

## **Summary of Representations and Responses to the Core Strategy**

### **Revised Preferred Options Stage (REVISED PREFERRED OPTIONS) July / August 2008 and the Proposed Amendments Proposed Amendments Paper July 2009**

This section provides a summary of the formal responses to the Core Strategy Revised Preferred Options Document (June 2008) and summarises the results of the various events and workshops carried out during the six week formal consultation which took place between June 2008 and August 2008.

In total there were 114 formal responses to the document. The consultation responses from Revised Preferred Options June 2008 assisted the council in the revision of policies which led to further consultation in June 2009 for key changes in the Proposed Amendments Proposed Amendments Paper. This summary therefore additionally provides a summary of consultation and feedback from events for the eight policies consulted upon and the Revised Spatial Strategy during the six week consultation which took place between June and August 2009.

The Revised Spatial Strategy and the eight policies that were consulted upon were felt to have been amended significantly since the last Core Strategy consultation into Revised Preferred Options in June 2008. These policies were amended due to either representations that were made during the Revised Preferred Options consultation 2008; the findings of new or updated background studies; guidance received from the Planning Inspectorate; or the alignment with council priorities.

The remaining policies in the Core Strategy Revised Preferred Options document (June 2008) were not amended significantly but have been subject to minor changes to text and layout.

In total 329 responses to the document were received during the consultation period in 2009. The consultation responses have assisted the council in revising the eight policies and the Spatial Strategy for the Submission Version of the Core Strategy.

### **1. Spatial Strategy**

#### **Formal Responses – Revised Preferred Options Stage 2008**

36 general representations were received regarding the Spatial Strategy 11 in support, 12 partially supporting and 13 objections. The key issues raised were as follows:

- Concern that there appears to be a weak relationship between development and public transport
- Concern about the selection of some areas for development due to their characteristics i.e. flood risk

- General points regarding tables with quantum's of development around consistency and new and future commitments
- General support by some for the overall strategy and the plan to optimise brownfield land and the encouragement or regeneration and renewal of existing urban areas.

Consultation Events and Workshops – Revised Preferred Options Stage 2008

At the CABE LDF Workshop, CABE questioned how the different points of the spatial vision interrelated.

***Significant changes required*** - The Spatial Strategy was revised to continue the protection of the urban fringe but to also provide for some managed land release for housing in the period post 2020 on a contingency only basis subject to monitoring the amount of new homes built - ***further consultation was therefore undertaken in the Proposed Amendments Proposed Amendments Paper.***

Revised Spatial Strategy

Formal Responses – Proposed Amendments Proposed Amendments Paper Stage 2009

In total there were 19 representations regarding the Revised Spatial Strategy; 2 in support, 10 partial support and 7 objections. The key issues raised were as follows;

Consultation Events and Workshops – Proposed Amendments Proposed Amendments Paper Stage 2009

At the **LSP Development Morning** there was concern from some that the issue of climate change does not have significant focus in the document and it was emphasised that this needs to be paramount in all decision-making regarding future development and should be given greater prominence.

**2.1 DA1 – Brighton Centre and Churchill Square Area**

Formal Responses – Revised Preferred Options Stage 2008

34 representations were received; 7 supported the policy, 19 were qualified support and 8 were objections. The key issues raised were as follows:

- There was general support given for both the redevelopment of The Brighton Centre and the extension of Churchill Square within the representations.
- Concern from respondents was expressed around the supporting sustainable transport infrastructure needed to deliver a redeveloped Brighton Centre and the Churchill Square expansion and felt that this should be clarified more explicitly within the policy.
- Others felt that biodiversity requirements should be elaborated upon more clearly along with prioritisation of pedestrians and cyclists.

- A small number were concerned about tall buildings within the area.

#### Consultation Events and Workshops – Revised Preferred Options Stage 2008

At the **Core Strategy Consultation Event** the level of influence for development on areas of land that is privately owned (e.g. Churchill Square) was queried.

### **2.2 DA2 – Brighton Marina and Black Rock**

#### Formal Responses – Revised Preferred Options Stage 2008

63 representations were received; 5 supported the policy, 13 expressed qualified support and 45 registered their objections. The key issues raised were as follows:

- There was general concern expressed about the quantum and density of housing proposed for the site (i.e. an additional 2,000 units over the Plan period), which the majority of respondents objecting to the Preferred Option considered to be over-development.
- Respondents also felt that any development proposed for the area should not exceed cliff height as determined by the Brighton Marina Act 1968 and that this should be clarified within the policy.
- Others expressed concern about the inadequacy of existing infrastructure to support the proposed quantum and density of housing development.
- Some respondents felt that there was an absence of adequate proposals for improving road access in the vicinity of the Marina to take on board projected growth.
- Respondents were also concerned about allowing further development of a site which is deemed at high risk of flooding and that this is likely to be exacerbated by climate change predictions relating to sea level rises.

#### Consultation Events and Workshops – Revised Preferred Options Stage 2008

At the **CABE LDF Workshop** it was felt that there was poor connectivity in the document between major projects especially Marina.

#### **Significant changes required**

The total number of new homes identified for this development area was reduced from 2,000 to 1,650 - **further consultation undertaken in the Proposed Amendments Proposed Amendments Paper**

#### Formal Responses – Proposed Amendments Proposed Amendments Paper Stage 2009

314 representations were received; 29 supported the policy, 38 expressed qualified support and 243 registered their objections. The key issues raised were as follows:

- 251 'standard responses' object to revised proposals. Many endorse the comments put forward by a local residents group

- Reduction to 1,650 new homes is welcomed, but the new figure is still too high. Brighton & Hove is primarily a historic seaside town with very limited growth potential.
- Inclusion of 'cliff height' restriction supported.
- Other objectors state no justification for reduction in housing numbers and no justification for cliff height restriction – no clear evidence for change of approach. Tall buildings area and need for new housing too great.
- Part B of the policy (sets out broad amounts of development) is too prescriptive in terms of assigning land uses to specific sites. This detail better placed in Site Allocations DPD.
- Those respondents who supported the proposals - thought they would regenerate the marina, bring needed housing, visitors and employment to the area

Consultation Events and Workshops – Proposed Amendments Proposed Amendments Paper Stage 2009

At the **LSP Development Morning** it was felt that in general the business sector supported the Explore Living planning application and therefore did not support the changes to the Marina policy. It was also felt that the Marina development was needed to give local young people the chance to work on building these schemes

At the event questions were also raised as to whether the revised policy would impact upon the Explore Living appeal.

**2.3 DA3 – Lewes Road**

Formal Responses – Revised Preferred Options Stage 2008

A total of 51 representations were received of which 15 were in support, 20 gave qualified support and 16 were objections. The key issues raised by the representations were as follows:

- The Universities support the policy for Lewes Road and recognition of the role of the Universities in the wider area. Concerns that high student numbers in the area should be addressed in the policy by identifying sites for purpose-built student accommodation.
- Support for local priorities in the policies particularly sustainable transport improvements, improvements to the public realm including greening the area and biodiversity.
- Comments are made on details set out in relation to individual sites mentioned in the preferred option including Preston Barracks (too much employment floorspace being sought), Falmer Academy (representations in support and against proposal), Woolards Field and the Community Stadium.
- Lewes District Council's comments emphasise the linked issues between the authorities and welcome the references to improved sustainable transport.

Consultation Events and Workshops – Revised Preferred Options Stage 2008

At the **BHEP event** it was suggested that businesses ideally wanted to locate in the city centre and therefore queried whether employment floorspace would come forward on sites further out such as Preston Barracks.

At the **CABE LDF Workshop** it was considered that the impact of student numbers was under-played, and the role of the universities was not strong enough in the document. It was also felt that there was poor connectivity in the document between major projects particularly the integration of the Falmer Stadium. It was felt that cross-cutting strategies would be needed to deliver the Stadium's regeneration benefits.

## 2.4 DA4 – New England Quarter and London Road

Formal Responses – Revised Preferred Options Stage 2008

A total of 49 representations were received of which 12 were in support, 18 gave qualified support and 19 were objections. The key issues raised by the representations were as follows:

- Support for local priorities in the policies particularly sustainable transport improvements, improvements to air quality and public realm including greening the area and biodiversity and support for local businesses and creative industries.
- Comments are made on details set out in relation to individual sites mentioned in the policy, such as Open Market (need for redevelopment and opportunity for more local food producers) and the Co-op (increased housing capacity requested by developers).
- Comments are made on various aspects of the regeneration London Road area which range from transport management, environmental and public realm improvements to retention of existing buildings and land use quantum.

Comments are made on the need for new/improved 'anchors' in the London Road area in general and a Tesco superstore in particular with representations in support and against. The need for new/improved anchors is generally acknowledged. Some voice concern over the negative impact a Tesco superstore could have upon local character and a retail mix which includes independent shops.

Concerns are raised, mainly by developers, over the potential limits posed by the boundaries set for 20,000 sqm the post-2016 office allocation and whether there is scope for the minimum number of residential units within this area to be higher than 795 housing units.

Consultation Events and Workshops – Revised Preferred Options Stage 2008

At the **Core Strategy Consultation Event** the **Earthwise / London Road group** asked how private investment fitted into the Core Strategy i.e. Tesco's

proposals to build a new supermarket in the London Road area, and whether this fitted in with the timescale of the Core Strategy.

At the **BHEP event** it was questioned whether major land owners in the area were supportive of a possible 20,000 sq m additional office floorspace to be provided in the London Road area.

### **Significant changes required**

Mixed use development was proposed on the Preston Road office sites which therefore led to a significant increase in housing identified in this development area - ***further consultation was undertaken in the Proposed Amendments Paper***

### **Formal Responses –Proposed Amendments Paper Stage 2009**

A total of 27 representations were received of which 6 were in support, 13 gave qualified support and 7 were objections. The key issues raised by the representations were as follows:

- Lack of clarity with respect to terminology for 'strategic allocations', 'sites' to be protected or 'sites for additional office development' within the area
- Queries regarding timescale for new office development, how it would be delivered and whether it is viable
- Queries regarding the need for new office development given economic conditions
- Need to link development proposals to traffic minimisation and management, improved transport infrastructure, need to reference public transport

### **Consultation Events and Workshops – Proposed Amendments Paper Stage 2009**

At the **LSP Development Morning** it was felt that the London Road policy was in conflict with air quality aims for the area and seemed to encourage health inequalities by supporting car use. It was also discussed that the transport implications for the area were inadequate and could have knock on effects for the whole city particularly deprived neighbourhoods. Mixed use development was supported in the area – particularly if this meant an improvement in the public realm.

## **2.5 DA5 – Eastern Road and Edward Street**

### **Formal Responses – Revised Preferred Options Stage 2008**

A total of 17 representations received: 10 in support, 3 qualified support and 4 objections. The key issues raised by the representations were as follows:

- There was broad support for the proposals to improve the built environment, connectivity between neighbourhoods and access to employment that have demonstrable benefits in improving sense of well-being, community

cohesion and mental health. There is a request the high proportion of older people in the area be recognised in the text.

- Improvements to sustainable transport measures are welcome along with improving pedestrian and cyclist safety.
- Site specific companies and developers support the proposals set out in the preferred option for the Amex site, Gala Bingo and Circus Street.
- The area is in need of greening and improved biodiversity.
- In this area water and wastewater infrastructure is required to serve new development and developer contributions should be sought.

## 2.6 DA6 – Hove Station Area

### Formal Responses – Revised Preferred Options Stage 2008

26 representations were received of which 6 supported the policy, 9 offered support with qualifications, and 11 raised objections to the policy. Key issues raised were:

- Some respondents felt that additional retail floorspace should be planned for in the area, and questioned the interpretation of the 2006 Retail Study.
- Several respondents emphasised the need to integrate more greenery/biodiversity/green infrastructure into the area
- The above point was also linked to the need to improve walking and pedestrian links within and around the Hove Station area.
- Several comments raised concern about the safeguarding of the allocated waste site Sackville Coalyard – whether it would prejudice the development of other uses, and whether it was deliverable as a waste use or should be reviewed with reference to PPS3 and moved to the facility at nearby Leighton Road.
- Some comments challenged the validity of the idea of a creative cluster in the area. Others questioned how the Core Strategy could influence the affordability of workspace for creative industry businesses.

### Consultation Events and Workshops – Revised Preferred Options Stage 2008

At the **Core Strategy Consultation Event**, **The Regency Society** stated that all areas were important and wanted to know why developments at Hove Station were of lower priority in terms of timescales. He pointed out that developers would see that these areas are prime sites and thus surely it would be important to promote these areas sooner.

He also stated that Hove Station is identified as a tall-building node and therefore had the potential to have tall-buildings with retail on the lower levels and housing on the upper levels.

## 2.7 DA7 – Shoreham Harbour and South Portslade

### Formal Responses – Revised Preferred Options Stage 2008

50 representations were received of which 9 supported the policy, 26 gave partial support, and 15 objected to the policy. Summary of issues raised were:

- Impact on biodiversity/flood risk/coastal processes has not been assessed.
- Should improve railway stations/cycling routes.
- Low energy/low & zero carbon developments very important.
- We need a new link road/we do not need a new link road.
- Significant development at Shoreham Harbour in the plan period is unrealistic.
- Need to maintain a viable port operation/should relocate all port activity to increase area to be re-developed.
- Some respondent's state need to recognise regional/sub-regional importance of proposed development.

#### Consultation Events and Workshops – Revised Preferred Options Stage 2008

At the **Core Strategy Consultation Event** questions were raised around renewable energy provision for development at Shoreham Harbour and whether the proposals included a wind farm. **Cllr Smart** queried where 10,000 homes proposed for the area would go and raised that there would be concern regarding the provision of a link road. Representatives from **Save Hove** reiterated that Shoreham Harbour is a protected employment site and whether the employment uses would have to be retained.

#### Significant changes required

Five alternative development options were proposed for comment - **further consultation was therefore undertaken in the Proposed Amendments Paper**

#### Formal Responses –Proposed Amendments Paper Stage 2009

31 representations were received of which 9 supported the policy, 13 gave partial support, and 9 objected to the policy. Summary of issues raised were:

- More information required before decisions can be made, e.g. transport/development capacity of area, coastal erosion, flood risk etc.
- Impact on rest of city should be more clearly identified.
- Support for employment led regeneration.
- Need to safeguard wharves for minerals import / waste uses / secondary aggregates.
- Need Link Road / Do not need Link Road.

#### Consultation Events and Workshops –Proposed Amendments Paper Stage 2009

Feedback from **the Portslade Community Forum** in July 2009 regarding the plans for Shoreham Harbour indicated general concerns regarding the following;



#### Transport

- A new road system in and out of the harbour needs to be provided in order for the scheme to work.
- Improved public transport must be integral to any regeneration proposal
- Would have been helpful to have had results of transport and employment studies at this meeting

#### Funding

- Apparent no guaranteed funding from the Government
- Housing led regeneration
- Most options based on over-emphasis on housing numbers - need a balanced approach to meet needs of port/harbour, housing, industry, shops and important job creation or local people
- Concern about focus of housing alone and what will happen if thresholds are not met. The priority should be for local housing needs/local families
- Not enough affordable housing
- Proposals should include re-use derelict buildings and improving sustainability of existing buildings

#### Level of Support

- Level of local will/support for the amount of development & change proposed. "We've heard all this before".

#### Infrastructure

- All necessary infrastructure (including schools) must be in place before new population arrives
- Concern about capacity of schools to take additional population. Schools already oversubscribed.
- Improved access to beach essential to any proposal
- Also need provision for elderly
- Can people living here now and their children keep their quality of life

#### Employment/Training

- Need to improve training facilities for teenagers, especially vocational training. Young boys (and girls) should be given more opportunities of getting
- Tasters of work/further education: one week of work experience is not enough

Options - Options 1 and 3 were the only options considered acceptable by those present. No-one favoured options 2, 4 or 5.

- Option 1 was favoured option for some. Accept that something needs to be done and regeneration needed, but concern at potential piecemeal approach. Also concern that this option should identify social and environmental benefits
- No-one favoured Option 2 (5,500 dwellings) as likely not to generate sufficient benefits
- Option 3 was the preferred option for some, but concern about density and flood risks

- Option 4 (10,000 dwellings) should be rejected: too much and over reliance on flats. Should be greater concentration on houses with gardens – suitable for families
- No-one favoured Option 5 (Unplanned development)

At the **LSP Development Morning** it was questioned whether the current 5 options listed under the Shoreham Harbour policy reflected the changed funding position

## **2.8 SA1 – The Seafront**

### Formal Responses - Revised Preferred Options Stage 2008

40 representations were received in total; 5 were in support of the policy, 20 offered partial support and 15 were objections. The key issues raised by the representations were as follows:

- Some respondents felt that the policy needs to make clearer and stronger references to the role and importance of the historic townscape in relation to the seafront.
- Respondents representing environmental groups and organisations felt that the policy should make stronger references to the role and value of the natural environment in relation to the seafront.
- Many representations expressed concerns regarding maintenance and repair issues referring, for example, to the quality of the seafront railings and lamp-posts. Some representations called for stronger commitment to ongoing regeneration and maintenance and the need to secure more funding.
- Some comments raised concern about specific references in the policy to key schemes/major projects along the seafront that might now fail to materialise.
- Some respondents were concerned about transport and access issues along the seafront. Some representations asked for clarity regarding any future Rapid Transport System and proposed works to the A259. Others expressed concern that improved traffic flow should not be at the expense of reducing priority to cyclists and pedestrians.

## **2.9 SA2 – Central Brighton**

### Formal Responses – Revised Preferred Options Stage 2008

19 representations were received in total: 6 supported the policy, 10 were qualified support and 3 were objections. The key issues raised were as follows:

- Some respondents felt that the described 'Cultural Quarter' should include the Lanes. Some represented that the policy did not properly address the leisure needs of older persons.
- Some respondents were concerned with the effect that cycle and pedestrian improvements and may have upon the use of existing transport facilities including buses. Others were concerned that urban realm improvements outlined did not go far enough to sufficiently improve the environment.

## 2.10 SA3 – Valley Gardens

### Formal Responses – Revised Preferred Options Stage 2008

15 representations were received; 7 supported the policy, 4 were qualified support and 4 were objections. The key issues raised were as follows:

- Any changes to the road layout or traffic routes must not result in the severance of the deprived areas on the eastern side of the city.
- There should be greater reference to sustainable transport, a clear commitment to retaining bus lanes and more specific mention of cycling.
- Barriers and street clutter should be removed to ease pedestrian movement.
- The potentially important role of Valley Gardens within the city's green infrastructure network should be included in the policy.
- More and better use should be made of the green spaces around St Peter's Church.

## 2.11 SA4 – Urban Fringe

### Formal Responses – Revised Preferred Options Stage 2008

38 representations were received in total; 11 were in support of the policy, 20 offered partial support and 7 were objections. The key issues raised by the representations were as follows:

- Majority of the respondents welcomed the protection and enhancement of the urban fringe and the Downs. Light was raised by a couple of respondents. Some sought the strengthening of the policy to ensure there is no development outside of the built up area or the deletion of the reference to permitting development that could justify a countryside location whilst others wanted this expanded to allow the enhancement/expansion of existing established uses, farm diversification, sustainable tourism or to enable ecohomes/earthships upon the footprint of derelict/empty farm buildings.
- Three respondents felt some areas of the urban fringe were potentially suitable for development to help revive communities and to balance the environment with local economy. Toads Hole Valley was raised as a potential site. However another respondent felt Toads Hole Valley should be retained and was part of the Green Corridor and a good gateway to the Downs.
- Many respondents noted the importance of the urban fringe to biodiversity/Green Network and some sought additional monitoring indicators. Some welcomed opportunities for multi-functional use especially wildlife, local food production and appropriate recreation uses whilst others cautioned against additional interference.
- There was support for the protection of sensitive and vulnerable groundwater resources and encouragement of appropriate land management.

- Some respondents supported the creation of 'gateway' and interpretive facilities and/or improving safe sustainable access to the countryside. References to particular documents were welcomed or suggested e.g. Downlands Initiative, South Downs Management Plan, and the Rights of Way Improvement Plan.

### **Significant changes required**

SA4 changed, to continue to protect the urban fringe but to provide for some managed land release for housing only if it should prove to be required later in the plan period - ***further consultation was therefore undertaken in the Proposed Amendments Proposed Amendments Paper***

### **Formal Responses –Proposed Amendments Paper Stage 2009**

203 responses were received in total; 46 objections; 8 in support and 149 partially supporting the policy. The key issues raised by the representations were as follows:

- Objections to Urban Fringe contingency - important green spaces, setting of city, etc
- Has the Core Strategy recognised full potential and capacity of key urban sites?
- Should consider a variety of uses for the Urban Fringe and should identify key sites before 2020 e.g. Toads Hole Valley.
- A clearer strategy is required to inform and implement the approach to the UF (Natural England and BH Economic Partnership).
- Some support for Urban Fringe contingency provided that groundwater protection, landscape impacts and setting of city protected (Environment Agency, South Downs Joint Committee)

### **Consultation Events and Workshops – Proposed Amendments Paper Stage 2009**

At the **LSP Development Morning** there was concern over the Urban Fringe policy – these documents have long lifespan – concern that this opens door to development in future. Needs more safeguards to be spelt out in policy – more provisios e.g. affect on aquifers. It was suggested that monitoring would be very important to help protect the Urban Fringe under this new policy. Urban Fringe development cannot be justified if the city has empty properties.

There was also reference made to Park & Ride sites and the need to assess any negative impacts on aquifers – particularly if these were to be on the urban fringe.

## 2.12 SA5 – South Downs

### Formal Responses – Revised Preferred Options Stage 2008

28 representations were received in total; 14 were in support of the policy, 10 offered partial support and 4 were objections. The key issues raised by the representations were as follows:

- None of the respondents objected to the general principle of the policy. The majority of respondents supported the policy and the protection of the South Downs. Many recognised the need for the protection of and the benefits to biodiversity and the natural environment and a few sought an additional reference to conserving and enhancing the landscape within the council priorities. Support was given to the reference to groundwater protection and references to particular documents were welcomed.
- Further references were requested including the recognition of the cultural contribution of the South Downs, protection from light pollution, specified areas as gateway facilities, greater regard to be given to sustainable access/tourism and the need to enhance access only 'where appropriate'.
- A few sought greater protection from urban sprawl and development whilst another wanted more regard to supporting a viable rural economy/farm diversification.
- Several respondents observed that the reference to South Downs AONB should be corrected to read Sussex Downs AONB.
- Several respondents raised the need to ensure the land within the AONB and undesignated countryside is protected appropriately prior to the confirmation of the National Park designation.

### Consultation Events and Workshops – Revised Preferred Options Stage 2008

The CABE LDF Workshop raised questions as to what might happen if the National Park was not created. They also stated that more should be made of topography of the city, particularly that the inter-visibility between the South Downs and the urban area did not come across.

## 2.13 SA6 (was SN1 & SN2) - Sustainable Neighbourhoods

### **a) SN1 – Sustainable Neighbourhoods**

#### Formal Responses – Revised Preferred Options Stage 2008

18 representations were received in total; 7 were in support, 10 offered qualified support and 1 was an objection. The key issues raised by the representations were as follows:

- There were a wide range of comments made but overall there was support for the policy.
- The biggest grouping of comments was on the need to emphasise the importance that opportunities and encouraging sport and recreation can have for local economic and social benefits. This includes encouraging

healthier lifestyles and reducing health inequalities by providing for walking, cycling and access to local healthy food.

- Add the need to improve the environment and biodiversity to the policy.
- The Green Party proposed the need to raise densities in some areas in order to improve public transport.

## **b) SN2 - Residential Renewal Areas**

### Formal Responses – Revised Preferred Options Stage 2008

A total of 8 representations were received; 3 in support, 5 with qualified support and not objections.

- Policy generally support with comments on suggested amendments.
- There should be clearer links made to reducing health inequalities through increasing opportunities to cycle and walk and increased access to healthy food.
- There should be guidance on dealing with 'orphan open spaces in residential renewal areas.

## **3. Core Policies**

### **3.1 CP1 Sustainable Buildings**

#### Formal Responses – Revised Preferred Options Stage 2008

29 representations were received in total; 11 were in support of the policy, 11 offered qualified support and 7 were objections. The key issues raised by the representations were as follows:

- Some respondents felt that the policy should encourage and provide guidance on the re-use of and improvement to existing/older buildings.
- Delivery of zero carbon buildings in the city remains a main concern among those objecting the policy. More flexibility regarding the wording of the policy and guidance on the assessment of constraints to delivery was requested.
- Some respondents objected on the basis that the policy does not go far enough towards delivering CO2 emission targets and/or zero carbon city.
- Some respondents felt stronger justification for the delivery of standards, particularly zero carbon, was needed.

#### Consultation Events and Workshops – Revised Preferred Options Stage 2008

At the **LSP Development Morning** there was a discussion around climate change and sustainability issues. There was general consensus that there should be evidence as to how the plan will help to deliver CO2 emission targets and the document should contain provision of cooling buildings, and shaded spaces. There was also the suggestion that the Food Partnership could be involved in healthy food production in the city.

At the **Core Strategy Consultation Event**, Ecologically queried how the Core Strategy fitted in with the sustainability objectives of the South East Plan and asked whether there was any reference or link to the council's Sustainability Strategy.

The **Commission for Architecture and the Built Environment (CABE) LDF Workshop** rose whether the reference to reducing the ecological footprint of the city was purely aspirational and suggested that this needed to be quantified such as the transport targets. **CABE** also suggested referencing 'Building for Life' (a CABE initiative) which could be helpful to ensure high design quality. **CABE** housing audits could be looked at as well.

### 3.2 CP2 Urban Design

#### Formal Responses – Revised Preferred Options Stage 2008

19 representations were received; 8 supported the policy, 7 were qualified support and 4 were objections. The key issues raised were as follows:

- The main focus of responses was on the issue of tall buildings and respondents were generally supportive of the approach of identifying broad areas suitable for tall buildings. There were some objections to the inclusion of specific areas - Central Seafront, Shoreham Harbour and Edward Street/Eastern Road. Specific objection was also made in respect of tall buildings on the King Alfred site. But there was also specific support for most areas.
- The broader aim of the policy was generally supported but there were some concerns that traffic congestion and air quality issues should be resolved before increasing density.
- Other issues raised were the need for new development to contribute positively to its historic surroundings and the need for new design to support active living and healthier lifestyles.

### 3.3 CP3 Public Streets and Spaces

#### Formal Responses – Revised Preferred Options Stage 2008

27 representations were received; 8 supported the policy, 13 were qualified support and 6 were objections. The key issues raised were as follows:

- The main relevant issues that were raised related to the concept of 'Lifetime Neighbourhoods' and particularly the need for streets and public spaces to be pedestrian-friendly and to include plenty of public seating/benches and shelter (as well as provision of public toilets). Linked to this were comments that the policy should be more specific about the active living / health benefits of pedestrian and cycle- friendly streets.
- There were also several comments that relate to the need for the policy to acknowledge the importance of biodiversity and 'greening'.
- Other comments in various ways covered the need to reduce street clutter.

- Developers raised objections to the generality of the requirement for developers to contribute towards public realm improvements and the lack of reference to the criteria in Circular 05/2005.
- The majority of the other objections/concerns relate to matters of detail rather than strategy – e.g. maintenance issues, communal waste bins, bus shelters, gated streets, planting in containers.

#### Consultation Events and Workshops – Revised Preferred Options Stage 2008

At the **LSP Development Morning** there was a general discussion regarding the Public Realm and iteration of the need for planned street and footpath cleaning to make city's public spaces healthy and attractive for residents and visitors.

**CABE LDF Workshop** stated that Urban Design Framework SPD needs to be delivered in the next 18 months, and should not wait until 2011. They stated that there should also be a clearer map of how will deliver design outcomes

### **3.4 CP4 Healthy City**

#### Formal Responses – Revised Preferred Options Stage 2008

19 representations were received; 9 supported the policy, 6 were qualified support and 4 were objections. The key issues raised were as follows:

- Several representations wanted expansion of allotment provision as part of a strategy to provide healthy food (Food Partnership, the Green Group, Transition etc)
- The need to make improved links from healthy living to access to secure green open space, including quality of life, air quality and reduced heat island effects i.e. to CP5 and CP6.
- Make links to the obesity strategy
- Need to explain how HIA will be evaluated and used in planning process
- Make links between healthy living and sustainable building (fuel poverty / water shortages)

#### Consultation Events and Workshops – Revised Preferred Options Stage 2008

At the **LSP Development Morning** it was suggested that there should be an explicit link of health with transport i.e. mention bike riding in the policy and its benefits.

At the **Core Strategy Consultation Event** the **Older People's Council** stated that it was difficult to comment on behalf of older people as they did not think much of the document related to older people directly. **Save Hove** stated that they thought there should be a separate document for "young people", "older people". They also suggested that reference should be made to the need for housing for older people (but not supported housing) and stated that there were many disenfranchised older people living north of the railway and that there may be problems in the future due to the increasing aging population.



### **3.5 CP5 Biodiversity**

#### Formal Responses – Revised Preferred Options Stage 2008

20 representations were received; 11 supported the policy, 6 were qualified support and 3 were objections. The key issues raised were as follows:

- Developer contributions: Schemes on previously developed land within town centres should not be required to deliver biodiversity benefits. The current wording of CP5 requires developer contributions that are not fairly and reasonably related to some proposed developments (ref Circular 05/2005).
- Indicators for BAP Targets: Ensure monitoring addresses BAP targets at national, regional and local level.
- People experiencing biodiversity: Include a new indicator for measuring increased appreciation of biodiversity.
- Site protection: Sites looked after by local community wildlife groups with an interest in biodiversity should be given the same protection as municipal parks.
- Green infrastructure: Include a green infrastructure policy; ensure it corresponds with regional policy and that it is represented on the proposals map.

### **3.6 CP6 Open Space**

#### Formal Responses – Revised Preferred Options Stage 2008

23 representations were received; 10 supported the policy, 10 offered partial support and 3 were objections. The key issues raised were as follows:

- Greater regard and promotion of biodiversity should be given within all open spaces/CP6 (suggestion to merge with CP5).
- Expand allotment/food production - allow more flexible use of parks in this way and allow resident planting schemes.
- Identify/map open spaces in the Core Strategy especially vulnerable sites (4 sites named).
- Clearly state planning obligations, relating to open space, will accord with Circular 05/2005.
- There needs to be more clarity on how the development areas will incoRevised Preferred Optionsrate CP6 objectives.

### **3.7 CP7 Sports and Recreation**

#### Formal Responses – Revised Preferred Options Stage 2008

17 representations were received; 5 supported the policy, 7 offered partial support and 5 were objections. The comments were very diverse and can be summarised as follows:

- Many respondents were concerned over the current lack of provision and funding of sports in the City (felt the city could miss out on financial bonuses from the Olympic overspill).

- Some respondents felt there was a lack of facilities of particular note appropriate to a City of regional importance (the loss of the ice rink and football stadium was raised and the lack of regionally important facilities for taking part in sport rather than just watching).
- A variety of 'priorities' were suggested including refurbishment of King Alfred, making Preston Park a centre of excellence for cycling, the need to concentrate on everyday sports that help people travel around sustainably (cycling, walking and running), attention to 'urban' sports (skateboarding etc), provision of a roller-skating centre, provision of ice skating (could be temporary or Black Rock), exploration of sporting offer of the sea, provision of affordable and supervised teenager facilities, provision of football stadium and the return of Withdean to a state of the art athletics facilities.
- The need for affordable facilities (both in terms of for participants and also for developers re viability of schemes).
- The need to recognise wider benefits (e.g. social, economic etc) and control harm (light pollution from floodlighting, encroachment onto to beach/shingle, encroachment of large [sports] schemes on community sports pitches/facilities).

### 3.8 CP8 Sustainable Transport

#### Formal Responses – Revised Preferred Options Stage 2008

42 representations were received of which 10 were in support, 29 offered qualified support and 3 objected. The key issues raised by the representations were as follows:

- Concerns raised around the principle of the spatial strategy, that development is not directed into the right places, there should be development focused around stations and questions around the need for so much development.
- Questions raised on the soundness of the Transport Assessment.
- More consideration needs to be given to joint issues with adjoining authorities for example the management of traffic on the A259 and the A27 and impacts of major developments.
- Failure to set out how a sustainable transport system will be delivered and how traffic will be reduced for example is it through RTS, Park and Ride or parking management in the city centre, car clubs, travel plans etc? In terms of park and ride, 5 comments were in support, 1 against and 2 concerned about impact on the South Downs. Lack of mention of sustainable transport hubs in supporting text.
- There should be a greater emphasis in the policy on the need to improve air quality by reducing traffic. This can be achieved by providing less parking in the city centre and in new developments.
- The policy fails to take account of long term global issues and there affects on future travel patterns, for example the impact peak oil after 2015.

Consultation Events and Workshops – Revised Preferred Options Stage 2008

At the **LSP Development Morning** there was consensus that the provision of sustainable transport was not just about increasing choice but about preventing an increase in car journeys and increasing sustainable transport choices. Generally it was considered that there needs to be enhanced solutions for transport near to the Royal Sussex County Hospital (in Edward Street, Brighton) especially if it is to be expanded. Ideas ranged from cycling lanes, reduction in car usage, and parking for patients only. It was suggested that there should be a link to health with transport i.e. mention bike riding in the Healthy City policy (CP4) and also that there should not be more transport choices, rather the encouraging people to use public transport and bikes, maybe even travellers.

At the **Core Strategy Consultation Event, B&H and Mid-Sussex Friends of the Earth** queried how the transport and traffic assessment had been made raised concerns as to how the level of transport associated with development could be predicted when the details of future developments are 'very loose'. There was general concern from **Friends of the Earth** whether the Core Strategy would meet CO2 reduction targets for the next twenty years.

**The BHEP event** suggested that the greatest weakness of the city was access and parking.

**Significant changes required**

The policy was altered to clarify the council's approach to achieving greater choice in transport options including Park & Ride and a capital transport scheme - ***further consultation was therefore undertaken in the Proposed Amendments Paper***

Formal Responses –Proposed Amendments Paper Stage 2009

29 representations were received of which 7 were in support, 10 offered qualified support and 11 objected. The key issues raised by the representations were as follows:

- Objections state that policy is unclear, lacks detail and will not achieve a reduction in traffic.
- Some representations suggest that effective Park & Ride requires closure of parking in the city centre. Strategy for smaller P&R sites has proven to be unviable. Sites should be identified.
- Change in policy from Modal Shift to Modal Choice will not achieve required reduction in car use, improvement in air quality and differs from policy set in Sustainable Community Strategy
- Lack of clarity on what capital transport scheme is –how much will it cost and where will it go and when?

Consultation Events and Workshops – Proposed Amendments Paper Stage 2009

At the **LSP Development Morning** it was questioned whether the transport policies within the Core Strategy were aligned with the Sustainable Community Strategy aligned. It was also suggested that a small number of Park & Ride sites would not work in the city.

**3.9 CP9 Developer Contributions**

Formal Responses – Revised Preferred Options Stage 2008

21 representations were received on the policy; 10 were in support, 6 were partial support and 5 were objections. The key issues raised were as follows:

- Some respondents queried whether the policy accords with government guidance Circular 5/2005 for being necessary and fair and which could affect viability or undermine other policies that promote economic and social progress in city. It was also suggested reference to pending Community Infrastructure Levy (CIL) which should come into effect Spring 2009
- Comments were raised regarding Flood-risk measures and utilities provision, specifically water provision and sewerage/treatment and that timely provision and costs be met from developers' otherwise new/existing development may experience unsatisfactory levels of service or there may be failure in meeting standards of service.
- A comment was raised in concern to biodiversity measures that required developer contributions, but such measures were not reflected in other policies.
- There was a request that developers contribute to Health Impact Assessments on major developments of strategic importance.
- A respondent felt that public art contributions should go towards wider community benefits such as play/open space or community buildings.

**Significant changes required**

The policy was amended to clarify the council's approach to achieving the required infrastructure to support the planned amounts of development in the city - ***further consultation was therefore undertaken in the Proposed Amendments Paper***

Formal Responses –Proposed Amendments Paper Stage 2009

24 representations were received on the policy; 10 were in support, 11 were partial support and 3 were objections. The key issues raised were as follows:

- Some representations seek greater detail and priority for specific contributions (e.g. pedestrian/cycle schemes, biodiversity, air quality)
- Some request viability of each site should have greater consideration Support from Environment Agency, Older People's Council, Sport England for approach.

### 3.10 CP10 Managing Flood Risk

#### Formal Responses – Revised Preferred Options Stage 2008

8 representations were received of which 5 supported the policy, 1 offered support with qualifications, and 2 raised objections to the policy. Key issues raised were:

- There was general support for including a policy to highlight the significance of the issue of flood risk, and the approach set out for managing flood risk while allowing necessary development.
- Some respondents were concerned that allowing further development in high flood risk areas such as Brighton Marina and Shoreham Harbour, could present risk to human health.
- Several respondents highlighted the importance of sustainable drainage systems in mitigating against flood risk especially surface water, and how that infrastructure can be linked with biodiversity and other sustainability benefits.

### 3.11 CP11 Housing Delivery

#### Formal Responses – Revised Preferred Options Stage 2008

22 representations were received; 2 representations supported the policy, 12 were partial support and 8 were objections. The key issues raised were as follows:

- Many respondents referred to specific housing land supply issues. Responses pointed to the lack of a specific identified five year supply of 'deliverable' sites and queried the inclusion of a windfall allowance in the council's projected housing supply. Some objectors felt that the South East Plan Proposed Modifications (published after the publication of the Revised Preferred Options Document) should be used as the appropriate strategic housing target. One respondent referred to a lack of a 'contingency' position for delays or non-delivery of the wholly urban sites that make up the council's housing land supply position.
- In terms of housing mix, respondents from the development industry felt that it would not be appropriate to apply a blanket requirement for all new residential development. The development industry felt that the appropriate LDF approach should be flexible and establish how the characteristics and constraints of individual sites will be taken account of. There was some support for the approach outlined for 'large strategic sites' and some support for broad guidance as to the appropriate mix of housing types to be achieved across the City. Some respondents felt there should be further provision of one and two bedroom units to support business needs and others felt that the need for family housing should be more strongly emphasised.
- Some respondents were concerned about the impacts of additional housing and increased housing targets on the physical and social infrastructure, local amenity, urban grain and character. Some

respondents felt that infrastructure requirements should be taken account of early in the process.

- Some respondents from the development industry made site specific representations (e.g. Preston Barracks, Co-Op, Marina) generally putting forward sites for greater amounts of development.

#### Consultation Events and Workshops – Revised Preferred Options Stage 2008

At the **Core Strategy Consultation Event** a general question was raised regarding Regional Housing Targets and the need to deliver 11,000 additional homes in the Core Strategy. The question was raised as to whether Brighton & Hove was already at capacity in terms of people and homes.

At the **BHEP Event** it was questioned how the city would cope if the South East Plan Panel report's figures for housing were implemented.

#### Significant changes required

The policy was amended to demonstrate how the South East Plan regional housing targets for the city will be achieved - ***further consultation was therefore undertaken in the Proposed Amendments Paper***

#### Formal Responses – Proposed Amendments Paper Stage 2009

171 representations were received; 145 representations supported the policy, 9 were partial support and 17 were objections. The key issues raised were as follows:

- Core Strategy open to challenge on windfall issue – too much reliance on for first 10 years
- Some support for Urban Fringe contingency
- Has the Core Strategy recognised full potential and capacity of key urban sites?

#### Consultation Events and Workshops – Proposed Amendments Proposed Amendments Paper Stage 2009

At the **LSP Development Morning** it was suggested that areas such as Saltdean should be reflected in housing solutions for the city and that access to open space would be crucial in any new development. It was also discussed that there should be improved use of existing open space on housing estates where there is a recognised surplus – this could be annexed to properties.

### **3.12 CP12 Affordable Housing**

#### Formal Responses – Revised Preferred Options Stage 2008

17 representations were received; 5 supported the policy, 6 were qualified support and 6 were objections. The key issues raised were as follows:

- Respondents from the development industry generally welcomed and supported the flexibility afforded by the policy wording 'up to 40%'. Some

asked for further guidance on how the criteria within the policy would be applied. Others also commented that flexibility would be required regarding the tenure split of affordable housing and the unit type/size mix.

- Other respondents, principally Registered Social Landlords operating within the City, expressed concern that the policy wording 'up to 40%' would not provide a clear unambiguous base for negotiation and would undermine the ability to continue to supply an adequate supply of affordable housing.
- Some respondents felt that the policy requirement for affordable housing should be higher (50%) and that affordable housing should also be a requirement for smaller sites.

#### Consultation Events and Workshops – Revised Preferred Options Stage 2008

At the **Core Strategy Consultation Event, Friends of Hollingbury & Burstead Woods** raised how the delivery of social housing fitted into the Core Strategy.

The **CABE LDF Workshop** highlighted whether a policy was needed for the management or use of council housing stock now that the stock transfer decision was rejected.

### **3.13 CP13 Housing Densities**

#### Formal Responses – Revised Preferred Options Stage 2008

13 representations were received; 5 supported the policy, 7 were qualified support and 1 was an objection. The key issues raised were as follows:

- Developers commented that more clarification is needed on calculating densities where mixed use sites are involved. There was also a request for clearer guidance on density increases in the suburbs.
- The need to provide more family accommodation was raised and this was considered to be in potential conflict with higher densities.
- There was some concern that very high densities could lead to loss of open space and difficulties with provision of car parking.

### **3.14 CP14 Gypsies and Travellers**

#### Formal Responses – Revised Preferred Options Stage 2008

22 representations were received; 4 supported the policy, 15 were partial support and 3 were objections. The key issues raised were as follows:

- Some representations stated that Traveller sites should not be located close to contaminated land or other hazards.
- Some respondents questioned the value of the preferred option stating that proper site provision is needed now.
- Some respondents raised concerns that sites/land with national level designations should be included as 'locations to be avoided'. They felt

that any development within these locations would 'compromise' objectives of the designation.

- Some respondents felt that the needs of 'New Age' and 'Van Dwellers' had not been taken account of in the plan.
- One respondent requested clarification that the criteria in the policy would also be used to judge applications arising from unexpected demand.

### 3.15 CP15 Retail Provision

#### Formal Responses – Revised Preferred Options Stage 2008

22 representations were received; 7 supported the policy, 5 were qualified support and 10 were objections. The key issues raised were as follows:

- Existing centres: There were queries regarding Brighton's description as a Regional Centre, its defined boundary and comments regarding the over-focus on Brighton as a retail core. Representations were also made regarding the importance of the roles of local shopping centres/parades and the quality of their offer.
- Proposed new centres: Some respondents felt that there was not enough flexibility to alter the retail hierarchy/designate new centres in areas of under provision.
- Out of centre retail: the majority supported the policy stance to discourage edge and out of centre retail, although there was one suggestion that this might be the place for multiples, to allow independents to move back to town centre locations.
- Independent traders vs. clone town: there was widespread support for encouraging smaller retailers – reference to links with start-up businesses and the thriving creative industries sector. Comments also centred upon the avoidance of further chain stores to maintain Brighton's identity. One respondent stated that there is a surfeit of small unit space and a dearth of large unit space.

#### Consultation Events and Workshops – Revised Preferred Options Stage 2008

At the **Core Strategy Consultation Event, B&H and Mid-Sussex Friends of the Earth** commented on the negative impact of out of town retail parks such as Goldstone Retail Park, which he stated had inevitably taken trade away from centres such as London Road.

**Save Hove** noted that Brighton is stifled and should be allowed to breathe to encourage independent traders to thrive once again. They also stated that B&H had lost the retail, trade and individuality that once attracted people to the city, and this had led to a "clone town". **Save Hove** also felt that the promotion of out of town retail areas such as Sackville Trading Estate would encourage multiple retailers to locate and alleviate the pressure on Brighton.

**The Brighton Society** questioned whether the Brighton & Hove Retail Study (2006) had taken into account the increase in internet shopping. The question was also raised as to whether Brighton was 'over-shopped' as it has twice as



many shops as a city of an equivalent size. It was also discussed that it would be nice if Brighton was attractive for tourism instead of retail sprawl.

**CABE LDF Workshop** discussed the role of the Regional Centre and questioned whether there were package of priorities needed to respond to this. They stated that the regional role needed to be much clearer in the vision and that the city would have to work harder at providing 'metropolitan' functions. They thought that the uniqueness of city was expressed well in the place-shaping elements of the document but it did not seem to count the regional role as part of its uniqueness.

It was also raised by CABE whether the document had really spelt out what the vision for retail was to be in the future, i.e. whether we wanted to attract large floor plate retail.

### 3.16 CP16 Strategic employment sites

#### Formal Responses – Revised Preferred Options Stage 2008

There were a total of 20 representations made; 8 in support, 5 partial support and 7 objections. The key issues raised by the representations were as follows:

- A developer challenges the validity of the employment forecasting model upon which the Employment Land Study is based and therefore questions the need for an additional 20,000sqm of office space to 2026 to meet the city's employment needs.
- Two objectors question the over reliance on the New England Quarter to provide the 20,000 sqm additional B1 floorspace required.
- The implications of recent changes to the global economy should be incorporated into this policy such as the need to diversify the economy.
- There should be a more flexible approach to employment. The policy fails to take on board proposals in draft PPS4 on Employment to widen the definitions of employment generating uses to the service sector and include tourism, retail, education and health.
- The policy should be more flexible to address the need for more warehousing/storage in the city and to allow employment use to go to alternative uses if no longer viable.

#### Consultation Events and Workshops – Revised Preferred Options Stage 2008

At the **LSP Development Morning** clarification was sought for the meaning of the phrase 'sustainable economic growth'. It was questioned as to whether the term should be replaced with 'healthy economic growth' to ensure that the city's growth is headed in the right direction and concentrates on protecting and growing smaller businesses. It was noted that we have a unique city, and we should keep this individuality and be more careful in making decisions, not led by global companies. The identification of sectors with potential for growth that help to preserve unique character of the city– e.g. creative industries, tourism was encouraged. The Core Strategy should also take into consideration the 'global' situation, and analyse how the UK economy will fit internationally particularly in preparation for rising oil prices, and future energy prices.

In terms of the issue of employment and skills participants at the **LSP Development Morning** recognised the education of young people as a priority and the improvement of the skills of residents who are at risk of labour market disadvantages. The creation of higher value-added employment was encouraged.

At the **BHEP event** it was suggested that businesses ideally wanted to locate in the city centre and therefore queried whether employment floorspace would come forward on sites further out such as Preston Barracks. Warehouse and storage provision was also discussed and it was suggested that there was a lack of space for this in the city. It was questioned whether this had been addressed in the Core Strategy and whether warehousing would be allowed on allocated sites. Although employment levels are not high, demand is high.

### **3.17 CP17 Other Employment Sites**

#### Formal Responses – Revised Preferred Options Stage 2008

A total of 13 representations were received: 7 in support, 4 were partial support and 2 were objections. The key issues raised were as follows:

- There should be a more flexible approach to employment. The policy fails to take on board proposals in draft PPS4 on Employment to widen the definitions of employment generating uses to the service sector and include tourism, retail, education and health.
- SEEDA and Sussex Enterprise support the preferred option.
- There is a failure to address social enterprise and other new diversified uses in the Plan.
- There are insufficient warehousing and storage sites in the city.
- The policy needs to be updated in the context of high fossil fuel prices and the credit crunch.

#### Consultation Events and Workshops – Revised Preferred Options Stage 2008

**The BHEP event** discussed whether incubator space was required. However it was concluded that this kind of space was difficult to bring forward, and keep running. Participants' suggested that working with the council to reuse redundant office space was key; however there was often a need for some form of subsidy.

#### **CP16 & CP17 Significant changes required**

The policies were combined into a single policy to allow for mixed use development on sites to be identified in a future Development Plan Document and to recognise the role of Shoreham Harbour - ***further consultation was therefore undertaken in the Proposed Amendments Paper***

#### **CP16/CP17 Planning for Sustainable Economic Development**

Formal Responses – Proposed Amendments Paper Stage 2009

A total of 23 representations were received: 5 in support, 13 were partial support and 5 were objections. The key issues raised were as follows:

- Objectors suggest policy over-restrictive in uses to be allowed on employment sites, inflexible and may hinder delivery of development (against draft PPS4)
- Broad support for combining two policies but felt wording was confusing – in particular between strategic employment sites, strategic allocations and any employment sites listed in DA proposals.

**3.18 CP17 (was CP18) Culture, Tourism and Heritage**

Formal Responses – Revised Preferred Options Stage 2008

20 representations were received in total: 7 supported the policy, 9 were qualified support and 4 were objections. The key issues raised were as follows:

- The need to protect existing live performance and exhibition venues as well as expanding and promoting existing facilities.
- The need to include further reference to Sustainability and Sustainable Tourism and include the promotion of new communications technology improvements for business tourism.
- The need to provide creative industries floorspace within new developments.

Consultation Events and Workshops – Revised Preferred Options Stage 2008

At the Core Strategy Consultation Event, **The Friends of Brunswick Square & Terrace** stated that heritage areas should be more explicitly mentioned in the Core Strategy and stated that areas such as Brunswick should be identified and protected. He thought that their exclusion appeared to be a departure from how these areas were dealt with in the past.

**3.19 CP18 (was CP19) Hotel/Guest Accommodation**

Formal Responses – Revised Preferred Options Stage 2008

9 representations were received; 3 supported the policy, 4 were partial support and 2 were objections.

- Some respondents objected to the exclusion of Hove in the Hotel Core Area, stating that they thought that this would downgrade and exclude Hove. Respondents felt that there were important hotels outside of the proposed area and reiterated the importance of local hotels.
- Other respondents, particularly some hoteliers, felt that the policy should be more flexible to allow hotels and guest houses to change to other uses more easily. They felt that there should be a commitment to protecting small hotels and supporting them to maintain their businesses.

- Some respondents felt that the Council were not facilitating the increase in tourists via tourism schemes to fill all the available bed spaces in the city.
- There was some concern from respondents regarding the partial loss of hotels as part of enabling consent.

#### **4. Monitoring**

##### Formal Responses – Revised Preferred Options Stage 2008

20 representations were received; 1 in support of the monitoring section; 5 partly supporting and 14 objections. The key issues raised were as follows:

- Comments on the monitoring section predominantly focussed upon indicators for biodiversity and air quality.
- It was generally felt that more targets and indicators should be included in order to monitor biodiversity for each Development Area.
- There were some comments regarding the alignment of this section with national core output indicators.
- There was generally some misunderstanding regarding the role of the monitoring section and the requirements of national policy PPS12.