allow bed and breakfast change of use to flats – abolish concept of 'core area' • Promote heritage of Brunswick Town and Kemp Town – heritage assets are not valued – promote Listed Buildings/ regency buildings. Make more of built and natural environment. • Increase the role of regency buildings in attracting tourists and increase the range of attractions.- <p>Retail</p> <ul style="list-style-type: none"> • Main reason people come to Brighton are the 'stand alone' shops – their independence and uniqueness is part of attractiveness of city centre. • Will come to Department Store like J Lewis • Need more department stores 	

- New Local Centre? – designate Brunswick Town Centre from Norfolk Square to St John’s Church. Keep important assets – have lost a Post Office- constant threat of bars, takeaways and newsagents. Small shops at risk
- Mill Lane Parade – Local Centre but run down now
- Lots of shopping parades around the city- review of shopping centres
- Shopping parades have a community and convenience role.
- Shopping centres can recover- e.g. London Road with redevelopment of Co-Op building- learn lessons from this example
- Rye- prevented major supermarket chains from moving in
- Tesco Metro, Sainsbury’s Locals etc. threaten vitality of local centres- however some feeling that there was also some boost in trade for some retailers. E.g. boundary Road – if take away Tesco.
- Hard to control retail- all about what’s popular to create vitality of the area
- People come from London because everything is close together – people make a day of it
- Park and Ride- People would love Park and Ride
- Retail Areas- would be more attractive without drinkers and drug takers on the streets- improve retail environment, cleanliness. Impact of Licensing Act.
- Imbalance of visitor types- Tourism – heritage buildings not valued as part of the Tourism draw- promotion of protected buildings and Architecture.
- Future vibrancy of city dependent upon – Heritage, Sea.

Office Space

- Always about the office space in the City Centre
- Lots of offices around edges of the city but is not filled
- Businesses want city centre location- near station with main line service and amenities etc.
- More medium sized office space needed
- Development risk for office greater than that for residential- can sell resi before built but office only after built- money in residential
- Protect office space from conversion to residential – use article 4 direction.
- Site Allocation Issue- marketing is a more pro-active way to ensure businesses want to move in
- Zoning is a way could manage this
- Parking Issues - never enough provided for offices e.g Hove Park- lack of parking causes problems for residents
- Park and ride – smaller? Can work well and help support town centre
- People think of city as city centre and areas are not included such as Portslade
- City Centre goes up to Preston Park but does not go East and West- Shoreham Port in Portslade for example
- Smaller local hubs for office buildings

City Plan Part 2 Scoping Consultation – Event Log

Event	Stakeholder Workshops
Date and Location	8 th September 2016, County Cricket Ground, Hove
Attendance	<p>Mark Jones - Brighton & Hove Hotels Association Helen Walker - Regency Society / University of Btn Course leader Ron de Witt - Brunswick Town Group Robert Edwards- Kingscliffe Society Committee Andrew Boag - Brighton Area Buswatch (Chair) Kia Trainor - CPRE Sussex Derek De Young - Kemp Town Society</p> <p>Facilitators: Helen Gregory and Andrew Motley</p>
Key Issues Raised	
<p>Economy, Retail and Tourism Workshop 2</p> <p>Retail</p> <ul style="list-style-type: none"> • Type of shops, where they are, focus on the market • Need a mixed economy of shops/residential etc. to keep the area alive- need flexibility re. change of uses so these changes can be reacted to • Overwhelmed with cafes- downside- more cafes there are; the less variety of uses • Could prescribe cafes with varieties of uses- mixed uses • Recognition of a local centre with its own needs – like a conservation area character statement to be put to the retail health checks. • Could come up with a figure where the mix works- work towards that figure (once you have calculated it) • St James Street – most damaging influence for retail and residential population is licensing practice- problems with 24 hr licensing laws- even though it’s a cumulative impact zone. • Brunswick Town – also CIA- works well – presumption against licenses- strengthen and extend it- down Church Road • Western Road should be designated retail ‘corridor’ in its own right • What will new Churchill Square be a mix of and how will this affect the rest of the surrounding retail areas- Impact Study? • Lots of people come to Brighton to go to the areas that aren’t Churchill Square- places that are unique to B&H- keep that uniqueness; attractiveness of the whole area important to the economy. Reflect different character areas within city centre. • Kingscliffe area is attractive, seafront. <p>Tourism and Visitors</p> <ul style="list-style-type: none"> • Black Rock- doubts about moving conference Centre to BR- where will delegates stay? Transport concerns. • We need fewer hotels if people are using houses e.g. Airbnb • Hotels in city centre not being used as Hotels (eg. Backpackers instead) • Issue one of flexibility- eg trend of Airbnb not heard of until recently 	

- Trends- Need flexibility to find right level/react to new things
- Need to encourage one type of visitor accommodation and discourage other specific types that disrupt the city
- In past Hotels managed Stag and Hen do numbers but party Houses and Airbnb has allowed for more of these- 'quality' of visitor and 'quality' of hotel accommodation is reducing
- Hen and Stag nights create great damage to the street scene etc. cost to infrastructure
- People buying houses to turn into 'Party Houses' – Enforcement Issue. E.g Charles St in Kemp Town- whole street.
- Scrutiny Panel recommended self-management – this has not worked.
- Hotels, party house proprietors and Estate Agents should tell their guests, visitors and clients that the property is in a conservation area.
- Berlin banned BnB from areas of the city to allow for housing within the city.
- Similar problem as with HMOS- Article 4 to control?
- Not just about bed space numbers but also bed space quality
- Eastbourne- Realised unless quality of accommodation increased it will not be a good tourist destination - allow change of uses from 'tired' guesthouses with a low quality of offer
- Hotel Futures Study
- Conservation Areas- policy that keeps more family homes
- Brunswick- policy obstructs 5 flats to single family home- damaging, should encourage conversion back to family homes
- Subsidies for people to build Student Accommodation on periphery to protect the centre. This is being doing in York

Economy

- Need to discuss location of commercial and industrial areas with Adur and East Sussex County council
- Loss of artisan workshops in the mews of Brunswick Town
- Driverless cars - implications

City Plan Part 2 Scoping Consultation – Event Log

Event	CPP2 Stakeholder Event
Date and Location	Thursday 8th September 2016 County Cricket Ground, Hove
Attendance	<p>Housing Workshops 1 & 2 - notes of round table discussions</p> <ul style="list-style-type: none"> • Kelvin McDonald (Brighton Housing trust) – affordable housing, homelessness, HMOs • Helmut Lusser (Hove Civic Society) – maximise density, development in Hove • Stuart Cager (Family Homes not HMOs, Bevendean) – loss of family homes into HMOs, affordable housing • Pat Weller (Hangleton & Knoll Project) – social and real affordable housing, housing choices for older people • Cllr Heather Butler (Rottingdean PC) – second home ownership, affordable housing, housing needs in Rottingdean • Carolyn Candish (Ovingdean Residents Society) – shaping of UF development and housing mix • Cathy Gallagher (Saltdean Residents) – UF development, lack of transport integration on UF, affordable housing • Cllr Anne Meadsows (Moulsecoomb LAT) – HMOs, use of homes as holiday lets • David Robson (Regency Society) • Sue Moffat (KAHWRA) – housing options for older people, need for additional housing • Peter Reeves (KAHWRA) – limited options for development in Hove, contradicting policies, clarification on policy • Jeremy Mustoe (Brighton Society) – need to increase housing whilst protecting attractiveness of city and environment • Tom Richards (Deans Preservation Group) – UF development, inappropriate development • Tracie Parker (Deans PG) – UF development, protection of biodiversity • Rob Sheppard (Saltdean RA) – traffic, infrastructure requirement of new housing • Marcus Oldfield (BH Wildlife Forum) – effect of housing on green space, need to control developers • Valerie Paynter (SaveHove) – development in Hove, need for areas to be distinctive, protection of heritage • Dani/Julie (LOGS Mile Oak) – over-development in UF, impacts on existing infrastructure, transport & access

	<ul style="list-style-type: none"> • John Craddock (Ovingdean R&PS) – dev on Wanderdown Rd site, against dev. on SNCIs • Nigel Smith (SAFE Rottingdean) – inappropriate dev on greenfield sites, need for supporting infrastructure • Annie Gilbert (Ovingdean R&PS) – dev on Longhill Rd site, brownfield first • Lin Moss (SAFE Rottingdean) - against inappropriate over development, cumulative effects of development <p>Facilitators: Sandra Rogers and Helen Pennington</p>
<p>Key Issues Raised</p>	
<p><u>Workshop 1:</u></p> <ul style="list-style-type: none"> • Concern over the high target for housing yet continued conversion of family homes into HMOs to provide student housing. • People are in the wrong stock, e.g. older people in larger homes. There is a need to make use of existing stock by providing smaller properties for older people to release family homes onto the market. • Existing sheltered housing not meeting needs, e.g. people in their 60s no longer want that type of housing and want to stay in their own homes. • Risk of moving older people out of communities as no suitable provision. • The city is not in a position to resist development and potentially unsuitable developments are being found acceptable. • There should be an evidence base to show the mix required on individual sites across the city, as needs differ in different areas of the city. • Bevendean/Moulsecoomb area is the last really affordable area of the city. Shouldn't be losing family homes in this area to HMOs . Article 4 Direction needed to control this. • Under-development is an issue. Toad's Hole Valley housing target should be much higher. (2,000) • Important to make the best use of all sites. 100dph is too little in Development Areas. • Part 2 should have detailed requirements for all sites, e.g. density, numbers, mix etc. • Part 1 stops at the Marina. The Deans needs to be looked at in more detail as a distinct area in Part 2. • NPPF states housing shouldn't be delivered if the infrastructure cannot support it. • Transport is an issue linked to an increasing population. • There is continued "nibbling away" at small areas. There should be a properly planned approach to areas such as the Deans to make sure all needs can be met locally, schools, jobs etc. Deans should be self-sufficient. • The need for housing will continue to increase. There should be a limit set 	

based on what the capacity of the city is in its current form.

- Toads Hole Valley was designated a floodplain 20 years ago.
- Unequal society in Brighton & Hove. **New development not meeting the needs of people** who currently live in BH, only attracting people from out of the city.
- **Affordable housing isn't meeting local affordable housing needs.**
- There should be **restrictions on who moves into housing** (e.g. local connection)
- **40% affordable housing requirement is no longer achievable.**
- Affordable housing is only 80% of market cost. This still **too expensive.**
- Need to investigate **cheaper ways of providing housing.**

Workshop 2

- UF development has **traffic and infrastructure impacts** but concern that **objections on grounds of traffic not listened to.**
- **Lack of confidence in the council to deliver measures to mitigate the traffic impacts** of development in the UF.
- **Conflict and tension between developers**, who want to build big, and residents, who want the city to be preserved.
- **No evidence of any updated infrastructure requirements** for the city.
- **Designate St Aubyn's Playing Field as Local Green Space** - importance to Rottingdean, planned inclusion in the Rottingdean Neighbourhood Plan and two petitions.
- **Local GP surgeries are closing** and remaining health provision can't meet existing needs.
- **Current transport policies not realistic and don't work** – car-free and restrictions on on-street parking
- **City hasn't accommodated change in shopping patterns** and the impacts this has on transport, e.g. internet/shopping deliveries
- Don't want the city to become a mass of high rise building.
- **Areas which are poorly served by public transport should be ring-fenced as not suitable for high density** development
- **Council doesn't listen to people's concerns**, e.g. lack of school capacity isn't acknowledged when planning decisions are made and S106 money for schools doesn't result in extra classrooms/schools.
- There is **no planning of the road infrastructure** required to support new developments.
- Concern that applications for student housing in the Falmer area have not been approved.
- Housing that is being built are **too expensive and not being sold.**

- Need to **re-develop brownfield** sites.
- **Affordable housing** units should be around **£100,000** to be truly affordable.
- **Affordable housing policy is too flexible.**
- Brighton Marina **isn't meeting local housing needs.**
- There should be a policy on **restricting people buying second homes.**

City Plan Part 2 Scoping Consultation – Event Log

Event	Stakeholder Event
Date and Location	8 th September 2016, County Cricket Ground, Hove
Attendance	Barry Leigh North Laine Community Assoc (NLCA) Sandy Crowhurst- North Laine Community Assoc (NLCA) Cllr Carol Theobald -Conservative Group Cllr Lynda Hyde- Conservative Group Cllr Anne Meadows - Chair of Moulsecoomb LAT Cllr Daniel Yates -Labour Group Facilitators: Steve Tremlett and Rebecca Fry
Key Issues Raised	
<u>Student Housing Workshop Notes</u>	
<ul style="list-style-type: none"> • With better transport links purpose built student housing (PBSA) could be located on the urban fringe. This would need better transport links to the campuses to be established. • The possibility of locating new PBSA to serve the city in Lewes and Newhaven should be examined. • Higher levels of developer contributions should be sought on PBSA developments to reflect the impacts that they have. • Commuted sums should be sought to finance the development of off-site affordable housing. • The Article 4 Direction has slowed the conversion of more family homes to HMOs but the problem remains. The 50m radius should be expanded to 100m. • The proportion of all houses in a ward that are HMOs should be taken into account, rather than just those in the immediate vicinity. • Nottingham City Council’s policy should be looked at as a good example of how to manage the issue. <p>Facilitator notes:</p> <ul style="list-style-type: none"> • Competing demands from student accommodation and housing (10,000 bedspaces students versus 13,200 new residential units) • Need homes for full time residents who are committed to the city • Could we provide more purpose built student accommodation sites in the city – some on the table said did not think this was a good approach • Could we tell the University’s to provide more on site – however it was raised that Brighton University was not as straightforward as Sussex • Could we say no to speculative student development – raised that CP21 does prevent student housing sites on potential housing sites • Do we allocate student housing to the outskirts of the city and direct housing to within (some on the table felt urban fringe is better for students but others disagreed) • Many students from beyond the city boundaries, some live at home. • Speak to neighbouring authorities (part of Duty to Cooperate) in respect of 	

meeting out student housing requirements. Newhaven could be a good location already reasonable transport links

- Need to look at housing density to help address all the needs however must recognise there is a need to also look outside the local authority boundary – city is constrained by National Park and the sea
- Can the infrastructure from the outer areas link into the Universities – think carefully about the infrastructure required and ensure buses link in (the no.25 and 50 bus currently provide good service to the Uni's. The no.5 does at certain times of the day does link but not as regular as no.25, students are not 9-5)
- Different infrastructure is required so should charge higher s106/developer contributions re student housing
- Apply 40% affordable housing proportion on student bedspace numbers
- Main area under pressure from student accommodation is Pelham Street up to the slope/Lewes Road. Approximately 50 HMOs in North Laines (it also suffers from holiday lets, party houses)
- The Article 4 Direction radius could be made larger than 50m – problems from student housing affects the health of the city/residents
- CP21 and Article 4 Direction has moved people on and caused problems elsewhere
- Nottingham have combined competing uses and set a threshold of 15%
- Concern raised over the future of the Astoria
- Need high enough standards and enforce them - perhaps a role for building control
- Due to the constraints may not be able to find sites for Travellers/Gypsies – should seek to address within other authorities via the Duty to Cooperate

City Plan Part 2 Scoping Consultation – Event Log

Event	Stakeholder Workshop
Date and Location	8 th September 2016, County Cricket Ground, Hove
Attendance	<p>Nigel Smith - SAFE Rottingdean Lin Moss - SAFE Rottingdean Cllr Nicky Jackman - Rottingdean Parish Council John Cook - Patcham Community Action Team Cllr Heather Butler - Rottingdean Parish Council Cllr Daniel Yates- Labour Group Paul Phillips -Kemp Town Society Andrew Boag -Brighton Area Buswatch (Chair) Danielle Card -L.O.G.S Mile Oak Manda Curry or Julie Harris - L.O.G.S Mile Oak</p> <p>Facilitators: Liz Hobden and Clare Flowers</p>
Key Issues Raised	
<p>Transport and Community Facilities – Workshop 1</p> <p><i>LH asked attendees to each name one issue that was most important to them</i></p> <p>Transport</p> <ul style="list-style-type: none"> • Transport through Woodingdean • Patcham – park and ride and new leisure facilities in Patcham • Kemptown – what is happening at Maderia Drive, Conference Centre and impact on transport in the area and tourism • Promote bus issues • Rottingdean – traffic impact and Air Quality Management Area (AQMA) – cumulative impact of traffic volumes on Rottingdean; transport volumes, air quality and community infrastructure eg primary school places • North Portslade – traffic have one way in and out of north Portslade and concerns over urban fringe site and transport <p>Health and community facilities</p> <ul style="list-style-type: none"> • Impact of new dwellings and frameworks. Working more effectively on capacity – mitigatory impacts • Better air quality and impacts and best measures – gaps? <p>Air Quality and Park and Ride</p> <ul style="list-style-type: none"> • Park and ride – if adequate park and ride this would help. Support for park and ride especially in Cambridge, Oxford and Bournemouth – we have South Downs National Park which is a challenge. • Consensus of workshop participants that park and ride would help and even if outside boundary working with South Downs National Park – is a sub-regional issue. • Integrated travel policy into and out of city. Transport density (uses) studies required. • Restricting car use particularly for people coming from outside the city area 	

Other solutions

- Mitigation – in AQMA need to improve situation before moving on. How about high standards eg zoning around areas – better parking and sustainable development in identified AQMA area
- AQMAs – certain priorities identified in action plan eg low emission zones and also need to have a wider area considered in transport plans
- Cumulative impact – how to reduce Air Quality Management areas.
- In Rottingdean AQMA figures dipped but no overall approach re cumulative effects of LDC sites.
- Transport Assessments of developments are not challenged sufficiently by Highways Authority. Transport Assessments submitted often not good enough. Transport officer not expert enough.
- Better design – difference between Rottingdean and Brighton, better definitions and tighter criteria.
- Also impact of changes of road usage
- Encourages sustainable travel via park and ride and discourage journeys into the city
- Also problems with congestion causing Air Quality issues even with hybrid cars
- Encourage active travel
- A23 M23 is very busy
- Our transport systems are low tech and should encourage smarter technology
- In Mile Oak only one road in and out and there is a big development site proposed
- Limited links to the bypass from Mile Oak
- Don't have clear picture of what the journeys in the city area (the technology is there but is not used by BHCC)
- Bus network is always north- south and not east – west.
- Getting across the city by bus without going through the centre.
- Restricting car use particularly for people coming from outside city centre.
- Limited link to Bypass in Mile Oak
- Travel Plans (TR5) no clarity in the city Plan and not working – congestion and pollution.
- There is support for clear thresholds to be in transport guidance.

Community Facilities

- How do protect community uses, are community hubs a good solution?
- North Portslade – GP surgery shortage.
- Supportive of community hubs- e.g. of really good hub in Woodingdean. Should be looking at how to put community uses together
- Need to understand the demand for community facilities (like we are doing for housing figures) that will help plan for need for facilities.
- Also look at older hospital sites e.g. Polyclinic and what else could be there (eg a land use study). The whole delivery of health is changing.

- Need for retirement homes (Social Care indicate there is fine capacity here)
- Extra care is an important model to support
- Schools – in N. Portslade - we have a School Organisation Plan
- Re Rottingdean and Saltdean areas – need more schools for the amount of new development
- CIL requirements in City Plan Part Two to pay for community infrastructure requirements.

City Plan Part 2 Scoping Consultation – Event Log

Event	Stakeholder Workshop
Date and Location	8 th September 2016, County Cricket Ground, Hove
Attendance	<p>Clare Tikly (Vice-Chair) - Hove Civic Society Paul Norman - Hanover Action Jon Stanley - Hove Seafront Residents Association Mark McCullough - Brighton and Hove Hoteliers Association William Gandy -Bevendean LAT Pat Weller - Hangleton and Knoll Project Cathy Gallagher -Chair of Saltdean Residents Association Cllr Penny Gilbey - Portslade Community Forum Ann Menhinick - Portslade Purple People Kitchen Foodbank</p> <p>Facilitators: Liz Hobden and Clare Flowers</p>
Key Issues Raised	
<p>Transport and Community Workshop 2</p> <p>Key concerns</p> <ul style="list-style-type: none"> • Access to the city prime concern (hotel trade) • Air quality, covering land for parking spaces and run off issues, parking issues • Schools are relying on desktop transport plan and is inadequate • Bring transport and school transport plans as a central issue • Air quality management issue in Church Road/ Trafalgar Road, Portslade Shoreham Port and lorries. • North Portslade –heavy lorries go through as all bridges in West Sussex too low for lorries to pass. • Pollution from A27 and centre of city • Deans area issues – A259 and low connectivity in Saltdean – in and out. Lack of community facilities (Lido was community centre). Deans could be sustainable. Bus routes only go to city centre. At the back of Saltdean no buses to NH. • Hangleton and Knoll – longer hours for buses and cost of transport and buses (affordability issues). • Hanover – AQMA, active transport – insufficient cycle infrastructure (cycle parking) must be more of this. South over Community Centre is not accessible to all – limited to who is allowed to use it (not just physically limited). • Bevendean and Moulsecombe – costs of buses and community impacts of HMOs – impact on schools, not enough children for the school due to HMOs • Air quality – noise and vibration of lorries, accessing city. <p>Transport</p> <ul style="list-style-type: none"> • North Street air quality – why are Brighton & Hove Buses latest fleet deliveries not hybrid? • Can there be a diesel ban – there is in London/ Southampton. There are only a few routes into town so those areas have AGMA and monitor those. 	

- Transportation of delegates to a new conference centre at Black Rock is critically important to the success or failure of the conference centre
- Get university to support bus routes from University of Sussex into outer areas of city beyond Lewes Road corridor.
- Promoting electric bikes for older age accessibility – promoting well-being and active travel
- Cross city bus routes – cutting down on cars goes hand in hand with public transport development
- Hanover and Elm Grove – allocations for cycle infrastructure in residential areas reduce cars and increase sustainable transport options in practice.
- Trees and Green Walls as mitigation in Air Quality Action Plan areas
- Concentration on cycling may not be so important in the Denes and need more or different mitigation – although there are more technological solutions – eg electric bikes.
- Want cycle facilities with public transport
- Also disability issues will need car parking
- Permit system - No car days or alternate car to promote – trying out alternatives and help reduce volume
- Need to removal of old bikes from existing bike stands – register bikes with QR codes to report dumped bikes and abandoned motor cycles
- QR codes so you can report abandoned bikes in cycle racks
- Better behaved cyclists on seafront – cycle give way signs don't work
- Promote city car club – space for every car parking permit granted
- Need to ban older diesels
- Not enough priority for safety around schools
- Better pavements – for wheelchairs
- Air Quality Management Plan- extend focus to alternative infrastructure beyond traffic management and green mitigation (trees and shrubs).
- Extend some community bus times - use by families – unable to use them
- Investigate park and ride take it seriously
- Concentration on cycling may not be so important in Deans
- Saltdean – cycling not possible for most – 50+ demographics – wind, hills.
- Better and safer for wheelchairs to use our streets
- Saltdean locked in A259 Falmer Avenue – no routes to the east from back of Saltdean.

Community

- Closing down community facilities – children's facilities
- Community hubs – expectation that community should run with a budget
- Bevendean and Moulsecoomb – the biggest threat is being priced out of market by developers buying up for HMOs
- The University should help enable dispersal of students throughout the city via supporting sustainable transport.
- More HMOs is affecting the intake to our schools. Terrible loss of amenity
- Community centres – areas of benefit to whole community. Remove restrictions on access/ involvement.

- Communities struggling to retain community due to ongoing approvals – changing use of affordable family homes to HMOs
- Proliferation of HMOs leading to greater number of transient population with no/ limited interest in area/ community.
- Retaining affordable family homes essential for maintaining the character of communities and facilities.
- Communities stripped of resources. If you want communities to take hold of community need budget.
- Concerns in Saltdean – school at capacity, doctors at capacity, community centre closed. Chance to build sustainable communities.
- St Richards Community Centre – 2 halls available for consultation events for future city plan events

City Plan Part Two Scoping Paper

Statement of Consultation

Appendix 5 -

Summary of Responses and External Responses

Appendix 5

Summary of key issues arising from written responses and from Consultation Workshops and Events

By topic and question order

CPP2 Chapter 2 – Housing

Summary of key issues arising from Written Responses

In total 131 respondents commented on this section of CPP2 scoping paper with 1,078 representations (due to the number of respondents the names are listed in full in the table below and the respondent number is used under each question)

List of Respondents to Housing Chapter

Name / Organisation	Respondent No.
	2
	3
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	16
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	18
University of Sussex	24
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North Laine Community Association (NLCA)	43
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Our Lady of Lourdes Church	53
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Saltdean Residents Associations	66
Patcham CAT	68
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	81
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Kingsway & West Hove Residents Association	83
Friends of Hollingbury & Burstead Woods	85
	88
	89
Surrenden Park Residents Association	90
	91
	92
	93
	94
	95
	96
Ovingdean Residents & Preservation Society	97
	98
	99
	100
Roedean Residents Association	103
	104
	106
Deans Preservation Group	108
Conservative Group	109
Palace Street Developments Ltd	110
	112
	113
Varndean College	116
Natural England	119
The Regency Society of Brighton & Hove	120
	121
	123
Daniel Yates Councillor	124
Brighton Housing Trust	127
	128
Futureform Global Investments Ltd	129

South Downs National Park Authority	130
U&I Plc	131
	133
Brighton & Hove Food Partnership	134
Brighton Society	135
	136
The Woodland Trust	137
	139
National Grid Property and SGN	140
	143
X-Leisure (Brighton II) Ltd and Land Securities	144
	146
	148
SAFE Rottingdean	150
CPRE Sussex	151
	152
	153
Standard Life Investments Shopping Centre Trust	157
RPS CgMs	158
	159
University of Brighton	160
Chair of Craven Vale & Whitehawk Hill Allotments	162
	163
The Kingscliffe Society	165
Sussex Wildlife Trust	166
Saltdean Countryside	168
Select Property Group	170
Network Rail	172
Linden Homes	173
	174
Highways England	175
Friends of the Earth Brighton & Hove	177
East Sussex County Council	178
St. William Homes	179
LCE Architects	180
Crest Nicholson	181
	183
Tracy Hill, Councillor	184
	185
Longhill Woodland Group	187
Roedean Café and Mini Golf Course,	188
Brighton & Hove Economic Partnership	189
Unknown Respondent 1	190
Unknown Respondent 2	191
Unknown Respondent 3	192
Unknown Respondent 4	193

Bevendean LAT	194
Unknown Respondent 5	195
	196
	197

A: General Housing (Use Class C3) supply and additional site allocations

Question H1 Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

There were **81** respondents to this question.

Respondents:

2,4,5,7,10,13,14,15,17,18, 24,30,31,34, 35,36,37,38,39,40,
42,43,44,45,47,50,53,58,60,61,64,66, 68, 69,70,72,73,75,77, 83, 96, 97,103,108,109,
110,113, 120,123,124,128,135,136,139,143, 146,152,159,148,150,153,158,166,168,174,
175,178, 177,179,180,181,183, 185,189, 208,190,192,

Overall, there was very strong support to allocate suitable brownfield sites in the city for future housing development and thereby safeguard their use for housing over the full plan period.

3 respondents did not think suitable brownfield sites should be allocated for housing.

Some respondents were of the view that brownfield sites should be prioritized over greenfield site development. There was a view that if brownfield site development was maximized, including through a review of site capacity and increased densities, then there would be no need for greenfield site development or that the use of greenfield sites could be deferred or held back until absolutely necessary.

Some respondents qualified their support because there was concern that any development should be sensitive to existing communities and that development would need to take account of the need for local services, local infrastructure and impacts on local roads.

Other respondents supported brownfield site development so long as this did not include any allotments or green areas.

Some felt that brownfield sites should be used only for general housing and not for Purpose Built Student Accommodation.

The Brighton Society (135) suggested that an Urban Design Framework should set out clear design parameters on approximate density, suitable scale and height of development and relevant visual considerations particularly for sites within Conservation Areas.

Respondents from the development industry (e.g.180, 181) wanted to see higher densities encouraged in more central locations and felt that density should be guided by good design guidance rather than being applied too rigidly through policy. Some called for a review of guidance on taller buildings and more selective application of Conservation Area policy.

Highways England (175) was also supportive provided that proposals are accompanied by a Transport Assessment (TA) or Transport Statement and Travel Plan, assessing impacts on the Strategic Road Network (SRN) where relevant.

Brighton & Hove Economic Partnership wanted to see housing policy encourage more innovative models, methods and mechanisms of housing delivery to improve the efficiency of housing supply

Question H2 The 2014 and 2015 Urban Fringe Assessment studies have already looked at range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites.

Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

There were **60** responses to this question.

Respondents:

2,3,4,5,6,7,13,17,18,30,34,35,37,38,39,42,44,45,51,53,58,61,66,68,69,70,72,77,85,96,97,197,104,108,109,110,119,120,113,128,130,134,135,139,140,151,152,160,168,166,179,120,174,177,179,183,185,190,

Two respondents (110 Palace Street Developments and 160 University of Brighton) were clear that they thought the level of consideration in the Urban Fringe Assessment studies was appropriate and that the studies robust. One respondent (120 Regency Society) felt that the urban fringe sites should be subject to the same assessment criteria as for all other sites.

Seven respondents objected in principle to any housing development on the city's urban fringe sites.

The response from the South Downs National Park Authority (130) was to reserve comments until the draft site allocation stage of City Plan Part Two.

The Sussex Wildlife Trust (166) felt that sites needed to be considered in the context of ecological connectivity and their value in delivering towards the city's ecosystems services. They also stated that ecological surveys should comply with BS42020 code of practice guidelines.

Natural England (119) felt that urban fringe sites would require bespoke consideration due to location within setting of SDNP, contribution to NIA and Biosphere and open space and recreation value. Further consideration should be given to opportunities to enhance links to SDNP, provide Green Infrastructure and open spaces on a landscape scale.

The Food Growing Partnership (134) felt a specific requirement for food growing space within urban fringe sites should be made and if onsite provision not possible then a contribution sought to support food growing spaces accessible to the sites. This would be justified given the overlap between sites deemed suitable for development and these deemed suitable for food growing. The Partnership also strongly opposes any development on current allotment sites in the city and seeks policy protection under City Plan Part Two.

CPRE (177) were concerned that the development potential on some of the urban fringe sites had been underplayed and low density seen as low impact. Given the city's housing needs and the constrained land supply they felt that urban fringe opportunities should be reviewed and that well designed higher density developments could also be low impact and contribute more to city's housing needs. This view was shared by the Brighton Society (135) and in submissions from the development industry.

Other respondents felt that a number of further considerations were required:

- Allotments – no allotment sites should be built on: important community facilities, support physical and mental health, improve community cohesion, cannot be moved/replaced, takes years to improve soil, valuable resource for wildlife and plant diversity. Allotments must continue to receive protection as under QD.21 in 2005 Local Plan.
- Transport considerations, traffic generation and impacts on local roads, traffic safety, access to public transport facilities;
- Infrastructure including school places, health facilities, utility requirements;
- Air quality issues;
- Impacts on heritage assets and Conservation Areas should be further considered;
- Cumulative impacts of many of the above and cumulative impacts across several urban fringe sites;
- Any development on fringe sites should be just for affordable housing;
- Ensure affordable housing is genuinely affordable and is for local people;
- Sustainability Appraisal of individual sites in comparison to alternative sites
- Sites to be allocated should be subject to public consultation
- Design important and local character of existing communities; protect against urban sprawl e.g. around Deans villages.
- Specific design SPDs for all urban fringe sites
- Some fringe areas should be considered for Purpose Built Student Accommodation to free up family houses in urban areas
- Site specific consideration regarding access to green spaces. 2014 UFA only gave crude indication of overall impacts.
- Historic rights of public access need to be protected

- Strict adherence to any objections from SDNPA.
- Urban fringe sites could be considered for Park and Ride.

Question H3 Are there sites that you are aware of that you would like to see put forward as proposed housing sites (Use Class C3) allocations in City Plan Part Two?

There were **25** responses to this question.

4,7,13,53,63,73,190,75,77,96,97,108,110,113,116,120,129,139,158,159,172,173,174,179,192.

Site suggestions:

- Underused/redundant council offices, military sites, government sites (4,63,192)
- Toads Hole Valley and Brighton Marina (7)
- St Aubyns playing field (13,173). Capacity for greater number of units than indicated in SHLAA. Principle of developing part of playing field established through previous planning application (173).
- Saltdean Vale by Saltdean Football Club (13)
- St Aubyns School (53,173)
- Gas Works Site between Roedean and Kemp Town (73,75,190, 179)
- Spare land on university campuses (108)
- Peacock Industrial Estate (110)
- Disused buildings (113)
- Varndean College, land at Surrenden Road (116)
- Small areas of poorly used open space in areas like Bevendean, Coldean, Moulsecomb could be brought forward for small pocket schemes (120).
- Areas of older, poor quality, low density housing redeveloped to higher densities e.g Bevendean and Moulsecomb (120)
- Benfield Valley – significantly more capacity than identified in Urban Fringe Assessments (129)
- Empty and derelict brownfield sites along Preston Road (139,159)
- Preece House 91-103 Davigdor Road and P&H House 106 -112 Davigdor Road (158). Redevelopment of the sites could provide more housing and less weight should be given to restrictive employment policies.
- Combined Engineering Depot, New England Road BN1 3TU. Capacity for 100-103 units. Operational railway land and Colas Rail, Thameslink Railway, British Transport Police onsite. Access via New England Road (172)
- Land at Wanderdown Road should be included as an allocation (174)
- Kings House for 100% affordable housing (192)
- Black Rock (192)

Housing mix – dwelling types, sizes and tenures

Question H4 Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

There were **57** responses to this question.

5,7,10,13,14,17,18,24,30,35,37,38,39,40,42,43,44,47,50,58,60,61,66,68,69,75,77,83,96,104,108,110,113,116,120,123,124,127,128,129,134,139,140,143,144,190,146,148,150,151,152,153,168,179,180,192,

Many of the responses (26 in total) were supportive of site allocations specifying a range of dwelling types and unit sizes. Respondents were concerned that the market would only deliver what's profitable rather than homes to meet local needs.

Other responses (17 in total) felt a general criteria based policy would be more appropriate and would provide flexibility with mix being determined on a site by site basis taking account of site characteristics, market factors, viability and design parameters. These respondents did not support a more prescriptive approach. One suggestion was to set out a target unit size mix in the supporting text of any policy noting that this could change to future proof the policy.

Other respondents raised the following issues with respect to housing mix:

- Need to achieve more social and affordable housing in new delivery
- Provide more high density terraced housing, low rise flats and commercial premises below flats;
- Brownfield sites for older persons housing;
- Should be specific to local needs of residents;
- City Plan should use all possible approaches to ensure the supply of housing matches the needs as evidenced;
- Strong need for more family homes and for smaller supported housing types;
- Allocate a wide range of sites to achieve a broader mix.
- Mix could be guided through general residential and design policies;
- Should be a limit on studio flats
- Each proposal to be considered on its merits
- Each neighbourhood should have a quota for HMOs rather than simple distance basis.

Question H5 On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

There were **58** responses to this question.

4,5,7,10,13,14,17,18,24,30,35,36,37,38,39,40,43,44,45,50,51,58,60,64,66,69,72,75,77,83,96,97,103,104,108,109,120,123,128,129,135,136,139,140,143,146,148,150,151,152,153,159,160,168,178,179,190,180,

Most responses to this question supported the suggestion to seek to secure a proportion of family sized housing on urban fringe site allocations. It was recognised that this can be more difficult to achieve on smaller urban brownfield sites. A number of respondents qualified their support by stating that sufficient infrastructure (access to schools, health facilities, and roads) must also be adequately planned for.

A small number of responses did not support seeking to secure a proportion of family sized housing on the urban fringe site allocations. Some objected in principle to any housing on urban fringe sites. Others thought each site should be considered on its merits or that the building of smaller homes could free up family housing in the city.

The following points were also raised:

- Policies to seek a range and mix of rental and ownership tenures should be put forward;
- Put some student housing on urban fringe sites to free up family housing in the city;
- The mix should be in keeping with existing neighbourhoods;
- Where sites are smaller build hostels to support the rough sleeper strategy;
- Urban fringe sites 21,21a, 21c would not be suitable for family housing due to close proximity to Varley Park (student hub) (160 University of Brighton)
- Should be site specific decision rather than overarching policy.
- Detailed ecological assessments may indicate development cannot be undertaken without significant harm to biodiversity (178 East Sussex County Council).

Question H6 Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

There were **40** responses to this question:

4,5,7,18,30,34,35,36,38,39,40,42,43,44,51,58,61,64,68,69,75,77,96, 97,108,110,113,128, 129,134,135,136,140,146,150,153,159,178,179,192

The following suggestions were put forward as ideas to help ensure a good mix of housing is delivered:

- More liaison with Housing Associations and larger Developers;
- Brownfield sites offer the best opportunity to boost delivery and mix;
- Need to work with neighbouring authorities because housing needs will only be met in full by looking at new town solutions;
- Build more public sector housing on brownfield sites;
- Investigate issues regarding purchase of new housing by landlords and foreign investors;
- Universities should be more responsible for housing the student population;
- Look at demographic factors;
- Planners should zone areas and specify what's acceptable in terms of type, design and density;
- Require student housing to contribute to affordable housing;

- Council should offer more incentives to older people to free up family housing. Stricter policy on empty homes and allowing properties to remain unoccupied;
- Innovative uses of disused office space for student accommodation;
- Further consideration of identified sites; higher densities on brownfield sites;
- Prevent developers taking best sites for student housing;
- Limit HMOs in Bevendean;
- Support Community Land Trust initiatives and other non-commercial housebuilding.
- Build on city's eco-homes / sustainable building expertise and building to high environmental standards;
- Ensure a flexible, market-led approach to ensure housing delivery is not stifled.
- Mix should represent needs of the area being considered.

C: Making full and effective use of sites

Question H7 Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

There were **50** responses to this question.

4,6,7,14,18,24,30,35,38,44,50,58,60,61,68,69,70,73,75,83,96,97,104,108,110,113,119,120,128,129,134,136,139,140,143,144,146,148,150,151,152,153,159,168,179,180,181,190,192,195

Responses were split between respondents supporting a policy to ensure new development maximises or optimises site potential to avoid under-development and those that were concerned that such a policy would result in over-development, excessive densities, overcrowding and negative amenity / infrastructure impacts on surrounding areas.

Of those supporting such an approach the following points were made:

- A design response appropriate to local context and character is vital
- Appropriate or optimal potential should be the focus rather than maximum potential
- Such an approach accords with NPPF guidance - see para.58, NPPF with respect to optimising development potential of sites and para.47 with respect to flexibility to respond to surrounding context.
- Need to be strict design criteria / parameters set out
- High quality design should be sought
- Maximising site potential doesn't justify poor development; still need to consider townscape and amenity impacts
- Blanket approach won't work; different areas have different character
- May work in some parts of the city but not all; different considerations

- Important to consider local infrastructure and amenities to support higher density developments
- Should be for the applicant to demonstrate capacity of site is optimised whilst considering local context
- Policy should not unreasonably restrict development densities in central areas or be applied too mechanistically.
- Developers, Self-build and Co-Ops should be made to provide enough homes to reach the density council has set for each site.

Those objecting to such an approach cited the following concerns:

- Brighton & Hove already near maximum capacity;
- Could lead to over-crowding, congestion, excessive densities
- Overdevelopment is the problem; should be more mid-rise development
- High density not appropriate on urban fringe sites; need to balance development with impacts on National Park and need to incorporate Green Infrastructure and green space for local people.
- City's housing balance needs to be considered rather than the developer's profits
- Concerns regarding space standards, appropriate provision of local infrastructure and green space.
- Development should be in keeping with existing areas otherwise ghettos are likely to be built.
- Need to make sure nature and biodiversity is protected.

D: Housing for key groups in the city

Question H8 Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

There were **51** responses to this question.

4,5,7,10,13,14,18,30,34,35,36,37,38,42,44,47,50,58,60,66,68,69,72,75,77,96,97,104,108,110,112,113,120,128,135,136,139,140,143,146,148,150,151,153,159,168,170,179,192,190,191,195

The majority of respondents (40) were supportive of City Plan Part Two including policies which would seek to address and support specific accommodation needs within the city e.g. housing options for older people, for families and for people with specialist housing needs.

A small number of respondents (6 in total) considered that policies should not be overly prescriptive or restrictive and that a generic housing mix policy would allow flexibility for the housing mix to be addressed on a site by site basis.

Other comments were:

- Wherever possible, housing types should be integrated

- The City Council should consider the unmet housing needs for student housing and increase site allocations for purpose built student accommodation.
- Urgency of meeting housing shortfall is more important than the provision of specific tenures
- Unsure City Council has the land to be this specific.
- More affordable housing required
- More provision for family homes; policy to retain existing family housing stock should be foundation for this.
- Safeguard family homes by rejecting HMOs in Bevendean

Question H9 Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

There were **53** responses to this question.

2,4,5,7,10,14,17,18,30,34,35,37,38,39,42,44,50,58,60,61,66,68,69,70,73,75,83,96,97,108,110,113,140,148,192,195,120,124,138,135,139,143,144,150,152,146,151,153,159,165,168,179,190,

There was strong support for seeking to address different housing needs through site allocations (32/53). Respondents referred to significant need for affordable housing, for supported housing and for housing for older people. Many did not think the market would deliver the homes the city needs.

Other respondents (12 in total), mainly from the development industry, felt that site allocations should not be too prescriptive as this could be unduly restrictive and undermine site viability. There was a suggestion that certain forms of housing could be promoted through more generic policy to achieve balanced and mixed communities.

Other comments:

- Better to specify a proportion of housing types;
- Restrictive policy could lead to physical segregation of particular groups. Communities should be mixed.
- Not sure BHCC has land to be this specific
- Many older people want to live in central areas and families shouldn't be pushed to the peripheral parts of the city
- Prioritise housing for people in poverty
- Could development be funded from developer contributions?
- Homes should be built with a range of occupants in mind.

Question H10 Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

There were **49** responses to this question:

1,4,5,7,13,14,18,30,34,35,37,38,42,47,50,58,60,61,64,66,68,69,73,75,77,83,96,97,103,108,110,113,120,128,134,135,136,139,143,144,146,148,150,151,152,159,190,191,192,

Responses were fairly evenly split on this question. Just over half (22) supported policy provision for self- build / custom builds. Some thought this would offer good opportunities for more sustainable and eco-friendly builds. The Food Partnership (134) also suggested that this help facilitate collaboration and introduce multi-functional land use / shared space that includes community food growing.

Other respondents (19) were not supportive of planning policy / allocations to address self-build / custom build. Some saw self-build as wasteful of land and unlikely to contribute very much to targets for housing.

A number of respondents offered partial support on the basis that controls would be required to safeguard quality and quantity; that schemes would need to be self-funded and meet other policy requirements. Other respondents noted that all sites would be suitable for self-build / custom build plots therefore the policy wording should be flexible so that this can be assessed on a site by site basis.

E: Retaining housing

Question H11 Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

There were **57** responses to this question.

4,5,7,13,14,60,61,17,18,30,31,35,36,37,38,40,42,44,45,47,50,51,58,64,66,68,69,70,72,75,77,83,96,97,103,108,110,112,113,120,124,127,128,135,136,139,143,146,148,150,151,153,159,168,178,190,192,195

The majority of responses (44 out of 57) were supportive of planning policies resisting the loss of housing from the existing housing stock of the city.

A number of responses qualified their support by stating that it would depend on the quality/standard of the existing housing and whether redevelopment could result in a better standard of housing (30, 7, 128, and 96). One respondent felt that where there was no heritage value it might be better used (113).

Some felt that there are areas of the city that could be redeveloped more efficiently to provide more homes (13, Ovingdean Residents & Preservation Society 97, 61, Unknown Respondent 190).

Several respondents wanted to see more protection of family homes and stronger controls regarding their loss to HMOs (36, 45, 51, 112, 124, and 70).

The issue of 'party houses' was also raised (31, 45) and respondents wanted to see this addressed, pointing out that party houses were a business use rather than a residential use.

Question H12 Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs?

There were **43** responses to this question.

4,5,7,14,18,30,35,38,44,45,47,58,60,61,66,68,69,70,72,75,77,83,96,97,103,108,110,112,113,120,128,135,136,139,146,148,150,151,153,159,190,192,195,

There was very strong support for the protection of family housing, affordable housing, housing for elderly persons and housing for those with support needs.

F: Private outdoor amenity space in new housing needs

Question H13 Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

There were **64** responses to this question.

4,5,7,13,14,16,17,18,30,31,34,35,38,40,42,43,44,45,47,50,51,58,60,61,64,68,69,70,72,73,75,77,83,96,97,108,110,113,119,120,128,135,136,139,140,143,144,146,148,150,151,153,157,159,165,166,168,178,179,181,190,190,192,195

Overall, there was very strong support for planning policy in City Plan Part Two to set out a requirement for the provision of outdoor private amenity space in new residential development. A number of respondents noted the health and amenity benefits of private amenity space in residential development.

CPRE (151) felt that clear guidance and specific standards should be set out.

Natural England (119) felt this issue required careful consideration in order to improve quality of new development and the potential to contribute to eco-systems services.

The Sussex Wildlife Trust (166) noted that private amenity space contributes to the city's natural capital and delivery of eco systems services.

East Sussex County Council (178) noted that private amenity space particularly important for family dwellings and that imaginative design could provide this as roof terraces and extended balconies. In lower density suburban areas, ESCC suggested private amenity space should be specified through minimum size standards and oriented to have sun at least part of the day.

A number of respondents, some from the development industry, felt that policy should have some flexibility and would need to consider site characteristics and that the type, density and location of housing and not be prescriptive (St William Homes 179, 96, 113, Natural England 119, Regency Society 120, National Grid Property and SGN 140, Crest Nicholson 181, Unknown Respondent 195). One or two respondents noted that there would be no point in providing large gardens if they don't get used (Regency Society 120).

Some suggested that there was a role for the provision of communal space (113, Regency Society 120,178) particularly in flatted forms of development.

Question H14 Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

There were **52** responses to this question.

4,5,7,13,14,16,18,30,34,35,38,44,45,47,50,58,60,61,64,66,68,69,70,72,73,75,77,83,96,97, 108,110,113,120,128,135,136,139,140,146,148,150,151,153,157,159,168,178,179,181, 190,192,191,

Responses largely reflected those for Question H13 above.

CPRE (151) called for clear guidance and standards to be set out in policy.

ESCC (178) suggested where possible amenity space should be multi-functional providing for biodiversity, climate change, flood risk management as well as amenity.

Other respondents, largely from the development industry (St William Homes179, Palace Street Developments Ltd 110, 13, Regency Society 120, Standard Life Investments 157, Crest Nicholson 181), called for policy to be flexible and for it not to set out prescriptive standards. It was noted that both site opportunities and constraints would need to be considered. St William Homes (179) suggested guidance be set out through a Supplementary Planning Document.

G: Access and space standards in new housing development

Question H15 Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

There were **52** responses to this question.

2,4,5,7,14,16,17,18,30,35,37,38,42,43,44,45,58,60,61,64,66,68,69,72,75,83,96,97,103,1 08,109,110,116,120,128,139,140,146,148,150,151,152,153,157,159,165,168,179,181, 189,190,192,

There was strong support for the introduction of the new nationally described space standard for new residential development (38 out of 52 responses). Many thought this

was important to resist substandard accommodation being built in the city and to provide a level playing field for developers and to ensure consistency of high quality housing delivery.

Other respondents, largely from the development industry, called for some flexibility in the application of space standards to allow for unique site circumstances and to also ensure innovative forms of housing supply can be explored and encouraged e.g. modular (Brighton & Hove Economic Partnership (189), National Grid Property and SGN (140), (96), Unknown Respondent (97), St William Homes(179)).

It was pointed out that any such policy would need to be 'evidence based' and that viability was also a consideration (St William Homes179 and Unknown Respondent 190).

Question H16 Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

There were **51** responses to this question

4,5,7,14,16,17,18,34,35,38,42,43,44,47,50,58,60,61,66,68,69,72,75,77,83,96,97,103,108,113,120,124,128,139,143,144,146,148,150,151,152,153,159,168,179,181,190,191,192,195

There was strong general support for the introduction of higher optional standards for access and adaptability and an appropriate proportion of wheelchair housing in City Plan Part Two (35 out of 51 responses).

One respondent (191) also called for design guidance to address other 'invisible' disabilities e.g. Autism.

Other responses, largely from the development industry, felt that the higher optional standards could be costly and that policy would need to take account of site specifics e.g. vulnerability to flooding, site topography because some sites may be less suitable for the higher optional standards.

X- Leisure Ltd and Land Securities(144) stated that any policy should accord with guidance in NPPG and have reference to Building Regulations Part M4(2) and Part M4(3) and not impose any additional information requirements.

Crest Nicholson (181) felt that private wheelchair user dwellings can be delivered to 'adaptable' standard rather than fully adapted and this would assist with viability and sales issues. They suggested it could be useful to have a Housing SPD setting out clearer guidance on these issues and others including unit sizes, amenity space.

Question H17 Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

There were **12** responses to this question.

4,7,18,34,38,44,68,69,96,113,131,190

Respondent 131 (U&I plc) called for policy to provide additional clarity around requirements for the provision of wheelchair and accessible units, specifically around application of the terminology 'adaptable' and 'accessible' and the final fit out of units. It was suggested an updated needs assessment would be required for City Plan Part Two as the current 10% policy requirement was based on 2005 housing needs data. They also felt it would be useful to incorporate a cascade mechanism where there was a proven lack of market demand for accessible units.

Other comments from respondents were:

- Needs to be car parking provision for new homes
- Needs to be accessible green spaces too
- Adequate turning room, wide enough front doors for furniture and large windows.
- Fuel efficiency needs to be tackled in new development;
- Require compulsory solar panels/ground source heat pumps in all new development
- Need to get on and build lots more housing

H. Houses in Multiple Occupation (HMOs)

Question H18 Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Responses were received from **55** respondents:

2, 4, 5, 7, 14, 18, 24, 30, 35, 36, 37, 38, 39, 43, 44, 45, 50, 58, 60, 61, 64, 66, 68, 69, 70, 72, 75, 77, 81, 97, 103, 106, 108, 112, 113, 120, 123, 124, 127, 128, 135, 136, 139, 143, 146, 148, 150, 151, 153, 168, 184, 190, 191, 192, and 195.

Overall there was a clear majority with just over two thirds of those who expressed a preference in favour of leaving the issue to the market and not protecting existing HMOs. Concern was raised that HMO conversions result in an over-intensification of use, with consequent negative impacts such as more noise, refuse, and parking issues.

A number of respondents (including the Brighton Housing Trust and University of Sussex) made the point that, given the high cost of property in the city, HMOs are important part of the housing stock which is affordable for those on low incomes in the city, and are not solely occupied by students.

Three respondents felt that there should not be a citywide policy, but that each proposal should be judged on its merits taking into account the local proliferation of HMOs.

Question H19 Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Responses were received from **58** respondents:

2, 4, 5, 7, 10, 14, 17, 18, 24, 30, 35, 36, 37, 38, 39, 42, 43, 44, 45, 47, 50, 51, 58, 60, 61, 64, 66, 68, 69, 70, 72, 75, 77, 81, 97, 103, 108, 112, 113, 120, 123, 124, 128, 135, 136, 139, 146, 148, 151, 153, 159, 165, 168, 184, 190, 191, 192 and 195.

There was clear support for a policy encouraging the conversion of HMOs to family housing, with some particular concerns expressed regarding over-concentrations of HMOs in some areas, lack of family homes in the city and the effect on school intakes in areas with high levels of HMOs.

However a significant minority of respondents disagreed and emphasised the important of HMOs in the housing mix, with one respondent arguing that families shouldn't have a privileged status.

Some were of the view that such conversions should only be encouraged in areas of high concentrations of HMOs.

Question H20 Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Responses were received from **49** respondents:

2, 4, 5, 18, 24, 30, 35, 36, 37, 38, 39, 42, 43, 50, 51, 58, 61, 64, 66, 68, 69, 70, 72, 75, 77, 97, 103, 108, 112, 113, 120, 123, 124, 131, 134, 135, 136, 146, 148, 150, 151, 153, 160, 170, 184, 190, 192, 193 and 195.

A wide range of suggestions for mitigating negative impacts that can arise from HMOs were suggested, although many would be outside of the scope of the City Plan Part Two. The most common suggestion was that the delivery of new Purpose Built Student Accommodation (PBSA) could help to reduce the demand for HMOs from the student population. Some respondents emphasised that not all HMOs result in negative impacts, with the University of Sussex stating that significant progress is being made in limiting such impacts in locations where its students reside, and that it is continues to be keen to continue to work with the Council on such issues.

Other suggestions included:

- Expanding the Article 4 area which overrides the permitted development right for converting a C3 dwellinghouse to a C4 small HMO to other parts of the city;
- Setting a threshold for HMO concentration at ward or neighbourhood level, rather than using a 50m radius around an individual property;

- Reconsidering the 50m threshold as an appropriate radius will vary depending on plot size;
- Additional licensing of HMOs and pressure on landlords to maintain properties to acceptable standards;
- Better enforcement of existing rules and legislation regarding the management of HMOs
- More dispersal of student accommodation and HMOs around the city;
- A need to address issues arising from increasing use of properties as short-term Airbnb rentals;
- Better responses to complaints regarding anti-social behaviour;
- Apply business rates and/or council tax to buy-to-let landlords
- Better communication with occupiers regarding responsibilities, which could be linked to university communications.

The response from the HMO Forum set out points made at their meeting on 20th September 2016. Points raised which directly relate to planning policy included:

- Cumulative impact of potential expansions to existing HMOs under permitted development should be considered;
- Large numbers of HMOs appeared to lack planning permission;
- Need minimum room sizes in policy as many refusals on this basis are overturned at appeal;
- Impact of concentrations of HMOs on the wider community should be considered – e.g. pupil numbers at local schools, noise from occupants coming home late at night down residential streets;
- Some areas of the Lewes Road are being impacted not only by HMOs but by purpose-built student accommodation in close proximity. There is no planning policy which takes this into account because purpose-built student accommodation is not classed as HMO use. Can we look at adding to the 50m rule something else which takes into account the broader impact of all types of student accommodation?

I: Are there any other housing issues?

Question H21

- **Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?**

There were **61** responses to this question.

7,16,18,34,38,41,44,49,61,64,66,68,69,75,80,81,82,85,88,89,90,91,92,93,94,95,96,97,98,99,100,103,104,108,109,113,120,121,123,127,129,133,134,135,137,140,143,148,150,153,159,168,174,177,179,180,189,192,194

There was considerable support for the conclusion reached in the 2015 Further Assessment of Urban Fringe Sites for the assessment area L6/E5 for Hollingbury Park, Brighton which set

out that this area should not be considered for residential development.
(81,85,88,89,90,91,92,93,95,98,99,100,121,133,135,177,192)

The Regency Society (120) set out a number of issues it wanted to see given further consideration and this included:

- the need to regulate AirBnB in the city;
- to undertake a study to look at unused and underused land and the scope for redevelopment at higher densities;
- revisit the tall buildings policy; redefine different categories of tall buildings and review zoning policy
- review density policy; optimise density with clear minimum and maxima densities set out;
- Set out a minimum density of 50 dwellings per hectare for peripheral sites.

The Conservative Group (109) set out that:

- There should be no developer contributions on sites of less than 10 units;
- City Plan Part Two should address how to manage party houses – business use not residential use.

The Food Partnership (134) said it would like to see a new SPD around food growing and highlighting case studies on multifunctional use of land. It also thought affordable housing was key to preventing food poverty. Housing should be built to high energy standards and would like to see food growing and access to healthy food a key consideration in all future housing developments.

The Brighton Society (135) stressed the importance of monitoring at regular intervals and that this should include monitoring windfall sites, number of rentals within existing stock, AirBnB, second home ownership and numbers of properties bought as investments. Better guidance to Developers should be provided regarding preferred densities on particular sites.

Future Form Global Investments (129) was critical of the 2015 Further Assessment of the Urban Fringe sites study suggesting it did not adequately look to review developable areas of the sites. They suggest Benfield Valley has capacity for a far higher number of dwellings. They wish to see developable area extended and wish to work with the Council through City Plan Part Two to demonstrate this is possible.

The Woodland Trust (137) would wish to see new and existing trees planned into new development at an early stage and tree cover increased. Trees provide an important contribution in terms of visual benefits and also help air pollution and create oxygen. They add Ancient woodland should be protected and buffered from new development as is a unique habitat and has evolved over centuries.

The Brighton & Hove Economic Partnership (189) thought that mixed use development should not risk loss of employment space and where mixed use is encouraged then should prioritise dominant uses in applicable areas.

The following additional issues were also raised through a number of individual and organisation responses to this question:

- Full consideration should be given to impacts of traffic generation and air pollution levels; cumulative impacts of new development
- Adequacy of transport infrastructure needs to be taken into account when planning for new housing
- School places must be considered
- Be wary of poor developments and poor development practices
- Consider making better use of existing housing stock / estates. E.g Queensway and Craven Vale Estate are low rise, low density with lots of green space. Could achieve increased numbers of dwellings and improve quality (44)
- Do not build on Parks or Recreational green spaces
- More purpose built student accommodation (PBSA) is needed to free up suburbs near the Universities.
- PBSA should be extended throughout city and not just focus along 'academic corridor'. There are good transport links so this is feasible.
- High rise needs to carefully considered to ensure good designs
- Council takes too long to do anything
- Stop Nimbyism; need more homes in the city; why isn't tall buildings policy being applied?
- Need to clearly set out that there will be an opportunity to object to proposed allocation of any urban fringe site (94,103)
- Look at the impacts of second home ownership which restricts homes being available to those who live locally.
- Development should be accessible for disabled people that depend on public transport and consider matters such as where gradients are too steep for a wheelchair user to access a bus stop.
- Should be additional HMO licensing across the city with annual fees to enforce compliance.
- Should be an opportunity to review density on existing strategic sites e.g Gas Works site, Kemp Town – should be more homes in the allocation.
- Consider change of use to housing on those employment sites which have remained empty for over two years.
- Plan for communities where people interact and help each other.
- Prioritise local people.

Site Specific Objections

A number of respondents were specific in terms of objecting to the development of particular sites:

Respondent number	Site objecting to
15 136	St Aubyns Field Rottingdean – no building on the playing field

Respondent number	Site objecting to
94 188	Object to urban fringe site 37 Miniature Golf Course at Roedean. Even development of a small part of site will undermine site viability and its use as a golf course.
163	Object to urban fringe sites 38, 38a, 39 at Ovingdean. Development will be large family homes which will create more traffic and the need for local infrastructure. Ovingdean cannot support such development.
Saltdean Countryside168	Object to urban fringe site 50, not a sustainable location for residential development and at odds with National Park.
187	Object to sites urban fringe sites 41 and 43. Need to protect wildlife corridors.
196	Object to urban fringe site(s) 32 and 32. Development would increase light pollution, change character of area, have adverse landscape impact and negative impact on Bellvue Cottages.

Summary of key issues from the Consultation Events and Workshops

At the **Stakeholder Event significant** concern was expressed about the numbers of family homes being lost to HMOs particularly in areas near the Universities (e.g. Moulsecoomb and Bevendean) and there was a call for a much stricter policy approach.

A number of attendees were also concerned about the lack of genuinely affordable housing for local people and suggested there was a need to explore cheaper ways of providing housing for people with local connections.

Another issue raised was about housing mix and some respondents thought there should be more detailed requirements for sites based on updated needs evidence.

Many attendees were concerned about the traffic and infrastructure impacts of new housing development particularly around some of the urban fringe sites. Some thought there should be a properly planned approach to areas such as the Deans. Others thought that areas not well served by public transport should be declared not suitable for higher density development.

There was consensus that brownfield sites needed to be developed. Some thought that it was important to make the best use of such sites and that 100dph in Development Areas was too little.

Some attendees thought that more should be made of the urban fringe sites e.g. housing on Toads Hole Valley could be increased significantly.

Other concerns expressed were around housing options for older people; that some older people were in the wrong stock and that there needed to be more incentive for older people to move to free up family housing. Other attendees thought that older people do not want to be in sheltered housing and want to stay in their own homes.

Some attendees were concerned about second home ownership in the city and about party houses and their negative impacts on local communities.

The view was also expressed that the Article 4 Direction has slowed the conversion of more family homes to HMOs but the problem remains. It was felt that the 50m radius should be expanded to, perhaps, 100m and that the proportion of all houses in a ward that are HMOs should be taken into account, rather than just those in the immediate vicinity. Nottingham City Council's policy was suggested as a good example of how to manage the issue.

At the **Sustainability and Environment Consultation** workshop on Urban Fringe and Setting of SDNP most attendees were agreed that there was a need to more clearly define what would be 'appropriate development' on the urban fringe sites. Some felt standard housebuilder development would not be appropriate and that housing would need to be sensitive to surroundings. Some called for different types of design standards and particular requirements (e.g. LVIA, GI provision, energy standards) to be set out for urban fringe sites.

There was concern that development on urban fringes would lead to more congestion on roads unless bus services and pedestrian/cycle access routes could be improved. It was acknowledged that to make bus services sustainable a certain amount of development would be required.

There was interest in how council owned urban fringe sites would be procured for development. Some attendees thought this would have a real impact on the type of development delivered and affordability. Opportunities for community led schemes e.g. self-build groups and/or CLTs could make a valid contribution.

Many attendees were agreed that development on urban fringe sites should respect aims of the Biosphere, incorporate Green Infrastructure and improve linkages and access points to the South Downs National Park and links between urban and rural areas more generally. Some suggested it would be useful to map access points to the National Park and seek to improve /upgrade access.

The Food Partnership wanted to see food growing opportunities incorporated within developments to improve biodiversity, physical and mental health, and community cohesion.

At the first session of the **Professionals Forum** (general discussion on policy) there was consensus among participants that policy needs to provide a balance between the amount and detail of guidance and the need to retain some flexibility. Overall participants did not support prescriptive policies.

It was acknowledged that different responses could be relevant to different parts of the city and how to capture this in policy was a challenge.

Participants often saw policy as too long; that there was a need for more clarity and for parameters to be set out. Overall, policy needs to be pragmatic to achieve development.

It was also acknowledged that the pre-app process is very important and that early engagement with planning is key to clarify matters including policy.

During Session 2 (Housing Workshop) participants called for opportunities for higher density development to be explored and going higher than 6 storeys as set out in tall buildings guidance. Participants felt the city needs some exemplar schemes to change people's perceptions about tall buildings.

Participants felt that site allocations need to be informed by 'intelligence' including design guidance to inform minimum and maximum numbers, heights, etc.

Participants also felt that the city needs to encourage more innovative forms of housing delivery e.g. family housing can be delivered within higher density schemes and taller buildings and ways of doing this need exploring. Co-Op housing opportunities may suit some sites not favoured by larger scale developers.

Longer term, participants felt that the council needs to address city's housing shortage through Duty to Co-Operate at sub regional level and this might require more radical solutions e.g. new settlements / urban extensions.

It was also felt that more head-leasing of HMOs would allow for better management.

At the **Brighton & Hove Economic Partnership** there were some concerns that the introduction of space standards might stifle some forms of development and could reduce capacity on sites. Participants felt that some flexibility / exceptions in policy would be required to allow for innovative housing products e.g. modular housing.

The issue of second home ownership was raised and whether the council has any evidence about scale of second home ownership in the city and whether it could be restricted.

Mixed use developments – participants acknowledged the need for more housing but didn't want to lose out on employment floorspace. There was support for a 'no net loss' approach in terms of job provision.

Participants felt there was a need for innovation and a range of housing delivery options to boost supply and help provide different models for affordable housing. It was suggested modular building may be part of the solution for helping to boost housing delivery and provide more affordable housing. Construction takes half the time traditional new build takes and economies of scale can be achieved through modular production.

It was suggested that there could be a role for bigger institutions, pension funds, the universities, etc to invest in housing e.g. private rented sector new build and student accommodation – funding and returns over longer timescales (30 years).

Site suggestions – retained land at the Keep; field behind Falmer Campus

A toughening of HMO policy was also suggested, for example by only allowing an HMO on one side of a C3 dwelling to further minimise the impacts.

- The Article 4 Direction radius could be made larger than 50m – problems from student housing affects the health of the city/residents
- CP21 and Article 4 Direction has moved people on and caused problems elsewhere
- Need high enough standards and enforce them - perhaps a role for building control

CPP2 Chapter 3 – Economy and Employment

Summary of Key issues arising from the Written Responses

In total 24 respondents commented on this section of CPP2 scoping paper with 87 representations.

A. Offices

Question E1 Are there additional sites/clusters of sites that could deliver a range of size and type of new office floorspace that you would like to be considered as office site allocations through the preparation of City Plan Part Two?

There were 8 responses:

(14)

University of Sussex (24)

(61)

(65)

Palace Street Developments Limited

(110)

(113)

National Grid Properties & SGN (140)

St Williams Homes (179)

Some general suggestions were put forward: more effort should be made to use the space above shops; existing empty offices and converting shops that cannot be let. One respondent felt mixed spaces make for better communities and safer streets. The University of Sussex supports a policy approach in CPP2 that encourages further economic growth through the allocation of new employment sites in the city and retention of existing sites where these are viable.

Sites suggested for consideration:

- **Brighton Marina, Marina Gasworks, Whitehawk**
- **The Hippodrome, The Astoria**
- **Peacock Industrial Estate** – Palace Street Developments Ltd (110) felt the estate was no longer suitable for providing further industrial use (due to surrounding residential schemes) and should therefore be utilised for residential led mixed use development along with a level of supportive employment uses – advancing service sector such as finance, digital and media.
- Both National Grid Properties & SGN (140) and St Williams Homes (179) wanted a review of **DA2 Gas Work Site Allocation** to omit the need for any business floorspace suggesting that the location lends itself to housing rather than business use.

Question E2 How can we better support the delivery of office sites in the city?

There were 9 responses:

University of Sussex (24)

(35)

(61)

(65)

(109)

Palace Street Developments Ltd (110)

(113)

Brighton & Hove Friends of the Earth (117)

Unknown Respondent 3 (192)

Two respondents suggested delivery could be improved through mixed use developments as this would help enable speculative offices and address housing shortfall e.g. 3 stories of office with residential above. One respondent suggested through the use of cluster hubs/ business parks

A number of responses suggested making better or more effective use of existing employment land and the protection of existing good quality office provision/ areas. The use of redundant council buildings for small business, cheap office space was also suggested.

- BHFOE felt there was a need to restrict car parking in new development and use the land for more productive purposes such as employment or housing) – this approach could provide more offices on Preston Barracks Site (see also E12).
- The University of Sussex indicated that its recently approved campus masterplan identifies its commitment to further growth of its Sussex Innovation Centre and will be seeking support for extensions of this activity into the city.
- The University of Sussex supports a policy approach in CPP2 that encourages further economic growth through the allocation of new employment sites in the city and retention of existing sites where these are viable.
- One respondent considered there was a need to encourage large businesses, blue chip business into the city – this would be more sustainable as many people commute and encourage average salaries to rise.

- The Conservative Group felt more should be done to ensure there is adequate office space both for existing city-based firms wishing to expand and to attract new companies (both start-ups and established firms).

Question E3 In light of the permitted development right (which allows offices to be converted to residential use) becoming permanent, should the council's office to residential Article 4 direction be expanded? Which other office clusters should be included?

There were 9 responses:

(35)

University of Sussex (24)

(61)

The Conservative Group (109)

Palace Street Development (110)

(113)

Brighton & Hove Friends of the Earth (117)

Brighton & Hove Economic Partnership BHEP (189)

Unknown Respondent 3 (192)

There was not a consensus of opinion.

- One respondent did not support the conversion of offices to residential as they felt more businesses needed to locate in Brighton.
- The BHEP supported the role of the Article 4 Direction but felt consideration must be given to design – to promote future proofing of developments, so that retrospective changes to either use class is more appropriate and acceptable to meet market demands, in future. Such an approach will also help to prevent office space from falling behind in standards of specification, given that it will also allow for easier and more appropriate sub-division of space. The same approach should be considered to promote the capacity built into structures to allow for additional storeys in future (STP and should Tall Buildings Guidance evolve, for instance).
- The University of Sussex supports the retention of existing office sites where these are viable.

Three respondents were supportive of extending the Article 4 Direction area:

- To include further offices which otherwise could be lost for housing. The Council needs to have some measure of control or it cannot plan effectively (BHFOE).
- The Conservative Group felt the Article 4 Direction should be extended more widely in the City in consultation with the business community.
- One respondent suggested the whole city should be covered

Three respondents did not want the Article 4 Direction to be extended:

- As it allows inadequate old offices that no one wants to rent to be converted to housing.
- Once office values rise this will enable new development to become viable.
- Given the overwhelming need for more housing in the city every effort should be made to ensure that the required provision of housing need is met.

B: Mixed Employment Areas and mixed use allocations

Question E4 Should the City Plan Part 2 seek to identify new mixed use site allocations and indicate a range of appropriate 'other' employment uses such as education and training uses and private healthcare uses alongside B1a office use?

There were 8 respondents:

University of Sussex (24)

(35)

(61)

(65)

Palace Street Developments Ltd (110)

(113)

(164)

Unknown Respondent 3 (192)

4 respondents supported the identification of mixed use sites:

- The University of Sussex supports the use of a policy that identifies mixed use site allocations including those that indicate the suitability of education and training uses alongside B1a office use.
- With an increase in population comes a need for increased education and healthcare services.
- A mix of living, working and amenities gives the opportunity for creating sustainable communities; increased safety and vigilance and opportunities for green energy options. Peacock Industrial Estate presents ideal opportunity for residential led mixed use site.
- City College indicated its plan to create a new sustainable mixed use development with improved teaching and learning facilities, public realm improvements; commercial and residential developments opportunities and a disposal site for housing for much needed housing or education use. CPP2 therefore should ensure that future detailed policies are not overly restrictive; potentially hindering the ability for education providers such as City College from investing in much needed improvements to facilities. The viability of large scale improvements is frequently dependent on separate funding streams and integration within wider mixed use schemes.

Three respondents did not support the suggestion:

- Utilise what we have – saturation of shops or restaurants.

Question E5 Are there any sites you are aware of that would be suitable for mixed use employment uses and that you would like to see considered for allocation through City Plan Part 2?

There were 7 responses:

(61)

(65)

Palace Street Developments (110)

(113)

Kames Capital (158)

City College (164)

Unknown 3 (192)

The following sites or opportunities were put forward by respondents:

- **The Hippodrome, The Astoria**
- **Peacock Industrial Estate** – area characterised by a variety of land uses. Most recent planning permissions/ permitted development rights exercised mean the site is now encompassed within a residential envelope. With excellent nearby local transport facilities, the site is considered appropriate for a mixed use scheme with both residential and employment uses to form a new residential led mixed use development.
- Former factory/brewery/pub conversions ideal for workshops on ground floor and flats above.
- Kames Capital wish to put forward two sites for proposed mixed residential and employment (office) use: **Preece House, 91-93 Davigdor Road Hove and P&H House, 106-112 Davigdor Road, Hove**
- **City College Pelham Street Campus** - looking to significantly improve the campus through a new sustainable mixed use development. Detailed policies should not place restrictions which unduly limit the viability of improvement schemes to education facilities within the city. CPP2 through overarching objectives and policy framework should help facilitate the needs of City College in the significant improvement of educational facilities at the Pelham Street Campus.

Question E6 Is there a need for a specific policy to promote/ guide the provision of specific types of employment building types such as managed starter units, live/work or co-working space, and creative industries workspace or is there sufficient guidance in the City Plan Part 1 at CP2?

There were 9 responses:

(14)

(35)

(61)

Palace Street Developments Ltd (110)

(113)

City College (164)

Brighton & Hove Economic Partnership (189)

Unknown Respondent 3 (192)

Unknown Respondent 5 (195)

Whilst a couple of respondents considered there was a need for specific guidance and one respondent specified the need for space for creative industries workspace, the majority of respondents cautioned against over-specific policies and a couple of respondents suggested there was no need – either because there was over-supply of start-up space at the moment (due to projects in the pipeline such as Preston Park, Circus Street and expansion of The

Werks) or because the priority should be for larger business space to encourage larger companies to set up to benefit more people.

- Rather than relying on specific policies it is encouraged that the provision of more specialised offices spaces is left to market demands. Flexibility within planning policy ensures that this is possible and that a wide range of employment spaces can be provided to meet demand.
- Detailed policies should not place restrictions which unduly limit the viability of improvement schemes to education facilities within the city.
- BHEP – given speculative office development continues to face viability challenges encourage mixed-use development as an enabling feature for schemes containing office space but also important to support the creation of employment space – prioritisation of employment use in key employment areas should be supported. Avoid being too rigid in specification and avoid policy-making/ development briefs that are countercyclical to market.

C: Industrial

Question E7 Are there existing mixed employment areas that need a specific protection policy or is the approach set out in City Plan Part 1 at CP3.5 sufficient?

There were 5 responses:

(14)

Palace Street Developments Ltd (110)

(113)

City College (164)

Unknown Respondent 3 (192)

Two respondents answered 'no'.

- Greater contextual evaluation of existing sites should be considered alongside existing protection policies. Larger scale sites which are limited in potential for intensification and are in close proximity to transport links should be instead considered for alternative uses such as residential redevelopment in order to contribute towards the much needed housing supply. Palace Street Developments Ltd suggested Peacock Industrial Estate which they consider represents an opportunity where larger scale industrial units surrounded by residential usage should be considered appropriate for any release from protection and identified for residential redevelopment with some alternative employment space.
- Madeira arches need to be restored and brought back into use. A number of artists lost their workshop and shop window spaces.
- One respondent cautioned that detailed policies should not place restrictions which unduly limit the viability of improvement schemes of existing education facilities within the city.

Question E8 Are there any opportunities to identify and safeguard land/site for a new industrial estate in the city? If yes, where?

There were four responses:

University of Sussex (24)

(113)

LCE Architect (180)

Unknown Respondent 3 (192)

No opportunities were specifically put forward for consideration.

- LCE Architects considered that the city needs fit-for purpose employment facilities. Consideration should also be given to the location of these facilities specifically workshops, industrial units and warehousing, particularly where new and innovative initiatives are being offered. Many existing employment uses are in the wrong location – attracting heavy vehicles right into central parts of the city. The council should start thinking about new built industrial and warehousing complexes at the periphery of the city set in a high quality environment. Similar assessment should be undertaken as was undertaken in 2015 for housing sites in the urban fringe. The council could look at its own landholdings to implement such an approach. Inner city warehousing could be freed up for much needed high density urban redevelopment.
- One respondent questioned that if a new industrial estate is needed why Sackville Road Industrial Estate was being redeveloped. They also considered that there are plenty of empty units in Southwick and Portslade which are not being utilised.
- University of Sussex supports a policy approach in CPP2 that encourages further economic growth through the allocation of new employment sites in the city and retention of existing sites where these are viable.

Question E9 Are there opportunities to intensify existing industrial estates to bring forward new industrial floorspace? If so, which estates?

There were 4 responses:

Palace Street Developments Ltd (110)

(113)

Brighton & Hove Friends of the Earth (117)

Unknown Respondent 3 (192)

- Only industrial floorspace that has previously been highlighted as suitable should be intensified. The 2012 Employment Land Study provides guidance on appropriate estates for intensification.
- One respondent questioned that if a new industrial estate is needed why Sackville Road Industrial Estate was being redeveloped. They also considered that there are plenty of empty units in Southwick and Portslade which are not being utilised.
- Need to make the best possible use of land that is developed in a sustainable and high quality way. Restrict car parking in new developments so increasing space for housing or employment. Concerned with the pressure to allow retail on out of centre and out of town industrial estates. Develop a policy to bring sites back into employment use -

removal of retail at Hollingdean Depot (Malpass Markets) and protect Hollingbury (the Argus building and no-retail sites at Hollingbury) from further conversion to retail.

- Rent needs to be cheap to encourage new manufacturing businesses to locate in the city.

Question E10 Should the council consider introducing an Article 4 direction to protect strategic industrial estates and business parks from the new permitted development rights to residential use?

There were 8 responses:

(14)

University of Sussex (24)

(35)

North Laine Community Association (43)

Kingsway and West Hove Residents Association (83)

Palace Street Developments Ltd (110)

(113)

Unknown Respondent 3 (192)

Two respondents felt it was not necessary.

- The April 2016 revision of the General Permitted Development Order now takes noise into account in residential conversions. In light of this it is highly unlikely that industrial estates will see further loss of space so Article 4 Direction is considered unnecessary.

Four respondents thought article 4 direction areas should be brought in.

- One respondent suggested Shoreham Harbour and surrounds should be protected from losing industrial space as it makes sense to site it around the harbour.
- Replacement losses would be unlikely due to the huge difference in relative site value for industrial and business compared with housing and due to the environmental constraints on finding further sites. Furthermore the introduction of residential use in industrial estates, including Aldrington Basin, could affect the operation of businesses if residents seek curbs on the operation of businesses that they consider to affect their amenity.
- Article 4 Direction for office to residential should be retained.
- University of Sussex supports a policy approach in CPP2 that encourages further economic growth through the allocation of new employment sites in the city and retention of existing sites where these are viable.

Question E11 Are there any other opportunities to bring forward new industrial floorspace in the city?

There were three responses:

(113)

BHEP (189)

Unknown Respondent 3 (192)

- One respondent questioned whether this was needed.
- The BHEP suggested an enterprise zone/ intensification areas should be considered for locations that have been the focus of promotion in order to provide regeneration. Areas such as London Road which has benefitted from regeneration initiatives can capitalise further by such an allocation. In cases such as this, the topographical merits of areas must be considered and if applicable, Tall Buildings Zones be included to incentivise higher densities.
- The empty warehouses along the coast to the west

D: Are there any other employment issues?

Question E12 (Can you think of any other policy issues that relate to employment (not already covered in the sections above) that you think City Plan Part Two should seek to address?)

There were 13 responses:

(35)
 NCLA (43)
 (51)
 Hove Civic Society (63)
 (65)
 Kingsway & West Hove Residents Association (83)
 South Downs National Park Authority (130)
 Select Property Group (170)
 Hopegar Properties Ltd (171)
 BHFOE (117)
 (186)
 Brighton & Hove Economic Partnership BHEP (189)
 Unknown Respondent 5 (195)

A number of respondents suggested approaches to accommodating employment needs:

- LCE Architects felt the city needs fit-for purpose employment facilities. Consideration should also be given to the location of these facilities specifically workshops, industrial units and warehousing, particularly where new and innovative initiatives are being offered. Many existing employment uses are in the wrong location – attracting heavy vehicles right into central parts of the city. The council should start thinking about new built industrial and warehousing complexes at the periphery of the city set in a high quality environment. Similar assessment should be undertaken as was undertaken in 2015 for housing sites in the urban fringe. The council could look at its own landholdings to implement such an approach. Inner city warehousing could be freed up for much needed high density urban redevelopment.
- BHFOE suggest that by restricting car parking in new developments the land could be used for more productive uses e.g. to deal with shortfall in employment and housing

land. Example of Preston Barracks where reducing the number of car parking spaces in such an accessible location would increase employment land.

- Also concerned on the pressure to allow retail on out of centre and out of town industrial estates e.g. Hollingdean Depot. Council should develop a policy to bring those sites back into employment use and restrict conversion to retail on other industrial estates (e.g. Hollingbury Industrial Estate).
- The BHEP queried whether employment land forecasts that underpinned CPP1 continue to accord with anticipated job growth. They questioned whether Permitted Developments, acting as a market intervention, have changed the supply of employment space.
- The BHEP questioned whether the CPP2 has done enough to outline the reasons as to why particular uses such as industrial are not particularly suited to the locality to the same extent as such uses are suited to more established industrial estates within the wider City Region. Is CPP2 clear what would take up the industrial space instead? Whilst the city benefits from a rich CDIT and start up contingent, co-working, micro space, maker space and creative space will not be for all occupiers – consideration must be given to meeting the needs of all prospective occupiers – flexibility and ‘move on’ space to accommodate SMEs in middle-stage of growth.
- Suggest consideration given to whether council estate could meet some of these needs. Do densities in these spaces provided the most efficient use of land?
- Consideration must be given to connectivity of infrastructure with employment sites. If poor public transport accessibility level ratings supporting infrastructure should be considered.
- In order to build sustainable future for employers or employees need to address the massive gap between small spaces and large workspaces. Need to address the need requirements for companies expanding or creating jobs.

Some other more general points for consideration were made:

- Encourage large scale employers, do want you can to stop large scale employers leaving the city (eg Amex).
- Policies that relate to industry need should where appropriate refer to port and marine related activities to ensure that the unique resource of Aldrington Basin is recognised in CPP2.
- Development of the rural economy – strategic issues for NPA – clearly opportunities for the city to allocate or intensify the use of land for business units to allow residents to work near home has sustainability benefits.
- Consider that there has been a lack of heritage tourism focus by the council. Examples of Bath, York and Edinburgh indicate that by making the most of our significant heritage assets - not just the Royal Pavilion - could bring in significant financial contributions.
- Policy should ensure there is protection from new residents applying pressure on nearby business which may harm amenity. This should be done by requiring appropriate mitigation measures in new development. Existing employment uses should also be protected from pressure to reduce their activities when potentially more sensitive uses are allowed nearby. PPG paragraph 006 and NPPF paragraph 123 should be taken into account.

Two respondents felt the mix of properties in the **North Laine** has already been changed enough – past a level where industrial and other uses should have been retained. Therefore aspects of EM10 (North Laine) should be retained. No further erosion of the mix.

A number of responses related to training issues:

- Apprenticeship training and volunteering credit schemes like Spice Time to encourage engagement and development of new skills.
- Given the amount of listed building in the city BHCC should engage with the city's training institutions to ensure that there are more formal training opportunities that provide appropriate heritage building training for architects and surveyors as well as engineers/ plumbers and plasterers.
- One Respondent suggested that - **Enterprise Point - part of the Melbourne Street Industrial Area** (and allocated in CPP1) - should be re- allocated for purpose built student accommodation.

Summary of Key issues from Consultation Events and Workshops

At the **Stakeholder Consultation** event there was discussion around the preferred location for office space, with the city centre (as far north as Preston Park) seen as the preferred location. Although some participants felt that other areas should not be ignored such as Portslade and Shoreham Port others felt much of this space was difficult to fill. More medium sized office space was felt to be needed. Smaller local hubs for office buildings were also suggested.

The use of Article 4 direction to protect office space from being lost to residential was supported.

The difficulty of speculative office developments was acknowledged and proactive marketing, zoning, provision of sufficient parking and park and ride were offered as ways of attracting businesses.

At the **Professional Forum** there was a concern that the CPP1 Employment Land policy provided too high a level of protection for employment land regardless of quality of the land/ premise. There should be greater flexibility when considering redundancy that allows for the merits of the proposed scheme; the strength of the argument around the quality of the employment floorspace rather than x number of months marketing. There was felt to be a too rigid application of policy. There was also considered to be conflicting advice between council departments. It was felt by one participant that the protection of employment space increased land values unnecessarily.

There was a general agreement that new policy needed to reflect changing patterns of working; changing markets (conversions of offices to residential and back again) and were flexible so that market would decide other employment sites and suitability for other development pressures.

In the discussion on town centres, the attractiveness and location were seen as critical factors in decisions regarding where people choose to use as employment space. The need to understand small scale changes – co-working is cost-effective. The example was given of a coffee shop below a hotel in Shoreditch which operates as an informal business space. Policies should be positive, aspirational and not just about trying to make up shortfall in strategic allocations. No need to retain unused policies (e.g. live work).

At the **Brighton & Hove Economic Partnership** event both workshops considered it important for the policies to be based on a clear understanding of business requirements (e.g. find out from Entrepreneurial space and Eagle Space about move on accommodation needs). One participant queried whether the forecasts requirements were accurate and up to date. It was felt that the council should have a clear strategy on the businesses it wants to attract. Research is underway for the Greater Brighton Economic Board looking at sector specialisms.

There was an agreement that floorspace needs will differ and new policies should not be too rigid in requiring particular types of business space. Whilst there is the emergence of new types of space – micro, creative, and maker and multi-use space there was also need for move on accommodation – often joint space or scale up hubs. It is challenging for businesses in the £1m - £3m range to find employment floorspace that meet their needs. Consider that the shortfall of space does matter as it will constrain businesses who want to grow. Cross collaboration and cross sectors was seen as a growing trend. More support was required for creative arts and digital sectors.

The importance of flexibility of new business space was stressed in both workshops; that new space is clearly designed for employment uses and are future proofed so they can be used/ sub-divided in different ways depending on changing business needs and even able to take additional floors. This will help avoid their conversion to residential.

Policies should be based on a clear understanding of future needs and more efficient use of floorspace – need to consider wider economic benefits of proposed schemes and acknowledge different ways of working.

Office Delivery

With respect to tackling office delivery both workshops considered it was important to get going on delivering employment space on other projects. There are still enquiries for office space in the city centre. Speculative office development is starting to happen again. May be viability issues on some sites, enabling can help but in city centre mixed use sites are not necessarily needed to help deliver office as there are coffee shops/ restaurants nearby. It may be more a matter of inward investment activities and targeting businesses. However the city is constrained in supply of sites it can offer. For Patcham Court Farm one respondent recommended that the policy should be broad enough to encourage developers come forward, the developer then can produce a more detailed masterplan.

One workshop challenged the council to ensure it was using its assets; doing what it could to bring forward employment floorspace. There was a concern that the approach by the

council was disjointed – planning seems to be focused on place; property services on buildings and ED on businesses.

Issue for existing city centre businesses is that when leases are coming to an end the rents are now increasing. Need to encourage landlords (including the council) to let out their underused or vacant floors above shops in central Brighton to be used by small businesses.

Need for supportive infrastructure – one participant suggested parking whilst in another workshop one participant suggested active travel – making it easier to get around the city by bike – better linked and better coverage of cycle paths.

Permitted Development Rights

One of the BHEP workshops considered permitted development rights to be a real issue for businesses, kicked out of business space to make way for residential conversions. There was concern that the new floorspace coming forward does not make up for the loss of existing space through prior approvals.

Recognised the role of article 4 direction and recognised there may still be a need to protect offices outside the article 4 direction area.

Industrial Floorspace

One workshop considered there still to be a demand for industrial space, lack of space means rents have gone up by 20-30% in the Hove area. Need to look to the Greater Brighton area to accommodate future industrial floorspace needs and to free up sites for higher density B1 a uses. Industrial uses could better be directed to warehouses in Newhaven and Burgess Hill. Space hungry uses (e.g. low density businesses in Industrial House, Hove Station area) should be moved out to the edge of the City. The example was given of Crawley who was releasing its sites in a managed way to encourage regeneration. However there was a query as to whether there was really an appetite from neighbouring authorities to work together, to get these sites going for the wider area.

At the **Construction Voice event**, one of the panel members suggested that the City Plan would not be able to deliver what the city needs e.g. workspace to meet the requirements of a growing economy because it does not identify sufficient land for this purpose. The consequence would be both employers and workers leaving the city once they grew. Better utilisation of council owned land was suggested and whether there should be a bid to make coordinated and strategic use of all public assets in the city region. Another panel member indicated that many graduate businesses and entrepreneurs are in need of somewhere to start up and grow. The University of Brighton will be creating co-working spaces on campus open to both student/graduate businesses in the city, to encourage cross-fertilisation and collaboration.

At the **Chamber of Commerce Workspace event** there was a detailed discussion of future workspace requirements. The concern was that whilst businesses are expanding the available workspace is actually decreasing due to the impact of permitted development

rights and the impetus on housing. It was suggested that demand for space is biggest amongst companies with a turnover of between £1 – 3 million. Options are limited and space is expensive often with the added pressure of a long lease and 12 months down-payment which also stands in the way of business development. Developer proposals often do not fit the needs of Brighton businesses particularly in the digital sector where short-terms leases are important.

There was a need for creative solutions. Discussion led to suggested of shared amenities, co-working and flexible space and a bigger push by the council to retain office space rather than allow it to be converted to housing. Manufacturers used and needed space differently. For some business the way to take control was to find freehold business space (acknowledged this could be difficult to find particularly in central Brighton) or to share space.

Several participants suggested expanding the entrepreneurial space outside the city centre but this would require improved transportation links.

CPP2 Chapter 4 – Retail & Town Centres

Summary of key issues arising from Written Responses

In total there were comments on this section by 30 respondents making a total of 130 representations. Please note that some comments that were made were not considered relevant to the particular question asked and may therefore have been moved to a more appropriate question in this summary document

A: Boundaries of Primary and Secondary shopping frontages

Question R1 Should City Plan Part 2 seek to amend / remove some less successful sections of defined shopping frontage from designated shopping centres?

There were 9 responses.

(5)

(14)

(50)

(KAWHRA) (83)

(113)

Rottingdean Parish Council (125)

(153)

Standard Life (157)

Unknown Respondent 1 (190)

There was a variety of mixed views regarding this question. Five respondents supported the approach of amending /removing less successful sections of defined shopping frontage. Rottingdean Parish Council suggested that a review may be necessary in the context of the

changing nature of retailing, although care should be taken to protect a critical mass of shops in a centre. Standard Life stressed the importance of the Council keeping retail frontages up to date. One of the respondents highlighted that a review of centre boundaries should only occur in post 1950's areas.

Four respondents suggested it would not be a good idea; some suggesting that perhaps it would be better to give encouragement and guidance to raise standards in all shopping centres, or if the businesses were functioning then areas should be left alone.

Question R2 Are there successful stretches of shops (not currently protected) that should be included in defined primary or secondary frontages of defined shopping centres?

There were 3 responses.

(113)

Rottingdean Parish Council (125)

(153)

Two respondents suggested that there were no additional stretches that should be included. One respondent suggested that any pre 1950 buildings should absolutely be protected.

B: Updating Retail Frontage Policies

Question R3 Would it be better to have a single policy setting out the criteria for changes of use in Primary and Secondary Frontages within all defined shopping centres rather than separate policies for each type of centre in the retail hierarchy?

There were 8 responses.

(35)

(42)

(KAWHRA) (83)

(113)

Rottingdean Parish Council (125)

(153)

Standard Life (157)

Unknown Respondent 1 (190)

Four respondents suggested that there was no need to have a single policy. Standard Life in particular stated that they felt it is preferable to have separate policies for each type of centre within the retail hierarchy to better respond to individual context. It is also important to allow for flexibility in Primary Shopping areas to enable A3 and A4 uses which contribute to vitality and viability.

One respondent suggested that decision should be based on the specific areas of the City

Three respondents thought that one retail policy would be desirable. Kingsway & West Hove Residents Association (KAWHRA) for example specified that it was desirable to avoid the repetition in existing policies, by stating what was common and indicating the difference applicable to the different types of frontage. Similarly Rottingdean Parish Council said it would be clearer if there was a single policy, apart from for the more unique distinct areas such as North Laine, The Lanes and the Marina where character and unit size are related.

Question R4 Should there be policy to restrict the loss of large retail units (more than 1,000sqm which includes all retail trading floors) in Primary Frontages?

There were 7 responses.

(35)

(42)

(113)

Rottingdean Parish Council

(125) (153)

Standard Life (157)

Unknown Respondent 1 (190)

Five respondents suggested that there should not be a policy to restrict the loss of large retail units. One respondent added that Brighton is known for its independent shops and this is what Brighton should focus on. Standard Life suggested that restricting the loss of larger units would prevent retail development from being able to respond appropriately to ever evolving customer needs and demands and thus could lead to increased vacancies in prime shopping locations.

One respondent suggested that a policy would be a good idea in order to help to sustain and characterise a primary shopping area. Another respondent suggested that the decision should be based on specific areas of the City.

Question R5 Do we need a separate policy for special retail areas such as the North Laine and the Lanes or could these areas be dealt with by a general frontage policy?

There were 12 responses.

(35)

(42)

North Laine Community Association (NLCA) (43)

(51)

(61)

(109)

(113)

Rottingdean Parish Council (125)

(153)

The Kingscliffe Society (165)

BHEP (189)

Unknown Respondent 1 (190)

Generally eleven respondents supported the need for a policy for special retail areas in the city. For example North Laine Community Association and one other respondent supported the idea and felt that a policy should ensure that units are not amalgamated in order not to lose the small scale traders in areas such as the North Laine. The Conservative Group also thought that separate policies for special retail areas was a good idea and would offer further protection in planning policy to preserve unique independent status of some shops.

Rottingdean Parish Council thought that this approach would help define the character of certain areas. There were suggestions for other areas where a special retail policy could apply. Ideas put forward were to protect all pre 1960s buildings, Rottingdean High Street, and areas within Hove. The Kingscliffe Society suggested that St James Street should be considered.

BHEP acknowledged that areas such as Brighton Lanes and the North Laine require unique recognition but also recognised that there should also be flexibility in planning policy in order to keep the city agile and accessible to growth. They suggested that any new A1-A3 units that are developed should be positively encouraged to be adaptable and retro-adaptable in order to future proof for a variety of uses.

Question R6 Should policy seek to restrict changes of use to new large A3/A4 uses to service seated customers only?

There were 8 responses.

North Laine Community Association (NLCA) (43)

(51)

(113)

Brighton & Hove Food Partnership (134)

(153)

Standard Life (157)

BHEP (189)

Unknown Respondent 1 (190)

Five respondents supported a policy to restrict changes of use to new large A3/A4 uses to service seated customers only. For example the North Laine Community Association (NLCA) and one other respondent stated that these large units which will possibly become bars and cause additional disruption and noise for the residents in areas such as North Laine. Noise and disruption from the late night economy is an issue for the residents of the North Laine.

Two respondents stated that they didn't think this type of policy would be appropriate to include. Standard Life in particular considered that this would restrict potential

development proposals coming forward in prime locations. Any policy needs to be commercially driven otherwise risks increasing vacancies in prime shopping locations.

BHEP acknowledged that whilst alfresco dining is popular and a great asset to central Brighton in areas such as Gardner Street, careful consideration should be made to the other uses (i.e. other A1) that may be negatively impacted by this; such consideration will be useful when implementing further use of outside space in other parts of the city centre.

C: Brighton Marina – Special Retail Area Policy

Question R7 Should Part 2 of the City Plan have a special retail area policy for the Marina? If yes, what criteria should be considered in the policy?

There were 14 responses.

(5)

(14)

(35)

(42)

(61)

(65)

(113)

Rottingdean Parish Council (125)

X-Leisure (144)

(153)

Scotia Gas Networks (156)

Standard Life (157)

St William Homes (179)

Unknown Respondent 1 (190)

Nine respondents considered that there should be a special retail area policy for the Marina. Comments received concentrated on the need for the marina to have a distinct brand such as more independent shops but with the recognition that business rates were high for independent shops and that this needed to be addressed. There was also another suggestion that additional office buildings would help create life and assist the shops during the day along with a supporting self-sufficient community structure – banks, schools, GP services etc.

Respondent X-Leisure were a strong supporter for a special policy and considered that a special policy would provide additional policy support for the provision of the retail uses at the site in accordance with City Plan Part One Policy DA2 and the aspiration to create a new neighbourhood centre that will support those who will live and work at the Marina. They suggested that the criteria applied should be in accordance with Policy DA2 and should focus on delivering a mix of A1, A3 and D2 floorspace to create a thriving neighbourhood centre at the site.

Scotia Gas Networks stated that it is important that the policy for this area remains flexible and allow for a mix of future uses and we support the principles set out in policy DA2 around the enhancement of the retail offer for the Brighton Marina, Gas Works and Black Rock Development Area.

Three respondents considered that a special policy for the Marina was not required. Standard Life in particular commented that the Marina District Centre status has been removed by the Inspector within the City Plan Part One and therefore has no formal designation. It is therefore not appropriate to create a special retail area policy for the Marina. Albeit the Plan could provide guidance on the type of retail that may be appropriate but this has be set in the context of the retail hierarchy set by the City Plan Part One. Another respondent commented that it is already difficult to encourage retail to the Marina and to keep the retail and therefore policies should be as simple as possible.

An additional respondent suggested that we should include a special retail policy focussed to the south of Marine Parade.

Question R8 Alternatively, could changes of use within the Marina area be addressed through a general frontage policy as set out in section d) below?

There were 8 responses.

(35)

(61)

(113)

Rottingdean Parish Council (135)

Scotia Gas Networks (156)

Standard Life (157)

St Williams Homes (179)

Unknown Respondent 1 (190)

Three respondents stated that a general frontage policy for the Marina would be more appropriate. St Williams Homes for example stated that a separate more general frontage policy would allow flexibility and would be more effective in addressing future patterns of retail habits within the context of a longer term planning policy.

Six other respondent's comments received tended to not support a general frontage policy. Some respondents felt that the Marina was already passed sorting out and another felt that the Marina should be treated as a mini city at the edge of Brighton needing active retail, high quality high density housing, and offices / employment. Rottingdean Parish Council felt that in some respects a general frontage policy would give clarity but that the marina does perhaps require a defined approach because of its unique location and features.

D: Local Centres and Parades

Question R9 Is there a need for a separate policy for assessing changes of use in local centres and parades?

There were 7 responses.

(14)

(35)

(113)

Brighton & Hove Food Partnership

(134) (153)

Unknown Respondent 1 (190)

Unknown Respondent 5 (195)

Two respondents supported the need for a separate policy and one respondent stated no.

One respondent specified that a separate policy should only operate in special areas like the seafront.

There were three general comments made to this question. One respondent said that that any policy should consider and drive an identity for the city. The second respondent stated that we didn't need any more betting shops in the city.

B&H Food Partnership stressed the need for access to healthy and sustainable food as a consideration within planning, with particular emphasis around local parades and restrictions on numbers of hot fast food outlets permitted.

Question R10 Alternatively, could there be a general policy to assess changes of use in these and other retail areas in the city which fall outside of town/district centre

There were 4 responses.

(35)

(113)

(153)

Unknown Respondent 1 (190)

Two respondents stated 'no'. One respondent stated that a general policy should only apply to special areas like the seafront and another stated generally that Brighton needed an identity so any policy should consider and drive an identity for the city.

Question R11 Should Part 2 designate any additional local centres coming out of large scale housing developments such as Toads Hole Valley?

There were 9 responses.

(35)

North Laine Community Association (NLCA)

(43)

(65)

(113)

(153)

Unknown Respondent 1 (190)

(175)

Brighton & Hove Friends of the Earth (B&H FoE) (177)

Brighton & Hove Economic Partnership (BHEP) (189)

There was support from all 9 respondents for the designation of additional local centres coming out of large scale housing developments.

In particular Highways England supported the designation of local centres associated with large scale housing development in order to reduce external trips and potential impact on the Strategic Road Network.

B&H FOE also stated that important local centres associated with new housing development would reduce the need for people to travel.

Brighton and Hove Economic Partnership commented that they supported the designation of Preston Street as a local centre / A1-A3 area, to improve and control investment into the street. This would improve access to investment from the local Transport Plan.

E: Important Local Parades

Question R12 Should Part 2 of the Plan seek to name some local parades in the city as 'Important Parades' due to their neighbourhood significance? If so, which ones?

There were 12 responses.

(5)

(35)

(50)

(65)

Kingsway & West Hove Residents Association (KAWHRA) (83)

(113)

Brighton & Hove Food Partnership (134)

(153)

The Kingscliffe Society (165)

Brighton & Hove Economic Partnership (BHEP) (189)

Unknown Respondent 1 (190)

Three respondents commented that the designation of some local parades would be a good idea with two of those respondents suggesting that all of them should be designated. B&H Food Partnership suggested that they could help with the research into this particularly bearing in mind that some areas of the city have poor access to affordable fresh food within walking distance.

Six other respondents supported the idea and made suggestions as to which parades could be protected. All examples put forward are already designated as centres within the current City Plan Part One and Local Plan 2005 (Rottingdean High Street, Fiveways, London Road, Longridge Avenue, St George's Road and Richardson Road.)

Brighton and Hove Economic Partnership commented that careful consideration should be given to retail parades that have negatively changed as a result of permitted development legislation. They stated that we should prioritise the rebalance to further protect the balance of uses.

One respondent answered 'no' to this question but did not provide reasons.

F: Individual shops and small clusters of shops outside protected shopping centres and parades

Question R13 Given changes to the GDPO, is there a need for policy to protect shops and parades outside of existing centres? Should the City Plan Part 2 include a policy that covers larger shops over the 150sqm threshold of the GDPO?

There were 4 responses.

(113)

(153)

Unknown Respondent 1 (190)

Unknown Respondent 5 (195)

Two respondents answered yes to the need to protect shops and parades outside of existing centres. One additional respondent stated that we should protect shops outside of centres if they are of architectural or cultural value

One respondent answered 'no' to this question.

G: Floorspace above shops and commercial premises

Question R14 Should the City Plan Part 2 include a policy to guide appropriate uses for floorspace above shops and commercial premises in shopping centres outside of the Central Brighton Area?

There were 3 responses.

(113)

(153)

Unknown Respondent 1 (190)

Two respondents answered 'no' to this question and one respondent stated that the policy would be helpful but should cover the whole of Brighton & Hove not just the Central Brighton area.

H: Markets

Question R15 What are the key criteria that should be taken into account when assessing proposals for additional permanent markets?

There were 8 responses.

(5)

(65)

(113)

Brighton & Hove Food Partnership (134)

Highways England (175)

Brighton & Hove Economic Partnership (BHEP) (189)

Unknown Respondent 1 (190)

Unknown Respondent 5 (195)

Three respondents gave examples of criteria that could be considered these included, viability, public transport, cycling and walking and sustainability e.g. local products and produce.

One respondent states that criteria should be the preference of the immediate neighbouring community. Another respondent questioned whether markets were actually needed and whether they would impact negatively on similar facilities nearby.

Highways England stated that they would have concerns if markets were provided on the urban fringe in proximity the A23 and A27 strategic road network without careful consideration of impacts upon the SRN and mitigation as required.

Brighton and Hove Economic Partnership commented that although it was apparent there were challenges faced with the London Road market, it is clear that markets do have a place in the city and offer a useful source of economic benefit and diversity for trade /start-ups.

B&H Food Partnership noted that Markets provided a way for new businesses to start, for example, the Street Diner. If there is to be a new site for a market there should be an evaluation of and learning from the redevelopment of the Open Market and in particular the challenges of combining the residential units and a working market (for example opening and delivery times) Any new permanent market would be better if this is covered space.

Question R16 Are there any sites that might be considered for allocation for a permanent market use?

There were 3 responses.

(5)

(113)

St William Homes (179)

One respondent commented that an additional permanent market may not be sustainable to operate alongside the city's Open Market, London Road.

One respondent suggested that a good location for a permanent market mark be near to the i360 on the seafront.

St William Homes suggested that as an alternative idea, the council should promote meanwhile uses on allocated sites to establish activity and community uses on sites prior to development.

I: Are there any other retail issues?

Question R17 Are there any other retail and town centre issues that should be addressed through City Plan Part 2?

There were 11 responses.

(10)

(31)

(35)

(107)

(113)

(137)

(153)

(146)

Standard Life (157)

B&H Friends of the Earth (177)

Unknown Respondent 5 (195)

There were a number of responses received where respondents referred to issues outside of the remit of planning such as cleaning of the town centre, increase of street trees, pedestrianisation, homelessness, parking charges, and excessive signage and street furniture from businesses.

One respondent commented on how too much of newer build development jars with the older build. They suggested that Brighton should look to cities like Glasgow.

More specific comments

Proliferation of fast food takeaways that stay open too late on the Academic Corridor – Lewes Road needs to be looked at.

Comments received from Standard Life around the designation of a Primary Shopping Area. Boundaries of the PSA should be clear and be established for assessing retail and other town centre uses in the context of the impact and sequential tests. Identify edge and out of centre areas where provisions of Policy CP4 will apply. Identify areas of city centre where retail expansion is anticipated (including the DA1 Central site) and identify that once these areas are developed for retail and other town centre uses, they will form part of the designated PSA.

Comments from Friends of the Earth Brighton & Hove support the simplification of the City Plan, but believe there should be balance with policies that can actually support and protect the characteristics of the various types of shopping areas within the city.

BHFOE agreed that where shopping areas have evolved their boundaries should be amended. They noted that if a shopping area was not performing well it should not necessarily be removed from designated areas as this may be a sign that reinvestment is needed. Concern also expressed by BHFOE around amount of retail outside of defined shopping centres.

Summary of Key issues from the Consultation Events and Workshops

At the **Professionals Forum** it was suggested that boundaries could be drawn tightly around the prime retail areas and that we should look to reduce secondary retail areas, perhaps using a zonal approach. However there was acknowledgement that the council should allow opportunities for change of use to encourage innovation and small business, for example allowing people to convert their living rooms to shops or for other flexible commercial uses. There was also recognition that we should have a strong policy to protect local centres in particular to support sustainable neighbourhoods, but without being too restrictive. There was some acknowledgement in discussion groups that shopping centres are being used more as a leisure activity, whilst people do their main everyday shopping by alternative means for example online. High business rates in the city were highlighted as making it difficult for shops to compete with online shopping.

There was discussion at the event around the importance of ensuring that shopping centres are attractive and have a high quality public realm to encourage people to move through an area. Sometimes small positive changes such as those at Seven Dials and Fiveways help improve the shopping experience. Attractiveness and location were cited as critical factors in decision regarding where people choose to shop. The definition of the character of certain shopping areas was also listed as important by some participants for example the North lane or some particular buildings to ensure that new development meets the defined character.

At the **Stakeholder Consultation Workshops** there was recognition of some local centres having their own needs and a suggestion that a character statement would be useful to accompany retail health checks. Other participants suggested that we should be mindful that shopping centres can recover e.g. London Road and to be mindful that it is hard to control retail – it's all about what's popular to create vitality of the area.

There was some recognition that people come to Brighton for unique independent shops as part of the attractiveness of the town centre but also the importance of department stores as a draw e.g. John Lewis. In terms of new centres there was a suggestion of a new local centre for Brunswick Town from Norfolk Square to St John's Church (Western Road). There was some concern that supermarkets on the high street can threaten the vitality of local centres, however there were some contrasting thoughts that these operators boosted trade for some retailers in terms of providing footfall. Park and Ride to support shopping areas in the city would be ideal. St James Street and Brunswick Town issues of licencing retail and residential conflicts.

At the **Brighton & Hove Economic Partnership Workshops** it was recognised that there is a need for diversity of shops to prevent certain types of shops from becoming too commonplace in shopping centres. Article 4 Directions could address this in certain shopping areas where problems are already occurring.

Recognition that some centres need stimulation during the week to attract footfall as they are too reliant on weekend trade.

Parking issues and retail mix conflicts with increase in housing and loss of employment and leisure to housing.

Perceived dominance of A3 uses in the North Laine – particularly Gardner Street – increase of tables and chairs and signage on pedestrianised weekends obstructing A1 shops. Worries on the impact of pedestrianised schemes elsewhere in the city such as East Street. Pedestrianisation needs careful consideration.

There was agreement that the North Laine needs a special policy recognising the small unit sizes.

Discussion around the inclusion of Preston Street as a centre or part of Regional Centre so that it can attract some investment from the Local Transport Plan.

Disappointment about how open market in London Road has been operating – vision should be more like places in London like Camden with more places to eat. Missed opportunity as it has great links with the North Laine,

CPP2 Chapter 5 – Tourism

Summary of key issues arising from Written Responses

In total 27 respondents commented on this section of CPP2 scoping paper with 45 representations.

A: The Seafront

Question T1 (Are there any further seafront development sites, in particular in the area East of Palace Pier to Brighton Marina, that need to be allocated)?

There were 13 responses

(35)

(42)

(61)

(84)

(113)

Kemp Town Society (117)

Rottingdean Parish Council (125)

(153)

The Kingscliffe Society (165)

St William Homes (179)

LCE Architects (180)

Crest Nicholson (181) Unknown

Respondent 4 (193)

Two responses related to the potential of the area east of Palace Pier/ Madeira Drive; there was the need to make better use of the area and bring life and security to the area through cafes/ bars at Dukes Mound and the last station stop at Volks Railway or secure structures on the shingle for use as cafes/ bars which could be locked up when not in use.

However 4 respondents were concerned with further seafront development:

- The tourism role of the seafront should be protected and available to everyone.
- The Kemp Town Society felt the City Plan should enshrine the general principle that there should be no substantial commercial or residential development between the King Alfred and the west wall of the Marina. Small tourist attraction development should be the only permitted development and height and scale must always be the prime considerations and there must be provision of parking facilities away from the seafront e.g Gasworks Site.
- A similar concern was expressed by The Kingscliffe Society who felt development sites should be low-scale and restricted to the existing points i.e. opposite the Aquarium terraces, at the Peter Pan area, and at the Black Rock Volk's station, in order to preserve long broad promenades with wide open sea views.
- Kemp Town Society is concerned with the impact of additional coaches and cars if there are more attractions on the East end of Madeira Drive. The parked coaches/ cars in the

summer fill the area with fumes and detract from the visual effect of the connection between the sea and the Kemp Town Estate and Marine Parade terraces. Lines of parked vehicles on Roedean Road, Marine Parade or Kings Road and Kingsway create a visual divorce from the seafront.

- The Kingscliffe Society felt the city plan fails to make the permanent, regular and skilful maintenance of all the ornamental iron and woodwork (lamps, railings, shelters, benches) a top priority for expenditure. One-off regeneration projects are merely temporary measures. There is also a need to improve and augment lighting, showers, toilets, kiosks, shade, etc. along Madeira Drive.
- One respondent cautioned against vanity projects and careless disregard of the Victorian terraces as this will cause Brighton to lose its original identity and a reason for visitors to come here. Consider Hastings Seafront Project (Jerwood Gallery, redevelopment of pier free for all/ playground area) and the successful and valued areas of Madeira Drive - the pitch and put course; the Peter Pan playground (is well used and could be extended through lottery funding); the Yellowwave sports project; the Volks Railway. Additional temporary buildings should be taken down and not left to be squatted in/vandalised;

Two responses referred to the West Pier:

- A new West Pier would create a more substantial destination to the i360.
- Consider creating the new conference centre in a new pier to keep the facility central - could be a better option than Black Rock.

A number of responses related to allocations in the recently adopted City Plan Part One:

- St Williams Homes suggests the need to review the DA2 strategic site allocation for the **Gas Works Site** in CPP1 - their high level analysis suggests that this is a City edge location, outside the retail core area or any designated employment area and therefore lends itself to residential uses as opposed to business/commercial uses. Allocating this site for housing with a maximised density would meet local housing targets whilst maintaining the current green belt boundary and reducing reliance of unsustainable green field sites to meet needed housing growth.
- The Kemp Town Society suggested the **Gas Works site** should provide car and coach parks on its polluted areas. Park and Ride on this site along Madeira Drive and Kings Road has much to recommend it.
- Rottingdean Parish Council suggested that the **Black Rock site** has potential for an ice rink.
- LCE architects suggested a much more ambitious plan for the seafront is required. If a conference centre is to be built at Black Rock the budget must include a purpose built rapid transit system such as a low capital monorail system with hybrid electric cars.
- **King Alfred site** - King Alfred Leisure Centre Crest (Crest Nicholson) considered the wholesale regeneration of the site will deliver a new focus for the western end of Brighton Seafront, anchored by new high quality leisure centre that suits the needs of the community. The King Alfred/RNR Planning Brief SPG (2002) is dated and predates the publication of the NPPF.

Two respondents commented on an emerging seafront proposal (the Seafront Lanes Scheme) which they considered should not be permitted because:

- The beach is not for residential buildings but for everyone to enjoy.

- It is not needed or wanted given there is the Saltdean Lido.

Question T2 Is there sufficient guidance in the City Plan Part 1 to assess planning applications that come forward on the seafront?

There were 9 respondents:

(35)

Surfers Against Sewage (71)

(84)

(113)

Kemp Town Society (117)

(153)

The Kingscliffe Society (165)

Brighton & Hove Economic Partnership (189)

C. Nicholson (181)

Five respondents felt there was insufficient guidance:

- The regionally important surf break to the east of the Marina should be protected from development in and adjacent to the Marina and access via the clifftop ramp should be preserved.
- Access to watersports across whole of seafront should be protected and enhanced.
- Should be a policy to restore West Pier or build a new state of art pier.
- The Kemp Town Society requested clearer guidance as to what would be permissible within the vision for future developments on the seafront – building scale sympathetic to and in scale with adjoining historic structures; not to impose barriers between historic set pieces such as Kemp Town Estate and Brunswick and Palmeria Squares and the sea.
- No residential accommodation must be created on the sea side of Madeira Drive or Kings Road or (up to the west end of the Hove Lawns) Kingsway; development must provide for basic amenities and not overload the current infrastructure facilities.
- The Kingscliffe Society – a clear principle should be established that solid or opaque new developments should not be erected on the south side of seafront roads.
- BHEP – a positive planning policy that encourages further investment into Madeira Drive (between the Marina and the Pier) should be welcomed which will complement Black Rock proposals. A robust transport plan will be required to justify no loss of trade in respect of any reappportionment of uses from Old Town to Black Rock
- A further policy was sought by Crest Nicholson to guide the determination of any future planning application at the King Alfred/ RNR site. The strategic allocation in CPP1 lacks certainty and clarity. A detailed site specific policy could ensure there are no conflicts between the different policies of the Plan and take into account the site's constraints and issues associated with delivering a new leisure centre when considering issues such as viability and affordable housing and set lower levels. The policy could align with the parameters set in the development partner brief. This could be applied flexibly. Policy wording suggested for consideration.

Two general comments

- Need to protect the tourism role of the seafront – don't ruin/ block it, it should be for everyone.

- Those who assess projects should ensure long term sympathetic developments not 'primarily for profit' – tax payers need to be kept better informed of proposals.

B: Visitor Accommodation

Question T3 Should further need for hotel accommodation be identified, how best should this be accommodated within the Central Brighton area?

There were 10 responses:

(45)

(65)

(97)

(113)

The Kemp Town Society (117)

Rottingdean Parish Council (125)

South Downs National Park

(130) (153)

The Kingscliffe Society (165)

Unknown Respondent 5 (195)

6 respondents were concerned with potential for further hotel development in the city; they considered there were sufficient hotels and the issue was rather the quality of existing hotels; there was a need to protect local hotels from the further spread of chain hotels; and address the issue of unregulated Airbnb.

Two respondents considered that if the Brighton Centre is moved to Black Rock additional hotels will be required. Suggestions included an additional small hotel at the Marina (with caveats around height restriction and natural light and ventilation for lower levels if it abuts the cliffs/ ramps) or Gas Work Site. Dukes Mound or south side of Maderia Drive should be considered.

Rottingdean Parish Council suggested exploring the possibilities of encouraging hotel accommodation outside central area in locations such as Rottingdean.

The South Downs National Park Authority supported an update to the Hotel Futures Study to include an assessment of the impact of demand and growth of the visitor economy following current and future developments and to consider the whether any overspill into the Park accommodation takes place (see SDNP Hotel Futures Study). Consideration should be given to whether current/future developments place additional pressure on routes into the city that traverse the Park. Questioned whether there is a strategy in place to co-ordinate improvements in Sustainable Transport and access into the city to manage an increase in the visitor economy and whether greater integration / coordination with the existing and emerging South Downs National Park Authority strategies and plans e.g Tourism Strategy and the emerging South Downs Local Plan can be achieved.

C: Are there any other issues relating to tourism?

Question T4 Do you have any other issues for this topic area to consider?

There were 13 responses:

(35)

(65)

(84)

(86)

Ovingdean Residents & Preservation Society (97)

The Community Stadium Limited (111)

(113)

The Kemp Town Society (117)

Natural England (119)

Rottingdean Parish Council (125)

(153)

Standard Life (157)

The Kingscliffe Society (165)

Two comments related to conference facilities:

- CPP2 should recognise that the University of Sussex makes an important contribution to the city's tourist industry – own events, summer schools, academic conferences held at Falmer Campus – complement city's tourist industry and result in further spending in the city.
- Standard Life Investments Shopping Centre suggested the need for a policy to specifically identify the importance of conference facilities to the Brighton economy, seeking to encourage provision to be provided in the city centre and in other appropriate locations outside the city centre.

Two comments were made regarding to the importance of street cleanliness and maintenance:

- Such as along Queens Road and West Street -scruffy destination compared with other south coast destinations.
- Particularly after large-scale entertainment and celebratory events.

Three comments related to short term holiday lets

- short term holiday lets (Airbnb) should be taxed
- The Kingscliffe Society felt the City Plan should in some way address the trend towards party housing and Airbnb as it threatens the community and character of entire historic streets in conservation areas and should not await national policy.
- A large number of Brighton listings say they are managing the property in partnership with hotels – 5/6 flats all 'owned' by same person. This will impact on council's intention to increase permanent housing stock and they are run without any restrictions or fire regulations.

Four comments related to tourism role and need to attract tourists to areas outside central Brighton:

- Ovingdean Residents & Preservation Society felt the Ovingdean Seafront plays an important role in the city's tourism industry providing a different seafront experience to central Brighton and is visited by numerous people and visitors. Ovingdean village with its ancient listed church is a gateway to the national park. Vital to recognise urban fringe villages as important tourism assets and protect them from becoming part of the urban sprawl.
- Potential for an increase in recreational tourists if links to the South Downs National Park are improved.
- Rottingdean Parish Council suggested the need to consider how to effectively signpost and facilitate tourists to visit areas outside city centre such as Devil's Dyke, Stanmer Park and Rottingdean.
- One respondent felt the benefits and role of heritage tourism were not addressed in the city despite having one of the strongest architectural and historical offers in the UK (not just the Royal Pavilion). Hotels, restaurants, tour guides, etc all miss out on the funds that could be spent by visitors staying for days rather than hours.

Two comments related to design quality:

- Council needs to work in partnership with city to decide the identity of Brighton in the future and the legacy of new developments to ensure it does not become 'any town' by the sea.
- Ensure quality of built development and associated public realm on the seafront is of suitable high quality design to ensure conservation and enhancement of unique character.
- The Kemp Town Society felt the City Plan should enshrine the role of Madeira Drive as an events space with an absolute bar on development or road traffic arrangements or parking areas interfering with them or access to the public to them. Need to consider the impact of housing at the marina and increase use of the seafront between the Pier and Black Rock on traffic management, parking and safety of pedestrians. Queried whether the location of the nudist beach needed to be in a more central position and whether Dukes Mound slopes could be made more attractive and accessible.
- Park and Bus ride schemes - Waterhall/ Patcham
- Community needs should be prioritised rather than tourists - new swimming pool, a skateboard park, new primary and secondary school for the Eastern part of the city as a result of increased housing.
- Need to fully understand permeability and the benefit a city centre masterplan for wayfinding will bring to businesses and tourists alike.

Proposed Site Allocation

The Community Stadium Limited proposes that **Land Adjacent to the American Express Community Stadium, Village Way, Falmer** should be allocated for the development of a hotel along with ancillary community and leisure uses. This proposal was subject of a

planning application in 2015 (BH2015/03285). Supporting information relating to the application is put forward for re-consideration to support the proposed allocation.

Summary of key issues from Consultation Events and Workshops

At the **Stakeholder Consultation** concerns were expressed at both workshops with the growth of Airbnb in the city and the impact this was having on traditional visitor accommodation (not necessarily providing cheaper accommodation) and on residential areas. There was evidence of residential properties being used permanently for short term holiday lets. Hotels in the city centre are also being used as backpacker hostels. Opinion was that the council should intervene/ consider by-laws. The hotel future study update should understand the impact of this 'visitor accommodation' on the city. At a different workshop the issue with noise nuisance of party homes/ Airbnb came up and whether there was a possibility of regulating short term lettings whether the board of directors have authority to regulate them. Some blocks of flats are managed by shareholders, each of whom owns flats but not all live in them.

There was a difference of opinion as whether more hotels were needed. One participant considered more were required. Whilst others considered that if Airbnb had increased then fewer hotels would be needed. Representatives from the BHHA considered that occupancy rates city wide are at best 70%, kept afloat by conference trade whereas average occupancy rates in areas such as Kemp Town and Broad Street are 50%. They felt B&Bs should be allowed to change to flats and the hotel core zone should be abolished. Clarity was required on purpose / scope of the updated hotel futures study.

Concern was expressed at one workshop with the potential move of the Brighton Centre to Black – queried where delegates would stay and how would they get to the conference centre.

The heritage assets of the city needed to be valued and promoted eg Brunswick Town and Kemp Town – make more of regency buildings/ Listed Buildings in attracting tourists and increase the range of attractions.

At the **Professional Forum** There was a general agreement that new policy needed to reflect changing patterns of working; changing markets (conversions of offices to residential and back again) and were flexible so that market would decide other employment sites and suitability for other development pressures. Attractiveness and location were seen as critical factors in decisions regarding where people choose to shop, visit or use as employment space.

At the **Brighton & Hove Economic Partnership** event at one workshop a representative from the Hotel sector raised concerns with the growth of Airbnb/ Party houses and the impact this is having on the local B&B/ hotel economy – consider it is diminishing the quality of visitors and increasing vacancy rates due to increased choice and competition. Lower quality guest houses were seen as particularly suffering as limited in ability to invest in improvements and questioned whether the visitor accommodation policy in CPP1 was too restrictive to allow these to exit the market and not responsive to fast changing market.

Concerns were also raised with the potential relocation of the Conference Centre and transport - how to attract visitors who wanted to stay overnight.

Event Space – it was suggested at one workshop that further site allocations for outdoor event space should be made through CPP2 and these should have water, waste and electricity connections and hard standing. However the second workshops noted that events such as Pride, Marathon and The Fringe tend to get a negative response from retailers who do not welcome crowds blocking shop entrances and not spending money. A Way Finding Strategy for central Brighton was suggested as way to help understand how people find their way around on arrival at the station.

Seafront - uncertainty was expressed on the use of sites earmarked near the i360 and whether there will be the opportunity to influence development on Madeira Drive/ seafront. The East of the Pier (site of the Wheel and The Terraces) was considered in need of investment and further attractions.

At the **Construction Voice event**, one of the panel members suggested that the city needed tourism development to support the businesses in that sector, especially those in the ‘inverted T’ tourist route from the station to the beach and then along the seafront in both directions. The city was also in need of more outdoor events, to build on the tradition of Brighton as a place with a variety of events and attractions.

CPP2 Chapter 6 – Transport and Travel

Summary of key Issues arising from Written Responses

Question TR1 Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

In total 55 respondents commented on this section of CPP2 scoping paper with 372 representations.

Name / Organisation	Respondent No.
	5
	7
	9
	14
	17
	18
	20
University of Sussex	24
	30
	31
	35
North Laine Community Association (NLCA)	43

	47
	48
	49
	60
Saltdean Residents Associations	66
	75
Kingsway & West Hove Residents Association	83
	86
	96
Ovingdean Residents & Preservation Society	97
Roedean Residents Association	103
Deans Preservation Group	108
Conservative Group	109
	113
Kemp Town Society	117
Natural England	119
Rottingdean Parish Council	125
Futureform Global Investments Ltd	129
South Downs National Park Authority	130
Brighton & Hove Food Partnership	134
Brighton Society	135
	139
National Grid Property and SGN	140
Bricycles	142
	143
	148
SAFE Rottingdean	150
	152
	153
Standard Life Investments Shopping Centre Trust	157
	159
University of Brighton	160
The Kingscliffe Society	165
Highways England	175
Friends of the Earth Brighton & Hove	177
East Sussex County Council	178
St. William Homes	179
LCE Architects	180
Crest Nicholson	181
Brighton & Hove Economic Partnership	189
Unknown Respondent 2	191
Unknown Respondent 3	192
Unknown Respondent 5	195

Responses were received from 37 respondents:

5, 7, 9, 14, 17, 18, 24, 30, 35, 47, 48, 60, 66, 75, 96, 97, 108, 113, 117, 125, 135, 139, 140, 142, 143, 148, 150, 152, 153, 157, 159, 175, 177, 178, 179, 191, 192

Overall there was strong support for a more detailed transport policy to be included in Part Two of the City Plan, with approximately three quarters of those expressing a preference being in favour. However, not all of those in favour believed the policy needed to be wide-ranging, with some highlighting particular issues which required closer attention, as set out in the summary of responses to Question TR2 below.

The University of Brighton expressed support for Council initiatives to increase the use of public transport, cycling and walking within the city. It considers that Council planning policy concerning transport and travel is adequately covered within Policy CP9 of the City Plan Part One and there does not seem to be a reason for more detailed policy to be provided in the Part Two document.

Question TR2 What issues could a more detailed policy include that are not already covered by Policy CP9?

Responses were received from 25 respondents:

5, 17, 18, 24, 30, 35, 47, 66, 75, 97, 108, 113, 117, 125, 139, 142, 148, 150, 152, 153, 157, 159, 177, 179, 192

Air quality was highlighted as an issue not covered in sufficient detail in City Plan Part One by a significant number of respondents. Points raised included the need for achievable but challenging quantifiable targets for air quality improvements, with Friends of the Earth stating that new development in or close to the Air Quality Management Zones should be required to have a neutral or positive impact on air quality, not simply minimise or mitigate such impacts. East Sussex County Council felt that there was no need for a broad detailed policy, but one with a greater emphasis on air quality issues was necessary. A number of respondents felt that the cumulative impact of proposed developments on air quality should form part of the assessment of planning applications.

More rigorous requirements for Transport Assessments were also proposed, with a threshold of 9 or 10 residential units suggested as the point where a full Transport Assessment should be required. It was felt that such Assessments should include the impact of developments on congestion and journey times with air quality assessments at peak periods rather than over a 24 hour period.

Other issues raised included the promotion of the use of electric/hybrid vehicles and the need for additional transport infrastructure, which were suggested by a small number of respondents. Standard Life opined that a more detailed policy relating to a parking strategy for the city was necessary.

Highways England would like to see specification that significant developments in the city plan area should assess the impact on the SRN, noted they are in agreement with the City

Council that mitigation schemes are required, and would also like to see specification for all new major development schemes to submit a Travel Plan, with associated thresholds for the size of development that should prepare a Transport Assessment and Travel Plan.

Friends of the Earth also stated that there is a need to reduce road traffic in central areas, which will not only produce a better environment, but will improve people's health and quality of life and boost the local economy by improving the public realm, while also freeing up roads for those who really need to use them.

Question TR3 If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

- **A) A single focused policy on air quality and noise - Introduce a new sustainable transport policy with a set of criteria against which new development (by size/scale of development) should be assessed?**
- **B) A Zonal approach to air quality and noise – identify priority zones for air quality and noise improvement that will include a set of criteria against which new development will be assessed and identifies priorities for mitigation via future developer contributions/CIL payments.**
- **C) An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.**

Responses were received from 30 respondents:

5, 7, 14, 17, 18, 20, 24, 30, 35, 47, 48, 49, 66, 75, 83, 97, 108, 113, 117, 125, 139, 140, 142, 143, 148, 152, 153, 159, 191, 195.

Respondents to this question expressed the following preferences:

- A) 3 respondents
- B) 9 respondents
- C) 17 respondents

One respondent (St William Homes) felt that all three options were onerous and could impact on the viability of developments which in turn would have a detrimental effect on the delivery of new homes.

Question TR4 Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

Responses were received from 36 respondents:

7, 9, 14, 17, 18, 24, 30, 35, 43, 48, 60, 66, 75, 96, 97, 108, 113, 117, 119, 125, 135, 139, 140, 142, 148, 150, 152, 153, 157, 159, 175, 178, 179, 181, 192, 195.

Eighteen respondents were in favour of such a policy, with only eight feeling that it was unnecessary. Reasons given by those in favour included the need for developers to contribute towards the cost of managing the additional traffic volumes, noise and air quality issues that their developments create. One respondent suggested a policy could include flexibility to impose stronger conditions in certain areas with pre-existing negative impacts.

A number of respondents including National Grid, Standard Life, Crest Nicholson and St. William Homes felt that CIL should be covered separately through the Regulation 123 list and did not warrant a policy in the City Plan Part Two. For example, Crest Nicholson stated that “We are of the opinion that City Plan Part One Policy CP7 and Community infrastructure Regulations 122 and 123 provide sufficient guidance on this matter and Part Two of the City Plan does not need to set new policy in this regard. The issue with travel initiatives is that they are most effective when they are able to respond to specific requirements of a site and the scheme in question. Trying to standardise the approach in policy would be ineffective and arguably would not be justified as it may not represent the most appropriate strategy for solving the issue. We do not support the inclusion of such policies and would suggest that this is an appropriate area for supplementary guidance which can provide further clarity on what the Council would seek on these matters.”

Highways England would support a policy to secure developer contributions related to the quantum of development to fund any SRN improvements that are required to deliver the development in the City Plan, with contributions towards SRN improvements arranged through Section 278 agreements.

Natural England stated that the potential may exist for a strategic approach to improving sustainable transport options, for example improved cycling opportunities and green routes through the city to and from schools for example. Furthermore green routes into the National Park could be identified.

Question TR5 Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

Responses were received from 28 respondents:

7, 9, 14, 17, 18, 20, 24, 30, 35, 66, 75, 97, 108, 113, 117, 125, 135, 140, 142, 148, 150, 152, 153, 157, 159, 175, 179, 192.

There was overwhelming support for further clarity on this issue, with only three respondents taking the opposite view. Highways England would like to see more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans as it is not specified in the City Plan Part One. Some respondents felt that unambiguous thresholds would provide the Council with a stronger position when seeking to enforce the policy requirements. Views were also expressed that requirements should be made more stringent in light of traffic congestion in the city, and that a verifiable base document with base figures for congestion times and air quality should be maintained.

Of those taking a different view, the Kemp Town Society felt that as the appropriate thresholds may vary over time it would be inappropriate to include them in the Plan, and St. William Homes felt the issue was best dealt with on a case-by-case basis during pre-application discussions.

Question TR6 If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

Responses were received from 26 respondents:

7, 9, 17, 18, 20, 24, 30, 35, 66, 75, 96, 97, 108, 113, 117, 119, 125, 135, 142, 148, 150, 152, 153, 157, 159, 179.

There was a slim majority of respondents in favour of a City Plan policy to address this issue, with views expressed that quantifiable thresholds expressed through policy provide more certainty and are less vulnerable to appeals and that guidance is more open to interpretation.

Conversely, those favouring guidance based approach felt that it would be easier to update if circumstances changed, as well as a general view that policy should be streamlined.

Question TR7 Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

Responses were received from 28 respondents:

7, 9, 14, 17, 18, 24, 30, 60, 66, 75, 96, 97, 108, 113, 117, 125, 130, 140, 142, 148, 150, 153, 157, 159, 175, 177, 179, 192.

There was a majority of two thirds of respondents stating that a new policy was not necessary in City Plan Part 2. A concern of some respondents, including Rottingdean Parish Council, was that a citywide policy would not be appropriate given the differing nature of the city's neighbourhoods, for example different population demographics and distance from the city centre etc. One respondent gave the example that requiring cycle stand provision in developments at the top of steep gradients was inappropriate.

Some respondents were clear that active travel should be encouraged, but ambivalent about how this should be done. For example, Friends of the Earth stated "whether it is done in Part 2 or a standalone SPD or guidance, more emphasis needs to be given to promoting active travel in line with the Government's Cycling and Walking Investment Strategy," and an individual felt that policy should be restricted to setting the general principles whilst further detail should be provided where necessary within guidance.

Highways England would support policy/guidance setting out how new development will assist in promoting and enabling more active travel.

The South Downs National Park share the City Council's interests in the need to see a sustainable travel system. It is a key issue for both Authorities and the consultation document includes an extensive range of issues and options. For development locations close to the National Park, the SDNPA would look for works to be done which would ensure access into the SDNP by sustainable means, walking, cycling, or by public transport.

Question TR8 Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

Responses were received from 22 respondents:

9, 14, 17, 18, 24, 30, 60, 66, 96, 97, 108, 125, 140, 142, 148, 150, 153, 157, 159, 179, 181, 192.

A small majority of respondents agreed that there is already sufficient policy on this issue. One individual stated that more policies were unnecessary, but that existing policy should be better implemented and enforced.

However, Bricycles felt that policies need to be strengthened with reference to the Cycling and Walking Investment Strategy (2016), and Standard Life and an individual felt that a policy was needed in order to differentiate between different requirements in the city centre and hillier, more exposed outskirts where active travel was considered more difficult.

B&H Food Partnership expressed strong support for active travel and improved links to the South Downs National Park.

Question TR9 Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

Responses were received from 25 respondents:

7, 9, 14, 17, 18, 20, 24, 30, 31, 60, 66, 75, 96, 108, 119, 125, 135, 142, 148, 150, 152, 157, 159, 181, 192.

There was a slight majority against the inclusion of a policy covering these issues.

Some respondents felt the issue was too broad to be included as a specific policy in the City Plan Part Two, with suggestions that it should be "a central strategy plan" and that the issue "is too involved as the city grows to be fixed in the plan long term."

Standard Life and St William Homes felt the introduction of Community Infrastructure Levy Regulations 123 list and existing developer contribution processes would provide sufficient scope to cover a number of these issues, without recourse to a general mitigation policy.

Another view expressed was that the link between a development's impact on air quality (particularly in the AQMAs) and Public realm (e.g. pedestrian safety) and the information currently provided in Transport Statements/Assessments is too weak to inform a link with developer contributions - it is essential that the usual quality checking standards are applied to (in particular) Transport Assessments before believing a viable mitigation plan can be implemented.

However Natural England stated that such a move if delivered at a strategic level could benefit residents and wildlife via improving green routes and strategic Green Infrastructure.

Question TR10 Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

Responses were received from 20 respondents:

7, 9, 14, 18, 24, 31, 60, 66, 83, 96, 108, 125, 142, 148, 150, 157, 159, 181, 192, 195.

Approximately two thirds of respondents didn't think such a policy was necessary.

Of those who felt a policy should be included, one individual requested a balanced approach to requirements, giving an example of little-use disabled parking bays.

Another response stated that there should be addressed by a wider policy on public realm, not limited to 'developer' contributions which incorporate use of the public realm by existing establishments.

Rottingdean Parish Council felt a policy would have more impact if there was a zonal transport/travel policy focussed on equality, mobility and accessibility which implies different requirements in different areas of the city, linked to developer contributions.

Question TR11 Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

Responses were received from 14 respondents:

7, 9, 14, 18, 66, 75, 108, 125, 142, 148, 150, 157, 191, 192.

Opinion was split with five respondents in favour of a new policy and six feeling that it was unnecessary. Standard Life would welcome guidance on the role of Shopmobility but felt there was no need for a specific policy.

Question TR12 Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

Responses were received from 19 respondents:

7, 9, 14, 17, 18, 20, 60, 66, 97, 103, 108, 125, 142, 148, 150, 153, 157, 179, 192.

Overall there was support for reducing the amount of existing policy, but with some concerns expressed over whether guidance can be implemented and enforced effectively.

Question TR13 Are there any site allocations required in City Plan Part Two that would be suitable to provide the sustainable transport facilities described above? If yes, can you explain why they are required both in terms of city priorities and any evidence of need?

Responses were received from 18 respondents:

7, 9, 18, 66, 103, 108, 109, 117, 142, 148, 150, 157, 160, 175, 177, 180, 189, 192.

The most commonly requested site allocations were for a park and ride facility and a coach/lorry park (including by Roedean Residents Association, Conservative Group, and Brighton & Hove Economic Partnership) within the city. The former gasworks site in Kemp Town was the sole site suggestion for a park and ride. Suggested possible sites for a coach park were Greenway Bottom opposite St. Dunstons, Sheepcote Valley and the gasworks.

Bicycles and Brighton & Hove Friends of the Earth BHfOE) felt the full benefits of traffic reduction in the city centre from the provision of a park and ride would not be realised unless there was a corresponding reduction in city centre parking capacity. BHfOE also noted that if a park and ride is to be developed north of the National Park, there might be an opportunity to link it with land already used for parking such as at Hickstead.

Highways England stated they would have concerns about the location of such sites (park and ride, lorry and coach parks) in the vicinity of the Strategic Road Network, and requested that it is specified that any such sites would need to be supported by a Transport Assessment that fully assesses the impact of such sites on the SRN.

Question TR14 Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

Responses were received from 18 respondents:

7, 9, 18, 20, 30, 35, 66, 97, 103, 108, 117, 125, 130, 142, 150, 159, 178, 192.

There was significant support for this approach, with one two respondent taking the opposite view that solutions should be restricted to the Brighton & Hove administrative area.

East Sussex County Council agreed that this is a potential solution that could be explored, but from an ESCC perspective would want any site specific transport facilities located within the county to provide benefits for both the county and the city, to enable both local member and community support to be achieved. They noted that mechanisms to enable this option to be explored are either already in place or are being developed.

Other respondents noted that many journeys cross-administrative boundaries, as well as noting that the most effective improvements to transport infrastructure would be those that linked the city to other areas.

Question TR15 Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

Responses were received from 26 respondents:

7, 9, 18, 20, 66, 75, 86, 96, 97, 108, 125, 129, 134, 139, 142, 150, 159, 165, 175, 177, 178, 180, 189, 191, 192, 195.

A number of other matters were suggested for inclusion in a City Plan policy, not all of which are within the scope of the document, which included:

- Volks railway extension to the Marina
- There is a need for pedestrian access and the better public realm within the Retail and Town Centre Use policies;
- Improved accessibility to the new developments at the Marina;
- Less piecemeal improvements, more big radical schemes to alleviate congestion;
- New roads to relieve congestion;
- City bike scheme similar to Boris Bikes should be considered;
- Support for improved rail services, including reinstating the Lewes – Uckfield link, to improve network resilience;
- Encouraging the logistics companies to share some routes (equivalent to car-pooling).
- More could be done to make available real time information on route congestion and suggest alternative routings;
- East Sussex County Council felt that a policy for ensuring the effective and efficient management of cross-boundary transport movements by all road users along the A259 corridor should be considered within Part 2 of the City Plan
- Cycling design standards (mentioned above) are relevant to CP12 and CP13. See London Cycling Design Standards <http://content.tfl.gov.uk/lcds-chapter1-design-requirements.pdf> for well-received best practice.
- We need an integrated transport system which takes bikes on trains;
- Improvements to public transport along Madeira Drive, Grand Junction Road, King's Road and the east Hove front.
- Brighton & Hove Economic Partnership stated that PTALs (Public Transport Access Levels) can be utilised to help determine how much parking is appropriate for certain types of development. Consideration must be given to promoting the improvement

of rail capacity, within CPP2. Smart technology should be explored and encouraged to improve efficiency of public transport, car clubs, cycling and parking.

- SRN should be referenced in the CPP2 document, together with the role of the SRN should be made clear and how the impacts of development will be assessed evidence base as this needs to be wider than just the CPP2 area. Part of Brighton & Hove is in the South Downs National Park Authority area which is affected by traffic travelling to and from the city.
- In accordance with DCLG guidance, any development contributions towards SRN improvements should be secured via Section 278 agreements, and not via Section 106 or a CIL Reg123 List. The use of Section 278 agreements will enable multiple sites to contribute if appropriate, and also secures the Secretary of State's position by ensuring that 100% of contributions go towards the SRN improvement.

Summary of Key issues from Consultation Events and Workshops

At the **Stakeholder Consultation** event a number of key themes emerged. There was concern expressed regarding the impacts on the transport network of development on the urban fringe, and whether these had been adequately considered. The situation in Mile Oak in particular was mentioned, with the limited links to the A27 bypass highlighted. Zoning of transport policies was also suggested as the ability to improve active travel in the urban fringe could be more limited due to the more remote location and hillier terrain,

Air quality was highlighted as a particular concern. Participants requested that the cumulative effect of development on AQMAs be considered, including the effect of Lewes DC sites on Rottingdean. Measures such as a Low Emission Zone and cleaner buses were also suggested to improve air quality in the central area.

Concern was raised over the effectiveness of current transport policies. Support was expressed for an improved evidence base to create an integrated travel policy and clear thresholds in transport policies and guidance and a requirement for better quality, more effective transport plans.

In terms of public transport infrastructure, there was a consensus of workshop participants that park and ride would be beneficial, although the South Downs National Park was noted as a restriction on possible sites. Support was also expressed for improving access to Car Clubs and improving west – east bus links that do not pass through the city centre. There was also concern that areas with poor public transport should not be considered suitable for higher density developments.

At the **Environment and Sustainability Workshop** it was suggested that modal shift from cars should be encouraged and could be helped by improved access to train stations through measures such as better wayfinding and walking routes, and implementation of the proposed cycle hire scheme. Improved integrated pricing and oyster card payment style payment scheme covering all modes was also suggested.

Air quality was again discussed in some detail. It was noted there had been some improvements and most of the city has good air quality, although some areas are still in

need of improvement (e.g. London Road, North Street, Lewes Road, Rottingdean and South Portslade freight route). The view was expressed the effect of major new development of air quality should be carefully considered and that that opportunity for improvements should be sought. It was suggested that the scope of the Low Emission Zone could be expanded to also include HGVs.

The need to manage congestion was highlighted, and it was noted that congestion is not always in areas of poor air quality. The benefits of park and ride and congestion charging were highlighted but it was cautioned that there should be clarity about the objectives of any such policies within an integrated transport plan.

Support was expressed for improving awareness of and infrastructure to support electric cars, and for further pedestrianisation in the city centre to encourage walking and improve public realm, although there was caution that disruption to bus routes could be counterproductive.

The need for a transport solution along the Madeira Drive to King Alfred Corridor to reduce congestion and serve new developments was mentioned.

It was noted that there is little spare car parking capacity, however other comments indicated a preference to reduce parking provision in the city. Better management of parking capacity was suggested through SMART technology that can advise people where parking is available and help manage congestion.

At the **Professionals Forum** further pedestrianisation of the city centre was put forward as a means of improving the quality of the environment and encouraging active travel. Congestion charging could also be explored. Reductions in the number of buses in the city centre (particularly around Churchill Square) was also suggested as a means of reducing congestion and encouraging cycling. One idea is to have a central transport area with no motor vehicles where people have to walk or cycle for 5-10 mins to make it safer and more attractive to cycle

The difficulty of managing deliveries and congestion on narrow roads in the city centre was highlighted. Park and ride was supported.

The **Brighton & Hove Economic Partnership** expressed concern about bus lanes causing congestion, but noted that in the long term bus lanes should help to reduce congestion with more promotion of bus travel.

University of Sussex states that research has been undertaken research based on information available on social media and this indicates that there are significant concerns about safety on bikes. To promote more uses of sustainable transport with students the research recommendation finding ways of introducing behavioural change, providing better facilities for cyclists and restricting parking permits.

Legal & General expressed concern that there is insufficient parking to allow the business in the city to grow -potentially there will be 600 jobs brought to the city from 50 miles away –

people need to drive but there is insufficient parking. Support is needed to bring these additional jobs into the city in terms of parking and there are additional concerns about a controlled parking zone soon to be introduced in the surrounding area. Travel to work by car difficult for those traveling from outside Brighton – particularly access from Worthing/Eastbourne

It was suggested that Public Transport Access Levels (PTALs) be introduced in Brighton & Hove to determine how much parking can be allowed for certain types of development.

With regard to congestion, it was felt that better access into the city via rail and bus is needed to encourage car-drivers out of cars. There was concern at bus and train network capacity – little capacity on North Street for additional bus routes and customers like the fact they don't have to change buses to travel across the city. Brighton station can shut at busy periods due to overcrowding. The view was also expressed that the cycle network should be supported with cycle parking infrastructure and better cycle direction signs. Car clubs were also supported.

It was suggested that a congestion charge could be used to encourage people to travel more sustainably however only if alternative viable options are available, although another view was that that high parking charges already act as a congestion charge.

A general point was that interventions should be positive rather than punitive.

At the **Brighton & Hove Connected** meeting the need for improvements to relieve the pressure on routes into the city, together with the need for better East – West routes through the city, was highlighted.

CPP2 Chapter 7 – Biodiversity and Open Space

Summary of key issues arising from written responses

In total 72 respondents commented on this section of CPP2 scoping paper with 350 representations.

Landscape Scale Approach

South Downs Way Ahead Nature Improvement Area:

Question B1 Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

And

Question B2 If you think a policy is needed, what types of development should be included?

There were 53 responses provided by 32 respondents to questions B1 and B2

There were 31 responses to Question B1:

Keep the Ridge Green (76)

(96)

Ovingdean Residents & Preservation Society (97)

Deans Preservation Group (108)

(113)

Natural England (119)

(126)

South Downs National Park Authority (130)

(138)

(148)

SAFE Rottingdean (150)

CPRE (151)

(152)

University of Brighton (160)

(161)

Sussex Wildlife Trust (166)

(167)

Brighton and Hove's Wildlife Forum (169)

East Sussex County Council Strategic Economic Infrastructure Team (178)

St William Homes (179)

The Vale Residents Committee (182)

Unknown 3 (192)

Unknown 5 (195)

(4)

(5)

(18)

(35)

(38)

(52)

Saltdean Residents Association (66)

Surfers Against Sewage (71)

There were 22 responses to Question B2:

Keep the Ridge Green (76)

(96)

Ovingdean Residents & Preservation Society (97)

Deans Preservation Group (108)

(113)

(126)

(148)

SAFE Rottingdean (150)

CPRE (151)

University of Brighton (160)
Sussex Wildlife Trust (166)
(167)
Brighton and Hove's Wildlife Forum (169)
The Vale Residents Committee (182)
Unknown 3 (192)
Unknown 5 (195)
(4)
(5)
(18)
Southern Water (25)
(35)
(52)

Overall there was support for having a policy to guide the types of development that may be appropriate within the NIA. However five respondents did not support, three indicating it is appropriately addressed within CP10 and CP16 (subject to enforcement) whilst one felt a landscape scale approach should recognise the seafront and routes to it. Six responses provided comment without stating a clear preference for an additional policy.

Comments in respect of policy content were provided by many of the respondents and these included the following:

What type of development is considered appropriate: there was a range of views however the majority maintained the protection and enhancement of biodiversity and ecology to be key.

The University of Sussex (160) felt, in view of Policy DA3 of City Plan Part One, the policy should provide clarity and remove ambiguity. The University considered education development at Falmer Campus/DA3 area and student accommodation at/near Varley Park Campus to be appropriate development with the NIA.

Southern Water (25) requested development appropriate within the NIA should include provision for allowing essential utility infrastructure where there is a locational need and no suitable alternative sites available in order to help ensure the level service is maintained.

Some respondents felt no development was appropriate, green spaces should be protected. A number of respondents indicated all development and others indicated development on greenfield sites should be included, however, when read alongside their wider comments it is considered they are not saying all development and greenfield development are appropriate but that a policy should address all development.

Three respondents addressed design. Two suggested Regency style. Both also suggested other designs. One suggested New England development whilst the other suggested flintstone in the outer areas and also modern. The other respondent suggested adjacent building heights should be controlled to avoid harm to biodiversity from shading.

There were also some responses that dealt with protection such as: brownfield before greenfield; protect playing fields, parks, national heritage sites and village greens from development; preserve the few green spaces in Saltdean and the Deans particularly The Oval; protect the open space on Ditchling Road (place for dog walks, football and wildlife); protect green spaces including allotments;

Others issues to be covered in the policy:

Some respondents wanted the policy to provide clarity so that it won't be abused. It was felt the policy needs to make clear not all areas in the NIA are suitable for development especially sites that contain priority habitats and species which should be protected. Another respondent suggested each site should be judged on solid locally obtained evidence to achieve the best long term outcome.

A couple of respondents considered matters within policy QD18 should be incorporated. Such as comprehensive ecological assessments/assessments of priority habitats and species and species listed in the Brighton & Hove Local Biodiversity Action Plan (LBAP); and, regard to be given to achieving BAP targets. Development should go ahead only if it can be demonstrated that there will be overall gains in biodiversity or refused if it is liable to cause demonstrable harm to such species and their habitats (accord with paragraph 118, NPPF). Some respondents raised particular concern over urban fringe sites and felt further assessment needed and/or greater control to prevent damage prior to submission of a planning application.

Others issues raised included: regard to the Brighton & Lewes Biosphere; 'stepping stone' sites and wildlife corridors because they are essential for connectivity of species (recognise the one in Ovingdean); continuation of the landscape scale approach and strategic approach to biodiversity linking to National Park; guidance for Toads Hole Valley.

Green Infrastructure

Question B3 Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

There were 27 responses to this question:

(73)

Keep the Ridge Green (76)

(96)

Ovingdean Residents & Preservation Society (97)

Deans Preservation Group (108)

(113)

Natural England (119)

(126)

South Downs National Park Authority (130)

(138)

CPRE (151)

(152)

The Level Communities Forum (154)

Sussex Wildlife Trust (166)

(167)

Brighton and Hove's Wildlife Forum (169)

East Sussex County Council Strategic Economic Infrastructure Team (178)

The Vale Residents Committee (182)

Unknown 3 (192)

Unknown 5 (195)

(4)

(5)

(17)

(35)

(38)

(47)

Saltdean Residents Association (66)

All except two of the 27 respondents clearly supported a Green Infrastructure (GI) landscape scale approach. There were no specific objections however one respondent only provided a comment stating 'each site has to be judged on solid locally obtained evidence...' and another respondent said 'probably'. CPRE (151) and Sussex Wildlife Trust (166) also supported the production of a GI Supplementary Planning Document (SPD).

A number of supporting comments were provided which included:

- Natural England (119) welcomed strategic landscape-scale provision of biodiversity and Green Infrastructure in the City, linking and repairing habitats and sites. Advised opportunity to build on joint working on GI to capture gains for wildlife and people, showcasing green links through the City to the National Park and linking wildlife habitats and stepping-stones for wildlife. Connecting habitats felt key for enabling the adaption of wildlife through climate change and species migration. Policy should complement Biodiversity 2020 and make clear links to the urban fringe policy;
- The South Downs National Park Authority (SDNPA) (130) welcomed the reference to the South Downs Green Infrastructure Framework and the cross authority approach to GI and supported the continuation of such a landscape scale approach. Regard to a consistent approach to wildlife sites and biodiversity raised and also the impact of City Plan Part Two on the Brighton & Lewes Biosphere.
- Wildlife Trust (166) provided strong encouragement to developing an up to date GI network and implementation strategy, including connected green/blue infrastructure, and a green infrastructure policy. Development should contribute towards GI and joint working with neighbouring authorities encouraged;
- East Sussex County Council (178) supported – advised working at a landscape scale results in crossing authority boundaries and reference was given to the SDNPA and the East Sussex Green Infrastructure studies.

Other comments raised included: green spaces are at the heart of every community. They require designation and mapping which can inform where greater investment is needed to off-set pollution and deprivation [The Level Communities Forum (154)]; once the Downs and green space go they will never come back; St Aubyns Field, Rottingdean must be retained as a green space.

Nature Conservation, Geodiversity and Landscape Sites

Question B4 How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

There were 22 responses to question B4:

Keep the Ridge Green (76)

(96)

Ovingdean Residents & Preservation Society (97)

Deans Preservation Group (108)

(113)

Natural England (119)

(121)

(126)

South Downs National Park Authority (130)

CPRE (151)

(152)

The Level Communities Forum (154)

Sussex Wildlife Trust (166)

(167)

Brighton and Hove's Wildlife (169)

Friends of the Earth Brighton & Hove (177)

East Sussex County Council Strategic Economic Infrastructure Team (178)

The Vale Residents Committee (182)

Unknown Respondent 3 (192)

(4)

BHAF (Brighton & Hove Allotment Federation) (19)

(35)

(38)

Overall respondents supported the protection of nature conservation and biodiversity. No respondents specifically objected to this question. Two respondents indicated more than one policy could be beneficial whilst three respondents felt one policy could be used. This included CPRE (151) and Natural England (119). The latter advised a single policy could include a hierarchy of designations based on statutory designations (including geological sites), priority habitats and species for example. The irreplaceability of habitats could also be criteria. Sussex Wildlife Trust (166) referenced another local authority's single policy and suggested reviewing other Local Plans.

One respondent queried if there should be a hierarchy in view of the importance of small sites in areas with little green space and linking spaces. Whilst another felt nature conservation designations should be fully protected. Four respondents (including 97 and [BHWF] 169) sought the inclusion of undesignated sites that contain species and/or habitats listed within the LBAP and raised the City Council's duty to conserve Biodiversity (S41 NERC Act 2006). NPPF, paragraph 117 was also referenced.

East Sussex County Council (178) considered criteria could include notable habitats and species (S41, NERC Act 2006, priority UK BAP habitats and species etc).

South Downs National Park Authority (13) encouraged having regard to its strategic biodiversity policies and the impact on the sensitivities of the Brighton and Lewes Biosphere.

Friends of the Earth Brighton & Hove (177) sought the rationalisation and updating of biodiversity designations, in particular, the declaration of all Local Nature Reserves. Another respondent also specifically sought the declaration of the proposed LNR in the Hollingbury Park area.

Brighton and Hove's Wildlife Forum [BHWF] (169) considered S41, NERC Act 2006 should be robustly adhered to and policy should include wildlife corridors and sites that connect habitats and species (as well as LBAPs noted above). Reference was also given to 'Biodiversity 2020: England Biodiversity Strategy'.

Other matters raised included: air quality; a need for the policy to take a citywide approach taking into account embedded learning and eco-tourism moving the city from being over populated and traffic polluted to one demonstrating commitment to wildlife/ green environment and living experience enhancement; and, regard to sites with active community involvement such as allotments which add to diversity and food knowledge lacking today.

Question B5 Should there be a specific policy to address the general protection and enhancement of species?

There were 31 responses to question B5:

(73)

Keep the Ridge Green (76)

(96)

Ovingdean Residents & Preservation Society (97)

Deans Preservation Group (108)

(113)

Natural England (119)

(126)

(128)

South Downs National Park Authority (130)

(143)
CPRE (151)
(152)
Sussex Wildlife Trust (166)
(167)
Brighton and Hove's Wildlife Forum (BHWF) (169)
East Sussex County Council Strategic Economic Infrastructure Team (178)
The Vale Residents Committee (182)
Unknown Respondent 2 (191)
Unknown Respondent 3 (192)
Unknown Respondent 5 (195)
(2)
(4)
(5)
(17)
Brighton & Hove Allotment Federation (BHAF) (19)
(35)
(38)
(47)
Saltdean Residents Association (66)
RSPB (67)

Overall respondents supported the inclusion of a specific policy to address the general protection and enhancement of species. No respondents specifically objected to the inclusion of such a policy.

Six respondents, including CPRE (151) and BHWF (169), felt Local Plan policy QD18 should be fully retained making particular reference to "permission will not be granted for any development including changes of use that would be liable to cause demonstrable harm to such species and their habitats."

East Sussex County Council (178) suggested enhancement opportunities should focus on Brighton & Hove's BAP species (eg swifts, peregrines, starlings, white-letter hairstreaks, hornet robberfly etc) and a review of SPD11 alongside City Plan Part 2.

The South Downs National Park Authority (SDNPA) (130) indicated a need to have regard to a consistent approach to wildlife sites and biodiversity and to the impact of City Plan Part Two on the Brighton & Lewes Biosphere.

RSPB (67) sought the protection of Swifts and the installation of Swift boxes in urban development. Considered policy should also protect nest sites of House Martins and Swallows and facilitate creation of new nest sites.

Sussex Wildlife Trust (166) encouraged setting a net gain in biodiversity, recognising the importance of existing site value to biodiversity and species. It suggested seeking innovative and creative enhancements not just bird and bat boxes.

Attention was drawn to a number of other matters by respondents including: planting to encourage bees and pollinators; allotments to be recognised as central to policy because they support, harbour and protect rare species and act as green corridors; regard to the diversity of bird life and their habitats; inclusion of translocation in line with JNCC guidelines making clear it is not an acceptable alternative to in situ conservation and protection of LBAP species which formed part of the Biosphere Bid.

Question B6 Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

There were 24 responses to question B6:

(73)

Keep the Ridge Green (76)

(96)

Ovingdean Residents & Preservation Society (97)

Deans Preservation Group (108)

(113)

(126)

South Downs National Park Authority (130)

CPRE (151)

(152)

The Level Communities Forum (154)

Brighton and Hove Allotment Federation (155)

Standard Life Investments Shopping Centre Trust (SLI) (157)

Sussex Wildlife Trust (SWT) (166)

(167)

Brighton and Hove's Wildlife Forum (169)

East Sussex County Council Strategic Economic Infrastructure Team (178)

The Vale Residents Committee (182)

Unknown Respondent 3 (192)

(4)

(17)

(35)

(38)

Saltdean Residents Association (66)

Overall there was support for renaming SNCI's and updating sites based on the findings of the 2013 review. Ten respondents clearly supported such an approach whilst five supported subject to caveats (either to allow for new sites to be put forward where there is evidence or the retention of sites that could not be accessed). Two respondents only indicated support for renaming SNCI's to LWS's [SWT (166) and BHAF (155)].

Three respondents did not object but nor did they support. The importance of biodiversity was recognised and one felt protection should prevent sites from being downgraded prior to an application.

One respondent supported the 2013 review and advised it was undertaken with assistance from many local environment experts representing all aspects of the City's biodiversity in order to ascertain a credible list of LWS (76). However two respondents raised a concern if the 2013 review deselected sites due to a lack of access to the site. They suggested the City Council should work with land owners to improve management rather than deselection of poorly managed sites. Deselection may be inappropriate given a site's importance to the City's GI framework [CPRE (151) and SWT (166)].

Six respondents considered there should be a mechanism to allow for new sites to be designated this included the CPRE (151) and SWT (166). One of the respondents noted that the SNCI review did not consider all urban fringe sites and indicated sites without designation but with LBAP species or habitats should have recognition. Two respondents considered Meadow Vale in Ovingdean should be designated in view of subsequent survey findings [including SWT (166)].

The South Downs National Park Authority (SDNPA) (130) indicated a need to have regard to a consistent approach to wildlife sites and biodiversity and also the impact of City Plan Part Two on the Brighton & Lewes Biosphere.

Standard Life Investments Shopping Centre Trust (157) echoed several other respondents in that the plan should be as up to date as possible in this respect.

Sussex Wildlife Trust (166) encouraged recognition of the value of SNCI/LWS sites in City Plan and a commitment to regular review of sites to help ensure positive steps to management. Suggested the benefit of these sites could be calculated for biodiversity and wider ecosystem services for the City. Because the 2013 review is unpublished it is unclear what sites were selected and deselected. Suggested adopting the LWS selection criteria used by both East and West Sussex to ensure a consistent approach across Sussex.

BHAF (155) (nb. one of the two respondents submitted on behalf this body) considered the Council should define the various designations and should list and map the sites protected from development. Considered allotments could be LWS and/or LGS.

Question B7 Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

There were 33 responses to question B7:

(73)

Keep the Ridge Green (76)

(96)

Ovingdean Residents & Preservation Society (97)

Deans Preservation Group (108)

Natural England (NE) (119)

(126)

(128)
 Cllr T. Janio (132)
 The Woodland Trust (WT) (137)
 CPRE (151)
 (152)
 Brighton and Hove Allotment Federation (155)
 Sussex Wildlife Trust (166)
 (167)
 Brighton and Hove's Wildlife Forum (169)
 East Sussex County Council Strategic Economic Infrastructure Team (178)
 The Vale Residents Committee (182)
 Longhill Woodland Group (187)
 Unknown Respondent 2 (191)
 Unknown Respondent 3 (192)
 (2)
 (3)
 (4)
 (5)
 (6)
 (15)
 (17)
 Brighton & Hove Allotment Federation (BHAF) (19)
 (35)
 (38)
 Hove Civic Society (HCS) (63)
 Saltdean Residents Association (66)

The suggested approach/intention (outlined in B7 in the Scoping Report) was largely supported and no respondent specifically objected. However there were a variety of views. The support for different features and sites is summarised as follows:

- **Ancient Woodland** – 9 respondents [including NE (119); WT (137); CPRE (151) and ESCC (178)]
- **Aged/Veteran Trees** – 9 respondents [including NE (119); WT (137); CPRE (151); BHWF (169) and ESCC (178)]
- **Allotments** – 8 respondents [including two respondents on behalf of BHAF (19 and 155) the former advised allotments soils comparable to ancient woodland. Whitehawk Hill, Roedale Valley and Craven Vale specifically referenced]
- **Woodland** – 6 respondents [including BHWF (169)]
- **Locally important Geomorphological features and local geological sites** – 5 respondents [including BHWF (169) – listed 4 LGS sites and ESCC (178)]
- **Tree planting** – 4 respondents [including HCS (63) suggesting each new dwelling should provide a new street tree; WT (137) suggesting a target set to increase tree cover]
- **Nature reserve areas** – 4 respondents [including BHWF (169)]
- **Green/wildlife corridors** – 3 respondents [including BHWF (169)]
- **Ovingdean's wildlife corridor** – 3 respondents
- **Wildlife Stepping Stone areas** – 3 respondents
- **Trees and wooded areas** – 2 respondents [including BHWF (169)]

- **Other significant trees eg mature elms – 1 respondent** [ESCC (178)]
- **Mature hedgerows – 2 respondents** [including BHWF (169)]
- **Section 41 priority habitats and species – 2 respondents** [CPRE (151); SWT (166)]
- **St Aubyns field, Rottingdean – 2 respondents**
- **Urban Fringe Assessment sites:**
 - **Site 41 – 1 respondent** with another raising concern
 - **Site 42 – 1 respondent**
 - **Site 43 – 2 respondents**
- **Sites with active community involvement – 1 respondent**
- **Chalk Downland – 1 respondent**
- **Long established village boundaries – 1 respondent**
- **Yes – 1 respondent** (unclear if supported intention or the sites/features given as examples)

Attention was also drawn to NPPF paragraphs 117 and 118 and the importance of these features and sites to the biosphere. It was raised the principle of ecosystem services should be one underpinning philosophy which has a strong relationship with green corridors and Biosphere.

Open Space, Local Green Space and Gateways to the National Park

Question B8 Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

There were 24 responses to question B8:

Keep the Ridge Green (76)
 (96)
 Ovingdean Residents & Preservation Society (97)
 Deans Preservation Group (108)
 Kemp Town Society (KTS) (117)
 (126)
 (138)
 (148)
 SAFE Rottingdean (150)
 CPRE (151)
 Sussex Wildlife Trust (166)
 LCE Architects (180)
 Unknown Respondent 2 (191)
 Unknown Respondent 3 (192)
 (4)
 (17)
 (18)
 (35)
 (38)

(46)

(49)

(50)

Saltdean Residents Association (66)

Surfers Against Sewage (71)

The responses to this question suggest many respondents were unclear of the sites already designated as open space in the City Plan Part One. Many also appeared to confuse the question with that asked in B9 which relates to a specific designation type titled 'Local Green Space' rather than general open space. These latter responses are therefore considered under B9¹.

Some respondents suggested sites that lie within the South Downs National Park and therefore fall outside the planning control of the City Council and thus outside the City Plan area².

Three respondents considered there were no new sites that could be designated open space. There were no objections to any specific site being designated open space. However LCE Architects (180) accepted a need to increase sports facilities and play areas as the population increased but considered the focus for other amenity space should be on improving quality and accessibility to existing open space. It felt the focus should not be on the creation of new at the expense of housing and employment land given the constraints and needs. It suggested the City has the seafront and National Park and that new open space should not be by way of new 'green wedges' in the urban fringe but created where it is needed such as pocket squares within City Centre developments.

The proposed new open space designations suggested by respondents are as follows:

- The beaches down to low water mark should be designated open space. [Surfers Against Sewage (71)]; *(NB beaches are referenced in policy CP16 but not specifically identified on the policies map)*
- Rejoin Mighell Street to Edward street via a new open space providing a path for cyclists and pedestrians lined with trees and plants;
- All green field gateways to the Downs

The suggested management options are as follows:

- Volunteers – to assist with maintenance and to seek grant funding
- Payment for use of a space ring fenced to pay for sites maintenance (suggestion made in respect of St Aubyns)
- Options depend on whether it is public or private land.

Other matters raised by respondents included the following:

¹ These sites included: St Aubyns field, Rottingdean; The Oval, Saltdean; the green strips in Mount Estate, Saltdean; Toads Hole Valley SNCI; Hollingbury Park; Surrenden Road verges; Wanderdown Road open space, Ovingdean; all or parts of the seafront area from Kings Lawn to the west wall of the Marina (specific reference given to Hove Lawns, Dukes Mound and Lower Slopes and the Cliffs to west of Dukes Mound).

² These sites included: Beacon Hill, Rottingdean old golf course, Happy Valley.

- Management of all public open space should be a priority, this includes Schools and Universities;
- Support street tree planting and sculpture plinths [LCE (180)]*[Also raised by Hove Civic Society (63) in response to other questions];*
- Council encouraged to consider designating new open space after reviewing its green infrastructure network taking into account mapping data from Sussex Biodiversity Record Centre. Any new space should have multifunctional benefits. [SWT (166)].

Question B9 Are there any green spaces that you think should be designated as a ‘Local Green Space’? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

There were 38 responses to the question:

(73)

Keep the Ridge Green (76)

(96)

Ovingdean Residents & Preservation Society (97)

Deans Preservation Group (108)

Conservative Group (109)

Kemp Town Society (KTS) (117)

(121)

(126)

Futureform Global Investments Limited (129)

Brighton & Hove Food Partnership (BHFP) (134)

(143)

(148)

SAFE Rottingdean (150)

CPRE (151)

The Level Communities Forum (154)

Chair of Craven Vale and Whitehawk Hill Allotments Society (162)

The Kingscliffe Society (165)

Sussex Wildlife Trust (166)

(167)

Brighton and Hove’s Wildlife Forum (169)

Friends of the Earth Brighton & (177)

East Sussex County Council Strategic Economic Infrastructure Team

(178) The Vale Residents Committee (182)

(4)

(15)

(17)

(18)

(35)

(38)

North Laine Community Association (NLCA) (43)

(46)

47)

(49)

(50)

(51)

(52)

Saltdean Residents Association (SRA) (66)

Surfers Against Sewage (71)

There was a wide spread of suggestions for sites that should be designated Local Green Space all were supported with some reasoning. One respondent made clear they did not support Benfield Valley being designated a Local Green Space [Futureform Global Investments Limited (129)]. The respondent set out a development proposal, which they considered met national policy more effectively, indicating the remaining space could qualify as Local Green Space.

The proposed sites for Local Green Space designations are as follows:

- St Albans Playing Field – 12 respondents (15; 18; 35; 46; 47; 49; 51; [SRA] 66; [Conservative Group] 109; 126; 148; 150)
- Urban Fringe Assessment sites:
 - 38, 38a and 39 (Ovingdean) - 1 respondent (97)
 - 41 (Wanderdown Road open space, Ovingdean) – 3 respondents (96; 97; 182)
 - 42 (Meadowvale/Land South of Ovingdean Road, Ovingdean) – 5 respondents (97; 108; [CPRE] 151; 167; 182)
 - 43 (Ovingdean) – 2 respondents (97; 182)
- Ovingdean Hall School – 2 respondents ([Conservative Group] 109; 126)
- The woodland adjoining Hollingbury Park (as well as the park) – 2 respondents (121; [BHFOE] 177)
- Sheepcote Valley (East Brighton's Downs) and adjoining East Brighton Park (south end of valley) – 2 respondents ([Chair of Craven Vale and Whitehawk Hill Allotments Society] 162; [ESCC] 178)
- All allotments – 2 respondents (4; [BHFP] 134)
- Pavilion Gardens – 2 respondents ([NLCA] 43; 51)
- The Oval, Saltdean – 2 respondents ([SRA] 66; 143)
- Park around Hove Museum – 1 respondent ([Conservative Group] 109)
- Land around St Leonard's Church – 1 respondent ([Conservative Group] 109)
- St Christopher's School playing field (between Leicester and Glebe Villas) ([Conservative Group] 109)
- Roedean Pitch and Putt course – 1 respondent ([Conservative Group] 109)
- Land in front of the Lawn Memorial Cemetery, Woodingdean – 1 respondent ([Conservative Group] 109)
- The Plainfields open space in Patcham – 1 respondent ([Conservative Group] 109)
- Parks – Specific reference also made to the Level's elm trees – 1 respondent (154)

- The south Victoria Gardens (grass and trees) – 1 respondent ([The Kingscliffe Society] 165)
- Community food growing spaces: Moulsecoomb Forest Garden; Racehill Community Orchard and the Secret Garden – 1 respondent ([BHFP] 134)
- Wildlife Corridors – specific reference also made to the Ovingdean wildlife corridor – 1 respondent (73)
- Surrenden Road verges – 1 respondent (50)
- Green strips through Mount Estate, Saltdean – 1 respondent ([SRA] 66)
- Assets within the city’s ecological network (separate to the four sites detailed in B10) – especially those with no formal protection – 1 respondent ([SWT] 166)
- Land west of Ditchling Road (east of Carden Park) – 1 respondent ([ESCC] 178)
- University of Sussex playing fields and other open space – 1 respondent ([ESCC] 178)
- All or parts of the seafront area from Kings Lawn to the west wall of the Marina – particular reference made to Hove Lawns, Dukes Mound and the Lower Slopes and Cliffs to the east – 1 respondent ([KTS] 117)
- Beach area to the east of the Marina up until the 3rd groyne towards Rottingdean – 1 respondent ([Surfers Against Sewage] 71)

Some of the sites detailed above were also raised by respondents in their comments to other questions but not all. Further sites suggested in responses to other questions that are considered to be in need of some form of protection include:

- All green fields that are gateways to the Downs – 1 respondent (35)
- The Oval, Saltdean – 4 respondents (18; 138; 148; 150)
- Toads Hole Valley SNCI – 1 respondent (76)
- Dorset Garden park – 1 respondent ([The Kingscliffe Society] 165)
- The Old Steine gardens, Hove Lawns and, in addition to above, south Victoria Gardens – concern over scale and duration of entertainment and marketing events – 1 respondent ([The Kingscliffe Society] 165)
- All open space - should be given as much priority as possible – 1 respondent (76)
- No part of any allotment should be deemed suitable for housing – 1 respondent [Chair of Craven Vale and Whitehawk Hill Allotments Society (162)]

Some respondents suggested sites that lie within the South Downs National Park and therefore fall outside the planning control of the City Council and thus outside the City Plan area³.

Question B10 Do you consider the following green spaces should be designated Local Green Spaces?

- **Benfield Valley;**
- **Three Cornered Copse**
- **Ladies’ Mile Open Space**

³ These sites included: Green Ridge; Hollingbury Golf Course; Falmer Pond and associated open space; Waterhall and Braypool recreation areas and pitches; Beacon Hill and Rottingdean old golf course.

- **Hollingbury Park.**

There were 36 responses to question B10:

Keep the Ridge Green (76)

(78)

(79)

(96)

Ovingdean Residents & Preservation Society (97)

Deans Preservation Group (108)

Conservative Group (109)

(113)

(121)

(126) A. Lintott

(128)

Futureform Global Investments Limited (129)

CPRE (151)

The Level Communities Forum (154)

Sussex Wildlife Trust (166)

T. Parker (167)

Brighton and Hove's Wildlife Forum (169)

Friends of the Earth Brighton & Hove (177)

East Sussex County Council Strategic Economic Infrastructure Team (178)

The Vale Residents Committee (182)

Unknown Respondent 3 (192)

Unknown Respondent 5 (195)

(5)

(15)

(17)

BHAF (Brighton & Hove Allotment Federation) (19)

Southern Water (25)

(31)

(35)

(38)

North Laine Community Association (NLCA) (43)

(46)

(47)

(50)

(51)

Saltdean Residents Association (66)

Overall there was support for designating the four sites as Local Green Space. The majority supported all four sites with a small proportion supporting only one site or excluding a site. One respondent supported the designation of all four sites if it would further protect the sites from development but were keen to understand the added value designation would bring [Sussex Wildlife Trust (166)]. Southern Water (25) advised it did not object in principle but there is operational land in the vicinity of Hollingbury Park and would welcome engagement over any designation boundary.

One respondent however did not support the designation of Benfield Valley [Futureform Global Investments Limited (129)]. The respondent indicated the site does not meet LGS criteria and set out a development proposal which they considered met national policy more effectively, delivered greater benefits and where the remaining space could qualify as Local Green Space.

Should the following open spaces be designated as Local Green Space?	Respondent number
Benfield Valley	24 respondents supported: 5, 15, 17, 19, 38, 43, 46, 51, 66, 76, 96, 97, 108, 109, 113, 126, 128, 151, 154, 167, 169, 178, 182, 195 1 respondent objected: 129
Three Cornered Copse	27 respondents supported: 5, 15, 17, 19, 31, 35, 38, 43, 46, 51, 66, 76, 96, 97, 108, 109, 113, 126, 128, 151, 154, 167, 169, 177, 178, 182, 195
Ladies' Mile Open Space	27 respondents supported: 5, 15, 17, 19, 31, 38, 43, 46, 47, 51, 66, 76, 96, 97, 108, 109, 113, 126, 128, 151, 154, 167, 169, 177, 178, 182, 195)
Hollingbury Park	30 respondents supported: 5, 15, 17, 19, 31, 38, 43, 46, 50, 66, 76, 78, 79, 96, 97, 108, 109, 113, 121, 126, 128, 151, 154, 167, 169, 177, 178, 182, 192, 195

Question B11 Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

There were 29 responses to question B11:

- Keep the Ridge Green (76)
- (96)
- Ovingdean Residents & Preservation Society (97)
- Deans Preservation Group (108)
- Conservative Group (109) (*comment included in response to B9*)
- (113)
- Natural England (NE) (119)
- (126)
- (128)
- CPRE (151)
- Sussex Wildlife Trust (166)
- (167)
- Brighton and Hove's Wildlife Forum (169)

Friends of the Earth Brighton & Hove (BHFOE) (177)
East Sussex County Council Strategic Economic Infrastructure Team (178)
The Vale Residents Committee (182)
Unknown Respondent 3 (192)
Unknown Respondent 5 (195)
(4)
(5)
(14)
(15)
(17)
Bhaf (Brighton & Hove Allotment Federation) (19)
(35)
(38)
North Laine Community Association (NLCA) (43)
(50)
Saltdean Residents Association (66)

Overall there was support for making the four sites gateways to the National Park however one respondent did not agree, three provided caveated support. A summary of the responses are as follows:

No – 1 respondent

Yes – 21 respondents [two suggested they provide rare links from the town centre to the Downs and one supported as many sites as possible from all directions of the City, not forgetting the Deans. [Including the Conservative Group (109)]

Yes with caveat – 3 respondents [including CPRE (151) who said if it affords additional protection; SWT (166) who welcomed increasing accessibility to the National Park but if designated gateways the areas should be protected from development. It noted some were LNRs and felt more information needed on how sites will be made gateways and linked to National Park before commenting further; (76) advised only if advantageous to biodiversity of the site. Cycle ways on footways not always advantageous and users should be monitored to ensure wildlife not disturbed. Should liaise with SDNPA over unobtrusive signage and explore provision of wide 'green bridge' at Toads Hole Valley.

General support for the enhancement of provision of gateways without clear support for the 4 sites listed – 2 respondents [NE (119) and BHFOE (177)]

BHFOE (177) also raised that identifying a network of primary and secondary gateways with ways they can be improved would be useful. Helping to provide a greater understanding of the National Park and greater confidence to go out and explore the countryside. Higher profile gateways could boost tourism and thus economy, particularly if linked to pedestrian and cycle routes emerging from the city centre and bus routes.

One respondent felt each site should be judged on solid locally obtained evidence and another suggested Hollingbury Park should be part of the National Park.

Are there any other biodiversity and open space issues?

Question B12 Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

There were 33 responses to question B12:

Keep the Ridge Green (76)
(78)
(79)
Ovingdean Residents & Preservation Society (97)
Deans Preservation Group (108)
Conservative Group (109)
(118)
Natural England (119)
Futureform Global Investments Limited (129)
Cllr T. Janio (132)
(148)
CPRE (151)
(152)
The Level Communities (154)
Brighton and Hove Allotment Federation (155)
Chair of Craven Vale and Whitehawk Hill Allotments Society (162)
Sussex Wildlife Trust (166)
(167)
Brighton and Hove's Wildlife Forum (169)
East Sussex County Council Strategic Economic Infrastructure Team (178)
The Vale Residents Committee (182)
Unknown Respondent 5 (195)
(2)
(4)
(15)
Brighton & Hove Allotment Federation (BHAF) (19)
(26)
(38)
(46)
(52)
(55)
Saltdean Residents Association 66)
Surfers Against Sewage (71)

A variety of views were presented many fundamentally already raised in response to other questions. These included support for allotments with some respondents seeking a policy similar to Local Plan policy QD21; further assessment of urban fringe sites; net gain in biodiversity and the need to recognise the Council's duty to conserve biodiversity.

Other matters raised included traffic issues in Rottingdean and Falmer Road around Woodingdean; restricting encroachment onto shingle beaches; green space and Travellers;

protection of Rights of Way; a need to address pre-emptive site clearance prior to submission of planning applications; monitoring of development; recognition that there are gaps in knowledge / habitat and species data is not comprehensive; and, a need for a tree strategy.

Natural England (119), CPRE (151) and Sussex Wildlife Trust (166) all supported some form of ecosystem services approach and/or policy.

The Conservative Group (109) supported CP16 but believed an audit of green spaces should be undertaken with a view to further designating sites not currently afforded protection under CP16.

Summary of key issues from Consultation Events and Workshops

At the **Stakeholder Consultation Event** there was some support for designating the four sites detailed in the scoping document, question B10, as Local Green Space. Other sites proposed for Local Green Space designation included St Aubyns playing field, Rottingdean; Elm Grove (due to Elm Trees); remainder of Urban Fringe site 41 (Wanderdown Road); Land east of Longhill Close, Ovingdean; OPS suggested sites in Ovingdean; cemeteries. It was raised the protection given by the designation must be clear and strong enough to control development.

Overall there was support for a landscape scale approach that includes a cross boundary Green Infrastructure framework. It was suggested it should include wildlife corridors (one in Ovingdean was referenced), residential gardens, trees, green roofs and car parks.

Attendees also raised concerns over unregulated tree felling and habitat clearance especially within Sites of Nature Conservation Importance (SNCI). It was suggested where this occurs planning permission should be refused for a specified number of years. SNCI's fail if damage cannot be stopped. Concern also raised over failing to meet LBAPs. A number of sites in Ovingdean and Rottingdean area were also raised as well as a need to manage existing designations.

At the **Environment and Sustainability Stakeholder Event** there was support progressing a cross boundary Green Infrastructure (GI) network including linking spaces, increasing habitat links and access to the National Park, Local Wildlife Sites, education land, allotments/food growing space and rewilding highway verges. Acknowledged GI has multiple benefits including reducing surface water flooding, biodiversity benefits to aquifer, delivery of net gains in biodiversity, raising environmental awareness. Some support was given for the creation of a green lung through the heart of the City.

Concern was raised over a lack of resources to manage and monitor LBAPs and pollution of species from chemicals. Consideration of calculating Natural Capital Resources was also raised. A query was raised over how the marine environment will be taken into account including how terrestrial policies impact upon it, water quality from surface water run-off

and fisheries. A need to protect marine recreation was also raised as well as a requirement to provide swift nesting bricks within new development and refurbishments.

Some attendees wanted playing field and allotments designated Local Green Spaces (LGS). Others queried how LGS will benefit a site covered by other designations, the management of LGS and whether access to the National Park was more beneficial.

CPP2 Chapter 8 – Addressing Pollution, Water and Energy Resources

Summary of key issues arising from Written Responses

Addressing Pollution Water And Energy Resources (Questions P1 – P12)

In total 37 respondents commented on this section of CPP2 scoping paper with 134 representations.

Question P1 Are there any planning issues that you consider a Polluted Land and Buildings policy should address?

There were 7 responses to this question:

(35)

(65)

Surfers Against Sewage (71)

National Grid Property and SGN (140)

(153)

Environment Agency (176)

St William Homes (179)

Unsurprisingly a range of issues were suggested:

- asbestos free city
- run off from streets and buildings.
- Contaminated land particularly from Shoreham Port
- Both National Grid Property and St William Homes felt the policy should understand the need to consider remediation costs and viability constraints in order to ensure that best use of brownfield land can be achieved on certain sites. Allocation of sites for end uses which are unlikely to yield a commercial return could result in sites which become sterilized for development purposes.
- Consider the amount of houses being built in specific areas.
- The Environment Agency would like to see stronger reference made to pollution prevention in reference to sustainable drainage systems and control through appropriate design and mitigation in addition to flood risk.
- A Polluted Land and Buildings policy should address the potential impact of redevelopment on groundwater quality. There are a number of Source Protection Zones (SPZs) underlying parts of the city which must be protected from pollution as a result of new development. There are some SPZs which are covered in the SA as being important for drinking water supply, particularly in the Lewes Road area which has been the focus

for growth in the City Plan Part 1.

B. Land Stability

Question P2 Should the City Plan Part Two include a development management policy regarding unstable land or is this sufficiently addressed by national planning policy guidance and through Building Regulations?

There were 4 responses to this question:

(35)

(60)

(153)

Unknown Respondent 3 (192)

Two respondents felt no policy was required, one did not know.

One respondent suggested that as the city had steep inclines trees should be protected to avoid land slippage and potential flooding.

C. Pollution and Nuisance Control

Question P3 Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

There were 19 responses to this question:

(14)

(15)

(18)

(35)

(38)

(49)

(52)

(60)

(64)

(65)

Surfers Against Sewage (71)

(75)

(146)

(147)

SAFE Rottingdean (150)

(153)

Environment Agency (176)

St William Homes (179)

Unknown Respondent 3

(192)

Unknown Respondent 5

(195)

Seven respondents felt the issues should be addressed in one combined Policy.

Twelve respondents felt the issues were so important they could not be covered in the same way. One respondent felt the different issues needed very different solutions with appropriate knowledge and input from specialists/ experts.

One respondent felt noise pollution needs its own policy simply because it's all pervasive nature – impacts are severe and well documented; it affects communities. The Plan needs to be direct addressing how it will enforce the rights of its citizens in getting decent night's sleep without getting woken up by singing drunks (students) and mechanised bin vehicles. The policy should be direct and detail what the council consider appropriate and what it does not. Need to be clear whose interests are being catered for in terms of noise – local businesses or local residents.

The Environment Agency suggested splitting the issues into two policies which will make more explicit the council's intention to address water pollution specifically.

St William Homes considered the issues with air, land and water pollution control and noise nuisance should be addressed in planning guidance not policy.

Question P4 How can the City Plan Part Two support the South Downs National Parks Dark Skies Initiative?

There were 11 responses:

(14)

(35)

(38)

(52)

(60)

(65)

Natural England (119)

(147)

(153)

East Sussex County Council Strategic Economic Infrastructure Team (178)

Unknown respondent 5 (195)

Two respondents did not think the initiative should be supported.

6 respondents made suggestions such as use of intelligent lighting solutions; look at the timing of street lights; and the use of incentives for commercial and domestic buildings to upgrade/ switch off lights overnight. ESCC suggested the need to ensure all new development has the highest standard of technology for low impact, efficient and sustainable lighting. Minimum lighting should be provided as required for public safety.

Natural England felt this issue was important for Urban Fringe sites and they would need careful scrutiny and the issue related to the issue of tranquility and the setting of National

Park.

Two respondents felt that there should be less or no development as a way to address the issue.

Question P5 Is it necessary to have a detailed policy to protect the quality and potential yield of water resources to guide all future new development?

There were 14 responses:

(14)

Southern Water (25)

(35)

(38)

(52)

(60)

65)

(75)

Natural England (119)

(153)

Environment Agency (176)

St William Homes (179) Unknown

Respondent 3 (120)

Unknown Respondent 5 (195)

11 Respondents said there should be detailed policy. One said yes detailed policy or detailed planning guidance.

The reasons given included:

- 100% of drinking water supplies comes from groundwater contained in underground aquifers. Southern water therefore consider it important that groundwater source protection zones are protected by Local Plan policies in order to prevent any unacceptable impacts on the quality and yield of groundwater caused by new development.
- Natural England advised that water quality and quantity issues are of key importance to B&H given its reliance on the chalk aquifer and the vulnerability of the aquifer to pollution sources.
- Environment Agency would support a policy that protects the quality and potential yield of water resources. Support paragraph 8.10 and the thorough explanation of water resource and their quality. Support the recognition to protect SPZs and intention to seek higher water efficiency standards - Paragraph 8.11.

Two respondents said there should be no detailed policy – St William Homes said it should be outlined in planning guidance.

One respondent also asked that farms owned by council are managed for biodiversity and food growing.

Question P6 Is a detailed policy still required to address the location or storage of hazardous substances or is there sufficient national policy and guidance?

There were 10 responses:

(14)

(35)

(38)

(60)

Natural England (119)

National Grid Property and SGN (140)

(153)

St William Homes (179)

Unknown Respondent 3 (192)

Three respondents felt detailed policy was required. Natural England felt that given the vulnerability of the chalk aquifer receptor to pollution, careful guidance will be required for the use of hazardous substances.

St William Homes and National Grid Property and SGN felt detailed policy was not appropriate as there was sufficient guidance. Two respondents were unsure.

Question P7 Are there other pollution issues that the City Plan should address?

There were 13 responses:

(15)

(16)

(35)

(38)

(52)

Surfers against Sewage (71)

(75)

(137)

(146)

(147)

(148)

Unknown Respondent 3 (192)

Unknown Respondent 5 (195)

Many respondents felt there was a need to tackle air quality issues – so as to take areas out of air quality management status; air pollution from traffic, in particular Rottingdean High Street doesn't meet EU guidelines due to narrowness/sea breezes and stationary traffic; areas of greatest air pollution should have no new housing to protect existing residents and approaches to actively reduce air pollution should be put in place such as traffic calming/control/monitoring; rural aspect of village should be preserved; role of tree

planting as a way to improve air quality.

Surfers Against Sewers suggested the need to proactively require the assessment, investigation and mitigation of Shoreham Town Harbour gas plant leaking onto the beach and into the sea just west of 'Millionaire's Row' and other potentially contaminated land.

Three respondents made reference to street cleansing and litter – the need for better street cleansing and tackling street litter etc. along Lewes Road Target food and drink outlets. More litter and recycling bins along the beach to discourage litter in the sea.

Noise pollution was raised by two respondents, one felt it was necessary to tackle noise along the academic corridor (Lewes Road) at night and the other concerned with lack of protection from noise for tenants in older buildings (issues of holiday/ party homes; building works and drunks).

D. Water and Waste Water Infrastructure

Question P8 - Is it necessary to have a detailed policy to support the provision of water and wastewater infrastructure and co-ordinates development with its provision?

There were 13 responses:

(14)

Southern Water (25)

(35)

(38)

North Laine Community Association (NLCA) (43)

Surfers against Sewage (71)

(75)

Natural England (119)

(147)

(153)

Environment Agency (176)

Unknown Respondent 3 (192)

Unknown Respondent 5 (195)

Two respondents felt it was unnecessary to have a detailed policy; one respondent suggested the issue could also be addressed in an overarching infrastructure policy.

10 respondents felt there should be a detailed policy:

- Consideration should be given to the capability of present infrastructure in the city centre;
- Given vulnerability of the chalk aquifer;
- Southern Water would seek a policy that supports the provision of strategic water and wastewater infrastructure (such as additions or improvements at treatment and abstraction works). Would look for support within individual site specific policies for the provision of local sewerage and/or water infrastructure to be delivered in

tandem with new development, and where capacity assessments show there to be a requirement at a given site, would seek provision for development to connect to the sewerage/ water network at the nearest point of adequate capacity.

- Surfers Against Sewage felt wastewater infrastructure should not become overloaded by new development, and cautioned against the use of 'package sewage treatment plants' as they are more likely to result in groundwater pollution.

One respondent felt they were not qualified to respond.

E. Sustainable Drainage

Question P9- Given the existing national guidance and approach, is it necessary to have an updated policy on sustainable drainage in the City Plan Part Two?

There were 11 responses:

(14)

(35)

(38)

North Laine Community Association (NLCA) (43)

(52)

Surfers against Sewage (71)

(153)

Environment Agency (176)

East Sussex County Council Strategic Economic Infrastructure Team (178)

Unknown Respondent 3 (192)

Unknown Respondent 5 (195)

Six respondents felt an updated policy was required however the nature of SuDs needed to be appropriate to the location:

- Surfers against Sewage gave the example of areas where ground water flooding or pollution is a problem. Deep bored SuDs can lead to pollution of groundwater. SuDs should be encouraged on the Downs to prevent run-off from fields causing mudslides as happened in Bevendean and Rottingdean.
- Specifically in relation to the protection of groundwater quality. Soakaways in SPZ1 for example are unlikely to be appropriate from a water quality perspective. Environment Agency recommends that the wording covers pollution prevention and control through appropriate design and mitigation in addition to flood risk.
- Policy should target habitats and species of known importance to the area (ESCC has produced guidance on the issue).
- Plan should prevent building houses in gardens to maintain local drainage.

One respondent felt there was a need for a policy only if does not include building conversions, increase in occupancy/commercial holiday lets as well as new build.

One respondent thought a policy probably was needed and one respondent did not think a detailed policy was needed.

F. Coastal/ Marine Planning

Question P10- Is there sufficient policy guidance in the City Plan Part 1 (in terms of the need to protect and enhance the marine environment) to assess planning applications that come forward on the seafront?

There were 10 responses:

(14)

(35)

(38)

(64)

Surfers against Sewage (71)

(153)

The Kingscliffe Society (165)

Sussex Wildlife Trust (166)

East Sussex County Council Strategic Economic Infrastructure Team (178)

Unknown Respondent 3 (192)

Whilst two respondents thought that there was sufficient guidance, 7 respondents felt more detailed guidance was required:

- Sea and beach are filthy; volunteers are shocked at amount of rubbish they collect. Many specialists and organisations should be consulted.
- To protect areas used for marine recreation off Rottingdean, Ovingdean east of Brighton Marina (surfing), near Peter Pans playground (kayaking), around West Pier (surfing and surfing live saving), Hove Lawns (boat launching spot) King Alfred (kitesurfing), Hove Lagoon (various watersports), west of Millionaire's Row (surfing, kite surfing).
- Insufficient concern for marine environment when dealing with seafront applications.
- Sussex Wildlife Trust - Plan needs to address the cross over between terrestrial and marine planning environment to ensure appropriate safeguards for the natural environment – suggest seek expert advice e.g. Inshore Fisheries and Conservation Authority.
- City council is responsible for planning seaward to mean low water and the MMO is responsible for planning landward to mean high water, there is significant overlap which must be fully recognized and integrated between two plans; additional policy guidance would clarify the situation and ensure that developments are compliant with both plans.

Question P11 -Is there a need for further policy guidance to ensure adequate and maintained coastal defences and to ensure that development in the coastal zone takes account of the particular conditions experienced within the area?

There were 9 responses:

(35)

(38)

(52)

Surfers Against Sewage (71)

(147)

(153)

Standard Life Investments Shopping Trust (157)

East Sussex County Council Strategic Economic Infrastructure Team (178) Unknown respondent (192)

Whilst two respondents did not think further policy guidance was required; 6 respondents thought further policy guidance was required:

- Any changes to coastal defences should try to protect and enhance marine recreation.
- There are areas to east of the Marina where coastal erosion remains a threat to the A259. The City Plan Part One seeks to monitor this but actually areas around Ovingdean Roundabout, Rottingdean and Saltdean may require specific policies as they are within 10 km within A259.
- City Plan should recognize and integrate with Shoreline Management Plan policies.
- Be sensible about introducing cycle schemes as cycling on the seafront in the summer is dangerous and virtually impossible.

Question P12- Is there a need for further policy regarding the presumption against encroachment onto the shingle beach?

There were 13 responses:

(35)

(38)

NCLA (43)

(51)

(52)

Surfers against Sewage (71)

(153)

Standard Life Investments Shopping Centre Trust (157)

The Kingscliffe Society (165)

Sussex Wildlife Trust (166)

East Sussex County Council Strategic Economic Infrastructure Team (178)

Unknown respondent 3 (192)

Unknown Respondent 5 (195)

11 Respondents felt there was need for a further policy: there was concern with current and proposed developments that encroach onto beach:

- The Kingscliffe Society - presumption should be strengthened, development should not interrupt spectacular lengthy rectangular stretches of shingle beach. Reference could be made to potential removal of some of the unsightly and redundant structures.

- Sussex Wildlife Trust - support policy that protects rare and globally threatened habitat of vegetated shingle from encroachment – priority habitat as noted under section 41 of the NERC Act – already coming under pressure from development along the Sussex coastline.
- ESCC – the vegetated shingle is an internally important and globally restricted habitat for which Sussex is national stronghold. In addition to biodiversity interest, healthy shingle beaches offer natural coastal protection. There are 3 remaining areas of vegetated shingle in Brighton & Hove but there is also capacity for expansion given sympathetic management which includes resistance to encroachment.

Only one respondent felt no further policy was required and Standard Life Investments Shopping Centre Trust felt City Plan Part Policy SA1 provides detailed guidance and questioned the need for more policy guidance. Any new policy relating to development of the shingle beach should be criteria based whilst retaining the presumption against encroachment onto the shingle beach. This is on the basis that there may be circumstances where encroachment is justified in terms of wider benefits that may be delivered.

Summary of key issues from Consultation Events and Workshops

Pollution

At the **Stakeholder Event** there were noise pollution related concerns raised due to the concentrations of “Holiday Let” party houses e.g. Charles Street, Kemptown. Participants were also concerned with noise pollution issues connected with Night Bus Routes for residents and staying visitors and from refrigeration units on Lorries when delivering at stores.

[note air quality and transport issues arising from the events are addressed in the travel and transport analysis]

Sustainable Urban Drainage

At the various events there was a general view that detailed Sustainable Urban Drainage policy was still required.

At **Stakeholder Event** there was a discussion at the relevant workshop of SuDs and aquifers. There was felt to be a need to protect aquifers and aqua flows from development; recognition of the impact of topography and the need for new drainage system to address torrential rainfalls. Need to ensure there is infrastructure for drainage and adequate land drainage – avoid paving over front gardens and ‘garden grabbing’ as these impact on drainage and alter flood zones.

The sustainable drainage system needs to be strengthened; better SuDs hierarchy to promote green roofs / swales etc not rec soakaways

Suggestions were given as to how to tackle surface water and SuDS in the urban, hilly environment of Hanover – Rain Gardens to mitigate flooding and green roof (loft conversion). One participant suggested that in Lower Bevendean there was a grassed urban opportunity in Moulsecoomb Place.

The need to stop paving over front gardens and the need for upland flood control were also mentioned at one of the design workshops.

At the relevant workshop at the **Sustainability and Environment Event** it was suggested that there should be a specific policy around the worst affected areas and strategy/policy for existing built areas that flood.

Some questions were asked of the current approach:

- Is 1 in 200 years a robust assessment methodology? Should we consider planning for higher severity?
- Is 50% attenuation from a site high enough? Map flow rates and paths from different surface types.
- Is there a policy link between drainage and flood risk with marine water quality that protects marine habitats and species and designated sites?

The SuDs policy should contain:

- hierarchy
- Should require compliance with law on porous paving limits.
- Identify particular parts of city where particular SUDS are required, e.g. London Road.
- consider the impact of SuDs on groundwater quality
- should not be too prescriptive about the types of SUDS that could be used in new development.
- Stipulations on rainwater harvesting on all new developments.
- Transcribe best practice into policy (to front end development design)

At the second workshop at the **Sustainability and Environment Event** there was agreement on the benefits of a guide for developers on flood solutions, more guidance on surface water and drainage and an SPD on drainage/ water management in development etc. Discussion of whether there needed to be stronger policy to ensure water management is properly addressed or whether CPP1 provides sufficient hook for an SPD. Also discussed if there should be targets or whether these are already set elsewhere eg within SFRA.

Other issues:

- How to address the removal of trees and hard landscaping that increase flooding and cause water problems in developments other than new development. Better communications?
- Cumulative, collective impact can be significant and should be addressed
- Strategy/advice to use bigger gutters on new/old homes.
- Awareness campaign with local nurseries, parent and toddler groups and schools regarding flushing wet wipes down toilets.

- Encourage green walls and green roofs to achieve increased water attenuation, low carbon and visual attractiveness.
- Underground water storage: always integrate with 'brown water' sanitation, etc.
- Reduction of consumption of water would help in a water stressed area.
- Quality of soakaways and maintenance issues could be addressed via an SPD.
- Frontload information on water management.
- Height of electric plugs to avoid damage? Underground storage?

G. Low carbon and renewable energy – questions P13-21

Key issues arising from Formal Written Responses

There were 20 respondents who submitted written comments on the Portal to questions P13-P21 making 94 representations.

(14)

Brighton & Hove City Council, Alex Fox (22)

(31)

(35)

(38)

(60)

(64)

(65)

(75)

Aqualor Energi (87)

U & I PLC (131)

National Grid Property and SGN (140)

(153)

Standard Life Investments Shopping Centre Trust (157)

University of Brighton (160)

Sussex Wildlife Trust (166)

East Sussex County Council Strategic Economic Infrastructure Team (178)

St William Homes (179)

Unknown respondent 3 (192)

Unknown respondent 5 (195)

Question P13: Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

There were **13** respondents to this question:

(14)

Brighton & Hove City Council,

(22)

(38)

(60)

(64)

(65)

(75)

Aqualor Energi (87)
(153)
University of Brighton (160)
St William Homes (179)
Unknown respondent 3 (192)
Unknown respondent 5 (195)

Overall, there was strong support to include further policy to incentivise delivery of low carbon and renewable energy in CPP2. 8 respondents were supportive but 2 respondents were not supportive.

In support of further policy, concern was expressed that Brighton & Hove has less installed renewable energy capacity than comparator areas. The respondent referred to Scottish Futures Trust and standards in London demonstrating higher standards are achievable. The University of Brighton supports the inclusion of further policy referring to other good practice at other local authorities that could be implemented locally.

One respondent suggested principles to incentivise delivery of low carbon and renewable energy should be outlined in planning guidance not policy.

Question P14: Are there any types of energy that should be particularly supported e.g. community energy or particular technologies?

There were 8 respondents to this question.

Brighton & Hove City Council, (22)
(38)
(64)
(65)
Aqualor Energi (87)
Standard Life Investments Shopping Centre Trust (157)
University of Brighton (160)
Unknown Respondent 3 (192)

There was strong support for specific types of energy should be supported by CPP2 and a variety of technologies referenced. 7 respondents stated their support, 1 respondent did not support any particular types of energy being supported by CPP2.

A variety of specific technologies were referred to: district heating including consideration of cooling needs; marine technologies (wave power and water source heat pump); heat pump technology using heat from water aquifers; a stronger solar policy; use of battery storage; anaerobic digestion; and application of Energy Study findings on site and technology suitability.

3 respondents including Brighton University supported development of policy to support community energy in order that development meets the needs of local communities. They noted established local community energy companies, and referred to Cornwall Council working with Community Energy and private sector partners to increase renewable

generation; they also noted potential for district heating on a community energy model to enable local energy spend to stay in the local economy.

3 respondents advocated policy on heat pump technology taking advantage of the city's coastal and low lying location and potential for use of aquifer and sea sources of heat. One respondent noted heat pumps produce no local air emissions.

One respondent recommended that to future proof the policy further studies beyond the Energy Study would be needed to plan where technologies/systems can be installed relating specifically to sites, and how these can be upgraded to zero carbon in future if not installed as zero carbon initially.

Concern was expressed by one respondent that policy should not be overly prescriptive by energy technology as rapid advances may make policy outdated.

Question P15: Having regard to the findings of the Renewable and Sustainable Energy Study 2012 should City Plan Part 2 seek to identify and allocate sites for renewable and low carbon energy generation, storage or networks?

There were 7 respondents to this question: (14)

Brighton & Hove City Council,(22)
(38)

T Whittaker, Aqualor Energi (87)

Sussex Wildlife Trust (166)

St William Homes (179)

Unknown respondent 3 (192)

The approach for City Plan Part 2 to identify and allocate sites for renewable and low carbon energy generation, storage or networks was supported by the majority of respondents with 5 respondents including Brighton University supported and 3 objected to proposals that CPP2 identify and allocate sites for renewable and low carbon energy generation, storage or networks. In support of sites being allocated through the plan, one respondent felt it would provide greater clarity for developers.

Some considerations that respondents wanted to see addressed by allocation of sites were as follows: need to consider energy and thermal storage; sites near substations are ideal for grid services (power storage) to assist balancing city electricity demands and resilience of future; that DAs should lead on better energy; grid connection proximity (Sussex Wildlife Trust).

In support of the approach, care was urged that the council understand issues relating to microgeneration increase and UK Power Networks (UKPN) capacity The council's Housing Energy Manager referred to a solar PV program where 25% of DNO applications for solar PV were refused on grounds of 'back-feeding'. Planning must understand these issues and develop policy accordingly.

Sussex Wildlife Trust supported carbon reduction and micro generation, but urged consideration of land take of schemes.

One respondent objected to the site allocation for renewable and low carbon energy generation, storage or networks and referred to the Deregulation Bill (Section 43). However, this amendment removes LA powers to set energy or water efficiency standards in new housing only, it does not remove LA powers to require percentage of renewable energy from development or to allocate sites for renewable and low carbon energy generation, storage or networks.

Under general comments submitted, Gatwick Airport Ltd stated its 30km Wind Turbine safeguarding zone⁴ which may affect the north of the city. It noted an obligation to consult the Airport should any wind turbine be proposed within this zone.

Question P16: If yes, what sites should be investigated for energy uses? (taking into account the areas with opportunity indicated in the 2012 Renewable and Sustainable Energy Study)

There were **4** respondents to this question.

Brighton & Hove City Council, Alex Fox (22)

D Hearn (65)

Aqualor Energi (87)

Unknown respondent 3 (192)

There was consensus that sites should be investigated for energy uses taking into account Energy Study findings.

A variety of recommendations were proposed by the respondents: allocations for energy sites within the DAs and SAs as a minimum; that policy recognise publicly owned land for energy uses; that community buildings, leisure centres, libraries and public housing stock and Private sector estates with shared heating services should be identified for energy uses; and that Energy Study findings for specific technologies, especially water source heat pump technology should be considered.

Question P17: Should a renewable energy policy be explored for CPP2?

There were **11** respondents to this question.

M Sexton (14)

Brighton & Hove City Council,

(22)

(38)

(64)

(65)

Aqualor Energi (87)

National Grid Property and SGN (140)

⁴ <http://www.gatwickairport.com/business-community/airlines-business/business/aerodrome-safeguarding/> and <https://www.gov.uk/government/publications/safeguarding-aerodromes-technical-sites-and-military-explosives-storage-areas/the-town-and-country-planning-safeguarded-aerodromes-technical-sites-and-military-explosives-storage-areas-direction-2002>

Standard Life Investments Shopping Centre Trust (157)
University of Brighton (160)
St William Homes (179)
Unknown respondent 3 (192)

The suggested approach was largely supported for the development of a renewable energy policy in CPP2. Of 11 respondents, 7 supported, and 2 objected to renewables policy development. 2 respondents suggested viability issues should be considered and 2 respondents did not express a preference either way.

In support of the approach, concern was expressed that Brighton & Hove has less installed renewable energy capacity than comparator cities, and that Das and SAs as a minimum should include renewables policy. The University of Brighton were amongst those supporting a renewable energy policy.

Question P18: What factors should be considered when exploring this approach?

There were **6** respondents to this question:

Brighton & Hove City Council, (22)
(38)
(64)
(65)

University of Brighton (160)
Unknown respondent 3 (192)

Of those identifying issues to consider when developing a renewables policy, a range of issues was raised. These included: energy storage, grid capacity, heating and cooling networks, futureproofing, community energy, water source heat pump technology; solar energy; energy from recycled products (energy from waste?); design and infrastructure. Brighton University recommends that the City Council explores successful renewable energy approaches adopted by other local authorities.

Question P19: Should the City Plan Part 1 policy CP8 be supplemented with further clarification/policy in support of district heating? Or, could this best be dealt with in a supplementary planning document?

There were **7** respondents to this question.
(14)

Brighton & Hove City Council (22)
(38)
U & I PLC (131)
Standard Life Investments Shopping Centre Trust (157)
St William Homes (179)
Unknown respondent 3 (192)

There was an equal split in the response on whether further clarification/policy in support of district heating should be developed in the Plan document or in supplementary guidance. 3

of seven advocated plan policy, and 3 of seven advocated supplementary guidance, whilst one respondent did not support either. However, those supporting a plan policy also recommended production of supplementary guidance.

In support of policy in CPP2, it was recommended that evidence from feasibility studies commissioned by BHCC Housing could justify further site allocation policy on heat networks within DA5 Eastern Road and DA6 Hove Station. Development Managements policies as well as clarification/guidance in a supplementary document were strongly supported by the University of Brighton and BHCC Housing to provide further information in deploying decentralized energy networks. One respondent advocated that heat network delivery incorporating either low or zero carbon energy, could be applied more strongly in development areas.

In support of further guidance, issues considered to be missing from CPP1 included: recommendation to implement schemes to quality standards (e.g. the CHPQA, CIBSE CP1); heat customer protection (e.g. the Heat Trust scheme); district energy methodology on elements like private wire, cooling demands, interconnection (compatibility); requirement for submission of robust evidence considering incorporation of heat networks. Supplementary guidance was considered appropriate due to the technical complexity, and the extensive implications for the city and development schemes.

Question P20: Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?

There were **13** respondents to this question:

(14)

Brighton & Hove City Council (22)

(31)

(35)

(38)

(65)

(140) National Grid properties and SGN

(157) Standard Life Investments Shopping Centre Trust

(160) University of Brighton

(178) East Sussex County Council Strategic Economic Infrastructure

(179) St William Homes

(192) Unknown respondent 3

(195) Unknown respondent 5

8 respondents supported development of targets for energy efficiency in CPP2, 4 did not, and one was neutral but asked for viability to be considered.

The majority strongly supported development of energy efficiency targets especially in existing buildings and smaller development. Several respondents noted that it was particularly appropriate to apply standards to housing designed for rental as this was the worst performing housing in the city and impacted on the high local fuel poverty statistics. It was noted that forthcoming legislation to increase standards to a minimum EPC rating 'E'

was inadequate and included too many exemptions. As a result, planning policy could assist in delivery of more decent standards. Reference was also made to Draft BHCC HRA Energy Strategy, and the BHCC/PH Affordable Warmth Strategy in justifying policy development.

Caution was urged when considering energy improvements in hard to treat buildings such as those with listed status, solid walls, Bungaroosh construction, and insulation measures that prevent the walls from breathing.

Those objecting felt that standards should not be set at a local council level, and that viability may be impacted.

Question P21: Are there other pollution, water resource or low carbon and renewable energy matters that you think City Plan Part 2 should seek to address?

There were **6** respondents to this question.

Brighton & Hove City Council (22) (38)
(64)

University of Brighton (160)

Unknown respondent 3 (192)

Unknown respondent 5 (195)

A range of issues were raised in relation to general issues under this low and zero carbon energy. Of new issues not raised against previous questions, matters to consider included consideration of reducing air pollution; development of standards for energy efficiency of extension; promotion of local supplier networks to deliver low carbon projects. Comments also highlighted again the need to address standards in the private rented sector and the need to address energy demand reduction.

Summary of key issues from Consultation Events and Workshops

At the **Stakeholder Consultation** there was clear consensus that policy should be further developed to incentivise low and zero carbon energy. Particular reference was made to developing a renewables policy; tightening energy efficiency standards; stronger policy on use of solar technologies including solar PV slate for heritage buildings and a policy requiring solar for lost conversions; requirements for district heating and energy storage; and seafront developments to include heat storage reservoirs to utilize power from tidal, wind, solar.

At the **Sustainability and Environment Consultation Workshop** there was consensus that CPP2 should include further policy to incentivise delivery of low carbon and renewable energy (11 respondents) which was very strongly supported by most consultees who felt that there should be requirements for renewables to be delivered in new developments.

One consultee recommended allocating sites for renewable energy. Many consultees (3) emphasised need to strengthen policy support for solar technologies especially photovoltaics. One respondent urged caution over combustion technologies in AQMA areas,

instead recommending that a low NOx or no combustion zones be allocated in AQMAs. The issue of understanding restrictions for microgeneration in relation to DNO capacity was raised as something that the Plan should address. One consultee referred to opportunities for seaweed to be used as a renewable fuel.

There was strong support for community energy which emerged as the most favoured approach referred to by 7 consultees. Strengthening policy around heat networks was supported by several consultees (3) who also suggested policy support heat customer protection.

There was very strong support for targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings? 13 supported the approach. A variety of ways of securing this were suggested, these included use of EPC (D rating minimum); Passive House standards; use of HQM (Home Quality Mark). The favoured approach was to use some form of accreditation to demonstrate minimum standards, and that this should be an enforced planning requirement.

One consultees supported requirements for zero carbon rather than just low carbon development. Two consultees stressed the need to consider future proofing development by ensuring it can adapt to climate change, considering effects such as overheating which could be addressed via cross ventilation, solar shading, and reduction in excessive glazing.

CPP2 Chapter 9 – Design and Amenity

Summary of key issues arising from Written Responses

In total 30 respondents commented on this section of CPP2 scoping paper with 102 representations.

Question D1 Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

There were 19 respondents.

(30)

(38)

North Laine Community Association (43)

(51)

(60)

(65)

Kingsway and West Hove Residents Association

(83) Ovingdean Residents & Preservation Society

(97)

(113)

Varndean College (116)

The Regency Society of Brighton and Hove (120)

Rottingdean Parish Council (125)
U+I Plc (131)
Standard Life Investments Shopping Centre Trust (SLI) (157)
The Kingscliffe Society (165)
St William Homes (179)
LCE Architects (180)
Unknown respondent 1 (190)
Unknown respondent 5 (195)

Overall there was clear support for having a Place Making policy. Four respondents, however, felt such a policy was not needed.

One respondent suggested this policy should focus on the spaces between buildings and the public realm.

One respondent supported the reduction of the number of documents that it is necessary to wade through to establish the policies applicable to an area. This respondent suggested the Place Making policy should gather all considerations for areas avoiding the need to refer to other documents to find policy considerations.

Question D2 Should the Place Making Policy seek to incorporate guidance on new and emerging design issues such as expert review and integrated infrastructure design?

There were 15 respondents.

(30)
(38)
North Laine Community Association (43)
(51)
(60)
(65)
Ovingdean Residents & Preservation Society (97)
(113)
The Regency Society of Brighton and Hove (120)
Rottingdean Parish Council (125)
Standard Life Investments Shopping Centre Trust (SLI) (157)
The Kingscliffe Society (165)
(186)
Unknown respondent 1 (190)
Unknown respondent 5 (195)

Overall there was support for the incorporation of emerging design issues into the Place Making Policy in particular the areas prompted in this consultation question.

Three respondents welcomed the recent introduction of peer review by the council and its potential for raising design standards in the city in particular when it comes to large development.

Two respondents referred to the importance of monitoring the performance of peer design review and quality of outcomes.

Question D3 Are there other streetscape and/or new, emerging design issues apart from those identified above that should be included in a Detailed Place Making Policy?

There were 17 respondents.

(30)

(60)

Hove Civic Society (63)

D Hearn (65)

Ovingdean Residents & Preservation Society (97)

(104)

Conservative Group (109)

(113)

Rottingdean Parish Council (125)

Brighton Society (135)

The Kingscliffe Society (165)

East Sussex County Council Strategic Economic Infrastructure Team (178)

Brighton & Hove Food Partnership (134)

Brighton Society (135)

Friends of the Earth (177)

Crest Nicholson (181)

Unknown respondent 1 (190)

Five respondents felt the need for new development to reflect character and respond to landscape of existing area, in particular roofscape and materials to be covered via the Place Making Policy. One of these highlighted the need for this policy to focus on the quality of materials and their suitability to the local environment.

Individual respondents identified the need for this policy to address issues such as passive design, public realm around buildings, encouraging walking and cycling, making better use of buildings, in particular roofs (food growing, amenity space, commercial/event areas) and better control over large extensions.

With regards to tall buildings, one respondent suggested more opportunity be created for communities to provide their input into the design of large scale development and tall buildings. One respondent felt further restriction should be placed upon the impact assessment of tall buildings based on, for instance, urban grain, views, sense of place and topography in particular when it involves heritage assets. Another respondent felt the

need for a detailed policy that supports increased building heights and density on brownfield sites to be included in City Plan Part Two.

Another respondent indicated design policies should emphasise the need to achieve UNESCO Biosphere objectives by ensuring public realm design encourages more walking and cycling (via introduction of active frontages and avoiding stopped up roads, or closes that do not contain through routes for pedestrians and cyclists).

One respondent thought the policy should support innovative low energy and water design and encourage developments to design in south facing roofs to enable solar technologies to be fitted either as part of the development or at a later date.

Question D4 Should the Extensions and Alterations Policy incorporate aspects of SPD12 and should the policy seek to supersede it?

There were 12 respondents.

(38)

North Laine Community Association (43)

(51)

(60)

(65)

Kingsway and West Hove Residents Association (83)

Ovingdean Residents & Preservation Society (97)

(113)

Rottingdean Parish Council (125)

Brighton Society (135)

The Kingscliffe Society (165)

Unknown respondent 1 (190)

Overall there was significant support for SPD12 to be superseded in CPP2 by an Extensions and Alterations Policy and for aspects of the SPD to be incorporated into this policy.

Only one respondent suggested this was not needed and another considered that whether policy on extensions and alterations is in the main city plan or in supplementary documentation as long as it is communicated in an accessible and effective way.

One respondent suggested that the impact of extensions upon the streetscape should be prioritised over that upon the rear of the property.

Another respondent felt SPD12 can be too prescriptive and a degree of flexibility in the new policy would be welcomed. For instance, it was suggested that setting out principles of respect for neighbours and the visual characteristics of the area may be sufficient to deliver policy objectives.

Question D5 Are there any other design issues that this policy should provide guidance on?

There were 10 respondents.

(30)

(38)

(51)

(113)

Rottingdean Parish Council (125)

Brighton Society (135)

St William Homes (179)

East Sussex County Council Strategic Economic Infrastructure Team

(178)

(186)

Unknown respondent 1 (190)

Two respondents considered that it is important to guard against a negative impact on extensions on surrounding properties and street scene.

Individual respondents identified the following issues as in need of further guidance: passive design, water conservation, adequate internal space standards and incorporation of ecology/biodiversity into new development.

Three respondents felt that the policy needs to send a clear message that poor quality in design would not be supported in the city, in particular when it comes to tall buildings.

Question D6 Should the protection of amenity be addressed through a single consolidated policy? If not, can you explain why and suggest an alternative approach?

There were 8 respondents.

(38)

Ovingdean Residents & Preservation Society (97)

(113)

Rottingdean Parish Council (125)

U+I Plc (131)

St William Homes (179)

LCE Architects (180)

Unknown respondent 1 (190)

There was considerable support for addressing the protection of amenity via a single consolidated policy.

One respondent suggested amenity is a wide ranging issue that should be broken down into elements with each element being defined and addressed in detail as a means of preventing long drawn out process.

Question D7 Are there any further issues you consider an amenities policy should address?

There were 9 respondents.

(30)

(31)

Kingsway and West Hove Residents Association (83)

(113)

Rottingdean Parish Council (125)

U+I Plc (131)

Brighton Society (135)

Montpelier and Clifton Hill Association (141)

The Kingscliffe Society (165)

Individual respondents suggested an amenity policy should outline more clearly how a balance should be struck between the benefits of new development and their impact upon an area's character, quality of life, access and transport and on-street parking.

Some respondents felt it is important that an amenity policy spell out minimum daylight/sunlight parameters, overshadowing and consider the importance of incorporating entertainment, leisure and public facilities into new development.

One respondent felt it would be important that graffiti be brought under planning control and enforcement and any detrimental effect on the local amenity of an area be used to prevent development.

Two respondents suggested this policy should consider ways of enabling existing residents to put across their point of view more easily when it comes to amenity issues.

Another respondent suggested that the protection of amenity should encompass the impact of changes to activities in existing areas caused by the continual loss of pedestrian access due to commercial encroachment onto public space and its impact upon the ambience of an area.

Question D8 Would it be appropriate for an amenity policy to explore parameters for assessing the effective use of sites?

There were 9 respondents.

(30)

(38)

Ovingdean Residents & Preservation Society (97)

(113)

Rottingdean Parish Council (125)

U+I Plc (131)

Brighton Society (134)

St William Homes (179)

Unknown respondent 1 (190)

There was not clear consensus on whether an amenity policy should explore parameters for assessing the effective use of sites.

Two respondents suggested parameters should be set out in a SPD or site-specific guidance.

One respondent feels steps could be taken for new development to avoid the blocking off views to the sea and the sky and causing considerable overshadowing of a public space, in particular when it comes to tall buildings.

Question D9 Can you think of any other policy issues that relate to the design of new development (not already covered in the sections above) that you think City Plan Part Two should seek to address?

There were 3 respondents.

U+I Plc (131)

Brighton & Hove Food Partnership (134)

Montpelier and Clifton Hill Association (141)

One respondent suggested that in order for consultations to be effective, documents should be in plain language and avoid jargon (place making, legibility) and for provisions for the protection of the public interest to prevail over private gain.

One respondent welcomed the council's commitment to bringing forward an Urban Design Framework (UDF) as a means of providing additional clarity on the acceptable delivery of tall buildings and urban design. It is suggested City Plan Part Two should provide confirmation of the content and time-frame for production of this document and that the UDF should come forward alongside City Plan Part Two to help guide the forthcoming development of allocated sites.

Another respondent would like to see stronger planning policy relating to the integration of food growing in new developments and to the inclusion of design principles that improve connections with outlets selling affordable fresh produce and request for facilities for food waste collections to be provided at buildings with catering outlets.

Summary of key issues from Consultation Events and Workshops

At the **Stakeholder Consultation** there was support for streetscape approach to design policies city-wide and in Conservation Areas. However, it was felt that policies should avoid being too prescriptive, focusing on assessment parameters rather than style when it comes to delivering design quality.

Participants considered that these policies should enable local communities to have a say in what they want their place and hopefully lead to more quality of design of new development in the area.

The quality and maintenance of materials were considered of particular importance when it comes to safeguarding good quality of building design.

At the **Professionals Forum** there was support for city-wide design policies that are more focused and less restrictive and seek to facilitate the delivery of challenging housing targets whilst coaching better design. It was generally felt that new design can flourish without too much control on some areas and that a different approach is needed for different areas. In some areas of city diversity is what is attractive and design policies need to leave room for creativity. Different approach to different places is needed.

Some felt that more clarity when it comes to what is important in design would be welcomed and could help reduce inconsistency local planning authority response to planning applications.

Suggestions in order to promote good design and streamline the planning process included:

- that, as in the case of Mid-Sussex, an awards for good design be established in the city;
- requests for materials samples be replaced by a planning condition that secured maintenance of materials for a set time;
- whether there is a need for details of PVC windows when these are not unique but standard in most cases;
- write positive policies that help attract developers to the city to deliver housing target and enable for buildings higher than those existing but below the 6 storey threshold (podium) to be delivered; and
- modelling housing target delivery (what it would look like).

At the **Sustainability and Environment Consultation Workshop** it was noted that the city's 'main square' is the seafront and its public realm needs investment and improvement. Respondents suggested design policies should be more joined up to ensure efficient delivery of infrastructure (using spaces between buildings as effective, attractive connections between green and popular spaces in the city), more sustainable spaces (protection from heat island, wildlife corridors, mitigation against climate change) and innovative design (use top of building more efficiently, low energy solutions) and provide more opportunities for communities to influence changes in their area. Some respondents were concerned that the local planning authority already has considerable control over the street scape already and it important that design policies welcomes a mixture of new and existing.

CPP2 Chapter 10 – Heritage

Key issues raised by written responses

In total 35 respondents commented on this section of CPP2 scoping paper with 177 representations.

Question HR1 Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

There were 20 respondents.

(1)
(17)
University of Sussex (24)
(35)
North Laine Community Association (43)
(51)
Surfers Against Sewage (71)
Ovingdean Residents and Preservation Society (97)
Brighton & Hove Archaeological Society (105)
(113)
Kemp Town Society (117)
Rottingdean Parish Council (125)
Brighton Society (135)
(139)
(152)
Standard Life Investments (157)
ESCC Economic Infrastructure Team (178)
(186)
Unknown respondent 1 (190)
Unknown respondent 5 (195)

Overall there was clear support for having a specific policy for each type of heritage asset, with respondents considering that such an approach was simpler to follow and would provide greater protection.

Some respondents supported having a single over-arching policy covering all types of asset, with separate clauses for specific protection needs or with more detail in a separate document such as an SPD, an LBHPA or other document. One respondent felt that all assets should be graded, with separate policies for each grade.

Attention was drawn to the need to maintain or strengthen policy with regard to the repair of buildings in conservation areas, archaeology, street furniture and the rebuilding of the West Pier.

Question HR2 What are the key local heritage issues with long term implications that need to be addressed in the Part 2 policies?

There were 16 respondents.

(1)

(17)

Ovingdean Residents and Preservation Society (97)

Brighton & Hove Archaeological Society (105)

(107)

Conservative Group (109)

(113)

Kemp Town Society (117)

Rottingdean Parish Council (125)

Brighton Society (135)

(139)

(152)

ESCC Economic Infrastructure Team (178)

(186)

Unknown respondent 1 (190)

Unknown respondent 5 (195)

The main heritage issue raised was the need for better enforcement of the maintenance, repair and restoration of listed buildings and historic buildings in conservation areas. This was a general issue raised by several respondents, whilst two specifically mentioned the disrepair of the Madeira Terraces and arches and one specifically mentioned the city's ornamental infrastructure and street furniture.

Two respondents mentioned the Royal Pavilion estate as a specific issue but one respondent felt that there is an over-emphasis on the Royal Pavilion.

Two respondents considered that high rise housing development is threatening historic areas. One respondent raised the poor quality of new buildings as an issue but one respondent felt that equal weight should be given to new buildings in policy. There was concern from one respondent about the harmful impact of development on marine views.

Other individual issues raised included: the need for more restrictions on housing development in and around Ovingdean; that heritage brings in business, that Archaeological Notification Areas (ANAs) need to be reviewed; and that there needs to be a more active and holistic approach to archaeology across the public sector in particular.

Question HR3 Are there important groupings of heritage assets that require a site-specific policy approach? (e.g. the Royal Pavilion estate).

There were 17 respondents.

(17)
University of Sussex (24)
(35)
North Laine Community Association (43)
(51)
Ovingdean Residents and Preservation Society (97)
Brighton & Hove Archaeological Society (105)
(113)
Kemp Town Society (117)
Rottingdean Parish Council (125)
Brighton Society (135)
(138)
(139)
Standard Life Investments (157)
ESCC Economic Infrastructure Team (178)
(186)
Unknown respondent 1 (190)

Nearly half of the respondents agreed that the Royal Pavilion estate warrants a site-specific policy approach.

Three respondents felt that a specific policy approach was needed for the Brunswick estate and the same number proposed the Kemp Town estate.

Individual respondents suggested: the University of Sussex; Ovingdean village; Whitehawk Hill Neolithic Causewayed Enclosure; Hollingbury Hill Fort; the Hippodrome and Astoria entertainment venues; Rottingdean conservation area; the Madeira Terraces; Hove Engineerium; Saltdean Lido; and any sites that encourage tourism. One respondent referred to the seafront under Question HR4 as warranting a site-specific policy.

One respondent considered that any site-specific policy should be in an SPD and one respondent felt that the NPPF provides sufficient guidance.

Question HR4 How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

There were 18 respondents.

(1)
(17)
University of Sussex (24)
North Laine Community Association (43)

(51)
Kingsway and West Hove Residents Association (83)
Ovingdean Residents and Preservation Society (97)
Brighton & Hove Archaeological Society (105)
(113)
Kemp Town Society (117)
Regency Society (120)
Rottingdean Parish Council (125)
(139)
(152)
Standard Life Investments (157)
ESCC Economic Infrastructure Team (178)
(186)
Unknown respondent 1 (190)

Of those respondents who directly answered the question five considered that all or most policy should be in the City Plan. Fine detail could be left to other documents only if necessary. Only one respondent specifically considered that detail should be left to SPDs. One respondent felt it should be mirrored in both.

There was some support for site specific planning briefs to support policy but one respondent was concerned about the quality of past planning briefs.

Other comments received were that: the City Plan should establish the principle of the importance of the setting of heritage assets; guidance is needed on suitable repairs and local materials for historic buildings; more guidance on archaeology is needed; and character statements and management plans should be put in place for all conservation areas that do not have them.

Question HR5 What are the gaps in our knowledge and understanding of the heritage of Brighton & Hove?

There were 16 respondents.

(1)
(31)
North Laine Community Association (43)
(51)
Ovingdean Residents and Preservation Society (97)
Brighton & Hove Archaeological Society (105)
(113)
Kemp Town Society (117)
Rottingdean Parish Council (125)
Brighton Society (135)
(138)
(139)
ESCC Economic Infrastructure Team (178)

(186)

Unknown respondent 1 (190)

Unknown respondent 5 (195)

Three respondents considered that the financial value of heritage on the tourist industry in the local economy is always underestimated.

On archaeology, one respondent felt that the older the period the less well it is known – e.g. evidence of Palaeolithic, Neolithic, Bronze Age, Iron Age, Roman, Saxon and medieval sites and deposits; whilst another suggested that a City Research Framework, focussing on each chronological period and key themes, would aim to define the gaps in our understanding and provide strategies for addressing those gaps

No other common themes emerged and this question was not well understood, but some comments were as follows: the discovery of Pugin's Cottage reinforces that there may be other gems to discover; the relationship of the city's architecture with its underlying topography and geology ought to be better known, and the heritage policy could include reference to this; a number of Brighton born-and-bred artists and scientists have achieved lasting international renown but these figures are undervalued in the general cultural profile of the city and could be noted in policy as candidates for commemoration in the public realm; and the status of our listed architecture, whether it is in sound condition, whether it is listed etc.

Question HR6 How could policy accommodate and overcome those gaps in knowledge? Is current national policy sufficient?⁵

There were 14 respondents.

(1)

North Laine Community Association (43)

(51)

Ovingdean Residents and Preservation Society

(97) Brighton & Hove Archaeological Society (105)

(113)

Kemp Town Society (117)

Rottingdean Parish Council (125)

Brighton Society (135)

(139)

ESCC Economic Infrastructure Team (178)

(186)

Unknown respondent 1 (190)

Unknown respondent 5 (195)

Nine respondents felt that national policy is insufficient to meet the needs of our important architectural heritage, puts assets at risk and dilutes protection. One felt that local policies should be more flexible.

⁵ In paragraphs 128, 129 and 141 of the National Planning Policy Framework.

One respondent suggested involving local societies more in decision making as they have a wealth of knowledge whilst another respondent suggested that a 'design statement' to be developed between the council and local societies would be helpful. Another suggestion was to "update" the city's conservation areas.

On archaeology, one respondent suggested that the former policy of PPG16 could form the basis for new local policy. Another said that whilst national policy is good it could be applied more effectively with regard to issues of archaeological interest through a detailed review of the key issues for each period and that within an SPD more detailed policy objectives for each chronological period and asset type could be set out.

Question HR7 What are the particular factors in Brighton & Hove that may be especially relevant to the setting of heritage assets?

There were 10 respondents.

(50)
Ovingdean Residents and Preservation Society (97)
Brighton & Hove Archaeological Society (105)
(113)
Kemp Town Society (117)
Rottingdean Parish Council (125)
Brighton Society (135)
ESCC Economic Infrastructure Team (178)
(186)
Unknown respondent 5 (195)

Three respondents mentioned the historic relationship of the city to the sea and seafront promenade as well as the importance of views to and from the sea.

Other factors mentioned were: panoramic views from ancient locations such as Whitehawk Hill and Hollingbury Hill Fort; the quiriness of the city and its different areas; and the open spaces that form the setting to historic landscape structures such as fountains.

One respondent welcomed and supported additional policies on setting but felt that it was impossible to suggest a generic approach.

Some threats to setting were put forward as: excessive highway signage; graffiti and street art; run down historic areas; and the juxtaposition of important heritage assets next to very poor quality modern architecture.

Question HR8 Is there a need for a policy on 'Heritage at Risk' or is policy CP15 in City Plan Part 1 adequate in this respect?

There were 14 respondents.

(1)

(17)
North Laine Community Association (43)
(51)
Ovingdean Residents and Preservation Society
(97) Brighton & Hove Archaeological Society (105)
(113)
Kemp Town Society (117)
Rottingdean Parish Council (125)
(139)
St William Homes (179)
(186)
Unknown respondent 1 (190)
Unknown respondent 5 (195)

Eight respondents felt that there is a need for further policy whilst five felt that there is not. Some respondents cited the condition of existing buildings such as the Madeira Terraces and Marlborough House as evidence that the existing policy is inadequate. One respondent suggested involving local societies at an earlier stage as this may generate ideas for innovative uses.

Question HR9 What are the greatest threats to the special appearance and character of the city's Conservation Areas and how can policy in City Plan Part 2 address these threats?

There were 15 respondents.

(1)
(17)
(35)
North Laine Community Association (43)
(50)
(51)
Ovingdean Residents and Preservation Society
(97)
(107)
(113)
Kemp Town Society (117)
Rottingdean Parish Council (125)
Brighton Society (135)
Kingscliffe Society (165)
(186)
Unknown respondent 5 (195)

A number of respondents raised the issue of new development as the greatest threat, with particular mentions for the lack of consistency and local distinctiveness in new development, the poor quality of infill development that is often pastiche and the threat posed by tall buildings in heritage settings. Four respondents raised lack of maintenance as the greatest threat, including specific references to landlords' lack of interest, and one

specifically referenced the Madeira Terraces. Three respondents raised the lack of enforcement and three raised the lack of public awareness of heritage and the council's failure to adequately promote it.

Two respondents identified street clutter as a threat and one specifically mentioned communal bins on the streets. Rottingdean Parish Council mentioned pollution and traffic as the greatest threats.

Question HR10 Is there a need for specific policy on energy efficiency and flood protection measures as they may impact on heritage assets?

There were 10 respondents.

(1)
(17)
Ovingdean Residents and Preservation Society
(97) (113)
Kemp Town Society (117)
Rottingdean Parish Council (125)
(139)
(186)
Unknown respondent 1 (190)
Unknown respondent 5 (195)

Five respondents felt that there is a need for a specific policy on these issues, especially flood protection, but four felt that there is no need.

Question HR11 Should there be specific design policy for historic areas and heritage settings or could this be covered within city-wide design policy?

There were 15 respondents.

North Laine Community Association (43)
Ovingdean Residents and Preservation Society (97)
Brighton & Hove Archaeological Society (105)
(113)
Kemp Town Society (117)
Rottingdean Parish Council (125)
Brighton Society (135)
(139)
Standard Life Investments (157)
Kingscliffe Society (165)
LCE Architects (180)
Crest Nicholson (181)
(186)
Unknown respondent 1 (190)
Unknown respondent 5 (195)

There was a mixed response to this question. Six respondents felt that there is a need for such a policy (one respondent specifically in respect of setting) whilst four considered that there is not and that a city-wide policy together with national policy is sufficient.

Some other respondents did not directly answer the question but referred to the need for each conservation areas to have a different approach, guided by character statements, and for policy to enhance local distinctiveness (such as vernacular traditions and local materials) but not be too prescriptive; two respondents felt that a more pragmatic approach should be taken, depending on the importance of the area within the city.

The Kingscliffe Society considered that there should be a much more forthright assertion in policy of the significance of the whole of the seafront decorative and ornamental infrastructure and street furniture and a policy to maintain the essentially relaxed pedestrian and beach-orientated nature of Madeira Drive, including a restriction on height.

Question HR12 What is key to the local distinctiveness of Brighton & Hove's historic areas and how should this be promoted or reinforced through policy?

There were 12 respondents.

(17)

(31)

(113)

Kemp Town Society (117)

Rottingdean Parish Council (125)

Brighton Society (135)

(139)

Kingscliffe Society (165)

LCE Architects (180)

(186)

Unknown respondent 1 (190)

Unknown respondent 5 (195)

The most common themes raised were: the relationship of the set-piece buildings to each other in their immediate vicinity; a certain uniformity of scale throughout; the relationship of development to the sea, including sea views; the influence of the downland on the urban cityscape; and the backdrop of the Downs. Also mentioned were the styles, materials and methods of manufacture deployed in traditional buildings.

One respondent felt that conservation areas are drawn too widely and that a much more qualitative approach is required to assess the extent of setting and impact. The Kingscliffe Society suggested that policy could help to enhance the historic character of St James's Street as a retail and residential neighbourhood.

Question HR13 Are there any specific sites that have such great potential to enhance a conservation area that they warrant a specific heritage policy?

There were 7 respondents.

Brighton & Hove Archaeological Society (105)
(113)
Kemp Town Society (117)
Rottingdean Parish Council (125)
(186)
Unknown respondent 1 (190)
Unknown respondent 4 (193)

There was little consensus on this question. The Royal Pavilion/Dome received two suggestions and the Hippodrome and Saltdean Lido one each.

Brighton & Hove Archaeological Society suggested that Whitehawk Hill, Hollingbury Iron Age Hill-Fort, the Patcham Dovecote, the Hangleton Dovecote and any other surviving Scheduled Ancient Monuments would benefit from a specific heritage policy.

Some respondents suggested wider areas: the Brunswick estate (two mentions), Regency Square, the Kemp Town Estate, The Lanes and Rottingdean.

The North Laine Community Association mentioned North Laine , Valley Gardens and the Royal Pavilion estate under HR14 and may have been referring to HR13.

Question HR14 Is there a need for policy on historic parks and gardens that seeks enhancement as well as conservation?

There were 13 respondents.

North Laine Community Association (43)
(51)
(51)
Ovingdean Residents and Preservation Society (97)
Brighton & Hove Archaeological Society (105)
(113)
Kemp Town Society (117)
Rottingdean Parish Council (125)
Brighton Society (135)
(139)
ESCC Economic Infrastructure Team (178)
(186)
Unknown respondent 1 (190)

There was a clear consensus in favour of having a policy that seeks enhancement. Some respondents mentioned particular park/gardens that warranted this approach: Pavilion gardens and Stanmer Park of the registered parks/gardens and Kipling Gardens and the communal gardens of Brunswick town as locally listed parks/gardens.

Question HR15 Can you think of any other policy issues that relate to heritage (not already covered in the sections above) that you think City Plan Part Two should seek to address?

There were 11 respondents.

Hove Civic Society (63)
Ovingdean Residents and Preservation Society (97)
Brighton & Hove Archaeological Society (105)
(113)
Rottingdean Parish Council (125)
Brighton Society (135)
Montpelier & Clifton Hill Association (141)
(163)
Kingscliffe Society (165)
ESCC Economic Infrastructure Team (178)
(186)

Perhaps not surprisingly a number of different issues were raised.

Hove Civic Society considered that many conservation areas are drawn too widely, with unnecessary protection around them including a too prescriptive approach in terms of visual impact from new surrounding developments and that an example is the Hove Station conservation area. They also called for 'investment strategies' to be prepared for conservation areas in partnership with local groups, with an emphasis on the public realm.

The Montpelier & Clifton Hill Society commented that adopted HE and QD policies together with the supporting SPDs and SPGs should be retained without being watered down or streamlined. They added that SPG15 should be amended to restrict further tall buildings city wide and that tall buildings should not under any circumstances be allowed within conservation areas, whilst in areas adjoining conservation areas they may be allowed in exceptional circumstances if an overriding public interest can be proven and if they relate well to their context.

The Kingscliffe Society commented that policy should not only serve to protect listed buildings, green spaces and conservation areas, but also the unique overall shape and historic character of the city, which is essentially determined by the downland and shoreline topography.

Ovingdean Residents and Preservation Society called for Conservation Area Character Statements to be written into heritage policy.

Rottingdean Parish Council commented that there should be policy guidance on signage within conservation areas and de-cluttering of signage where appropriate.

The Brighton Society commented that there should be a much more forthright assertion of the significance of the city's exceptional historic decorative and ornamental infrastructure and street furniture.

East Sussex County Council Strategic Economic Infrastructure Team commented that it would be useful to include reference to the role of Section 106 agreements in relation to heritage assets, particularly those at risk. These should include provision of local capacity for the storage of, and public access to, archives resulting from archaeological and/or historical investigations.

Brighton & Hove Archaeological Society commented on the scope for more archaeological sites to be found, particularly around the A27 and the Brighton & Hove foreshore. The Society also raised the need for recording of the West Pier before it is completely lost and the diminishing space available in the city to store and display archaeological finds.

One respondent stated that new buildings have no soul and no architectural narrative and are mostly shoddily built and that they make the city anonymous and generic. Another respondent also raised the need to improve the quality of new design development when historic buildings are being lost. The same respondent commented that better training is required for the building profession in the city to ensure that the right skills are available to work on historic buildings. This respondent also commented that more Listed Building Heritage Partnership Agreements are a good way forward, allowing appropriate organisations to take on an oversight role in relation to their heritage management.

Some respondents referred to Heritage issues in response to the questions on Design.

North Laine Community Association (43)

(51)

Regency Society (120)

Brighton Society (135)

Montpelier & Clifton Hill Association (141)

Two respondents to question **D1** felt that development of local assessments for conservation areas and their special requirements is part of the place making process and were concerned that many of these assessments are out of date.

The Regency Society would welcome a commitment that the council will prepare studies for those conservation areas without them, Queen's Park and College, as well as management plans for those conservation areas under development pressure, including Old Town.

The Brighton Society expressed concern that many planning applications for sites within conservation areas take too little account of the surrounding buildings in terms of scale, height, modelling, character or materials. This respondent also considers that higher design standards should apply not just within conservation areas but to new buildings on sites immediately adjacent to a conservation area.

The Montpelier & Clifton Hill Association considered that the 2016 adopted HE policies together with the supporting SPDs and SPGs should be retained without being watered down or streamlined.

Summary of key issues from Consultation Events and Workshops

At the **Stakeholder Consultation** there was some support for the idea of referencing conservation area character statements in policy and a suggestion that policy should say that development should be in keeping with the statements. There was also support for the suggestion that setting should be better addressed in policy in CPP2.

There was a consensus that conservation areas are different in type and level of importance and some felt that policy should distinguish between them.

It was suggested that CPP2 should review conservation areas, with some participants considering that there should be less conservation areas and other taking the view that more conservation areas should be designated. It was suggested that reviews be carried out in partnership with local groups.

It was suggested that the council should write better policies for better architecture and that poor quality design is encroaching on conservation areas – e.g. white render boxes.

On the other hand it was suggested that a conservation-based policy approach can obstruct other policies.

At the **Professionals Forum** there was support for a more relaxed and pragmatic approach to the rear of buildings, with the conservation focus on the street frontages. It was felt that it needs to be decided what is important about conservation areas and that this should be explicit in CPP2. What we have has appeared organically and we have got to allow that to continue.

It was generally felt that new design can flourish without too much control on some areas and that a different approach is needed for different areas. In some areas of city diversity is what is attractive. There were concerns that the street scene is dominated by pastiche. The emphasis should be on the analysis of the context – policy should allow for this analysis to be carried out and followed through.

The need to update and keep heritage buildings in up to date use was supported and that this should include taking into consideration energy efficiency - that should be the objective and how it is achieved leaves room for creativity.

Some thought that the council needs to be more selective with conservation areas. A view was expressed that there are too many conservation areas and their settings which means that there is no site in the city that is not affected by conservation.

At the **Conservation Advisory Group** meeting streamlining policy was supported as a good idea. But more guidance on the tall buildings area was considered to be necessary to ensure consistency and quality. But it was pointed out tall buildings and high density are not the only options. It was also suggested by some that extending the number of conservation areas is key to sustaining Brighton and Hove's heritage.

At the **Brighton & Hove Economic Partnership** workshop on Retail and Tourism it was noted that east of the Pier is looking a poor environment with removal of the Wheel and scaffolding up on the terraces; this area needs some investment and further attractions.

CPP2 Chapter 11 – Community Facilities

Summary of key issues from Responses

In total 27 respondents commented on this section of CPP2 scoping paper with 74 representations.

A. Retention of Existing Community Facilities, Assessing New Proposals for D1 Use Community Facilities etc

Question CF1: In the context of seeking to streamline policy in City Plan Part Two, what might be the most effective approach to setting out policies for community facilities? Different approaches could include, for example:

- **A single policy to address all types of community facility; their retention and how to consider new proposals?**
- **Policies to address the retention of and consideration of new facilities which are organised around the three main groups of community facility (as described above)?**
- **Separate policies for each individual type of community facility in particular where there is a difference in character between the uses and their impact?**

There were 13 responses.

(4)

(32)

(65)

Kingsway and West Hove Residents Association (KAWHRA)

(83) (96)

(113)

Varndean College (116)

Cllr Yates (124)

Rottingdean Parish Council (125)

U&L PLC (131)

(143)

Standard Life (157)

City College (164)

There was not a general consensus on the preferred policy approach:

- There were 5 responses that were general comments about community facilities and expressing the need to retain such facilities where possible.
- City College separately stated that CPP2 should ensure that detailed policies are not overly restrictive in hindering education providers from investing improvements to facilities.
- Two respondents supported a single community facilities policy.
- Three respondents supported a grouped policy approach;
 - Rottingdean Parish Council suggested grouping broad headings and then policies to be written accordingly e.g. educational, recreational, social and cultural and wellbeing /resilience and emergency services
 - U+I Plc – group policies to allow for each community facility to be considered independently taking into account differing characteristics, impacts and benefits of and the need for each community use type.
 - Varndean College - Each type of community facility should be considered independently, taking into account the differing characteristics, impacts and benefits of and need for each community use.

Two respondents supported the need for separate policies for different types of community uses. For example Standard Life stated that any policy should be criteria based and differentiate from different types of community as there may be circumstances where loss of and / or replacement in a different form may be appropriate in planning terms.

Question CF2: What are the key planning issues that will need to be taken into account when considering the retention of existing community facilities?

There were 10 responses.

(4)

(32)

(65)

Kingsway and West Hove Residents Association (83)

(96)

(113)

(124)

Rottingdean Parish Council (125)

(143)

City College (164)

There was not a consensus on the key planning issues, rather a variety of issues were suggested:

- Active user over a long period that is community driven
- Policy should recognise that rising property values threaten community facilities.
- More consideration needed of what happens if they are not retained.

- Guidelines that recognise and support the need to expand and develop facilities to encourage more sustainable operations.
- Meaningful community consultation
- Significant changes planned for the future delivery of healthcare and social care across the city. Planning Policy must enable these collated services to be developed and redundant sites to be freed up.
- The local need, demand and availability to the community
- Kingsway and West Hove Residents Association suggested that it would be important to take into account if alternative facilities are available within walking distance/accessible by public transport. The needs of the local community and the options available for meeting them.
- One respondent - City College - felt that the policy should not be overly restrictive
- Rottingdean Parish Council felt the council should look beyond short term cost cutting and should take account of changing demographics when reviewing facilities e.g. studentification/ ageing population. Properly consult with local community groups using easily accessible communication pathways.

Question CF3: What are the key issues for assessing development proposals for new community facilities? Should policy seek new community uses to meet a variety of community needs?

There were 10 responses.

- (4)
- (65)
- (KAWHRA) (83)
- (96)
- (113)
- Rottingdean Parish Council (125)
- City College (164)
- Crest Nicholson (181)
- Brighton & Hove Economic Partnership (189)
- Unknown Respondent 5 (195)

Five responses were concerned that the assessment should be related to evidence of need and demand:

- Evidence should include the active use over a long period that is community driven
- Population growth and housing projections over a 15-30 year period
- Level of use, user base (i.e. local to users)
- Policy should ask the existing community what is required locally and assess development on a case by case basis.

Three responses related to the nature of the facility:

- Ensure existing facilities are effectively resourced and managed rather than constructing new facilities. Ensure policy includes extensive consultation

- Kingsway and West Hove Residents Association felt new uses need to be flexible and multipurpose to respond to pressures on land supply
- BHEP suggested that community facilities should be positioned near to hub areas of activity. A balance of uses in proximity to a community facility should be made. Community infrastructure should be implemented prior to the completion of development that funds it subject to viability.

Two respondents requested that the policy should be flexible not restrictive. Crest Nicholson - cost of delivering high quality facilities is high and scheme viability must be paramount. Must be recognised by the council when assessing development proposals for new facilities and noted in policy that other requirements of the city plan will be applied flexibly to ensure facilities are delivered

Question CF4: Are there any types of community facility that due to their particular nature might warrant a separate/unique policy?

There were 16 responses.

- (4)
- University of Sussex (24)
- (32)
- (65)
- Kingsway and West Hove Residents Association (83)
- (86)
- (96)
- (113)
- Varndean College (116)
- Cllr D Yates (124)
- Rottingdean Parish Council (125)
- U+I PLC (131)
- University of Brighton (160)
- City College (164)
- Crest Nicholson (181)
- Unknown Respondent 5 (195)

Three respondents suggested that Public Houses should have a separate policy - removing permitted development rights as other authorities had done through use of Article 4 Direction.

Three respondents (University of Brighton, U+I PLC, Varndean College) suggested that D1 education uses should be separate from rest of D1 uses and should be assessed on their own merits.

Two respondents (including Crest Nicholson) suggested that the King Alfred Leisure centre warranted a separate and unique policy in order to deliver a high quality leisure centre.

Other suggestions for types of community facilities were:

- Active community involvement like allotments

- University of Sussex - Better use could be made of Stanmer Park for sports facilities
- Libraries and Museums
- Redundant churches
- Specialist medical
- Community facilities which serve the very particular requirements of those citizens with special needs would benefit from a unique policy.
- Clubs

General comments

- City College - Ensure policy is not overly restrictive

B. Site Allocations for Community Facilities

Question CF5: Do you have any evidence of the need for any community facilities in the city that are not currently identified? Are you aware of sites that may be suitable to meet those needs?

There were 10 responses:

(1)

(4)

University of Sussex (24)

(65)

(113)

Varndean College (116)

Rottingdean Parish Council

(125)

(143)

Crest Nicholson (181) Unknown

Respondent 2 (191)

Responses put forward the following suggestions of community facilities needed in the city that were not currently/ sufficiently identified:

- Olympic sized swimming pool
- Allotments
- Dedicated Art museum for the city
- Stanmer Park for sports activities

A number of responses put forward suggestions of sites and potential community uses:

- Allow expansion of Varndean College to ease pressure from closing of Central Sussex College in Haywards Heath and increasing high school places from 2018 in the city.
- Ice rink - e.g. at Black Rock
- Saltdean Tigers Football Club – need for improved facilities
- Need for business and community space that can be hired for different uses and for different periods on a flexible basis. At the King Alfred scheme there is an opportunity for a community hub to operate.

One respondent felt that Carlton Hill area has no community facilities.

CF6: Are there sites you are aware of that you would like to see put forward as community facilities allocations in City Plan Part Two?

There were 8 responses.

(2) (3) (4) (6)

University of Sussex (24)

(65)

Kingsway and West Hove Residents Association (83)

(113)

Four respondents suggested allotments should be allocated as community facilities as they contribute to health, well-being and quality of life and are important social spaces.

Other suggestions were:

- Stanmer Park for sports activities
- The Hippodrome
- St Leonard's Church, New Church Road Hove

Question CF7: Can you think of any other policy issues relating to community facilities that City Plan Part Two should address?

There were 7 responses.

(4)

(32)

(47)

(57)

(113)

Rottingdean Parish Council (125)

Brighton & Hove Food Partnership (134)

The following policy issues were suggested:

- The council needs to appreciate the peculiar nature of community facilities and how market values for property can prevent new uses coming to the fore.
- Sport England suggested reference is made to the Playing Pitch Strategy which provides evidence with the regard to the retention of exiting community facilities and the creation of new ones.
- Inequality in provision between Brighton and Hove
- Address the shortage of children's play areas
- Allotments - proven spaces that have active community involvement - productive and add to food knowledge
- Facilitate development of smaller indoor community swimming pools similar to the Newhaven pool - especially in the east of the City

- B&H Food Partnership felt community/ shared kitchens should be protected in CPP2 as they are used to teach cookery or run shared meal projects e.g. lunch clubs etc.

Summary of Key issues from Consultation Events and Workshops

At the **Stakeholder Workshop** a number of issues were raised. There was discussion of whether community hubs could be a way of protecting community uses with support for the idea of putting community uses together. The hub at Woodingdean was cited as a good example.

There was a need to understand the demand for community facilities (as we have done for housing figures) that will help plan for need for facilities.

It was also raised that the delivery of health care is changing:

- Need for retirement homes (Social Care indicate there is fine capacity here)
- Extra care is an important model to support.
- Also look at older hospital sites e.g. Polyclinic and what else could be there (eg a land use study).
- There was considered to be a shortage in GP surgery provision in North Portslade.

With respect to education facilities:

- Need for more schools in N. Portslade (there is a School Organisation Plan)
- In Rottingdean and Saltdean areas there was considered to be a need for more schools given the amount of new development

There was a suggestion of the need for CIL requirements in City Plan Part Two to pay for community infrastructure requirements.

At the **Professionals Forum** it was suggested that the council needed to obtain input from the community when determining the type of community facility required. There should be a hierarchy to communities facilities with social at the bottom however accept some areas don't have a pub or social venue so could have a zonal approach

There was also a view that a balance is needed with regard to retaining community facilities especially leisure centres. Community facilities should be encouraged in residential areas and should be provided within larger residential schemes.

The CPP2 could explore the 'Community Hub' idea planned into residential areas. In terms of designating sites, the Plan could identify existing key community facility sites. It was felt that there were insufficient health care facilities.

A number of suggestions were put forward at the **Brighton & Hove Economic Partnership Meeting** such as:

- the use supermarkets as a hub for other services, e.g. GPs, opticians
- Increase mixed use sites with community facilities incorporated
- Public buildings, e.g. schools should incorporate other community infrastructure

- Make use of Article 4 Directions to protect existing community facilities
- Promote mobile services to areas lacking provision, e.g. mobile GP
- Increase school places
- Ensure community infrastructure is in place before development is completed in order to meet the increased demand on time
- Release council-owned land by stream-lining services and use for community infrastructure

CPP2 Chapter 12 – Purpose Built Student Housing

Summary of key issues arising from Written Responses

In total 36 respondents commented on this section of CPP2 scoping paper with 177 representations. (N.B. comments made often being relevant to more than one question).

(5)
 (14)
 (23)
 University of Sussex (24)
 (27)
 (37)
 (42)
 North Laine Community Association (43)
 (45)
 (51)
 (59)
 (60)
 (61)
 (65)
 Cllr A Meadows (69)
 (70)
 (77)
 Ovingdean Residents & Preservation Society (97)
 Conservative Group (109)
 (113)
 University of Sussex Students Union (114)
 Family Homes Not HMOs (115)
 Regency Society of Brighton & Hove (120)
 Cllr D Yates (124)
 U+I plc (131)
 (145)
 (146)
 RPS CgMs (158)
 University of Brighton (160)

Select Property Group (170)
Highways England (175)
LCE Architects (180)
Brighton & Hove Economic Partnership (189)
Unknown respondent 2 (191)
Unknown respondent 3 (192)
Unknown respondent 5 (195)

Question SH1 - Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

Responses were received from 29 respondents:

5, 14, 24, 27, 37, 42, 45, 59, 60, 61, 65, 69, 70, 77, 97, 113, 114, 115, 120, 124, 131, 146, 158, 160, 170, 180, 189, 192 and 195.

Overall a significant majority of respondents (approximately three quarters) expressed support for establishing a target for the amount of PBSA. It was generally felt that accommodating more students in PBSA would assist in reducing the pressure on the private rented sector of the city's housing stock and would alleviate some of the pressure on family homes. A target was felt to be an appropriate way of managing the development of new PBSA. One respondent noted that paragraph 50 of the NPPF requires local planning authorities to plan for the housing needs of different groups in the community.

Two respondents, including the University of Brighton, cautioned that a target may make the Plan inflexible to changing student demand throughout the Plan period. The university stressed that the difficulty in predicting student numbers up to 2030 made it difficult to set an appropriate target. It should be noted however that the University of Sussex did support the introduction of a target. Concerns were expressed from other respondents that a target could act as a cap on PBSA development, and it was also suggested that a mechanism for reviewing the target over the Plan period could be considered once there was more certainty over future student numbers.

Question SH2 - Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

Responses were received from 29 respondents:

5, 14, 24, 27, 37, 42, 43, 45, 51, 59, 60, 61, 65, 69, 70, 77, 97, 113, 114, 115, 120, 124, 131, 158, 160, 170, 191, 192 and 195.

Overall there was broad support for the allocation of additional sites for PBSA, although a minority of respondents disagreed. For instance the Regency Society felt that off-campus sites should not be allocated but appraised on a site-by-site basis when planning applications were submitted

RPS Group stated that a significant allowance for unallocated windfall sites to come forward and contribute to the need should be included in the Plan in addition to site allocations.

The University of Sussex supported further site allocations to improve student choice despite its masterplan providing significant additional accommodation on campus, as some students will always prefer to live off-campus.

The University of Brighton reiterated a commitment to working with the City Council to identify opportunities to allocate additional university-owned sites for purpose built student accommodation

Question SH3 - Are there any locations/sites that could be considered for purpose built student housing development?

Responses were received from 25 respondents:

5, 14, 24, 27, 43, 45, 51, 59, 60, 61, 65, 69, 70, 77, 97, 113, 114, 115, 120, 124, 158, 160, 170, 192 and 195.

Overall there was strong support from a number of respondents for prioritising development of new PBSA on university campuses. Some respondents felt that only sites on campuses should be considered, whereas others preferred a more flexible approach where on-campus sites were examined first before off-campus sites were considered for allocation. Other respondents, including the Brighton & Hove Economic Partnership, felt that developable land immediately neighbouring the university campuses should also be prioritised.

The University of Brighton is keen to work with the City Council to support significantly more student accommodation at the Moulsecoomb campus, as well as encouraging the City Council to take a more positive approach to new development at Falmer as previously set out within Policy EM18 of the Local Plan 2005. The university is keen to work with the City Council to determine the appropriate level of growth and to specific policy support at Falmer Campus in order to deliver the university's strategic objectives of enhancing its medical school, sports facilities and student accommodation provision at the campus.

The University of Sussex felt that small, piecemeal PBSA developments, of which there have been a few recently) are not the best solution. It stated that off campus PBSA developments would be brought forward by private developers so would not suggest particular sites itself.

A frequently expressed opinion was that the council and universities should work with neighbouring authorities to develop student housing elsewhere, with Lewes and Newhaven being suggested as possible locations. Some respondents felt that only locations outside the city's boundaries should be considered.

Additionally a number of specific locations/sites were suggested. These were:

- Amex House site

- Brighton Marina
- Waste transfer station, Moulsecoomb Way
- Preston Barracks
- Falmer, with the area behind Amex Stadium and Falmer School
- Rottingdean
- Toads Hole Valley
- Areas with high levels of HMOs – London Road and Lewes Road
- Shoreham
- Lewes Road Bus Garage
- Enterprise Point, Melbourne Street

Question SH4 - Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

Responses were received from 27 respondents:

5, 14, 24, 27, 37, 43, 45, 59, 61, 65, 69, 70, 77, 97, 113, 114, 115, 120, 124, 145, 146, 158, 160, 170, 191, 192 and 195.

Views were mixed as to whether new development should continue to be focussed around Lewes Road. Some felt this would minimise road pressure on road infrastructure and public transport due to the proximity to the universities, whereas other respondents favoured a more dispersed approach to PBSA.

The University of Sussex and its Student Union both support a more dispersed delivery of purpose built student accommodation within the city. However the Union cautioned that dispersal requires a commitment to adequate infrastructure and support services, with developments not be granted in isolation. It is also important that efforts are made to ensure there is community cohesion in the areas which are identified as being suitable for PBSA. Segregation is likely to foster tensions in communities and therefore it is important to ensure that PBSA sites also include facilities of shared use. Place for community interaction must be guaranteed and though we accept that housing providers alone cannot resolve the challenges of cohesion, infrastructure is an important element to this.

However, the University of Brighton felt that a more dispersed approach to suitable locations for purpose built student accommodation is more likely to worsen accessibility to the university campuses and cause an unacceptable impact upon residential amenity in surrounding areas. Furthermore, by ensuring student residences are located in close proximity to the university campuses, a critical mass will be created that is necessary to deliver an exceptional academic and student offer.

Select Property Group - 'dispersed approach' for student accommodation could encourage unsustainable development. SPG maintains that allocations should be focussed on the Lewes Road to offer students proximity to facilities and to maintain the university hub. In pursuing a dispersed approach to PBSA site allocations, BHCC runs the risk of relegating students to pockets of the City not easily accessible from the university campuses

The Brighton & Hove Economic Partnership cautioned that careful consideration should be made as to the locations in order to ensure a balanced mix of communities; this relates to the over-intensification of areas not conducive to student housing in some cases, which puts communities at risk. The requirement needs to be addressed as a Greater Brighton City Region rather than within the boundaries of Brighton & Hove.

Question SH5 - What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

Responses were received from 26 respondents:

14, 24, 27, 37, 43, 45, 51, 59, 61, 65, 69, 70, 77, 97, 113, 114, 115, 120, 124, 145, 146, 158, 170, 175, 192 and 195.

The provision of efficient and reasonably priced public transport connections to the university campuses was identified as the main barrier by a large number of respondents. The University of Sussex stated that where such transport links exist (for example the 25X bus route), the experience is that students will be prepared to choose accommodation beyond locations along the Lewes Road. The Brighton & Hove Economic Partnership considered that appropriate transport connections would provide opportunities to explore "student village schemes" in areas in the region that will provide employment-generating activity.

The demand for PBSA in locations more remote from the academic corridor was also cited as a potential barrier. Select Property Group stated that without sufficient demand, site allocations further from the universities may be redundant. Viability was also noted as a barrier by the University of Sussex Student Union, who were of the opinion that locating PBSA in more central areas of the city with higher land values would result in the rents charged being affordable or the quality of accommodation being poor. However RPS Group were of the opinion that there are no barriers to locating student accommodation outside the academic corridor as students are already widely dispersed across Brighton and Hove.

The concerns and perceptions of negative effects of PBSA were cited by some as a barrier. The Regency Society felt that the concern of existing residents would have concerns that their area would become a student ghetto, hence the need for strong controls over the number of new student housing development in specific areas. Another respondent stated better explanation to communities that providing PBSA reduced pressure on further conversions of housing stock to HMOs may make them more amenable to PBSA development. One individual felt that if problems are seen to be dealt with in a more community focussed and sympathetic manner then barriers might come down.

Question SH6 - How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

Responses were received from 19 respondents:

24, 27, 43, 51, 59, 65, 69, 70, 77, 97, 113, 114, 115, 120, 124, 131, 158, 170, and 192.

The University of Sussex considered that existing policy within the City Plan Part One already satisfactorily assesses the cumulative impacts of purpose built student accommodation developments.

Two respondents considered that negative cumulative impacts could be avoided altogether if new PBSA development was confined to the university campuses.

U+I plc felt that the adoption of a city wide management standard would be beneficial, for both students seeking a safe and controlled environment, and residents who currently have no enforcement against students living in unmanaged HMOs within the city. A set of standards for managed accommodation was suggested to provide developers certainty and clarity over the City's requirements for new student housing. Similarly, Select Property Group stated that developing attractive, well-maintained and staffed accommodation encourages students to be respectful and well-behaved. Retaining a degree of separation of from residential properties was also considered to be helpful.

The University of Sussex Students Union felt that better communication and early engagement with neighbourhoods, local organisations and businesses is essential, with an appropriate communication plan implemented to ensure all stakeholders can review feedback and flag issues where appropriate. This was supported by RPS Group who stated that comprehensive support and highlighting of the benefits will lessen perceived cumulative impacts

Cllr Yates recommended that a policy in as Nottingham where a specific threshold for communities has been set for combined student household (both HMOs and purpose built accommodation) should be considered.

Question SH7 - Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

Responses were received from 22 respondents:

23, 24, 27, 37, 43, 51, 59, 65, 69, 70, 77, 97, 109, 113, 114, 115, 131, 145, 146, 158, 170, and 192.

A number of other general comments relating to PBSA were submitted and these are summarised below.

The University of Sussex stated that the potential allocation of purpose-built student housing in the City Plan Part 2 should seek to avoid mixed use developments involving social housing. In the University's experience and through its discussions with developers of purpose-built student housing, funding for such projects would not be forthcoming and therefore the developments would not be deliverable.

An individual felt that students deserve good quality housing and consideration of their needs, rather than becoming the focus for criticism and intolerance. By providing better quality accommodation and encouraging students and other short term residents to live and work amongst us in harmony, community cohesion can be improved.

U+I plc see the City Plan Part Two as an opportunity to provide increased clarity and guidance relating to student accommodation for example the provision of accessible units within student accommodation, and daylight and sunlight assessment targets.

University of Sussex Student Union argued that there is no structural incentive to ensure that the facilities, such as housing, required to support increased student numbers expand at the required rate. Both students and the wider community have common interests that could be productively developed. We would encourage the council to commit to regular consultation with both students' unions in the city and ensure we can play a meaningful role in the realisation and delivery of the City Plan Part 2. We believe that the relationship between students and the community should be one of mutual respect, cooperation and learning.

Select Property Group felt that the City Council should review its approach to criteria 6 and 7 of Policy CP21. In a city where there are substantial pressures to balance the needs of the different groups of its community, the approach of Policy CP21 could be interpreted as placing too great a preference on residential developments.

The North Laine Community Association considers that student accommodation should also be subject to the same requirements for affordable housing provision as general housing. This would reduce the disparity in viability between general housing and PBSA. We also consider that areas where student housing is considered also includes issues such as noise and disruption caused by late night movement of student groups.

The Council's Conservative Group stated in their representation that if the universities wish to expand they should make provision for sufficient numbers of purpose-built accommodation units to meet demand, where possible on campus. They should also do more in partnership with the Council to try and relieve pressure on the city's already over-stretched housing stock when these additional students seek accommodation in the city in their second, third and fourth years. This should include looking to source/build new student accommodation in towns in neighbouring local authorities such as Lewes, Falmer and Newhaven in Lewes District which have good transport links to Brighton & Hove.

An individual was of the view that students need better management and education of community living.

Summary of Key issues from Consultation Events and Workshops

At the **Stakeholder Consultation Event** there was opposition to the development of new PBSA in the city centre. Participants generally felt that this should be located on the urban fringe if transport links to the campuses could be improved, on university campuses (although it was recognised that this may be harder to achieve for the University of Brighton) or outside the city's boundaries in Lewes and Newhaven. Other points raised included:

- Higher levels of developer contributions should be sought on PBSA developments to reflect the impacts that they have.
- Commuted sums should be sought to finance the development of off-site affordable housing.
- Competing demands from student accommodation and housing (10,000 bedspaces students versus 13,200 new residential units)
- Homes are needed for full time residents who are committed to the city.
- Should provide more purpose built student accommodation sites in the city – some did not think this was a good approach.
- Do we allocate student housing to the outskirts of the city and direct housing to within (some on the table felt urban fringe is better for students but others disagreed).
- Need to look at housing density to help address all the needs however must recognise there is a need to also look outside the local authority boundary – city is constrained by National Park and the sea.
- Need to consider appropriate transport infrastructure to link outer areas to the Universities
- Different infrastructure is required so should charge higher s106/developer contributions re student housing
- Apply 40% affordable housing proportion on student bedspace numbers
- Main area under pressure from student accommodation is Pelham Street up to the slope/Lewes Road. Approximately 50 HMOs in North Laines (it also suffers from holiday lets, party houses)

At the **Brighton & Hove Economic Partnership** it was noted that the impact of not having enough student accommodation is that students get put off coming to the city and the universities suffer as a consequence. There was support for more dispersed locations for PBSA if the perception that students can only be in the Lewes Road area can be changed, provided that public transport is accessible and affordable.

The discussion at the **Strategic Housing Partnership** supported the allocation of more sites for PBSA to help reduce conflict between sites for general housing and sites for student accommodation.

At the **Professionals Forum** there was broad support for a target for the development of new PBSA. It was felt that this would help free up HMOs and provide better quality accommodation for students, with cluster flats being preferable as they enable groups of friends to live together. It could also have multiple uses, for example being used as visitor accommodation during university vacations

In considering appropriate locations for PBSA there was support for moving concentrations of PBSA away from the Lewes Road corridor which it was acknowledged may require better transport links. Some sites were considered to be unsuitable for long-term family accommodation, for instance those around the Vogue Gyratory which suffer from poor amenity and air quality, and could be better suited to student accommodation as the occupants would usually only reside there for 9 months.

Participants suggested that flats over shops could be combined to form new student cluster flats, and that the conversion of redundant offices to student accommodation should be considered. The former Amex House site was also suggested as an appropriate location.

One participant felt that less policy direction on sites could be a better approach with the pre-application process being used to assess each site on its merits, which could allow for flexibility due to changing circumstances through the plan period. Providing more flexibility by allowing development on SHLAA sites was also suggested.

CPP2 Chapter 13 – Traveller Accommodation

Summary of key issues arising from written responses

In total 16 respondents commented on this section of CPP2 scoping paper with 37 representations.

Question TA1 Is it better to try and make traveller site provision for smaller individual family-sized sites (e.g. 3-5 pitches) or larger sites (e.g. 10-15 pitches) that can accommodate a number of families?

There were 11 respondents:

(14)

(17)

Friends, Families and Travellers (21)

(42)

(50)

(60)

Ovingdean Residents & Preservation Society (97)

(146)

East Sussex County Council Strategic Infrastructure Team (178)

Unknown Respondent 3 (192)

Unknown respondent 5 (195)

Respondents were fairly equally split, of the seven respondents who expressed a preference four were in favour of smaller sites and three of larger sites. Friends, Families and Travellers felt that while travellers prefer smaller sites of up to 10 pitches, given the likely difficulties in finding suitable locations it would be best not to be too prescriptive. East Sussex County Council stated that the preference would depend on the ecological impacts of developing a site.

One individual's view was that smaller sites are less likely to cause concern and tensions with the settled community.

Question TA2 Should new site provision be public site provision, or private or both?

There were 8 respondents:

(17)

Friends, Families and Travellers (21)

(42)

(50)

(60)

Ovingdean Residents & Preservation Society (97)

(146)

Unknown Respondent 3 (192)

Of those who expressed a preference, two respondents believed provision should be made on private sites, two on public sites and one felt both options should be considered.

Friends, Families and Travellers did not express a preference but drew attention to the high cost of land in Brighton and Hove which may prove prohibitive to private site provision.

Question TA3 Should future pitch requirements for Traveller Accommodation be addressed through City Plan Part 2 or would this matter be better addressed through a separate Development Plan Document?

There were 7 respondents:

(17)

Friends, Families and Travellers (21)

(50)

Ovingdean Residents & Preservation Society (97)

South Downs National Park Authority (130)

(146)

Unknown Respondent 3 (192)

The South Downs National Park Authority noted the joint work which has been ongoing with the City Council on this issue and expressed a preference for the issue to be dealt with through the City Plan Part Two to reduce delays which could contribute to ongoing unauthorised encampments. This stance was supported by Friends, Families and Travellers who felt that it would be a more inclusive approach to consider the issue alongside other forms of accommodation.

Two other respondents felt that a separate document would be preferable.

Question TA4 Are there any other issues regarding Traveller Accommodation that you would like to see addressed?

There were 11 respondents:

Friends, Families and Travellers (21)

(31)

(46)

(50)

(60)

Ovingdean Residents & Preservation Society (97)

Conservative Group (109)

Kemp Town Society (117)

(146)

Unknown Respondent 3 (192)

Unknown respondent 5 (195)

Friends, Families and Travellers were of the opinion that, as an interim measure until new site capacity is delivered, negotiated stopping should be introduced, as committed to in the report of the Fairness Commission this year.

The City Council's Conservative Group felt it is unlikely that any additional sites would be found within the city's administrative area so locations in other areas should be considered through joint working with other local planning authorities.

A number of other comments were made which broadly related to the potential to reduce antisocial behaviour experienced on unauthorised encampments if additional sites could be provided.

Summary of Key Issues from Consultation Events and Workshops

At the **Stakeholder Workshop** it was suggested that due to the constraints it may not be possible to find sites for Travellers/Gypsies. If this is the case the Council should seek to address the issue within other authorities via the Duty to Cooperate

CPP2 General Comments

Summary of Key issues arising from Written Responses

General Question - Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

There were responses from 35 respondents:

(2)

(3)

(5)

(6)

Gatwick Airport Limited (8)

(11)

National Grid (12)

The Hyde Group (28)

(29)

(31)

(54)

(57)

(62)

Hove Civic Society (63)

Patcham CAT (68)

(77)

(96)

Ovingdean Residents & Preservation Society

(97)

(101)

(102)
(104)
(107)
The Conservative Group (109)
(113)
Ovingdean Estates (122)
Futureform Global Investments Limited (129)
Brighton & Hove Food Partnership (134)
Montpelier and Clifton Hill Association (141)
(146)
(148)
(149)
Scotia Gas Networks (156)
University of Brighton (160)
East Sussex County Council (178)
Unknown Respondent 3 (192)

Housing issues

A large number of responses to the 'any other issues' question were concerned with housing issues:

- Five respondents were concerned with the need to ensure that adequate infrastructure (schools, health care, leisure and sport facilities shops etc) is in place to support new development. The Conservative Group (109) wished to see infrastructure needs considered in CPP2 ensuring for example the provision of a new school at the same time as housing development if current provision is insufficient. Concern was expressed that Rottingdean has insufficient infrastructure to support more housing.
- One respondent considered there should be no further housing in areas where pollution is above safe levels
- Four responses to this question urged the council to protect allotments from housing allocations citing their importance for biodiversity, community, health and well-being.
- Concern was expressed by a number of respondents that the council policy of selling of affordable family homes in Bevendean, Moulscombe and Coldean has reduced the number of family homes; linked with the spread of HMOs which have negatively impacted on the community and local schools.
- HMOs should be better managed and the licensing scheme extended and a strengthened enforcement of illegal HMOs.
- Student accommodation should be built on the university campus to free up valuable family affordable housing and ensure students are kept safe.
- Brownfield sites should be utilised first to address the housing shortage rather than greenfield sites and particularly the villages of Rottingdean, Ovingdean and Woodingdean should be protected from housing development and infilling; development on the urban fringe could create isolated ghettos due to lack of bus services and topography.
- The village of Rottingdean cannot support a substantial increase in the population.
- Mistake to assume that all of the targets for potential development need to be identified now.

- Consideration to the role of developments outside the city (Mayfield, Newhaven) in reducing the pressure for housing in the city.
- One respondent considered there are many hectares of unused greenfield and spare land within the city that should be used for housing and employment sites for the good and well-being of the city.
- The University of Brighton (160) considers that everything should be done to maximise the delivery of new homes on deliverable sites as soon as practicable to address the housing shortfall. Support opportunities for city to meet its own needs as best it can within its boundaries in collaboration with key landowners and strategic partners. The sustainable growth of the city is essential to the success of its higher education institutions – by ensuring the needs of the city are met the council will ensure a more attractive environment for prospective students who in turn contribute towards social, economic and cultural life within the city.
- University of Brighton (160) reaffirms its commitment to assisting in the delivery of key strategic housing allocations (e.g. the Moulsecoomb campus).
- The council should proactively supporting self-build and custom build homes to address housing affordability and should release council owned land.
- More facilities should be made to accommodate/ help street sleepers; more temporary housing; getting empty properties back into use, ringfencing local housing for local people and restrictions for holiday home owners.

Gypsy and Travellers

- Traveller sites should be provided officially with facilities that are paid by the occupiers, and policy should remove unauthorised encampments.

Food and Planning

- Brighton & Hove Food Partnership (134) want to ensure that food is at the heart of planning and policy work that the CPP2 should support a sustainable food systems planning approach, recognise the need of land for food growing, space for food infrastructure and urban design that encourages healthy behaviour. CPP2 should consider the recommendations set out in the LGA joint Report 'Building Foundations' Tackling Obesity through Planning and Development' as well as some reference within the CPP2 to the key actions and targets in the City Sustainability Action Plan (September 2015) related to local and sustainable food.
- Brighton & Hove Food Partnership (134) wish to develop a new SPD around 3 key areas: food growing; access to healthy food and preventing obesogenic environments and would look to identify and secure financial resources in order to produce the SPD.

Design and Heritage

- Montpelier and Clifton Hill Association (141) felt that the central aim of the city plan should be the protection of public interest and the protection of private amenity. The suggestion at paragraph 9.15 of the Scoping report to ensure that amenity matters are not used as a means to prevent the effective use of sites should be deleted.
- The Montpelier and Clifton Hill Association (141) felt the 2016 adopted HE and QD policies together with the supporting SPDs and SPGs should be retained without being watered down or streamlined

- The Montpelier and Clifton Hill Association (141) SPG15 should be amended to state that tall buildings will not under any circumstances be allowed within Conservation Areas and put forward suggested amendments to the text in this regard.
- The council should enshrine the concept of 'sculpture in the city' as proposed by the Hove Civic Society (63) into CPP2 and allow developers to contribute via s106 contributions to new sculptures.
- The i360 and the marina are ugly and new hotels lack design imagination and beauty.

Renewable Energy

- Gatwick Airport Limited (8) drew attention to its 30km Wind Turbine safeguarding zone which affects the northern most part of the city. Should any wind turbine be proposed within this zone then they should be consulted with.

Hazardous Substances

- Scotia Gas Network (156) consider that the CPP2 needs to address the site constraints affecting the gasholder site and the key aspects considered pertinent to the redevelopment of a hazardous installation and the Gasholder site itself within the Brighton Marina area. Paragraph 173 NPPF is pertinent with respect to the substantial costs relates to the decommissioning of the gasholder, dismantling the associated infrastructure and decontamination of the site and suggest a policy that takes into account the need to incentivise and fund decommissioning through high value land uses should be included in CPP2.

Travel and Transport

- Create pedestrianised areas that facilitate a positive shopping experience and enforce ban on oversized vehicles in prohibited areas.
- The cost of travelling by bus should be reduced to encourage greater use.

Community Facilities

- Community services must include parks and they should provide facilities for children of all ages – eg large skate parks, multi sports areas with adjustable covering and all year round surfaces and lighting, indoor games areas, adequate covered seating and cafe and toilet facilities.

Other general issues for the CPP2 to consider

- CPP2 needs to take a more holistic approach, recognise the policy overlaps and not just focus on new development but the impact on existing development.
- Clarify the timetable for completing CPP2.
- Plain language and less planning jargon in consultation documents.
- Need for cohesive, strategic long-term Development Plan which will ensure that development is managed and guided by the Council and not by opportunist developers that protects heritage assets and regenerates run down areas.
- Concerned with the omission of a chapter dedicated to the ordinary people of Brighton & Hove; how to make the city a better place for all the people who live and work in the city now. Need to think about how things are currently and how the Plan will proactively deal

with the longstanding issues (antisocial behaviours, late night noise pollution from students, open drug dealing in public parks late night takeaways breaching licences). Listen and learn from history.

- Ensure the glossary is amended to include LWS and LGS to be consistent with DEFRA guidance.
- A strong and sufficiently resourced enforcement department is essential.
- Increased focus on maintaining a really high standard of street cleaning and washing. Eastern part of the seafront and a few streets back were highlighted by one respondent as needing to be tackled.
- More wildlife planting; planting at the seafront.
- National Grid reviewed the document but had not comment to make but would wish to be consulted on any proposals that could affect their infrastructure.

Proposed Site Allocations

The Hyde Group (28) - put forward Land at Falmer Avenue Saltdean (6 Falmer Avenue together with paddock land and stables to the rear) for consideration as a housing allocation. 1.35 Ha site area. The 2014 Urban Fringe Assessment; the 2016 SHLAA potential (site reference 1001) and the Planning Application BH2014/03394 and characteristics of the site are cited as justifications for the acceptability of 32 dwellings.

M.Stimpson (29) – put forward Land at Foredown Hill Portslade for consideration as a housing allocation. The adoption of the City Plan Part 1, the clarification from the council that the section 53 Agreement related to Application 3/89/1008 would not be upheld; the SHLAA potential (site reference 6052) and characteristics of the site are cited as justifications for the acceptability for 9 dwellings.

Ovingdean Estates (122) – put forward Land to the North East of Longhill Close, Ovingdean for consideration as a housing allocation. 1.1ha site. The 2014 Urban Fringe Assessment, the Council's Draft 2015 SHLAA Update (July 2016) (site references 723 and 43) and characteristics of the site are cited as justifications for the acceptability for housing but with a greater yield if the whole site is considered - 20-30 units.

Futureform Global Investments Limited (129) put forward additional information to support the proposed housing allocation at Benfield Valley.

Summary of key issues from Consultation Events and Workshops

At the **Professionals Forum** the first workshop topic considered how the City Plan Part Two could be more focused and streamlined (responding to the Planning Advisory Service PEER Review). Common themes emerged from the group discussions:

- Needs to be a balance between the amount of detail and guidance in policy.
- Less but more focused, objective policies avoid being too prescriptive. Too many policies means it is hard to keep track of them. Often only find out that a proposal is not policy compliant after submitting an application.

- Policies that are too general and too long are not helpful;
- Avoid criteria-based policy and have policies that are flexible; need to be pragmatic to achieve development
- Issue of interpretation and implementation of policy that can be too restrictive and not always consistent. Dormer windows policy guidance was given as a particular example of overbearing inflexibility. The same policies are sometimes used for different reasons in order to refuse applications. Need to empower interpreters.
- Guidance should be treated as such. Guidance is treated like policy.
- Future proofing plans and policy – plans take so long to prepare; always playing ‘catch-up’. E.g. 2005 Local Plan now very out of date.
- Need to be positive and encouraging – the NPPF presumption in favour not always carried through in B&H policies. Sometimes a presumption against development.
- Enforcement could be better delivered.
- Discussions are an important and critical part of application process. Pre-application is really important stage to clarify matters eg planning policy.
- Site based policies should be clear but shouldn’t have too much detail – overall approach should be set in the main body of the CPP2. Policies are too stringent especially in respect of small sites (requirements may make sense for larger sites but not small sites)
- The hierarchy of plans and policies is not clear. It is difficult to establish if older documents such as the Open Space Study and Urban Characterisation Study are still relevant material considerations and have weight in determining applications.
- Applicants would prefer to deal directly with building control rather than having to go via planning. There is too much overlap on some issues – for example a recent condition asked for details of soundproofing between flats. This is completely unnecessary as it is a building control issue.
- Confusion over the role and need for the Sustainability Checklist.
- Different responses are relevant to different parts of city – how to capture scope for this in policy?
- Avoid too many conditions.

Sustainability Appraisal

Summary of Key Issues from Written Responses

11 respondents indicated that they were submitting responses on the Sustainability Appraisal Scoping Report, however 2 of these respondents did not actually complete any questions.

The following 9 respondents provided a response to some of the questions.

(50)

Ovingdean Residents and Preservation Society (97)

(104)

Deans Preservation Group (108)

(113)

(152)

Environment Agency (176)
East Sussex County Council (178)
Unknown respondent 3 (192)

The following 2 respondents did not provide any answers to any of the questions.

(96)
Unknown respondent 5 (195)

Each of the following sections summarises the responses received for each question within each of the 9 topic sections of the SA Scoping Report.

Biodiversity, Flora and Fauna section

There were 7 respondents to this section.

Nb. Not all respondents answered every question in this section.

(50)
Ovingdean Residents & Preservation Society (97)
Deans Preservation Group (108)
(152)
Environment Agency (176)
East Sussex County Council (178)
Unknown respondent 3 (192)

Are there any other documents that should be referred to as part of the Context Review?

Yes: 2 responses (97, 178)

No: 0 responses

Don't know/not sure: 4 responses (50, 108, 152, 192)

Suggestions for other documents that should be referred to as part of the context review include:

- East Sussex Green Infrastructure Study (178)
- ODPM Circular 06/2005 Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System (178)
- BS42020: 2013 Biodiversity – Code of practice for planning and development. (178)

Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes?

Yes: 3 responses (97, 108, 178)

No: 0 responses

Don't know/not sure: 3 responses (50, 152, 192)

Comments on baseline data include:

- Ensure that Appendix B Indicator “SQM of habitat gained/lost” includes the amount lost so that the net gain can be calculated (178)
- Ensure the correct terminology is used for Local Geological Sites (LGS not RIGGS) (178)
- Make use of species data held at Sussex Biodiversity Records Centre (108)

Does the Sustainability Issues section adequately address the main issues?

Yes: 2 responses (97, 152)

No: 1 response (178)

Don't know/not sure: 3 responses (50, 108, 192)

Suggestions for improving this section include:

- Introductory section should recognise the indirect impacts to habitats and species such as disturbance, increased recreation and increased predation. (178)
- Likely Future Baseline should recognise gaps in knowledge and understanding, should recognise that habitats and species surveys are not comprehensive and that data is lacking with respect to identifying trends over time. (178)
- Key Sustainability Issues section should recognise that not all sites that support priority species and/or habitats are designated. (178)

Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations?

Yes: 2 responses (97, 176)

No: 1 response (152)

Don't know/not sure: 3 responses (50, 108, 192)

Comments include:

- Support for the inclusion of the objective for biodiversity. (176)
- SA4 is biased towards mitigating damage rather than avoiding damage to urban fringe sites (152). *(nb: assume comment not of relevance to this Sustainability Appraisal Objective as SA4 is a policy in CPP1).*

Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies?

Yes: 1 response (97)

No: 0 responses

Don't know/not sure: 4 responses (50, 108, 152, 192)

Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations?

Yes: 0 responses

No: 2 responses (97, 108)

Don't know/not sure: 1 response (50, 152, 192)

Comments include:

- Concern that ecologically important sites could be overlooked and that sites without a designation should have recognition if they contain species or habitats listed in the LBAP. (108)
- Suggestion that there should be a process for designating new sites as Local Wildlife Sites where new data is available. (108)
- Concern that the identification of (urban fringe) sites as having development potential in CPP1 has given the signal that development can go ahead prior to any planning application being submitted. (97)
- Concern that there are no policies in place to protect urban fringe sites from being cleared (*e.g. trees*) prior to a planning application being submitted (97)

Water Quality and Resources section

There were 3 respondents to this section.

Nb. Not all respondents answered every question in this section.

(152) Environment Agency

(176) Unknown respondent

3 (192)

Are there any other documents that should be referred to as part of the Context Review?

Yes: 0 responses

No: 0 responses

Don't know/not sure: 2 respondents (152, 192)

Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes?

Yes: 0 responses

No: 0 responses

Don't know/not sure: 2 respondents (152, 192)

Does the Sustainability Issues section adequately address the main issues?

Yes: 1 response (176)

No: 0 responses

Don't know/not sure: 2 respondents (152, 192)

Comments include:

- The SA covers the CHaMP (Chalk Management Partnership) objectives quite well (176)

Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations

Yes: 1 response (176)

No: 0 responses

Don't know/not sure: 2 respondents (152, 192)

Comments include:

- Support for the inclusion of the SA objective for water quality (176)

Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies?

Yes: 0 responses

No: 1 response (176)

Don't know/not sure: 2 respondents (152, 192)

Comments include:

- DMC could refer to appropriate SUDS methods being implemented in areas covered by a Groundwater Source Protection Zone 1. (176)
- DMC could include the provision of timely and necessary waste water treatment infrastructure to support new development. (176)

Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations?

Yes: 0 responses

No: 1 response (176)

Don't know/not sure: 2 respondents (152, 192)

Comments include:

- DMC could refer to appropriate SUDS methods being implemented in areas covered by a Groundwater Source Protection Zone 1. (176)
- DMC could include the provision of timely and necessary waste water treatment infrastructure to support new development. (176)

Soil, Waste and Land Resources section

There was 1 respondent to this section.

Unknown respondent 3 (192)

The respondent answered "don't know/not sure" to every question in this section and provided no further commentary. There is therefore no further analysis for this section.

Air Quality and Transportation section

There were 4 respondents to this section.

Ovingdean Residents & Preservation Society (97)

(104)

(152)

Unknown respondent 3 (192)

Are there any other documents that should be referred to as part of the Context Review?

Yes: 1 response (97)

No: 0 responses

Don't know/not sure: 3 responses (104, 152, 192)

Nb: No further details of additional documents were provided by respondent 97.

Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes?

Yes: 1 response (97)

No: 0 responses

Don't know/not sure: 3 responses (104, 152, 192)

Comments include:

- Brighton based data should be used, rather than using Sussex-wide county averages for both transport and pollution data. (97)

Does the Sustainability Issues section adequately address the main issues?

Yes: 1 response (97)

No: 0 responses

Don't know/not sure: 3 responses (104, 152, 192)

Comments include:

- Additional details regarding transport infrastructure should be provided and that a strategic long-term approach to traffic movement should be set out. (97)
- Measures to address issues such as congestion on the A27, A259, and London Road A23 within Brighton should be considered. (97)
- Current opportunities for Park & Ride do not work. (97)

Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations

Yes: 1 response (97)

No: 1 response (104)

Don't know/not sure: 2 responses (152, 192)

Comments include:

- Suggestion that there is no agreed definition of sustainability (104)
- Development on urban fringe sites will harm the SDNP (104)
- Development on the urban fringe will result in additional traffic and reduce air quality. (104)

Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies?

Yes: 1 response (97)

No: 1 response (104)

Don't know/not sure: 2 responses (152, 192)

Comments include:

- More weight should be given to the views of local communities (104).

Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations?

Yes: 0 responses

No: 2 response (97, 104)

Don't know/not sure: 2 responses (152, 192)

Comments include:

- More weight should be given to the views of local communities (104).
- Concern that the identification of urban fringe sites as having development potential in CPP1 has given the signal that development can go ahead prior to any planning application being submitted. (97)
- Concern that there are no policies in place to protect urban fringe sites from being cleared (*e.g. trees*) prior to a planning application being submitted (97)

Climatic Factors and Flooding section

There were 3 respondents to this section.

Nb. Not all respondents answered every question in this section.

(104)

Environment Agency (176)

Unknown Respondent 3 (192)

Are there any other documents that should be referred to as part of the Context Review?

Yes: 0 responses

No: 0 responses

Don't know/not sure: 1 response (192)

Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes?

Yes: 1 response (176)

No: 0 responses

Don't know/not sure: 2 responses (104, 192)

Comments include:

- An additional indicator should be added to the Baseline Data table which relates to decisions made in accordance with advice on surface water flooding from the Lead Local Flood Authority (176)

Does the Sustainability Issues section adequately address the main issues?

Yes: 0 responses

No: 1 response (192)

Don't know/not sure: 0 responses

Comments include:

- There should be more information on energy efficiency (192).

Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations

Yes: 1 response (176)

No: 0 responses

Don't know/not sure: 1 response (192)

Comments include:

- Support for the inclusion of the SA objective for flood risk (176)

Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies?

Yes: 0 responses

No: 0 responses

Don't know/not sure: 1 response (192)

Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations?

Yes: 0 responses

No: 1 response (104)

Don't know/not sure: 1 response (192)

Comments include:

- More weight should be given to the views of local communities (104).

Cultural Heritage, Landscape and Open Space section

There were 5 respondents to this section. *Nb. Not all respondents answered every question in this section.*

(50)

(113)

(152)

East Sussex County Council (178)

Unknown respondent 3 (192)

Are there any other documents that should be referred to as part of the Context Review?

Yes: 0 responses

No: 0 responses

Don't know/not sure: 3 responses (50, 113, 192)

Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes?

Yes: 1 response (178)

No: 0 responses

Don't know/not sure: 3 responses (50, 113, 192)

Comments include:

- Support for the baseline assessment, which has covered all topics and issues relevant to landscape and open space in the city. (178)
- Amend incorrect terminology: "Historic Parks and Gardens" should be "Registered Parks and Gardens" (178)

Does the Sustainability Issues section adequately address the main issues?

Yes: 0 responses

No: 1 response (152)

Don't know/not sure: 3 responses (50, 113, 192)

Comments include:

- Insufficient weight has been given to landscape. (152)

Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations

Yes: 1 response (178)

No: 0 responses

Don't know/not sure: 3 responses (50, 113, 192)

Comments include:

- Support for the SA Objectives for Cultural Heritage, Landscape and Open Space. SA Objectives address the threats and opportunities relevant to the Plan. (178)

Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies?

Yes: 1 response (178)

No: 0 response

Don't know/not sure: 3 responses (50, 113, 192)

Comments include:

- Support for DMC: DMC are thorough and comprehensive in terms of conservation and enhancement of landscape and townscape (178)
- Amend incorrect terminology: "Historic Parks and Gardens" should be "Registered Parks and Gardens" (178)

Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations?

Yes: 0 responses

No: 0 responses

Don't know/not sure: 3 responses (50, 113, 192)

Population, Human Health and Inequalities

There were 3 respondents to this section.

(50)

(113)

Unknown respondent 3 (192)

All respondents answered "don't know/not sure" to every question in this section and provided no further commentary. There is therefore no further analysis for this section.

Housing and Community

There were 4 respondents to this section.

(50)

Ovingdean Residents and Preservation Society

(97)

(113)

Unknown respondent 3 (192)

Are there any other documents that should be referred to as part of the Context Review?

Yes: 0 responses

No: 0 responses

Don't know/not sure: 3 responses (50, 113, 192)

Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes?

Yes: 1 response (97)

No: 0 responses

Don't know/not sure: 3 responses (50, 113, 192)

Comments include:

- More information on student accommodation should be included, for example the future direction of student housing. (97)
- Query regarding whether student numbers (*requiring housing*) will continue to rise based on the role that technology, home working and online learning will have in the future. (97)

Does the Sustainability Issues section adequately address the main issues?

Yes: 0 responses

No: 1 response (97)

Don't know/not sure: 3 responses (50, 113, 192)

Comments include:

- More information on student accommodation should be included, for example the future direction of student housing. (97)
- Query regarding whether student numbers (*requiring housing*) will continue to rise based on the role that technology, home working and online learning will have in the future. (97)

Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations

Yes: 0 responses

No: 0 responses

Don't know/not sure: 3 responses (50, 113, 192)

Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies?

Yes: 0 responses

No: 0 responses

Don't know/not sure: 3 responses (50, 113, 192)

Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations?

Yes: 0 responses

No: 0 responses

Don't know/not sure: 3 responses (50, 113, 192)

Local Economy, Employment, Skills and Education

There was 1 respondent to this section.

Unknown respondent 3 (192)

This respondent answered "don't know/not sure" to every question in this section and provided no further commentary. There is therefore no further analysis for this section.

Consultation Events and Workshops

There was one consultation workshop to gather feedback on the proposed Sustainability Appraisal Framework. This was held as part of the Sustainability and Environment Consultation workshop, 9th September 2016.

Participants were asked to comment on the proposed 19 Sustainability Appraisal Objectives and proposed Decision Making Criteria that will be used for the policy assessments.

Sustainability Appraisal Objectives

No comments were received on the following 3 SA objectives:

- SA Objective 4 Heritage
- SA Objective 11 Soil Quality
- SA Objective 18 Equality & Social Inclusion

Changes/questions were put forward for the following SA objective:

- SA Objective 5 Travel/Transport
 - One respondent questioned the wording of this SA objective "why do we need to reduce the need to travel?"

No changes were put forward for the following 15 SA objectives:

- SA Objective 1 Biodiversity
- SA Objective 2 Open Space/Green Infrastructure
- SA Objective 3 SDNP
- SA Objective 6 Air and Noise Quality
- SA Objective 7 Water Quality
- SA Objective 8 Flood Risk
- SA Objective 9 Greenhouse Gas reduction
- SA Objective 10 Climate Change adaptation
- SA Objective 12 Waste

- SA Objective 13 Land Use
- SA Objective 14 Housing
- SA Objective 15 Access to services
- SA Objective 16 Health
- SA Objective 17 Community safety/crime
- SA Objective 19 Economy/Employment

Specific comment of support noted for the following SA objective:

- SA Objective 7 Water Quality

Decision Making Criteria:

No comments were received on the DMC for the following 3 SA objectives:

- SA Objective 4 Heritage
- SA Objective 11 Soil Quality
- SA Objective 18 Equality & Social Inclusion

Comments on amending the proposed, or adding additional DMC were put forward for the following SA objectives:

- SA Objective 1 Biodiversity – DMC should also consider issues such as enhancements/severance of linear features; protection of the marine environment (water); and protection of a wider range of sites including allotments
- SA Objective 2 Open Space/Green Infrastructure – DMC should also consider issues such as protection of marine water and marine-based recreation; enhancements/severance of linear features; should clarify that open space includes food growing opportunities including allotments; and include reference to a landscape scale approach and green infrastructure. DMC should be amended to: improve and/ or make better use of existing open space.
- SA Objective 5 Travel/Transport – DMC should also consider issues such as increasing permeability for pedestrians and cyclists; implementing measures to encourage bus use such as signal priority, bus lanes, accessible and improved bus shelters; reducing availability of car-parking particularly in accessible locations; providing other services (e.g. community infrastructure) as required.
- SA Objective 6 Air and Noise Quality – DMC should also consider issues such as reducing motor traffic particularly private cars; and reducing congestion.
- SA Objective 7 Water Quality – DMC should also consider issues such as achieving higher water efficiency standards than required; reducing marine litter; meeting and exceeding Bathing Water Directive and River Basin Management Plan objectives; ensuring appropriate SUDS are used in groundwater Source Protection Zones. Amend 2nd DMC “... does not result in contamination of water resources” to “...protects and enhances water quality”. All DMC should be amended from “encourage” to “ensure”.
- SA Objective 8 Flood Risk – DMC should consider issues such as permeable infrastructure.

- SA Objective 9 Greenhouse Gas reduction – DMC should also consider issues such as carbon neutrality, use of energy efficient technologies and low energy fabric in development.
- SA Objective 10 Climate Change adaptation – DMC should also consider issues such as contributing to carbon reduction; reducing demand for water; and increasing water efficiency. DMC should be amended from “considers the potential risks” to “mitigates the potential risks”.
- SA Objective 12 Waste – DMC should also consider issues such as re-use within development; and integrated infrastructure for waste e.g. for food waste recycling.
- SA Objective 13 Land Use – DMC should also consider issues such as reducing space for car-parking and stop car-parking in the city centre and other accessible locations.
- SA Objective 14 Housing – DMC should also consider issues such as carbon neutrality, use of energy efficient technologies and low energy fabric in development.
- SA Objective 15 Access to services – DMC should also consider issues such as reducing the need to travel; improving access via sustainable transport including infrastructure such as bus-stops; maintaining local parades and individual shops; access to healthy affordable food.
- SA Objective 16 Health – DMC should consider issues such as recognising the health benefits, including mental health, of gardening and food growing, community food growing and allotments. Amend DMC to improve access “by sustainable transport”.
- SA Objective 17 Community safety/crime – DMC should consider issues such as encouraging positive commitment to valuing the local environment.
- SA Objective 19 Economy/Employment – DMC should consider issues such as maintaining local parades and individual shops; access to healthy affordable food; and preventing the loss of industrial workspace in accessible locations.

General comments:

A number of more general comments relating to the issue covered by the various SA objectives were received as follows:

- SA Objective 1 Biodiversity – to be more creative in achieving net gains in biodiversity (e.g. not just bat/bird boxes); ensuring designations are informed by up to date information.
- SA Objective 2 Open Space/Green Infrastructure – extra assessments required for urban fringe sites including landscape, dark skies and opportunities for green infrastructure.
- SA Objective 3 SDNP - extra assessments required for urban fringe sites including landscape, dark skies and opportunities for green infrastructure.
- SA Objective 5 Travel/transport – provide material incentives for people to use sustainable transport; BHCC school admission priority conflicts with this objective/DMC.
- SA Objective 6 Air and Noise Quality – business wants more cars; increasing congestion is increasing pollution and impacts on bus reliability, undermining sustainable alternatives to the car.
- SA Objective 7 Water Quality – BH in an area of water stress.

- SA Objective 8 Flood Risk – further guidance required on reducing flood risk.
- SA Objective 9 Greenhouse Gas reduction – BHCC needs a community energy strategy; renewable energy generation should be enforced through planning consents.
- SA Objective 10 Climate Change adaptation – BHCC has a legal duty to have a climate change mitigation and adaptation strategy; maintenance of up-keep of sustainable infrastructure should be required for all development.
- SA Objective 12 Waste –how do we measure/report waste prevented or reused?
- SA Objective 13 Land Use – reduce space for car-parking and stop car-parking in the city centre and other accessible locations. All land should have a clear designation to gain community support and sense of identity.
- SA Objective 14 Housing – need to re-examine the wording around “affordable”; is there potential for a new SPD on food growing in residential development that has more detail than the PAN?
- SA Objective 15 Access to services – local services will build local community support and engagement.



Brighton & Hove
City Council

Appendix 6

How the preferred policies address consultation responses

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DM1 - Housing Quality, Choice and Mix

The consultation sought views on whether City Plan Part 2 should seek to specify a range of dwelling types and sizes for individual site allocations or include more general criteria-based type of planning policy on housing mix. Consultee views on this were split fairly evenly, but the council considers that a general criteria based policy allows greater flexibility for housing mix to be determined at the planning application stage taking account of site characteristics, market factors, viability and design parameters. This approach is reflected in criterion a) of the policy, which also refers to City Plan Part 1 policies on sustainable neighbourhoods, housing density, housing mix and affordable housing.

There was strong support for the introduction of the nationally described space standards for new residential development. Many thought this was important to resist substandard accommodation being built in the city and to provide a level playing field for developers and to ensure consistency of high quality housing delivery. Others, largely the development industry, sought some flexibility in the application of the standards to allow for unique site circumstances and innovation.

There was similarly strong general support for the introduction of the optional access and adaptability standards, and, wheelchair user standards. Again some developers sought flexibility in the application of the standards to allow for unique site circumstances and felt the standards could be costly.

The proposed policy wording requires that all residential units should meet the nationally described space standards and the wider lifetime home and wheelchair user requirements are addressed in optional provisions in the Building Regulations [M4(2) and M4(3)], with exceptions only permitted where the applicant has provided a robust justification and the council is satisfied that particular circumstances apply.

Consultees also expressed very strong support for planning policy to require the provision of outdoor private amenity space in new residential development. It was generally felt that it would be preferable to have a policy that did not set out specific standards but clarified that type of provision should be appropriate to different types of residential development. This has been reflected in criterion (f) of the policy which requires the provision of useable private outdoor amenity space appropriate to the scale and character of the development.

There were some concerns expressed at the Economic Partnership workshop that the introduction of space standards might stifle some forms of development and could reduce capacity on sites. Participants felt that some flexibility / exceptions in policy would be required to allow for innovative housing products e.g. modular housing.

DM2 - Retaining Housing and residential accommodation (C3)

The policy reflects the majority of consultation responses which were supportive of planning policies resisting the loss of housing from the existing housing stock of the city. Some respondents felt it would depend on the quality/standard of existing accommodation and whether redevelopment could result in a better standard of housing whilst other felt that there are areas of the city that could be redeveloped more efficiently to provide more homes. Several respondents wanted to see protection of family homes and stronger controls regarding their loss to HMOs.

The policy wording aims to provide strong protection against the loss of housing, whilst allowing some flexibility in cases where a proposal may provide net benefits (e.g. to enable sub-standard residential units to be enlarged to meet residential space standards).

DM3 - Residential Conversions and Retention of Smaller Dwellings

The policy aims to manage the sub-division of residential units into smaller self-contained units to ensure that conversions provide a high standard of accommodation and to protect the stock of smaller dwellings suitable for family housing. This reflects the strong support from consultees for the protection of family housing and for the introduction of the new nationally described space standard for new residential development.

DM4 - Housing and Accommodation for Older Persons

The policy reflects the support from the majority of respondents for City Plan Part Two including policies which would seek to address and support specific accommodation needs within the city, including policies to specifically address and support housing options for older people. There was also very strong support for the protection of housing for elderly persons.

Some concerns were expressed around housing options for older people; including that there needed to be more incentive for older people to move to free up family housing, and that many older people want to stay in their own homes rather than move into sheltered housing. The policy is worded flexibly and would support the provision of a range of different accommodation options providing different levels of care support.

DM5 - Supported Accommodation (Specialist and Vulnerable Needs)

The policy reflects the support from the majority of respondents for City Plan Part Two including policies which would seek to address and support specific accommodation needs within the city, including policies to specifically address and support housing options for people with specialist housing needs. There was also very strong support for the protection of housing for those with support needs.

DM6 – Build to Rent Housing

Build to rent housing was not mentioned by any consultees. The need for the policy has arisen in response to recent proposals and planning applications for build to rent in the city and changes to the NPPF and PPG proposed by central Government.

DM7 - Homes in Multiple Occupation (HMOs)

The consultation responses showed a clear majority in favour of leaving the issue to the market and not protecting existing HMOs. Concern was raised that HMO conversions result in an over-intensification of use, with consequent negative impacts such as more noise, refuse, and parking issues and the policy therefore introduces additional criteria to address these at a very localised level as well as at a wider neighbourhood level. Setting a threshold for HMO concentration at ward or neighbourhood level was specifically suggested in the consultation.

The need for minimum room sizes to be set in policy was also suggested. The policy therefore clarifies that the standards set out in Policy DM1 – ‘Housing Quality, Choice and Mix’ also apply to HMO development.

A number of respondents (including the Brighton Housing Trust and University of Sussex) made the point that, given the high cost of property in the city, HMOs are an important part of the housing stock which is affordable for those on low incomes in the city, and are not solely occupied by students. This is emphasised in the supporting text.

DM8 - Purpose Built Student Accommodation

The policy reflects the support for additional PBSA provision that was expressed through the consultation in order to reduce the pressure on general housing stock. A target for PBSA delivery has not been set, despite majority support in the consultation. This is because a target would be an inflexible policy response given the uncertainties regarding student numbers later in the Plan period, and the likelihood that a target would not be achievable given the competing land uses pressures in the city. This approach is supported by the University of Brighton.

The provision of further clarity on daylight and sunlight assessment expectations is supported by consultation responses which stated that a good standard of living should be provided for occupants.

DM9 - Community Facilities

The policy approach has addressed consultation responses by differentiating between different types of facility, with a separate policy to reflect the particular characteristics of pubs, and with cultural and social facilities already covered by CP5. Whilst some

respondents requested specific policies for education, the policy is written flexibly enough to be applicable to this type of facility without the need for additional policies.

Two respondents requested a specific policy for the King Alfred site but this is already covered in City Plan Part 1 Policy SA1.

DM10 - Public Houses

Support was expressed through the scoping consultation for a separate policy on pubs as part of the overall approach to community facilities in order to reflect their unique role and characteristics.

DM11 – New Business Floorspace

Whilst a couple of respondents considered there was a need for specific guidance and one respondent specified the need for space for creative industries workspace, the majority of respondents cautioned against over-specific policies. Flexibility within the drafted policy ensures that this is possible and that a wide range of employment spaces can be provided to meet demand.

The importance of flexibility of new business space was stressed in both BHEP? workshops; the requirement that new space is clearly designed for employment uses and are future proofed so they can be used/ sub-divided in different ways depending on changing business needs and even able to take additional floors. This will help avoid their conversion to residential. This has been addressed by the policy wording. It was considered by some respondents at the Professional Forum and comments by internal colleagues that a specific live/work policy was no longer required.

DM12 - Primary, Secondary and Local Centre Shopping Frontages

There was no common consensus from respondents about whether a combined centre policy approach would be better than separate policies for each type of centre. The draft policy does now differentiate between primary and secondary frontages in the different levels of centres to try and reduce the number of shopping centre frontage policies in the Plan.

There was a mixed response to the amendment and removal of less successful sections of the defined shopping frontages in shopping centres therefore a retail topic paper has been prepared which highlights all of the scoped changes to the shopping frontages and why some may have been recommended for insertion or removal.

In terms of new centres there was a suggestion of a new local centre for Brunswick Town from Norfolk Square to St John’s Church (Western Road). This has now been included as a

Local Centre designation in the draft policy, a change from its former designation as secondary frontage in the Regional Centre.

DM13 - Important Local Parades, Neighbourhood Parades and Individual Shop Units

The draft policy wording in DM13 reflects the positive responses we received regarding designating some shopping parades as Important Local Parades. Some of the parades suggested by other respondents were already designated as retail centres. Nine parades have been suggested as Important local Parades in the draft policy along with criteria to protect their retail function. A retail topic paper has been prepared which highlights all of the scoped changes.

DM14 - Special Retail Area - Brighton Marina

This policy has been written in response to the comments received supporting the need for a special area policy for the Marina since its District centre de-designation in City Plan Part One. The policy aims to broaden and strengthen the choice and performance of retail activity in the marina through the encouragement of mixed retail activity and presents a flexible approach to ensure that its vitality and viability is maintained and enhanced.

DM15 - Special Retail Area - The Seafront

There was not a specific scoping question on the seafront as a special retail area. Question R5 asked if a separate policy for special retail area such as the North Laine and the Lanes or whether these areas could be dealt with by a general frontage policy. Whilst suggestions were put forward from a number of respondents this did not include the suggestion for a special retail area for the seafront. However consultation with internal colleagues felt the CPP2 needed to recognise the retail/ leisure uses on the seafront and to provide a policy steer for new / change of use retail applications along seafront as currently issue dealt with case by case basis. The issue of large A3/A4 uses and disturbances/ cumulative impact should also be considered.

DM16 - Markets

A policy for markets has been drafted in response to the general support received during the scoping consultation for a policy for permanent markets within the City.

DM17 - Opportunity Search Areas for New Hotels and Safeguarding Conference Facilities

Six formal responses to the specific visitor accommodation question in the scoping report (Question T3) were concerned with further hotel development; the issue was the quality of existing hotels and the need to protect local hotels from the spread of chain hotels and unregulated short term lettings (Airbnb). At the stakeholder workshops there was a difference in opinion as to whether new hotels would be needed.

The preferred policy reflects the findings and recommendations of the Visitor Accommodation Update Study 2018 which found a stronger than anticipated growth in hotel market and performance since 2006 and likely continued growth for all forms of visitor accommodation over the plan period. The City Plan will therefore be guided by forecast need for up to 5 new hotels over the Plan period. The draft policy reflects the study recommendations to attract hotel products and brands to Brighton that will help to attract new markets to the city and that will strengthen its competitive position as a business and leisure tourism destination.

With respect to potential sites two respondents felt more hotels may be required if the Brighton Centre moved to Black Rock. Suggestions included an additional hotel at the Marina with caveats on heights and design. South of Madeira Drive, Dukes Mound and Rottingdean were suggested as potential hotel locations. Whilst one site was put forward for hotel use (Land adjacent to the American Express Community Stadium, Village Way) the respondent has subsequently clarified with the council that they no longer wish the site to be considered for a hotel. Due to constraints of land availability in the city centre - which is the first choice location for hotel operators - opportunity areas are identified in the draft Policy these are 4 CPP1 Development Areas (and includes DA2 Brighton Marina, Gas Works and Black Rock areas which could help support the emerging Brighton Waterfront proposals).

Concern was expressed at the stakeholder and BEHP workshops at the growth of Airbnb and the impact this was having on the traditional visitor accommodation and on residential areas. This issue has been considered by the Visitor Accommodation Update Study 2018. There are currently limited powers available to local authorities to manage/ regulate short term holiday lets. However draft Policy DM2 Retaining Housing can be used for enforcement purposes where it can be demonstrated that there has been a material change of use from residential use to a holiday let.

Two respondents felt the CPP2 should recognise the importance of conference facilities to the Brighton economy and encourage further provision in the city centre and appropriate locations; and recognise the role of the University of Sussex in terms of academic conferences. Whilst CPP1 recognises the need for new conference facility (DA1) provision has been made in the draft policy to safeguard existing conference facilities within existing hotels recognising the contribution they make to the city's conference economy.

A number of general comments in response to question T4 were received on tourism development in the city generally such as making better use of the city's heritage assets, the

need to attract tourists to areas outside central Brighton including links with the South Downs, design quality and city identity, street cleanliness, public realm and wayfinding and the need for new tourism developments. Many of these issues raised will be considered by the emerging Visitor Economy Strategy.

DM18 - High Quality Design and Places

The consultation on this policy indicated that there was general consensus that a Place Making Policy should be included in City Plan Part Two and support for such a policy to focus on the assessment of proposals on a street/site scale and incorporate guidance on new and emerging design issues.

A wide range of design issues were identified by respondents to inform assessment of design quality on a street/site scale. These broadly encompassed issues to do with context (scale, height, roofscape, materials and topography), public realm (active frontages, spaces between buildings and network of routes for walking and cycling), design priority (elements visible from the highway) and cumulative policy gains (sustainable building design, energy generation, biodiversity, food growing and Biosphere objectives).

The preferred policy focuses on city-wide criteria to assess quality of design proposals for buildings and spaces, in particular at street level and elements visible from the highway. It sets out a basic framework for proposals that can be applied flexibly by planning officers and applicants in tandem with the nature and complexity of the proposals. The framework focuses on issues to do with local context (such as urban grain and topography), scale and shape of buildings (such as height, form, massing), building materials and architectural detailing; and/or spaces between and around buildings (purpose and function, access and linkages, uses and activities and comfort, image and sociability including artistic element). It also refers to Design/PLACE peer review service set up by the council and indicates that area and/or site-specific design guidance will be delivered via the Urban Design Framework Supplementary Planning Document.

DM19 – Maximising Development Potential

Responses were split between respondents supporting a policy to ensure new development maximises or optimises site potential to avoid under-development and those that were concerned that such a policy would result in over-development, excessive densities, overcrowding and negative amenity / infrastructure impacts on surrounding areas.

The proposed policy provides more clarity regarding the baseline design principles and criteria that can help to identify instances where proposals might lead to under development of sites (density, mix of uses in particular housing, layouts, over dominance of parking and left over spaces).

In order to avoid increasing the risk of promoting over-crowding, congestion, excessive densities and negative amenity/infrastructure impacts on surrounding areas this policy

focuses on proposals that deliver densities lower than those set in City Plan Policy Part One CP14 but do not meet the exception test set out in that policy.

DM20 - Protection of Amenity

The proposed policy seeks to strike a balance between the single policy preferred by consultation respondents and the retention of the successful aspects of Local Plan Policy QD27 sought by Development Management. Issues to do with material nuisance are due to be addressed via Pollution, Nuisance and Disturbance Policy and, as a result, have been removed from this policy.

Requests through consultation responses for enabling local communities to have more say in what their area, what it looks like and the impact of new development upon their amenity are addressed on two fronts. The first is by providing via the supporting text more clarity and advice around what aspects of amenity are covered in the policy and how these should be addressed in the context of planning application.

The second will not be addressed via this policy but rather via the Urban Design Framework Supplementary Planning Document (UDF SPD) that will seek to skill up local communities on design issues and identify their design priorities.

There was no consensus on whether the Protection of Amenity policy should explore parameters for assessing the effective use of site and, hence, parameters are not included in the new policy.

DM21 - Extensions and Alterations

The draft Extensions and Alterations Policy responded to the comments received by being supportive of sympathetic extensions that take into consideration context, scale and materials. The policy also refers to local design guidance regarding passive design, water conservation, and incorporation of ecology/biodiversity into new development. Aspects of SPD12 have been incorporated whilst pointing towards the more flexible approach taken to development, in particular outside Conservation Areas to enable new/innovative design to flourish on these areas.

Areas of city where greater diversity would be welcomed is expected to be identified and discussed in the context of the UDF SPD that is intended to benefit from input of local communities into what they want their place to be like.

DM22 - Landscape Design and Trees

The CPP2 scoping document did not raise a specific question relating to landscape design and trees however there was general support for the protection of trees and the natural environment.

DM23 – Shopfronts

Only two responses were received that referred to shop fronts (although there was no specific question on the subject). These responses regretted the deletion of existing design guidance on shop fronts and considered that aspects of these SPDs should be incorporated in the new plan. They also felt that there should also be guidance as to shop front lighting as there is a proliferation of lighted shop fronts.

The proposed policy responds to this by retaining, amalgamating and updating existing local plan policies on shop front, shop shutters and blinds into a single policy, to be supported by the retained SPD02 on Shop Front Design.

External lighting of shop fronts is most likely to form part of an advertisement display and will be covered by a policy on Advertisements. Internal lighting does not require planning consent.

DM24 – Advertisements

Only three comments were received that referred to advertisements or signs (although there was no specific question on the subject).

One was that there should be policy guidance on signage within conservation areas and de-cluttering of signage where appropriate, whilst another response expressed concern over excessive signage. A third response expressed concern over excessive highway signage and street art in particular.

At the stakeholder workshop there was also a more specific concern expressed regarding excessive signage in the North Laine area causing an obstruction.

The policy has included specific reference to advertisements affecting heritage assets and specifically mentions conservation areas in respect of illumination. The policy also specifically refers to the need to consider cumulative impacts of advertisements and the reasoned justification mentions pro-active action to remove clutters of signage. Further detail is provided in the SPD.

DM25 - Communications Infrastructure

The need for a replacement Telecommunication and Satellite Antenna policy was not included in the Scoping Report however it was considered that retained Brighton & Hove Local Plan policies QD22-24 required replacing and updating to address the planning implications of Smart City infrastructure.

DM26 - Conservation Areas

In response to consultation the policy makes explicit the importance of conservation area character statements and management plans and recognises that different conservation areas have different opportunities and constraints and so must allow for local distinctiveness.

The policy also is also clear about the greater importance that people generally attach to the public frontages and roofscapes, with a more relaxed approach accepted to works at the rear. It further responds to consultation by recognising the impact that changes of use can have on the character of a conservation area.

There are specific reference to the importance of trees and historic street furniture to the character and appearance of some areas.

DM27 - Listed Buildings

There was a general consensus that a streamlined set of heritage policies would be appropriate but that there should be a separate policy for each type of heritage asset, such as listed buildings. There was also a consensus that the listed buildings policy must address the need to keep buildings in use and in a good state of repair and this has been included in the policy.

DM28- Locally Listed Heritage Assets

Consultation responses sought that the policy be worded in a way that recognises the different issues affecting different types of assets, such as buildings or parks/gardens. It is not considered necessary or appropriate for the policy to be so detailed as to include separate policy considerations for each type of asset but rather the policy links explicitly to the identified significance of each asset. The policy has though been worded to ensure that it appropriately covers parks and gardens (such as by reference to “key components”) and the reasoned justification makes clear that there are different heritage values apply dependent upon the type of asset.

DM29 - The Setting of Heritage Assets

With regard to a policy on setting, local factors that were considered to be particularly worthy of conservation were: the historic relationship of the city to the sea and seafront promenade; the importance of views to and from the sea; the influence of the Downland topography on the urban cityscape; the backdrop of the Downs; and the inter-relationship of the major set piece developments such as formal squares and crescents.

DM30 - Registered Parks and Gardens

The policy has been positively worded to encourage works that would enhance these heritage assets wherever possible.

DM31 - Archaeological Interest

There was a general consensus that a streamlined set of heritage policies would be appropriate but that there should be a separate policy for each type of heritage asset, such as sites of archaeological interest. There were suggestions that policy on archaeologically should include for a detailed review of the key issues for each chronological period and that within an SPD more detailed policy objectives for each chronological period and asset type could be set out. This has not been included at this stage in order to avoid an unduly long and complex policy. There were also mentions that the policy should refer to the lack of local capacity for the storage of, and public access to, finds and archive material resulting from archaeological investigations. and that this should be addressed by developer contributions. This has been included in the policy and referenced in the reasoned justification

DM32 - The Royal Pavilion Estate

The written consultation document asked whether there are there important groupings of heritage assets that require a site-specific policy approach. Nearly half of respondents to this question considered that the Royal Pavilion estate warrants a site-specific policy approach. No other such groupings attracted that level of support.

DM33 - Safe, Sustainable and Active Transport

Although a small majority of respondents to the scoping consultant felt that policy CP9 provided sufficient detail, this was not an overwhelming view and it is considered that that policy does not provide the clarity required to determine planning applications, nor would it satisfactorily replace the remaining saved policies in the Local Plan.

DM34 - Transport Interchanges

Clear support was expressed for a supportive policy. However, of the sites put forward for park and ride or coach parking, none were considered to be available for development. The proposed policy therefore retains support in principle for new transport interchanges but does not allocate specific sites.

The requirement for there to be no unacceptable effect on the local or strategic road network reflects Highways England's concerns about this issue.

DM35 - Travel Plans and Transport Assessments

The policy addresses the strong support expressed for more detailed guidance on travel plans and transport assessments with only three respondents taking the opposite view. Many responses requested clear thresholds setting out when applicants should provide different levels of assessment; however following consultation with the council's Transport Planning Team, it is felt that this would be unduly inflexible and unable to respond to the particular context of each application.

DM36 - Parking and Servicing

The purpose of this policy is to transpose the requirements of the council's adopted Parking Standards SPD into policy, and as such parking was not an issue specifically addressed during the consultation.

DM37 - Green Infrastructure and Nature Conservation

The policy helps to address the overarching support for the protection and enhancement of species, nature conservation and provision of criteria-based policy(ies) to distinguish between the hierarchy of different nature conservation designations including locally designated sites (reviewed in 2013 in accordance with Defra guidance and endorsed in 2017 by Panel of ecologists). The approach adopted largely accords with the representation from Natural England. Some respondents gave particular reference to connectivity of habitats and species and the irreplaceability of habitats which the policy's supporting text seeks to address. And the policy text which states "Proposals liable to cause demonstrable harm to such sites and/or features will not be granted" helps to address the support from 6 respondents for similar wording currently provided in policy QD18 of the Local Plan. The supporting text further seeks to address the representations which sought regard to Brighton & Hove's BAP species and provision of new nest sites for swifts, house martins and swallows as well as innovative and creative enhancements.

DM38 - Local Green Spaces

There was support by at least 24 respondents for the four urban fringe sites Hollingbury Park, Three Cornered Copse, Ladies Mile and Benfield Valley being designated as Local Green Spaces. St Aubyn's Playing Field was also promoted in 12 responses received however it is considered in view of its unique circumstances that designation of this site should be sought via the Rottingdean Neighbourhood Plan so that there is greater clarity over the sites that are demonstrably special to the local community and hold local significance. No other sites were promoted by more than 5 respondents. The draft policy therefore reflects the support given to the four urban fringe site by listing them as proposed designations.

DM39 - Development on the Seafront

There was support from 7 respondents for more detailed guidance to assess planning applications that come forward on the seafront in terms of protecting and enhancing the marine environment put also to protect areas used for marine recreation and access to water sports. This has been addressed in the policy.

6 respondents felt further guidance was required to ensure adequate and maintained coastal defences and to ensure that development in the coastal zone takes account of the particular conditions experienced in the area and this has been addressed in the policy wording and has also included reference to resilience to the effects of climate change/

One respondent felt a specific policy may be required with respect to coastal erosion east of the Marina. However it is considered that sufficient guidance is contained within SA1 The Seafront.

There was support from 11 respondents for further policy regarding the presumption against encroachment onto the shingle beach (referenced in the supporting text to SA1 The Seafront). The draft policy sets out the exceptions to encroachment in relation to improving public amenities; access and improving existing areas of hardstanding. The policy allows for further waste collection facilities on the beach to address the concerns expressed by some respondents regarding litter and rubbish. The supporting text refers to the removal of redundant structures.

2 respondents felt that the cross over between terrestrial and marine planning and responsibilities should be clarified. The relationship to the South Marine Plan has been explained in the supporting text and in the policy to ensure that developments are in compliance with the marine planning policy.

DM40 - Protection of Environment and Health - Pollution and Nuisance

The policy largely addresses the strong support for a single policy combining health, safety, air quality and noise priorities relating to transport and travel given that some of the concerns related to matters outside the control of a development plan. It also addresses the limited support for a combined pollution and nuisance policy whilst acknowledging that other respondents sought separate policies. In particular the Environment Agency suggested a two policy approach which would make more explicit the council's intention to address water pollution specifically. There was also strong support for a detailed policy on the protection of the quality and potential yield of water resources. Water is therefore being addressed in more detail in a separate policy.

Natural England raised the importance of the South Downs National Park Dark Skies Reserve Status for Urban Fringe sites and the setting of National Park. ESCC suggested all new development should have the highest standard of technology for low impact, efficient and sustainable lighting. It also suggested minimum lighting is provided as required for public safety.

DM41 - Polluted Sites, Hazardous substances and Land Stability

Seven respondents raised a number of issues in respect of polluted land and buildings that should be addressed. Some issues fall between this and another policy, such as, Sustainable Drainage Systems and groundwater quality. However this policy in conjunction with other respective policies seeks to ensure appropriate measures can be implemented as sought by respondents.

Half of the four respondents commenting on land stability did not feel a policy was required whilst one did not know and the other sought the protection of trees on steep inclines to avoid land slips. The policy therefore seeks to integrate land stability with other factors relevant to the state of land to ensure measures can be sought when necessary. The protection of trees is however being covered in other policies (Green Infrastructure and Nature Conservation; and, Landscape Design and Trees).

There was a mixed response as to whether hazardous substances needed to be addressed in a City Plan policy. It is therefore considered its integration with other related matters is a suitable compromise and helps to ensure suitable measures can be sought when necessary. Whilst one respondent raised an issue relating to aquifers, the pollution of aquifers is addressed in other policies (Pollution and Nuisance; and, Protecting the Water Environment)

Three respondents were keen to have viability explicitly included in Policy and potentially sought the promotion of high value land uses to aid decontamination of polluted sites including the Brighton Marina Gas Works (falls within Policy DA2). However national policy already makes it explicit that viability is a material consideration, it would therefore be taken into account as appropriate and does not need to be included in policy.

DM42 - Protecting the Water Environment

The preferred policy addresses the concerns raised during the scoping consultation around the need for policies addressing water quality and yield and ensuring the timely provision of waste water infrastructure. There was support for these issues to be dealt with together rather than with other pollution issues.

The policy has not included a generic supportive statement in the policy to the provision of strategic water and wastewater infrastructure (such as additions or improvements at treatment and abstraction works) as requested by Southern Water in the absence of any detailed identification or programme of work. If there are any specified improvement projects to existing infrastructure within the administrative area of Brighton & Hove planned by Southern Water over the life of the Plan this could more appropriately identified in an update to the Infrastructure Delivery Plan.

DM43 - Sustainable Urban Drainage

The preferred policy addresses the concerns raised during the scoping consultation around the need for policies addressing surface water management. There was support for these issues to be dealt through the use of SuDS measures and that the policy should reflect local circumstances. Issues of protection of water quality are addressed in the policy but are also dealt with by draft City Plan Part 2 policies relating to Protecting the Water Environment and Protection of Environment and Health – Pollution and Nuisance. Detailed discussion on Sustainable Urban Drainage took place as part of the Sustainability and Environment Scoping consultation Event and has informed the policy but also the drafting of SuDS Supplementary planning document which will set out further detailed guidance to support the implementation of the Policy.

DM44 - Energy Efficiency and Renewables

There was strong support from respondents to include further policy in the CPP2 to encourage delivery of low carbon and renewable energy. Whilst there was strong support for specific types of energy to be supported by CPP2 it was also felt that the policy should not be too overly prescriptive of the type of energy technology and ensure the policy is future proofed. This has been reflected in the wording in the preferred policy which does not specify/ prioritise specific types of energy. Whilst there was support for the CPP2 to identify and allocate sites for renewable and low carbon energy generation, storage or networks from some respondents the preferred policy, informed by the Brighton & Hove City Plan Part Two Energy Study (2018), identifies specific areas where greater potential for the installation of low and zero technologies including Development Areas are identified and will be encouraged.

Whilst there was strong support for the development of a renewable energy policy in CPP2 and a range of issues were put forward to consider by respondents, guided by the Brighton & Hove City Plan Part Two Energy Study (2018), a renewable energy target policy has not been taken forward. However in order to mitigate carbon emissions associated with all new development and meet national and local policy objectives for carbon dioxide emissions reduction the minimum 19% CO₂ reduction target required by CPP1 Policy CP8 for new residential building now applies to all types of development. The policy does include a caveat regarding technical feasibility and viability to address concerns raised by some respondents.

Most respondents supported the development of energy efficiency targets especially in existing buildings and smaller development and given issues of local fuel poverty. It was noted that forthcoming legislation to increase standards to a minimum EPC rating 'E' was inadequate and included too many exemptions. Those objecting felt that standards should not be set at a local level, and that viability may be impacted. However guided by the Brighton & Hove City Plan Part Two Energy Study (2018) and evidence on performance rating and 'potential' higher minimum standards the preferred policy include higher minimum (EPC) standard. The policy does include a caveat regarding technical feasibility and viability to address concerns raised by some respondents.

DM45 - Community Energy

There was strong support for further development of policy on low and zero carbon energy. An area that was particularly well supported across the consultation was Community Energy. This policy introduces generic policy in support of Community Energy.

DM46 - Heating and cooling network infrastructure

Consultees responding to Question P19 strongly supported production of additional guidance/policy to support district heating. This was supported for either or both planning policy or supplementary guidance. All those suggesting further policy should be adopted in CPP2 also recommended production of supplementary planning guidance. References were made to the following issues that should be addressed: Combined Heat and Power Quality Assurance (CHPQA); and CIBSE Code of Practice for 'CP1': Heat Networks Code of Practice for the UK; heat customer protection (e.g. Heat Trust Scheme). Additional supplementary guidance was also considered appropriate due to the technical complexity, and the extensive implications for the city and development schemes. The Shoreham Harbour Heat Network Study (2016) recommended text to be incorporated into CPP2. This has influenced some of the text proposed for this part of CPP2. A Heat Network Study has also been produced for Hove Station area and Eastern Road Areas, which when published may be likely to influence the DA policies. One internal consultee recommended that stronger policy should be adopted in all Development Areas to support heat networks.

Site Allocations

SA7 - Benfield Valley

Consultation responses at the Scoping Stage of City Plan Part Two expressed support for a Local Green Space designation at Benfield Valley.

A response from the development industry was critical of the 2015 Further Assessment of the Urban Fringe sites study suggesting it did not adequately look to review developable areas of the sites. It was suggested Benfield Valley has capacity for a far higher number of dwellings and the developable areas could be extended. The respondent wanted to work with the Council through City Plan Part Two to demonstrate this is possible.

In terms of responses to the Scoping Consultation questions regarding urban fringe sites more generally, a wide range of responses were received (see H2 below). These are summarised here as also considered relevant to the consideration of Benfield Valley which is an urban fringe site.

- Strong support for retaining allotment sites as these are important community facilities, support physical and mental health, improve community cohesion, cannot easily be moved/replaced, valuable resource for wildlife and plant diversity.

- Transport and traffic considerations; impacts on local roads, traffic safety, access to public transport facilities; air quality issues need to be adequately addressed;
- Need to encourage / incentivise sustainable transport opportunities where development of urban fringe sites occurs;
- Infrastructure including school places, health facilities, utility requirements will be important;
- Impacts on heritage assets and Conservation Areas should be further considered;
- Ensure affordable housing is genuinely affordable and is for local people; encourage opportunities for community-led housing;
- Design important and need to reflect local character of existing communities; protect against urban sprawl;
- Opportunity to secure higher sustainability standards from development on urban fringe sites;
- Ecological considerations very important; opportunities to improve connectivity and deliver towards ecosystems services;
- Opportunity to incorporate food growing within urban fringe sites;
- Historic rights of public access need to be protected; opportunities to improve accessibility to open spaces and better linkages to the national park should be explored;
- Considerable support for recommendation in 2015 Further Assessment of Urban Fringe Sites to remove assessment area L6/E5 Hollingbury Park, Brighton

The policy for Benfield Valley responds positively to many of the matters raised during the Scoping Consultation. It recognises the value of the open spaces at Benfield Valley, the importance of the landscape, the wildlife and the heritage assets at Benfield Valley and the need to improve accessibility and linkages between the adjacent urban areas and with the National Park. A review of the development area potential found that higher density development than that suggested in the 2014/2015 Urban Fringe Assessment studies could be accommodated to assist with meeting the city's housing needs provided that it is well designed and provides for the effective and long term positive and effective management of the open spaces, ecology and heritage assets of the valley. The policy clarifies that various technical assessments will be required to accompany development proposals.

Strategic Site Allocations

There was general support for the identification of new mixed use sites (Question E4) from formal responses and at the various consultation events. Only 3 respondents considered it would be better to utilise existing sites rather than new allocations. A number of respondents put forward sites for consideration for mixed uses and these have been considered as part of the preparation of the City Plan Part Two and either taken forward within H1 Housing and Mixed Use sites or as Strategic Site Allocations where it was considered that the issues affecting the site/ proposed mix of use required a more detailed, site specific policy framework. It should be noted that a number of sites put forward during the consultation were already allocated as Strategic Allocations in the adopted City Plan Part 1 and were therefore not reconsidered in the City Plan Part 2.

A number of the strategic site allocation opportunities emerged during the preparation of CPP2 through awareness of schemes at pre-application stage or through the One Public Estates project (SSA1 - Brighton General Hospital site, Elm Grove, Freshfield Road and SSA4 - Sackville Trading Estate and Coal Yard, Hove)

SSA2 - Combined Engineering Depot, New England Road

This site was put forward by the landowner (Network Rail) for consideration as potential housing site. Given the forecast employment floorspace needs of the city and the shortage of sites identified in the CPP1 to meet these needs the preferred policy seeks an element of employment floorspace to be provided alongside the housing allocation for this site. It was also considered that a strategic site allocation was required to address site specific issues and ensure a high quality of design and amenity and townscape improvements.

SSA3 - Land at Lyon Close, Hove

The preferred strategic allocation responds to a number of landowners who put forward their sites in this location for consideration for mixed use development (in response to scoping consultation questions E2, E4 and E5) in light of emerging or permitted schemes elsewhere on the site. It was considered in light of these emerging/ permitted schemes a more comprehensive approach was required for the wider site to ensure issues of townscape, public realm and open space provision could be more appropriately and comprehensively addressed. It was also considered important given the employment needs of the city and the role the wider site plays in the provision of employment floorspace that the preferred policy ensures that the employment role of sites is maintained as part of mixed use redevelopment rather than residential led mixed use.

SSA5 - Madeira Terraces and Drive and SSA6 - Former Peter Pan Leisure Site (adjacent Yellow Wave), Madeira Drive

Question T1 asked whether there was a need to allocate further seafront development sites. Respondents considered generally that it was important to protect the original identity of the seafront; valued and successful places and protect and develop its tourism role. A number of respondents felt more should be made of Madeira Drive and this was also mentioned at workshops. The BHEP considered a positive planning policy was required to encourage further investment into Madeira Drive.

The preferred strategic allocations of Madeira Terrace and Drive and the Former Peter Pan Leisure Site have sought to address the concerns raised by a number of civic societies and other respondents in relation to the need for a sympathetic scale of development (the need to preserve long broad promenades with open sea views); concern with the impact of additional coaches and cars; the need for maintenance of ornamental iron and woodwork; the provision of facilities such as toilets, kiosks and shade and the need to protect Madeira Drive's role as an event space.

Two respondents felt the potential of West Pier should be considered in the CPP2 however this is felt to be sufficiently addressed through the City Plan Part 1 – SA1 The Seafront.

SSA7 Land Adjacent to American Express Community Stadium, Village Way

The strategic allocation policy responds to a response to the Scoping Consultation from the Community Stadium Limited who put forward the site for consideration for allocation in the City Plan Part 2. The original representation proposed that the site be allocated for a hotel (which reflected a previous application for the site BH2015/03285). However the Community Stadium Ltd have reconsidered options for the site and proposed alternative uses that include employee facilities and classrooms for the Albion in the Community/ health uses in associated with Club or potential health partners or academic space for the Universities. Allocation of the site for B1a/ D1 uses would accord with the key priority for the Lewes Road Area (DA4 - City Plan Part 1) which is to support the academic corridor as well as bring forward new employment floorspace. Whilst the representation indicated the potential for shop/ ticket offices and hospitality facilities (restaurant/ bars) to serve the stadium these uses are considered ancillary to Stadium and would not require a specific site allocation.

H1 - Housing and Mixed Use Sites

Overall, very strong support was expressed for allocating suitable brownfield sites in the city for future housing development and thereby safeguard their use for housing over the plan period, with only three respondents stating suitable brownfield sites should not be allocated for housing. A number of sites were suggested for development, and these have all been considered for allocation through the site selection process.

Some respondents were of the view that brownfield sites should be prioritized over greenfield site development.

Many of the responses were supportive of site allocations specifying a range of dwelling types and unit sizes. Respondents were concerned that the market would only deliver profitable development rather than homes to meet local needs.

Other responses felt a general criteria based policy would be more appropriate and would provide flexibility with mix being determined on a site by site basis taking account of site characteristics, market factors, viability and design parameters. These respondents did not support a more prescriptive approach. On balance this was considered to be a more appropriate approach, with the requirements of City Plan Part One Policy CP19 being sufficient to ensure an appropriate housing mix on residential development sites.

H2 - Housing Sites - Urban Fringe

A range of responses were received to the Scoping Consultation (Q.H2) regarding the extent to which 2014/2015 Urban Fringe assessment Studies had assessed urban fringe sites

Some respondents were clear that they thought the level of consideration in the Urban Fringe Assessment studies was appropriate and that the studies were robust. Other respondents felt that the development potential on some of the urban fringe sites had been underplayed and low density seen as low impact. Given the city's housing needs and the constrained land supply a number of respondents felt that urban fringe opportunities should be reviewed and that well designed higher density developments could also be low impact and contribute more to city's housing needs. Other views expressed concern that high density development would not be appropriate on urban fringe sites and that there was a need to balance development with impacts on National Park and need to incorporate Green Infrastructure and green space for local people.

Some respondents objected in principle to any housing development on the city's urban fringe sites.

Most responses supported the suggestion at the Scoping Consultation stage of seeking to secure a proportion of family sized housing on urban fringe site allocations. It was recognised that this can be more difficult to achieve on smaller urban brownfield sites. A number of respondents qualified their support by stating that sufficient infrastructure (access to schools, health facilities, roads) must also be adequately planned for.

The following is a summary of the main points raised through the Scoping stage of consultation:

- Strong support for retaining allotment sites as these are important community facilities, support physical and mental health, improve community cohesion, cannot easily be moved/replaced, valuable resource for wildlife and plant diversity.
- Transport and traffic considerations; impacts on local roads, traffic safety, access to public transport facilities; air quality issues need to be adequately addressed;
- Need to encourage / incentivise sustainable transport opportunities;
- Infrastructure including school places, health facilities, utility requirements will be important;
- Impacts on heritage assets and Conservation Areas should be further considered;
- Ensure affordable housing is genuinely affordable and is for local people; encourage opportunities for community-led housing;
- Design important and need to reflect local character of existing communities; protect against urban sprawl;
- Opportunity to secure higher sustainability standards from development on urban fringe sites;
- Ecological considerations very important; opportunities to improve connectivity and deliver towards ecosystems services;
- Opportunity to incorporate food growing within urban fringe sites;

- Historic rights of public access need to be protected; opportunities to improve accessibility to open spaces and better linkages to the national park should be explored;
- Considerable support for recommendation in 2015 Further Assessment of Urban Fringe Sites to remove assessment area L6/E5 Hollingbury Park, Brighton

The proposed site allocations policy clarifies that any development on urban fringe sites will need to address all relevant City Plan policies; this will include, for example, those with respect to affordable housing provision, the need for high quality design and the need to adequately address transport and traffic considerations. The policy identifies, for each proposed site allocation, the key site planning considerations that will need to be addressed and also requires that opportunities to secure improved and additional accessible open space are secured along with local food growing opportunities, green infrastructure and local community facilities. No allotment sites are put forward as proposed site allocations. Sites suitable for family sized housing are identified and areas of development potential are clarified taking on board the recommendations from the 2015 Further Assessment of Urban Fringe Sites Study. The supporting text to the policy clarifies that a number of technical assessments will be required to support applications for development.

H3 - Purpose Built Student Accommodation

There was general support for the allocation of additional PBSA and strong support for prioritising new development on university campuses. For example, the University of Sussex supported further site allocations to improve student choice despite its masterplan providing significant additional accommodation on campus, as some students will always prefer to live off-campus.

Views were mixed as to whether new development should continue to be focused around Lewes Road, including opposing views from the universities. Some respondents felt this would minimise road pressure on road infrastructure and public transport due to the proximity to the universities, whereas other respondents favoured a more dispersed approach to PBSA.

A number of potential locations were put forward as potential locations for new PBSA development. These locations have all been assessed, and only Lewes Road Bus Garage site was considered a suitable, policy-compliant site for allocation¹, and has therefore been included in the draft Plan. A further site on London Road was subsequently identified after the consultation period and has also been proposed as an allocation. Whilst it is acknowledged that both sites are located in areas where other PBSA developments are already operating, no suitable sites were proposed in other areas of the city.

E1 Opportunity site for business and warehouse uses

¹ See Site Allocations Topic Paper for further detail on the assessment process.

No sites were specifically put forward for consideration for new industrial estates/ land in the city (in response to questions E8-E11).

Whilst the University of Sussex supported the allocation of new employment sites one respondent queried whether new industrial sites were needed if some existing industrial estates were being redeveloped. Several respondents suggested the need for more efficient use of floorspace and car parks in existing industrial estates or extensions to existing sites. This issue is addressed in the adopted CPP1 Policy CP3 Employment Land and draft Policy DM11 however there are constraints to expanding existing estates due to surrounding residential uses or the national park. One respondent suggested an assessment of the appropriateness of existing provision should be undertaken and of opportunities on the periphery of the city and on council land. The Brighton & Hove Economic Partnership (BHEP) suggested enterprise zones/ intensification areas should be considered. An Industrial Estates Audit was undertaken in December 2017 and informed the preparation of CPP2 however there are limited opportunities for business/ warehouse sites in the urban fringe given the landscape, ecological and heritage issues of many of these sites (as identified in the council's Urban Fringe Assessments). One view expressed at the BHEP workshop was to look to the Greater Brighton area to accommodate future industrial floorspace needs and to free up sites for higher density B1 a uses and this is an issue being considered through Greater Brighton City Region.

Respondents considered that new space should meet the needs of all prospective occupiers – flexibility and 'move on' space to accommodate SMEs in middle-stage of growth. This has been addressed in draft Policy DM11.