

Summary of responses to the Sustainability Action Plan from the Development phase

Comment		Response
General		
Show CO ₂ , water and energy saving from each action		Energy and water efficiencies will be monitored, and carbon impact shown where feasible to calculate. CO ₂ modelling will be done in 2013/14.
Improve presentation - prioritise and simplify		a summary plan will be produced, with a simpler published/online version
Too ambitious		Some targets are intentionally ambitious and have been based on the best information available at the time, to work towards One Planet Living.
Not strategic enough		This action plan also links to the draft economic strategy, the City Plan, the review of the Sustainable Community Strategy and the City Deal, which includes aspects of the City Region. Through cumulative specific actions, it aims to transform the sustainability and resilience of the city.
Have a specific objective/measure for each point		Measures, milestones and objectives are now included in the Plan, and Key Performance Indicators will be built into the wider performance framework for the city and council.
Simplify language		The revised Plan aims to balance the need for simplicity with the detail that others have asked for. A plain language summary is planned.
More sensible use of statistical information		The Plan aims to strike the right balance between accuracy and simplicity and is based on evidence and sound data.
Zero Carbon		

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green deal - access for local suppliers/contractors; "consider" local suppliers should be replaced by "ensure" local suppliers.	Local suppliers and contractors' will be supported to take full advantage of Green Deal opportunities. The council's procurement strategy also supports this. EU procurement law does not permit exclusion of non-local bids.
The Green Deal procurement programme should involve a values based agreement with the main contractor which goes over and above a commercial relationship.	The council's Sustainable Procurement Policy should ensure a wide range of benefits from this procurement, working in partnership
Green Deal awareness raising should include area based community campaigns, peer to peer, so not just landlords as is mentioned	These have been added to the plan
Council to set an example - e.g. through better control of heating systems and behaviour change	The council has a rigorous environmental management system for Hove Town Hall and Kings House, and will be extending this to more people and buildings as part of the Plan.
Ideally the Zero Carbon plan would be developed and start to be implemented within 18 months	The council has already started implementing the actions in the Plan and shares the sense of urgency. The council is working to an achievable timeline.
OPL design guide for new development	The Sustainability Checklist provides a comprehensive design guide, including assessment of embodied carbon.
Code Levels 5 and 6 can be problematic and don't always provide good environmental solutions.	Code levels for new buildings are nationally recognised. The council's Sustainability Checklist and its planning policies (for example SPD08) encourage developers to go further.
identify a geographical pilot for energy efficiency - test bed for innovation/funding?	The Energy Study has done this and it will inform the city's next steps on energy efficiency and supply.
encourage wind, solar and Combined Heat and Power, including whole city scheme (£4.2bn) i.e. reduce planning controls/include on every development site	Studies have shown a 'whole city' CHP scheme to be unviable, but the Energy Study looks at the feasibility of 14 district heating sites, with three in more detail. The council uses its planning controls carefully to support renewables while acknowledging other planning constraints.
Seek partnership with big 'remaking cities' energy provider, and onshore investment spin offs from Rampion.	The business case for a strategic partnership with an energy provider will be considered as part of the Energy Study work. The City Regeneration Unit will be working to maximise the added value from the off-shore Rampion work.
Target fuel poverty and winter deaths as focus for energy efficiency programmes	Fuel poverty reduction is a key performance indicator in the Plan.

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Zero Carbon is difficult to structure - it deals with energy and heat and not transport or food (as is indicated in the draft). Suggest rename it as 'energy' (subtitle electricity and heat)	We are following a structure set out by BioRegional under One Planet Living headings, which starts with 'Zero carbon'. Emissions from Materials, Transport, and Food are covered in their own sections.
Zero Carbon – Could appraisal of contracts and investigation of power purchase agreements occur in the short term?	With some years still to run on the council's energy supply contracts, this cannot be brought forward yet but will be looked at later.
Rewrite taking AECOM into account and its consultation.	The next steps with the AECOM energy study are set out in the Plan and further work is planned.
Zero Waste	
Council resources - behaviour change e.g. photocopying	The council has an environmental management system, and will be extending this to more people and buildings as part of the Plan. There are plans to reduce the use of paper through a behaviour change campaign, and an increase in electronic working where feasible.
Construction waste - skip licences	Recycling and re-use of skip contents is the responsibility of the owners and licensing is not considered a useful method of improving their practice.
Diversify recycling	Assessing the feasibility of this is an action in the Plan.
Food waste including local processing	The council is continuing to explore funding opportunities
Detailed background information sought	The Plan has to balance brevity and simplicity with rigour and detail. More information is in background documents, or from the authors.
Seeks a sustained campaign on waste reduction	This has been given more emphasis in the revised Plan.
Some other Councils are already operating domestic food waste collection. Why has this not been included?	The council is continuing to explore funding opportunities.
Adequate controls for domestic food waste in the shorter term	The council is continuing to explore funding opportunities and the 'Love Food, Hate Waste' campaign.
Food waste collection is essential if the recycling targets are to be achieved	The council is continuing to explore funding opportunities and other planned measures will improve recycling rates in the meantime.

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More detail requested on the background data	Revised targets are in the Plan. For more data on all types of waste, see the Waste & Minerals Plan or for domestic waste see the council's Municipal Waste Management Strategy. [links]
Sustainable Transport	
Car owners needs are not acknowledged - they will be forced to leave the city.	Tackling congestion is a key objective for the Plan.
Tackle car allowances and car parking	This is part of the council's current plans.
Car share schemes for large employers	Included in the Plan as part of The Travel Plan Partnerships efforts with employers to reduce the need to travel.
Tackle short distance trips - balance carbon with air quality and safety	The objective is to balance carbon reduction with air quality and safety, and to encourage active travel by making cycling and walking as attractive as possible.
Public realm improvements - areas specified	This is properly covered via the City Plan itself.
Quantify transport carbon impact - periodic targets	This is included in the Plan and modelling will be done.
Too many buses clogging up Rottingdean	Buses reduce car congestion in Rottingdean and elsewhere..
Promote used public transport vehicles and recycled fuels	This is included in the Plan.
Promote and measure staff commuting and work related travel	This is in the Plan.
Support business to adopt sustainable transport and promote a standard	This is in the Plan.
Promote public transport above walking and cycling as these may not be realistic in parts of the city	There is no fixed hierarchy and each scheme is assessed on its merits.
Increase range of Controlled Parking Zones and increase resident permit charges	There are no plans to increase charges. CPZ's are introduced according to demand from residents.
Cycling strategy - promote parking, routes (how prioritised?)	A cycling strategy is being produced.
Boris Bike' cycle scheme	This would be considered as part of the cycling strategy
Promote Low and Zero carbon vehicles should be 'promote low emissions vehicles' - i.e. including Nitrogen oxides.	Plan amended to include this.
refer to NICE guidance on walking and cycling	now referenced in Health & Happiness section
Balance emissions with air quality and safety - e.g. routes out of town	Plan now includes reference to air quality and safety

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reappoint Road Safety manger		Road Safety Manager is in post.
Cities Fit for Cycling' campaign is referenced		It is now referenced in the Plan.
Data on safety (cyclist incidents) improved		Brighton & Hove reports data based on the national industry standard.
Reorganise bur routes and have more flexible ticketing for journeys		The council does not control bus routes but encourages flexible ticketing.
More two way cycling		More two way routes are planned.
Sustainable Materials		
transparency in procurement as anti-corruption measure, and openness from developers about their owners		The council follows best practice and all legislation on transparency and openness, and the council has clear procurement and planning policies on this.
reduce council paper consumption		This is in the Plan.
adopt government buying standards at next renewal		This is in the Plan.
re-use buildings - e.g. Barracks		re-use is not always the best use for scarce urban land, and refurbishment may not always be the most sustainable solution.
I welcome and support the work on Sustainable Materials as a way of reducing waste.		Acknowledged
procure locally		The council's procurement policy says: "Buy goods from fair, ethical and sustainable sources when local products are not available". Local procurement accounts for more than 50% of purchasing.
Sustainable Water		
include sea level rise		Now in the Plan
Land use & Wildlife		
Promote planting on brownfield sites		Brownfield sites are scarce in Brighton & Hove, but the city plan says "The community use of private and schools open spaces will be sought when considering proposals affecting these sites including the temporary use of redundant or undeveloped sites."

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Culture & Community	
Engage with the Adult Learning Community and include the work of The Adult Learning Group and Brighton and Hove Community Learning Trust.	Now in the Plan
Promote public art	This is covered by Planning guidance.
Reduce eyesores/blackspots	This is covered by Planning guidance/enforcement.
Everyone knows what OPL is by 2014	The communications and engagement strategy will help work towards this.
Equity & Local Economy	
SAP is rooted in green growth economy, align with econ strategy	Now included. This Acton Plan is aligned with the developing economic strategy and green growth.
emphasise economic resilience	The Plan has placed more emphasis on this.
Hot house for Fair Trade enterprise - amend text of SAP	Done - Fair Trade more clearly articulated.
Health & Happiness	
Definitions of Health and Wellbeing to adhere to the Health and Wellbeing Board's criteria	The Action Plan will be integrated with the Board's forthcoming Health and Wellbeing Strategy.
Priorities should be in line with JSNA.	The Action Plan is aligned with the JSNA and supported by its evidence base.
Identify objectives, enable robust monitoring, evaluate annually	Monitored outcomes are listed in the Plan and BioRegional has called for an 18 month review.
New housing developments to have specified minimum area of green space, and wildlife corridors	The council's planning policies make provision for this, and for balconies and 'off site' open space where possible.
New housing be built to already established floor area requirements for public housing	The council can best consider this through Part 2 of the City Plan which will cover more detailed development policies and site allocations. Further background evidence to support a minimum standard will be required.
Policies and channels for public consultation concerning matters of health and well-being should as far as possible be part of these structures - Healthwatch	The Action Plan is governed by the Healthy City Partnership and they will work with the City Engagement Partnership and others on the best means of consultation and engagement.
substance misuse and Mental Health - call for review of the licensing regulations	The council's licensing committee will be considering this in due course.

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scope for further public consultation about the needs of older people, in areas of housing, health and leisure;	The Plan includes a section on the 'Age Friendly City' which covers this.

