

Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

	24 Respondents	Representations	Main Comments
Part One: Introduction	Support	8	<ul style="list-style-type: none"> As such, the delivery of affordable housing should be a key priority for the City Plan. Future development plans for the city should take full account of the unique assets on the Royal Pavilion Estate, not just the Royal Pavilion, and the ambitions of the organisations The plan is too long and could be shortened by avoiding the repetition that is found within the development and special area policies. Biosphere management strategy would be best considered as one of the 'Sub-regional local strategy statements' Consideration should be given to the broader economic and tourism role of education and this should be reflected in the City Plan analysis/assessment.
	Partly Support	11	
	Object	5	<ul style="list-style-type: none"> Acknowledgement of the importance of maintaining access to sunlight for residential properties and gardens. Need an urban design framework that prevents the loss of sunlight to gardens and properties. Lack of sufficient information and detail on various draft policies with which to make reasoned responses. No evidence on working with neighbouring authorities under the "duty to cooperate" which is necessary before the City Plan can be finalised. Delete specific employment allocations from the Part 1 plan and undertake a thorough re-assessment of employment evidence. An oversupply of hotel rooms is of sufficient importance to be featured in the Challenges section 1.23.
	Partly Object	3	
	Total Representations	27	

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Part Two: The Strategy	31 Respondents	Representations	
	Support	26	<ul style="list-style-type: none"> • Welcome the overall vision set out in part 2 of the Plan, particularly pleased to support strategic objective SO12 • A Strong and Prosperous City - will inevitably put pressure on the environment but must not be at the cost of the surrounding countryside including in particular the South Downs National Park • Support for the overall aim to introduce/encourage low carbon transport - achieving a flexible transport network. • Support for Strategic Objective (SO)9 • welcome the Council's commitment to taking a key role in promoting the city as a gateway to the South Downs National Park • City Plan Part One is the first Development Plan Document which provides a high level strategic and spatial vision plan for the future of Brighton & Hove. • A policy should be included in the plan requiring a systematic review of the council's whole property portfolio with a view to releasing small sites for housing development. • the plan should carry a clear message that redevelopments would be welcome outside the conservations areas, subject to certain criteria • broadly supportive of the overall vision and objectives for Brighton & Hove, it is extremely disappointed that there is no identification of the contribution it can make to 'A Strong and Prosperous City'. • Policies for the development areas and strategic allocations should not repeat citywide policy but instead should focus on outlining how and why a particular policy might be applied more or less vigorously in a particular area, or defining what the implementation of that policy would mean on the ground to aid clarity
	Partly Support	27	

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			<ul style="list-style-type: none"> To ensure that these objectives are realised the City Plan policies need to be appropriately drafted to reflect these goals and decisions on the allocation of specific sites should be left to the Part 2 document where an appropriate balancing exercise can be undertaken.
	Object	7	<ul style="list-style-type: none"> The assessed housing requirements much higher than the city can realistically accommodate Minor changes recommended based on the potential transition of Brighton and Hove to a low carbon City: Suggestion of a new policy Preferred areas for developments - linking land use with transportation Continue Hangleton Link Road to Shoreham Harbour - new policy As the city develops more housing we need to make sure that land for schools and playing fields are provided for. The requirements for new homes should be met in full, if the City's constraints prevent the delivery of the full amount, the City Council should ensure, in accordance with the NPPF, that neighbouring authorities help to meet the identified needs.
	Partly Object	10	<ul style="list-style-type: none"> The wording of the vision should ensure that these other employment generating uses are fully embraced and not unwittingly excluded City Plan should explicitly identify the school places and sites required for families already living in the Brighton and Hove area, and for those moving into the area, especially in parts of the city where there is already an acute shortage of school places. The City Plan does not appear to recognise the need to develop local food infrastructure that could enable the re-localisation of the food system Greater consistency needs to be shown in the City Plan towards biodiversity

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			<ul style="list-style-type: none"> • There should be more radical policies to claw back some out of town retail sites for employment use, such as the creation of reuse/recycling/upcycling parks to help achieve the city's zero waste ambitions. • The DPD should support a more flexible, as opposed to prescriptive approach to mixed use development on the identified sites. • The approach to the specific allocation of sites therefore needs to be carefully balanced and the selection of one specific use (i.e. B1 employment space) should not be unduly favoured against the provision of other uses.
	Total Representations	70	
Part Four General Comments	3 Respondents	Representations	
	Support	1	
	Partly Support		
	Object	1	
	Partly Object	1	
	Total Representations	3	
General Plan Comments	1 Respondent	Representations	
	Object	1	
DA1 Brighton Centre and Churchill Square Area	17 Respondents	Representations	Main Comments
	Support	2	<ul style="list-style-type: none"> • General recognition of potential benefits of redevelopment
	Partly Support	11	
	Object	0	<ul style="list-style-type: none"> • Proposed additional retail floorspace at Churchill Square is too low and not viable • Need for high design quality and to restore damaged streetscape around Cannon Place / Russell Square / Russell

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	Partly Object	4	Road <ul style="list-style-type: none"> • Objection to tall buildings. • Variety of views expressed on transport about parking, West Street / Clock Tower improvements, pedestrian and cycle access
	DA1 Total Representations	17	
DA2 Brighton Marina, Gas Works and Black Rock Area	28 Respondents	Representations	Main Comments
	Support	8	<ul style="list-style-type: none"> • Cliff height: Welcome cliff height restriction on development • Residential targets: Support for the amount of housing identified in the Inner Harbour • Boating & leisure: Encouraged by reference to marine related activity although this should have a greater emphasis in the policy • District Centre status: Welcome proposals to maximise opportunities for encouraging independent businesses to support District Centre status.
	Partly Support	21	
	Object	8	<ul style="list-style-type: none"> • Lack of consistency/compatibility between 'do not breach cliff height' and minimum target of 1000 residential units in the Inner Harbour. Cliff height restriction not consistent with identification of Marina as suitable for tall buildings. Potentially undeliverable and therefore unsound • Target residential quantity too high. Marina does not have capacity for this quantity therefore should be lowered. • District Centre status should be removed. Retail more suited to city centre
	Partly Object	5	

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			<ul style="list-style-type: none"> Concern that infrastructure is insufficient, e.g. ramp and sewer capacity. Cumulative impact with RSCH redevelopment lead to traffic congestion and local parking problems e.g. Kemp Town
	DA2 Total Representations	42	
DA3 – Lewes Road Area			
	20 Respondents	Representations	Main Comments
	Support	9	<ul style="list-style-type: none"> General support for the policy and strategy to develop an academic corridor along the Lewes Road
	Partly Support	9	
	Object	1	<ul style="list-style-type: none"> Concerns about some allocated sites in terms of allocated uses and floorspace, generally seeking increased range of uses and / or floor area (e.g. University of Sussex). Proposal for Ambulance Make Ready Centre on Woollards Field South
	Partly Object	7	
	DA3 Total Representations	26	
DA4 – New England Quarter and London Road Area			
	29 Respondents	Representations	Main Comments
	Support	12	<ul style="list-style-type: none"> London Road area regeneration supported. New England House supported (EP and LEP)
	Partly Support	14	
	Object	3	<ul style="list-style-type: none"> Student housing – proposals either: i) do not sufficiently reflect the capacity within the area for student accommodation – in particular at the Co-op Site and at Pelham Street site (policy does not reflect pre-application discussions) and Buxton's site but also the role of student housing to help with the viability to regenerate sites such as Vantage Point and Blackman Street site. Or Student Housing ii) would create potential impacts of late night noise nuisance and anti-social behaviour in London Road

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	Partly Object	5	<p>and North Laine area; and would constrain the long term expansion plans of City College.</p> <ul style="list-style-type: none"> • Viability of employment sites/ delivering new business quarter – whilst general support for employment opportunities within area, there are concerns around the viability of new/ replacement office floorspace within area – Vantage Point, Preston Road sites and at Blackman Street site. Justification for approach to a minimum floorspace, inflexible and based on out-dated evidence and contrary to NPPF. Policy should be more flexible and allow for other uses – student accommodation/ study tourism.
	DA4 Total Representations	34	
	17 (1 late) respondents	Representations	Main Comments
DA5 Eastern Road and Edward Street Area	Support	9	<ul style="list-style-type: none"> • Support for policy and strategic allocations from the Brighton & Hove Economic Partnership, the Coast to Capital LEP and Cathedral Group.
	Partly Support	6	
	Object	0	<ul style="list-style-type: none"> • More flexibility in the range of uses allowed on strategic allocations minor changes to the policy. • Reduction in the amount of office space provided at Edward Street Quarter following a capacity and viability study from 30,000sqm to 20,000sqm. • Allow D1 education and school boarding accommodation within the range of uses allowed on Freshfield Road Business Park
	Partly Object	8 (1 late)	
	DA5 Total Representations	23 (1 late)	
DA6 Hove Station Area	DA6 - 34 respondents (+4 late)	Representations	Main Comments
	Support	3	<ul style="list-style-type: none"> • General support for the designation of area for regeneration

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	Partly Support	12 (+2 late)	
	Object	9 (+1 late)	<ul style="list-style-type: none"> • Concern over scale of development and impact on quality of life, traffic, capacity of railway/station, parking, infrastructure (schools, medical facilities), wind, overlooking. Loss of light, views and increase in noise especially at night - a view that local roads and infrastructure cannot cope with proposed level of development – allocate a site for a school/relocate King Alfred to DA6 • Policy too restrictive/Greater flexibility in the uses should be sought (eg include retail/leisure) (6 + 4 and 2 late respdts suggest other uses such as leisure, school, medical) • Employment (B-Class uses) requirements too high /Employment led redevelopment approach is not appropriate/not viable/not deliverable/conflicts with NPPF. Uncertainty over the promotion of creative industries and respective ‘affordable’ rents – Alternative approaches include job creation; retail-led; mix of employment/housing/retail/leisure; mix of employment/housing/leisure; or, potentially housing-led approach. • Housing numbers and type – reps seeking an increase (3) and reps seeking a decrease (4) in the housing numbers, reps seeking family houses (3), reps seeking a specified amount of 3 bed units (1), reps seeking housing for the elderly (1) • Designate area as a District Centre • Delete Waste Allocation – blights the area and future investment impact upon the delivery of regeneration in the area.
	Partly Object	10 (+1 late)	
	DA6 Total Representations	34 (+4 late)	

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DA7 Toad's Hole Valley	115 respondents (+ 4 late)	Representations	Main Comments
	Support	13 (1 late)	<ul style="list-style-type: none"> Support from citywide stakeholder like B&H Economic Partnership, B&H Affordable Housing Partnership and B&H Friends of the Earth, Brighton Society Support for housing, affordable housing, mixed use development, offices and improvements to the SNCI.
	Partly Support	14(1 late)	
	Object	78 (2 late)	<ul style="list-style-type: none"> Objections largely from local residents, local residents' groups and local elected representatives. Principle of development is unacceptable on this open space and brownfield sites should be developed first. The proposal is unacceptable in terms of transport – the roads are too busy, King George VI Avenue is dangerous and it will lead to parking problems and pollution. There is no evidence that the scheme is viable and what is shown in the policy is deliverable.
	Partly Object	10	
	DA7 Total Representations	115 (+ 4 late)	
DA8 - 26 respondents			
DA8 Shoreham Harbour	Support	5	<ul style="list-style-type: none"> Support overall proposals and reference to Port Masterplan
	Partly Support	5	
	Object	7	<ul style="list-style-type: none"> Concern over lack of a transport strategy Development should be sympathetic to existing residential development in the area Need to accommodate future capacity of wastewater treatment works
	Partly Object	9	
	DA8 Total Representations	26	

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	SA1 - 41 respondents	Representations	Main Comments
	Support	6	
	Partly Support	8	
SA1 The Seafront	Object	19	<ul style="list-style-type: none"> The most objections to SA1 were concerned with the wording for the Western Seafront that sought a greater consistency of scale, height and roofline along the north side of Kingsway. There was a concern that this suggested an acceptance of tall buildings at the north side of Kingsway (between Welbeck Road and Boundary Road) which would be inappropriate given context and character of the residential area to the north. Whilst some respondents objected to the amount of residential development identified at the King Alfred/RNR strategic allocations others supported the proposals but wanted to see greater clarity that leisure could be provided off-site and the amount of affordable housing to be provided. Sewerage capacity was raised as an issue to be addressed in the Strategic Allocation. Greater clarity requested in the policy that apart from identified sites there should be a presumption against development south of the coastal road. One representation suggested that small scale low rise development may be permitted to enhance the use of the beach for recreation. Several amenity groups did not agree that there had to be further plans or a 'solution' found for the West Pier. Issues of tranquillity, appropriate low-scale family orientated leisure facilities, improved maintenance ornamental landscape, high quality landscaping/ public art and lighting raised East of Palace and Pier to Marina. Issues of tranquillity appropriate low-scale landscaping around the i360 and appropriate maintenance of Hove Lawn also raised with regards the Central Seafront.
	Partly Object	11	
	SA1 Total	44	

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Representations			
SA2 Central Brighton	SA2 - 19 respondents	Representations	Main Comments
	Support	4	<ul style="list-style-type: none"> • General support for the overall policy and basic aims
	Partly Support	7	
	Object	3	<ul style="list-style-type: none"> • Concern about the tests for protecting office uses being too onerous • Concerns about binge drinking and how to manage night time economy • Need for clear definition of Cultural Quarter • Housing / affordable housing provision should be recognised in policy • Recognition of role of small retailers but doubt over need for new retail units. • Objection to City College allocation
	Partly Object	5	
	SA2 Total Representations	19	
SA3 Valley Gardens	SA3 - 11 respondents	Representations	Main Comments
	Support	0	<ul style="list-style-type: none"> • General support for the principle of improving the physical environment and enhancing the green spaces to create a public park.
	Partly Support	7	
	Object	1	<ul style="list-style-type: none"> • No outright objections but concerns regarding the impact on traffic management and potential changes to the road layout. • The Cultural Quarter, including the Royal Pavilion estate, should be included in SA3 not SA2.
	Partly Object	3	
	SA3 Total Representations	11	

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SA4 Urban Fringe	SA4- 20 respondents	Representations	Main Comments
	Support	3	<ul style="list-style-type: none"> Support for policy aims and objectives Requirement for particular care over development proposed on the urban fringe of the city because of proximity to South Downs National Park
	Partly Support	4	
	Object	8	<ul style="list-style-type: none"> In view of city's outstanding housing shortfall and particular need for affordable housing should re-assess the urban fringe for housing opportunities. In view of proximity of SDNP, Plan may fail to convince Inspectorate that greenfield sites are worth saving to form part of city's green network. Not all parts of the urban fringe warrant same degree of protection; not all are areas of high landscape value and some land needs reassessment. Object – policy should contain a clearer statement to protect the local countryside from development Policy should contain a clearer statement to protect the local countryside from development.
	Partly Object	5	
	SA4 Total Representations	20	
SA5 The South Downs	SA5 - 13 respondents	Representations	Main Comments
	Support	1	<ul style="list-style-type: none"> In general support from those who commented on policy.
	Partly Support	3	
	Object	8	<ul style="list-style-type: none"> Removal of the policy sought by the South Downs National Park Authority with policy discursive text inserted elsewhere in plan.
	Partly Object	1	
	SA5 Total Representations	13	
SA6 Sustainable Neighbourhoods	SA6 - 13 respondents (+ 3 late)	Representations	Main Comments
	Support	4	<ul style="list-style-type: none"> Support for active aims of the policy to reduce inequalities in health and employment

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	Partly Support	4 (+1 late)	<ul style="list-style-type: none"> Support for the approach that includes effective partnership and effective collaborative working between sections. Welcomes support for defining neighbourhood forums.
	Object	1	
	Partly Object	1 (+ 2 late)	
	SA6 Total Representations	10 (+3 late)	
CP1 Housing Delivery	CP1 - 25 respondents	Representations	Main Comments
	Support	8	<ul style="list-style-type: none"> Support for City Plan housing delivery target of 11,300 Support for an approach based on capacity and availability of land for housing set against high demand/requirements for housing and a context of significant physical and environmental constraints. Support for balanced strategy regarding future growth of the city (ie. the need to plan for jobs and other land use requirements as well as housing). Support for housing within DA7 Toads Hole Valley Development Area Some concerns expressed re. housing shortfall and meeting the Duty to Cooperate NPPF requirement.
	Partly Support	4	

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	Object	10	<p><i>Housing target is too low</i></p> <ul style="list-style-type: none"> Housing target falls significantly short of forecast housing requirements for the city. Does not meet government policy set out in NPPF. Plan has not adequately addressed Duty to Cooperate. In view of city's housing requirements and particular need for affordable housing the Plan should look for more housing from the following suggested sources: urban fringe sites, re-assessment required; employment sites, more flexibility required; reassessment of existing and additional areas for taller buildings. Housing Providers NPPF requirement for 5 year supply +5% buffer is not demonstrated. Does not meet NPPF requirements. Duty to co-operate is not demonstrated to show how unmet requirements will be met. Plan will be found unsound. <p><i>Housing target is too high</i></p> <ul style="list-style-type: none"> Housing target should be lower; city is tightly constrained; city cannot accommodate an ever-growing population; development should all be within built up area and all development should be on brownfield sites; no development at Toads Hole Valley. A target of 10, 200 suggested. A target of 8,000 suggested.
	Partly Object	3	
	CP1 Total Representations	25	
CP2 Sustainable Economic Development	CP2 - 13 respondents	Representations	Main Comments
	Support	5	<ul style="list-style-type: none"> Greater emphasis should be given to role for green industries/ renewable industries for job creation.
	Partly Support	5	

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	Object	2	<ul style="list-style-type: none"> • Definition of sustainable development/ sustainable economic development required. • In order to implement CP2, the Council must increase its housing provision so that it meets forecast requirements aligned to its economic growth aspirations • There should be more detail in the role of skills in developing the economy and explain how it will facilitate closer links with the city's two universities and business to foster the knowledge based economy. Universities role as employment generators. • Policy should look beyond just the modernisation and expansion of existing educational uses and embrace and support wider opportunities through the growth of educational tourism which have the potential to represent a significant positive contribution to the local economy. • Given requirement of CP2 Part 6 to provide training schemes during the construction phase, there is no justifiable reason to require financial contributions as well (this would duplicate the requirement).
	Partly Object	1	
	CP2 Total Representations	13	
CP3 Employment Land	CP3 - 17 respondents	Representations	Main Comments
	Support	3	<ul style="list-style-type: none"> • Particularly support the upgrade and refurbishment of the listed industrial estates and business parks – should be a similar reference for the refurbishment of existing office stock where appropriate.
	Partly Support	4	

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	Object	7	<ul style="list-style-type: none"> • The Council needs to be sure that it is protecting sites that genuinely meet the needs of industry • The policy is inflexible and will constrain redevelopment, investment and new job creation. • Up to date evidence base is required to justify policy. • Part 5 of policy should be more flexible/ encouraging of alternative uses/ mixed use development. Test of redundancy too stringent and if redundant, sites should contribute further to supply of housing/ affordable housing. • Identified sites (land north of Newtown Road and Franklin Road Industrial Estate) for employment-led mixed use development should be released for other uses as demonstrably no longer required for that use. • Question the employment allocations for Toads Hole Valley and Gas Work Site and need to ensure that City Plan Employment Policies do not contradict/ more restrictive than emerging policies for Shoreham Harbour.
	Partly Object	3	
	CP3 Total Representations	17	
CP4 Retail Provision	CP4 6 respondents	Representations	Main Comments
	Support	3	<ul style="list-style-type: none"> • General support for the overall retail aims of the City Plan and the focus on existing retail centres for new developments. • Recognition of the role of small retailers within the city.
	Partly Support	1	
	Object	2	<ul style="list-style-type: none"> • Proposed changes to boundaries/proposed uses affecting the regional shopping centre, Hove Station area and the Marina. • Objection to proposed local threshold of 1000 sq m to trigger impact assessment of proposals outside shopping centres.
	Partly Object	1	
	CP4 Total Representations	7	

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	CP5 11 respondents	Representations	Main Comments
CP5 Culture and Tourism	Support	4	<ul style="list-style-type: none"> Arts and culture support the tourism industry and contribute to the economy. Recommend policy seek through development direct net benefits to local economy. Creates a sense of place Welcome the opportunity to deliver creative industries work space. Need to clarify 'affordable' in relation to artists and creative industries workspace
	Partly Support	6	
	Object	0	<ul style="list-style-type: none"> Integrate the city's tourism offer with the SDNP and link Brighton to it's natural environment as a tourism draw Policy should be more robust and require developer contributions that match those that are required to support sports infrastructure.
	Partly Object	1	
	CP5 Total Representations	11	
	CP6 6 respondents		
	CP6 6 respondents	Representations	Main Comments
CP6 Visitor Accommodation	Support	2	<ul style="list-style-type: none"> Align CP6 with CP3 and seek affordable housing as an alternative use Support general approach but policy should be flexible to encourage other forms of tourist accommodation e.g. study hotel
	Partly Support	0	
	Object	3	<ul style="list-style-type: none"> Over supply already exists. Not matched by tourist developments and therefore supply outstrips demand No need to protect hotel uses. Change of use to other uses should be made easier especially if unviable. 'Hotel Core Zone' approach is not welcome. Considered too inflexible. Encouragement of Impact Assessment insufficient – it should be mandatory so as to assess existing supply
	Partly Object	0	
	CP5 Total	5	

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		Representations	
CP7 Infrastructure CIL and Developer Contributions	CP7 14 respondents	Representations	Main Comments
	Support	3	<ul style="list-style-type: none"> Part Support for developer contributions but should be weighed up against wider public benefits – and early consultation is need to ensure CIL is not a prohibitive addition to City Plan. Affordable Housing should be priority as community benefit but will suffer if CIL unrealistic – and should be reduced or zero-tariff on appropriate sites with high AH.
	Partly Support	5	<ul style="list-style-type: none"> CIL is clearly untried and untested and could lead to disputes - perhaps not appropriate for City Plan at this stage. CIL should be used to fund community development work. Particular support of policy referencing Flood Risk, Water Efficiency and Groundwater quality. General comments on sustainability re food production.
	Object	2	<ul style="list-style-type: none"> Plan seriously underplays changes needed to de-carbonise the city (to meet national CO2 reduction targets). IDP should be underpinned by policies in plan.
	Partly Object	3	<ul style="list-style-type: none"> Balance for setting a CIL is considered and recognised there will need to be exemptions due to viability. CIL should be simple and not affect viability. Large development should not be permitted in favour of multi-million CIL returns. CIL should not be charged to ‘not for profit’ organisation such as Universities – this may undermine other planning policies. Policy does not adequately support provision of water and wastewater infrastructure. Impacts on wastewater treatment works at Shoreham not fully considered and should be addressed in Shoreham Joint Area Action Plan (JAAP). May also impact on proposed development at Toads Hole Valley.
	CP7 Total Representations	13	

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	CP8 24 respondents	Representations	Main Comments
CP8 Sustainable Buildings	Support	8	<ul style="list-style-type: none"> • Support for ambitious standards and acknowledgement of indirect advantages arising from policy approach such as the potential for development of environmental industries in the city. Recognition of the challenge of meeting the standards set in the policy and the need to consider circumstances which might influence the ability to meet the standards, particularly in terms of technical feasibility and financial viability, in particular when it comes to provision of affordable housing. • Suggestions to incorporate into policy the potential for 'allowable solutions' (off-site compensation measures) in respect to water; protection of occupant and neighbour health, future proofing buildings for heat network connections (development areas) and minimum dwelling size. • Request for clearer vision for energy, water and waste neutral, high-standard, cost effective, resource efficient future for the city.
	Partly Support	6	
	Object	3	<ul style="list-style-type: none"> • Concern over costs of meeting higher levels of the Code (levels 5 and 6) and BREEAM standards and balancing out priorities. Request that council adopt a flexible approach to enable balance between priorities, and to enable consideration of factors such as financial viability that may affect the ability to meet standards, • Concern that policy does not go far enough in terms of waste, in particular food waste, sustainable materials, heat island mitigation, water and air quality. • Request that robust justification is required in circumstances when meeting standards might be affected by financial viability and incorporation of One Planet Living principles, in particular those for Development Areas policies.
	Partly Object	8	
	CP8 Total Representations	25	

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CP9 Sustainable Transport	CP9 33 respondents	Representations	Main Comments
	Support	6	<ul style="list-style-type: none"> • More detail in policy welcomed • Majority of respondents accepted that formal Park + Ride is no longer deliverable due to the lack of site available and the designation of the South Downs National Park including the Economic Partnership, Local Enterprise Partnership, Conservative Group. • General support for proposals to better use train services at weekends and improve the service
	Partly Support	15	
	Object	9	<ul style="list-style-type: none"> • Transport Strategy is weak and not ambitious enough to achieve the modal shift required. There are a number of comments relating to the strategy including the need for more emphasis on improving bus service reliability and increase patronage, need for more radical solutions to reduce car use, need to retain park and ride to reduce the amount of traffic in the city • Partial supporters and objector raised concerns about the lack of detail set out on the proposal for Informal Park + Ride. • Comments ranged from a request more detail on where the sites are and how the scheme would work through to concerns that it is neither practical nor deliverable • Need for an updated Transport Assessment of the City Plan following major changes to the Plan.
	Partly Object	2	
	CP9 Total Representations	32	
CP10 Biodiversity	CP10 13 respondents	Representations	Main Comments
	Support	5	<ul style="list-style-type: none"> • Include street trees • Include reference to the importance of culture / community for achieving biodiversity • Include reference to all negative direct and indirect effects of
	Partly Support	5	

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			development on biodiversity
	Object	1	<ul style="list-style-type: none"> Detailed textual changes to support the Biosphere initiative
	Partly Object	2	<ul style="list-style-type: none"> Detailed boundary changes to NIA boundary to facilitate development.
	CP10 Total Representations	13	
CP11 Flood Risk	CP11 1 respondent	Representations	Main Comments
	Support	1	<ul style="list-style-type: none"> Support the inclusion of policy CP11 which clearly sets out flood risk management requirements for new development in the city. Support the inclusion of following aspects in policy: <ul style="list-style-type: none"> Flood risk Water Efficiency in new development Groundwater quality Infrastructure, CIL and Planning Obligations
	Partly Support	0	
	Object	0	
	Partly Object	0	
	CP11 Total Representations	1	
CP12 Urban Design	CP12 41 respondents	Representations	Main Comments
	Support	4	<ul style="list-style-type: none"> The proposal for an Urban Design Framework is supported. There is some support for tall buildings. There is some support for the proposed design criteria and in particular support for good contemporary design.
	Partly Support	10 (+1 late)	
	Object	19	<ul style="list-style-type: none"> There are a large number of objections to the inclusion of Western Seafront / Kingsway as Tall Building Area, though some of these clarify that they are only referring to that part of Kingsway east of Welbeck Road. There are some objections to tall buildings elsewhere. There are objections that the policy does not clearly map each
	Partly Object	8	

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			tall building area and does not specify building heights.
	CP12 Total Representations	41(+ 1 late rep)	
CP13 Public Streets and Spaces	CP13 9 respondents	Representations	Main Comments
	Support	3	<ul style="list-style-type: none"> General support for the policy and for more shared space schemes, such as New Road, in particular
	Partly Support	4	
	Object	0	<ul style="list-style-type: none"> Concerns regarding the commissioning of public art. Respondents concerned about best practice, siting of art works, quality of art works and lack of public consultation.
	Partly Object	2	
	CP13 Total Representations	9	
CP14 Housing Density	CP14 15 respondents	Representations	Main Comments
	Support	3	<ul style="list-style-type: none"> Significant support for building at higher density and for the proposed density levels, with the proviso that 50dph should be seen as a minimum not a target.
	Partly Support	4	
	Object	6	<ul style="list-style-type: none"> Some strong concerns that higher density would fail to provide sufficient family accommodation and would lead to the loss of public open space and that setting minimum density levels is too inflexible.
	Partly Object	2	
	CP14 Total Representations	15	
CP15 Heritage	CP15 8 respondents	Representations	Main Comments
	Support	3	<ul style="list-style-type: none"> General support for the policy but this is subject to concerns that the policy should be more strongly worded and should provide greater detail about development in conservation areas.
	Partly Support	4	
	Object	1	
	Partly Object	0	
	CP15 Total	8	

Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

	Representations		
CP16 Open Space	CP16 15 (+ 2 late) respondents	Representations	Main Comments
	Support	2	<ul style="list-style-type: none"> Redundant open space should only be developed as 100% affordable housing (2) Open Space standard is excessive in view of proximity to coastline and National Park and shortfall in meeting housing requirements. Re-assess to help meet housing and open space requirements. (1 + 2 raising concern) Conflicts with DA3 and CP21
	Partly Support	6 (+2 late)	
	Object	3	
	Partly Object	4	
CP16 Total Representations	15 (+2 late)		
CP17 Sports Provision	CP17- 10 respondents	Representations	Main Comments
	Support	3	<ul style="list-style-type: none"> No recognition in the policy or supporting text of the University's contribution to the provision of sports facilities in the City through its indoor sports centre and outdoor playing fields. Redundant sports buildings also present an optimum opportunity for affordable housing and where such buildings or sites are no longer suitable for sports provision the stated alternative should be 100% affordable housing. Contributions for new sports provision should be limited to major development only to ensure does not cause restrictive impact. More emphasis on sports provision, both indoor and outdoor.
	Partly Support	6	
	Object	0	
	Partly Object	1	
	CP17 Total Representations	10	

Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

	CP18- 9 respondents	Representations	Main Comments
CP18 Healthy City	Support	4	<ul style="list-style-type: none"> • Support measures to meet needs of older people but consider a specific policy required to address concerns of older people. • Need to design urban spaces to facilitate outdoor activities of teenagers • Culture of noise, disorder etc around St James's St adversely affecting health and need to be addressed • Like to see importance of local environmental quality in supporting health acknowledged in policy • Seek commitment to safeguard and increase allotments in policy • Cost of implementing HIA for developers / red tape • Health facilities should be more widely defined – seeks wider in principle support of health facilities on all sites
	Partly Support	2	
	Object	1	
	Partly Object	2	
	CP18 Total Representations	9	
	CP19- 14 respondents	Representations	Main Comments
CP19 Housing Mix	Support	4	<ul style="list-style-type: none"> • General support; housing delivery incorporating a mix including provision of affordable housing helps retention and recruitment of staff for local employers. • General support; tackles equalities issues e.g. accommodation for disabled people and space for travellers is acknowledged. • Needs of older people highlighted; accommodation for older people should not be looked at only in terms of conventional housing but should also embrace care and extra care. Plan should ensure an adequate supply of accommodation to meet the diverse needs of older people.
	Partly Support	4	

Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

	Object	4	<ul style="list-style-type: none"> • Policy should state clearly the preferred unit size mix as a citywide aspiration for the City Plan period. Too vague at the moment. If affordable housing mix can be specified why cant mix for all housing? • If council wishes to improve choice/mix then it should seek to meet its forecast housing requirements. • Housing mix policy should not be prescriptive or imposed by the Local Authority (LA). The LA should provide for a choice of sites in a choice of locations to provide for different types of dwellings to be provided. Mix will be influenced by viability; densities and site allocation. • There should be a clearer statement referring to the shortage of family accommodation and need for more decent sized family housing; would like to see this addressed. • Policy should set out minimum dwelling size standards. • There should be a new separate policy that addresses housing for the elderly. • Role of Private Rented Sector is ignored in the Plan; yet this is the only sector expanding. Need for shared accommodation (provided through private rented sector) not acknowledged in the Plan. Numerically greatest need is for single person accommodation and plan ignores this.
	Partly Object	2	
	CP19 Total Representations	14	

Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

	CP20 16 respondents	Representations	Main Comments
CP20 Affordable Housing	Support	3	<ul style="list-style-type: none"> • General support for the affordable housing (AH) targets and the new sliding scale approach. Registered providers, BHEP and LEP • Concern that the policy criteria in CP20 allow for too much flexibility (around achieving the AH targets) and whether this much flexibility may lead to reduced AH delivery. Request to tighten up criteria. Registered providers
	Partly Support	6	
	Object	3	<ul style="list-style-type: none"> • Some concerns regarding requirement to provide financial contribution for developments of 5-9 units and whether this could affect viability or the rate of schemes coming forward. Registered providers • Recognition that provision of affordable housing assists with retention/ recruitment of staff for local employers. University of Sussex • Request for more information/clarity around how the financial contributions secured through policy will be used in the interests of transparent local government • Not enough flexibility in the policy; affordable housing targets need to be applied more flexibly particularly based on financial viability assessment. 40% requirement has made many sites not viable for development. • Requiring affordable housing provision on sites of 5-9 units could be counter-productive and negate the financial viability of these developments. Result could be less housing gets built.
	Partly Object	4	
	CP20 Total Representations	16	

Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

	CP21- 33 respondents	Representations	Main Comments
CP21 Student Housing and Housing in Multiple Occupation	Support	16	<ul style="list-style-type: none"> • Support the approach of purpose built student accommodation. • Concern expressed over anti-social behaviour related to HMOs and support for proposed management of location of new HMOs. • Need for transport and other infrastructure related to student accommodation
	Partly Support	7	
	Object	7	<ul style="list-style-type: none"> • Objection to City College allocation and suggested allocations of other sites – Co-op site, Buxtons site, Blackman Street site and Richmond House. • Concern about criteria for assessing purpose built accommodation, particularly restriction to student use and avoiding housing / SHLAA sites. Concern over cost of purpose built accommodation and need to recognise importance of rented accommodation.
	Partly Object	3	
	CP21 Total Representations	33	
	CP22- 3 respondents	Representations	Main Comments
CP22 Traveller Accommodation	Support	0	<ul style="list-style-type: none"> • Positive criteria for assessing suitability of future sites. • Careful consideration must be given to any proposals on urban fringe land – due to potential impacts on National Park.
	Partly Support	2	
	Object	1	<ul style="list-style-type: none"> • New Traveller sites should not be located in the South Downs National Park • No mention in policy of private traveller accommodation.
	Partly Object	0	
	CP22 Total Representations	3	

Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

Annexe (1) Implementation & Monitoring	Annexe (1) 5 respondents	Representations	Main Comments
	Support	2	<ul style="list-style-type: none"> Policy DA2 Health providers should be identified in the list of delivery partners.
	Partly Support	1	
	Object	1	<ul style="list-style-type: none"> Policy CP21, there is no reference to the East Slope strategic allocation despite its inclusion in the main Plan. There are considerable gaps on the monitoring arising from the Plan and the performance framework must be set so that it evolves and is in line with One Planet Living objectives
	Partly Object	1	
	Annex (1) Total Representations	5	
Annexe (2) Infrastructure Delivery Plan	Annexe (2) 12 respondents	Representations	Main Comments
	Support	0	<ul style="list-style-type: none"> The statement that proposals should explore opportunities for district heating / combined heat and power technologies across all DA1-DA8 Development Areas should be elevated to policy The infrastructure delivery plan notes that mitigation may be required at several junctions on the A27 dependent upon the impacts. Clarification is requested as to how the work is progressing to understand what mitigation is required. Provision of affordable housing should be included within the IDP. Should be specific to health requirements in the area and be more explicit that the Black Rock site could be an appropriate location to deliver them It believes that a separate infrastructure provision entry is needed for this (Kemp Town area). Include 1) Plans for open public WiFi in city centre and tourist areas 2) Consideration of reducing light pollution at late night on the sea front
	Partly Support	6	

Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

	Object	3	<ul style="list-style-type: none"> The University of Sussex entry does not reflect information on its future development plans for the campus previously submitted to the City Council and which will be reflected in the updated master-plan currently being prepared. City Plans should explicitly identify the school places and sites required for families already living in the Brighton and Hove area, and for those moving into the area, especially in parts of the city where there is already an acute shortage of school places. IDP has not included the water and wastewater infrastructure that Southern Water identified in previous consultation. Capacity of the current waste water treatments works at Shoreham Harbour is limited and any enhancement/expansion needs will need to be addressed in the joint Area Action Plan for this site. The IDP must be underpinned by policy – especially re renewables infrastructure.
	Partly Object	3	
	Annex (2) Total Representations	12	
Annexe (3) Housing Implementation Strategy	Annexe (3) respondents 2	Representations	Main Comments
	Support	0	<ul style="list-style-type: none"> Housing Implementation Strategy does not indicate a target or trajectory of affordable housing delivery either in percentage or actual terms.
	Partly Support	0	
	Object	0	
	Partly Object	2	
	Annex (3) Total Representations	2	

Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

	Proposals Map Respondents 4	Representations	Main Comments
Proposals Map	Support		<ul style="list-style-type: none"> The development area boundary as shown on the map must be seen as indicative at this stage and will be determined through the joint Area Action Plan. Strong objection to a private piece of land being designated as an area of open space. Amendment required of the built up area boundary
	Partly Support		
	Object		
	Partly Object	3	
	Total Representations	3	
	Supporting Evidence Document Respondents 1	Representations	Main Comments
Supporting Evidence Document	Support		<ul style="list-style-type: none"> SFRA tends to overstate the risk of flooding from a breach of the existing defences suggesting that this would produce catastrophic flooding with little, or no, warning.
	Partly Support	1	
	Object		
	Partly Object		
	Total Representations	1	
	SA Respondents 1	Representations	Main Comments
Sustainability Appraisal	Support	1	<ul style="list-style-type: none"> Support of SA objective 7 amendments
	Partly Support		
	Object		
	Partly Object		
	Total Representations	1	
	Respondents 1	Representations	Main Comments
Key Diagram	Partly Object	1	<ul style="list-style-type: none"> The development area boundary as shown on the map must be

Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

			seen as indicative at this stage and will be determined through the joint Area Action Plan
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