

Appendix 2



Edward Street Quarter – Draft Planning Brief

Consultation Report
September 2013

Contents

- 1. Summary**
- 2. Background**
- 3. Consultation methodology**
- 4. Response and respondent profile**
- 5. Results and key changes to the Planning Brief**

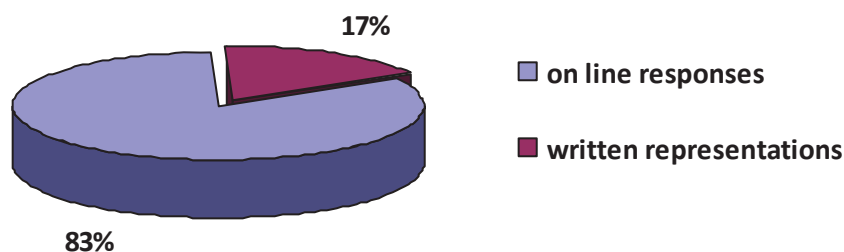
1. Summary

This report summarises the results of the consultation on the draft planning brief for the Edward Street Quarter. The planning brief has been prepared to guide the future redevelopment of land in the vicinity of the new American Express building on John Street and Carlton Hill, Brighton. The brief includes the redevelopment of the former American Express building to the immediate south, as well as other buildings and land nearby.

Public consultation on the draft planning brief commenced on Monday 15 April and closed on Tuesday 11 June 2013, following an extension to the original six week consultation period of two weeks, to allow for late submissions by key stakeholder groups.

A total of 199 responses to the planning brief consultation were received. 165 (83%) of responses were submitted online through the council's consultation portal, while 34 (17%) were submitted as written representations (see Fig 1). The majority of responses were from individuals and/ or businesses in the local area (93%). However, 14 responses were received from stakeholder groups or their representative individuals, ranging from statutory organisations such as Natural England to campaign groups such as Green Sea and St James' Community Action Group (SJGAG). A full explanation of the consultation methodology is contained in Section 3 of this report.

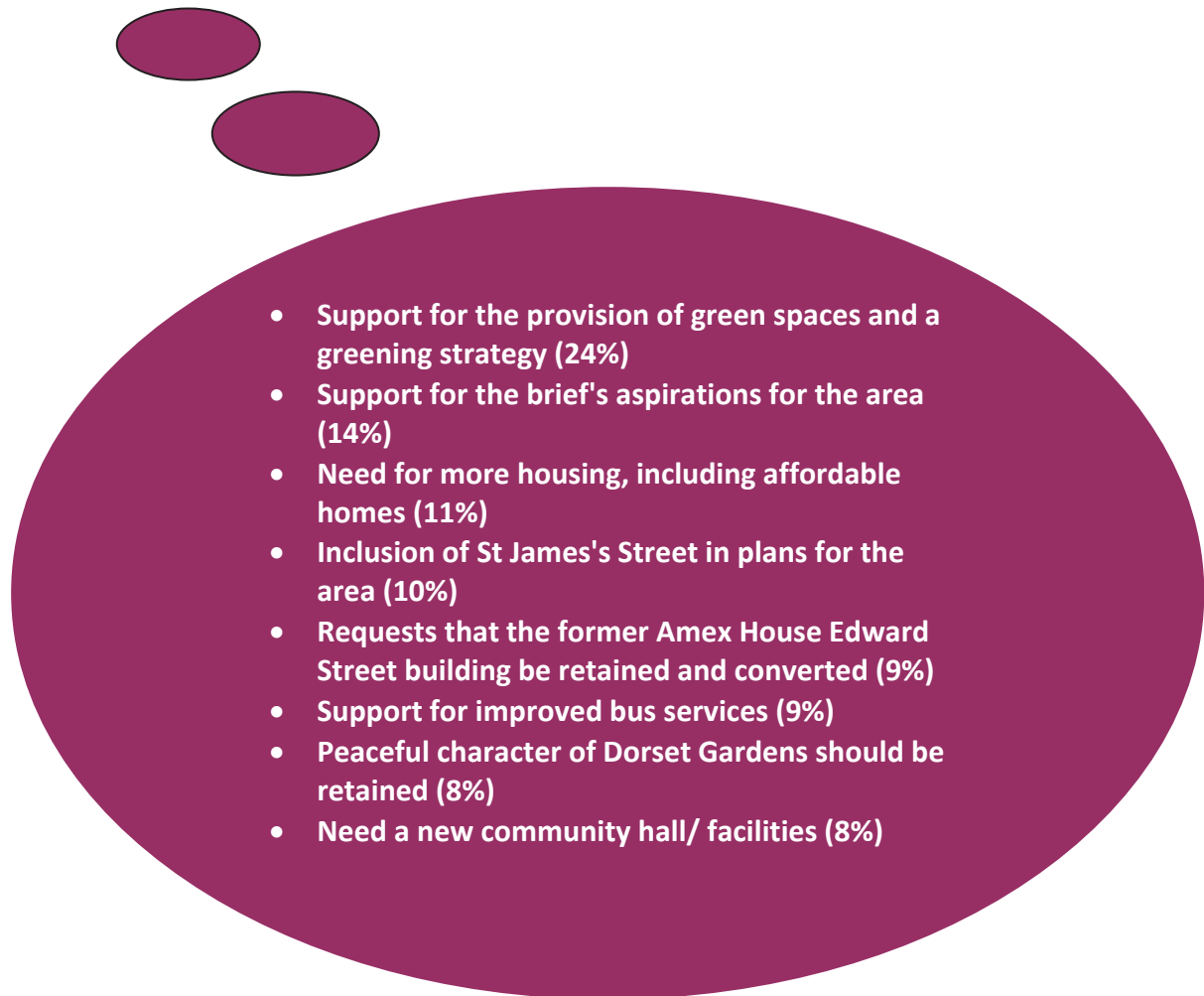
Fig 1: Response to consultation



Section 4 examines the personal characteristics of respondents to the consultation based on the online response to the council's equalities monitoring questions. The results of this analysis are detailed in a series of tables contained in Appendix 1 of this report. Finally, Section 5 of this report identifies:

- the key issues arising from the consultation;
- the council's response to these key issues; and
- whether the planning brief has been amended in the light of the comment or not.

The top eight key issues emerging from the consultation are highlighted below:



2. Background

Planning permission was granted in 2009 for the construction of a new building for American Express's European operations immediately to the north of their existing building. The planning permission (ref: BH2009/01477) was subject to a Section 106 agreement which included a requirement for the demolition of the existing American Express Edward Street building which is anticipated by 2016. This has highlighted the need for new planning guidance to secure a more appropriate neighbouring scale of development to the adjacent new building.

The preparation of the draft Planning Brief for the Edward Street Quarter has followed the council's two stage consultation process with stakeholders summarised in Fig 2. Over the past 10 months, the council has held meetings with CBRE, the planning consultants acting on behalf of American Express (the main landowner of the site) and their architects, to explore their aspirations for the site. A capacity and viability assessment of the site was undertaken by CBRE to test the amount of development that could reasonably come forward on the site without compromising the integrity and appearance of their new HQ

building. The results of this capacity and viability assessment have informed changes to the draft brief and the strategic allocation for Edward Street Quarter in policy DA5 of the City Plan.

Fig 2 – Consultation process



The council was also aware that there were some important interest groups in the vicinity of Edward Street that had expressed an interest in the development of the draft planning brief. Two community organisations (Turner Area Partnership and Green Sea) were particularly keen to establish a dialogue with the council and to express their views about the future redevelopment opportunities for the site. Their concerns about the transport infrastructure, construction noise and greening strategy in relation to the wider development area (including Edward Street) have helped inform the content of the draft brief. Engagement with both organisations has continued throughout the consultation process, with officers attending two Turner Area Partnership meetings to update members on the development of the brief.

Regular meetings to discuss the draft brief have also been held with local ward councillors as well as the Chair and Deputy Chair of the council’s Economic Development & Culture Committee. These meetings have been extremely useful in informing the communication strategy and approach to consultation on the brief. Concerns about the local area, expressed by councillors at these meetings, have also been addressed in the brief. Officers within the council’s Transport, Economic Development, Planning Policy, Development Control, Heritage and Sustainability teams, were consulted during October 2012 on the emerging content of the brief. Their comments and observations have informed changes to the brief.

3. Consultation methodology

A letter advertising the consultation on the draft brief was sent to 3,381 properties (both private households and commercial premises) in the vicinity of the development area in the week commencing 8 April 2013 (see Fig 3). The mailshot encompassed 56 streets in total. This represented a much more extensive catchment area than, for example, the statutory consultation undertaken in relation to the American Express planning application.

Insert Fig 3 (Map of the consultation catchment area)

The letter included:

- an explanation of the council's aspirations for the site;
- details of where to find the draft planning brief on the council website;
- details of the public exhibition;
- clarification on how to comment on the draft brief i.e. posting comments in box during drop-in exhibition, submitting online through council's consultation portal, emailing comments etc.

This letter was also emailed to **all of the landowners** as well as approximately **100 groups and organisations** with an interest in the development area, including: all of the Brighton & Hove Partnerships (i.e. Local Economic Partnership, Housing Partnership etc.), infrastructure organisations such as the Voluntary and Community Sector Forum (who have circa 500 groups on their membership list), statutory organisations (Natural England, English Heritage etc), utilities, amenity and civic organisations as well as residents associations.

Other publicity measures included:

- putting up approximately 20 A4 laminated posters advertising the public exhibition in the area around Edward Street;
- issuing a council Press Release advertising the consultation;
- advertising the consultation on the Home Page of the council's website with a link to the consultation portal, during the six week consultation period (165 online responses submitted).

A public exhibition was held during the second and third week of the six week consultation period. A staffed exhibition took place at two venues close to the American Express site:

- Brighton Deaf Centre, Carlton Hill - 22 April, 2-8.00pm
- Dorset Gardens Methodist Church, Dorset Gardens - 23 April, 2-8.00pm

An unstaffed exhibition was then held at:

- Brighton & Hove City Council, Customer Service Centre, Hove Town Hall, Norton Road, Hove - 25 April – 3 May, 8.45am- 5.00pm (Monday – Friday)

An email alert about the consultation was also sent to registered users of the consultation portal.

During the consultation period, the draft planning brief was available at exhibition venues, for download on the council website and in hard copy on request. The responses submitted online using the council's consultation portal were automatically logged and sent to the lead officer in the form of an Excel spreadsheet. Responses which were submitted in writing or by email, were analysed using the same coding system as that established for the online responses. A summary of the results is contained in Section 5 of this report.

4. Response and respondent profile

In total, 199 responses were received:

- 165 people commented online via the council's consultation portal;
- 34 submitted written comments on the feedback forms provided at the public exhibitions, via email or by letter.

109 (66%) of the 165 online responses via the council's consultation portal were from individuals who were keen for the council to find suitable, alternative premises for the Brighton & Hove Wood Recycling Project. The project, a social enterprise which specialises in recycling wood, is currently located in Circus Street just outside of the development area for Edward Street Quarter. A planning application is currently being prepared by Cathedral Group on behalf of the city council, who owns the freehold of the Former Municipal Market site in Circus Street. The redevelopment plans for the site will entail the permanent relocation of the Wood Recycling Project to an alternative site. The strategic allocation for Edward Street Quarter is principally B1a office development with some supporting residential and retail development. It is therefore not a suitable location for the Wood Recycling Project which is mainly B1c (light industrial) use. However, the city council's Economic Development team is actively exploring alternative premises and sites which would be suitable for this type of use in the locality.

The responses from individuals solely concerning the re-location of the Wood Recycling Project have not been included in the analysis of results because they did not relate to the planning brief and its content. However, their views have been fed back to the Chair of Economic Development & Culture Committee, ward councillors and officers in the Major Projects & Regeneration and Economic Development Team. The issue has also been addressed in the committee report.

As part of the online consultation, respondents were asked to complete the council's standard equalities monitoring "About you" questions. This is because the council has moral and legal responsibilities to promote equality. As part of this duty, the council needs to monitor the people who engage with it, who are currently using or would like to use the city's services in the future.

The results are detailed in Appendix 1 of this report but in summary:

- A wide range of ages were represented in the respondent profile with the largest number of respondents in the 45-54 year age group (36%).
- More males (72%) responded than females (28%).
- 41% of respondents identified themselves as lesbian, gay or bisexual.
- 86.5% identified their ethnicity as White English/ Welsh/ Scottish/ Northern Irish/ British.
- 5.4% were of Other ethnicity.
- 33% said they had no religion; the largest religion represented was Christian (59.3%).
- 22.9% said that their day to day activities were limited because of a health problem or disability which had lasted, or was expected to last, at least 12 months.
- 13.8% said they were carers.

5. Results and key changes to the Planning Brief

The council's response to the key issues raised as a result of the public consultation together with suggested amendments to the draft planning brief are detailed in the following table.

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
1. Green spaces/ greening strategy important	Support the brief's aspirations to create green corridors, through appropriate planting and landscaping in the development area and to enhance linkages to existing green spaces in the local area e.g. Tarner Park, Dorset Gardens Peace Park etc (19).	No action required.	No change
	Suggestion that the greening strategy includes living walls to act as noise and pollution buffers in Edward Street and other highly trafficked areas.	The brief will be expanded to include a direct reference to the integration of green/ living walls within the design of buildings in the developed area. Photos will be inserted of Amex and Bellerby College's green walls.	Amend
	Natural England were pleased to see the brief's commitment to a greening strategy for the development area but would like this section to be expanded to include a reference to the council's desire for biodiversity measures to be built in to the design of development, in line with para 118 of the NPPF.	The brief will be amended accordingly.	Amend
2. Tarner Park	Oppose brief's proposal to improve access to Tarner Park via Tilbury Place, on child safety grounds. This would create an	This is a valid concern expressed by the Chair of Trustees for Tarnerland Children and Young People's Project, who have run the After School Club	Amend

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
	area of low visibility where children would be able to exit the park unnoticed.	and Holiday Play Schemes in the park for a long time. The sentence has been removed from the brief.	
3. Dorset Gardens Peace Park	Concern expressed about the proposed creation of a park entrance on the northern flint wall boundary of the Peace Park (4).	Both the Kingscliffe Society and Brighton Society are opposed to any partial demolition of the flint wall and these views are respectfully noted. Any future project to make the best use of the park as a public open space will need to reconcile the objectives of improving access, creating a more attractive and well used asset for current and future communities and balancing these goals against heritage concerns.	Amend
	The existing gates/ railings on the eastern boundary of the park are in a poor state of repair and are not accessible for disabled people. The park lacks a footpath, seating and dog management facilities. Support for park maintenance and the introduction of a management plan (4).	Noted – these comments have been passed on to the council’s Parks team. Improving the park for the benefit of all is an objective of the brief and significant future planning applications in the area covered by the brief will be expected to contribute to these objectives.	Amend

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
	<p>Respondents were keen to retain the peaceful character of the Dorset Gardens park, which they felt was an intrinsic part of its heritage setting (6).</p>	<p>The peaceful character of the park is largely down to the fact that it is hardly used. This is due to the lack of attractions, seating facilities and accessibility. Section 14 of the brief sets out the key aspirations for the peace park which is currently underutilised. However, it stresses that “any changes affecting the gardens will require liaison with the council’s Heritage team to ensure changes are sympathetically designed and meet the requirements of the East Cliff Conservation Area Study and Enhancement Plan”.</p>	Amend
<p>4. General perception of the Planning Brief</p>	<p>General support for the Planning Brief and its aspirations for the development area (11). Planning brief is a waste of public money (4).</p>	No action required	No change
		<p>The brief was produced in-house without the need to appoint consultants. Without a planning framework in place to guide the future redevelopment of this development area, it is likely that a piecemeal approach to future development would occur and quality would suffer, which could itself incur cost to the</p>	No change

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
		public purse.	
5. Mix of land uses	A good mix of uses proposed for the area (4). Too much retail floorspace proposed (4).	No action required	No change
		This point was not only made by individuals but also the Kemp Town Local Action Team, who felt that 5,000 sq m of additional retail floorspace in the Edward Street area would compete with existing retailers in St James's Street (4). However, other respondents, such as the Brighton Society, felt that "all the ground floor frontages on to the square should have retail/ café uses to generate life and activity" (3). Such uses are intended to provide services that will serve the working and resident population, promote public safety, provide a lively and well used neighbourhood, along with a new customer base that will complement and assist the much larger retail destination of St James's Street. In order to allay fears it is proposed that the quantum of retail floorspace be removed from the brief and replaced with the following text: 'Ground floor	Amend

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
		land uses with active frontages are encouraged, including commercial uses, ancillary retail, cafes restaurants etc in locations which front public spaces. Such uses help to provide passive surveillance, increase public safety and promote vitality within the development area .	
	Too much B1 office floorspace allocated for the site. There are many examples of empty offices in the local area. Building new offices will only exacerbate the situation (5).	This is one of the few sites in the city which is allocated for employment uses. Promoting new employment sites in appropriate locations is a key component to achieving the city's targets for office floorspace over the lifetime of the City Plan. It is also anticipated that the presence of American Express's European Head Quarters building will attract complementary office development in the area.	No change
	Need more housing and affordable homes in this area (7).	Agree that achieving more housing and affordable homes in the area is important. The planning brief reflects the strategic allocation for Edward Street Quarter in policy DA5 of the City Plan which currently states a minimum of 65 residential units to be brought forward in the development	No change

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
		<p>area. The policy is worded flexibly to allow for a higher quantum of residential development if necessary, especially if viability is in question. No change is recommended to the brief.</p>	
	<p>Need a new community hall/ facilities (6).</p>	<p>The brief includes a section on Community infrastructure and facilities. It states that “the need for community facilities arising from the development and its impact on the wider area, will need to be met by developers either through the direct provision of community buildings/ facilities or through financial contributions directed towards existing community facilities in the vicinity of the site”. There is consequently no need to amend the brief.</p>	<p>No change</p>
	<p>Larger pre-school nursery needed with outdoor space (3). Concern expressed about the cumulative impact of residential units proposed within Circus Street, Thwaites Garage and the planning brief on existing school places (1).</p>	<p>Section 15 of the brief recognises that the proposed quantum of development in the brief will impact on schools and nurseries in the local area. It suggests that financial contributions will be sought to address this issue. The council is aware of the cumulative impact of</p>	<p>Amend</p>

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
		<p>proposed development in the area on education provision. They have also been approached by the manager of Puffin pre-school nursery who is keen to acquire new, larger premises with outdoor space. There is scope for some direct provision of education services on site, subject to viability assessment. The brief will be amended to reflect this.</p>	
	<p>Provision of a large multi-practice GP surgery (1).</p>	<p>Section 15 of the brief acknowledges that the amount of proposed development for the developing health area will impact on existing health services/ facilities in the local area. It suggests that financial contributions will be sought to address this issue. GP practices in the vicinity of the site are keen to acquire larger, more fit-for purpose premises. There is scope for some direct provision of health facilities on site, subject to viability assessment. The brief will be amended to reflect this. In recognition of the cumulative impact on health services of the amount of residential development proposed in relation to Circus Street, Thwaites</p>	<p>Amend</p>

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
		Garage and the brief, Section 15 will also recommend that a rapid community profile and/or health impact assessment is carried out in support of future major planning applications associated with the development area.	
6. Amenity issues	Concern was expressed about the proposed location of the residential development and its impact on the amenity of residents in White Street. Respondents felt it could cause issues like overlooking, loss of sunlight and daylight etc. (3).	A capacity assessment of the site was undertaken to inform the development of the brief. The results suggested that approximately 65 residential units could be accommodated as part of the overall mix of uses, within local townscape constraints and without compromising amenity. Since the residential element is likely to be quieter than the commercial activities on the site, it was felt that any new housing should ideally be located to the east of the site, to cause minimum disturbance to the residents of White Street. A new paragraph will be added to the Housing section of the brief which will emphasise the importance of protecting the amenity of residents in the local area.	Amend

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
	<p>Some respondents were concerned that the proposed public spaces would be shady and draughty due to their location and orientation (4).</p>	<p>The planning brief includes a concept diagram of the preferred development approach which incorporates public spaces and greenways linking between buildings. All major development applications will need to submit an Environmental Assessment including how the proposed development performs in terms of daylight/ sunlight, wind, noise and other amenity issues. The planning brief will be amended to reference the requirement for all major development proposals to be accompanied by an Environmental Statement.</p>	Amend
	<p>Support the brief's reference to the need to provide gardens and/ or private amenity space in relation to the residential units (1).</p>	<p>No action required.</p>	No change
	<p>Concern was expressed about the density of the proposed development which is considered to be too high for the area (2).</p>	<p>The density, height and massing of proposed development has been capacity tested by the city council and EPR Architects on behalf of American Express. The planning brief has taken on board these results and is considered to be a proportionate</p>	No change

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
		<p>response to this assessment. The height of development coming forward in the development area should not exceed 7 storeys. Green corridors have also been included together with generous public spaces. It is therefore considered that the proposed density is appropriate within the context of the area.</p>	
	<p>Support for living walls to act as noise and pollution buffers (1).</p>	<p>The Greening section of the planning brief will be updated to include reference to living walls to act as noise and pollution buffers.</p>	Amend
	<p>Support for the use of building materials to be sound proof</p>	<p>The proposed uses in the development area i.e. office, residential and retail, are not generally associated with noisy activity. Building Regulations ensure that noise is abated through good design and use of materials. The planning framework is the not the appropriate mechanism for dealing with this issue.</p>	No change
	<p>Concern about construction noise and pollution arising from the redevelopment of the site</p>	<p>This concern is probably the result of local residents having recently experienced the construction of the new Amex HQ building. In order to</p>	Amend

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
<p>8. Retention of former Amex HQ building</p>	<p>A number of respondents thought that the former Amex HQ building was: architecturally interesting, worthy of retention and should be re-used as offices for local SMEs or for education purposes (7).</p>	<p>demonstrate that these issues are taken seriously, it would be appropriate to add some text to the planning brief to emphasise the need for development proposals to address amenity concerns raised during the consultation such as: construction noise, pollution, air quality, water and sewerage infrastructure etc.</p> <p>The demolition of the former Amex HQ building by 2016, is a requirement of the S106 agreement for the new Amex building which was granted planning permission in 2009. This requirement was in recognition that the old building not only directly compromises the integrity and visual appearance of the new building but also has a negative impact on the setting of the Carlton Hill Conservation Area and the adjoining listed buildings. In their comments concerning the planning application for the new Amex building, the South East Regional Design Panel noted that AMEX House was 'architecturally undistinguished' (2 September 2009).</p>	<p>No change</p>

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
		<p>English Heritage has raised no objection to its demolition.</p> <p>Leaving the building in situ would also affect the marketability and value of the rest of the Amex site and would probably render any future development unviable and therefore undeliverable, which would be contrary to the guidance provided in paras 173-177 of the NPPF.</p>	
9. Bus provision and infrastructure	<p>General support for the priority given in the planning brief for improvements to bus routes and infrastructure in this strategically important area (7).</p> <p>Two respondents felt that officers leading on the development of the planning brief should work closely with the Better Bus Programme Officer (2).</p> <p>Support for improved bus routes in <u>both directions</u> along Edward St (6).</p>	<p>Section 13 will be updated in the light of the results emanating from the Better Bus Programme consultation.</p> <p>Officers have been working closely with the Better Bus Programme officer throughout the development of the planning brief.</p> <p>Currently, Edward Street only has bus services running westwards to the city centre. All other buses servicing the east of Brighton are routed via St James's Street and Marine Parade.</p>	<p>Amend</p> <p>No change</p> <p>Amend</p>

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
		<p>Whilst these bus services are only a 5 minute walk away, there is growing public support for the provision of a bus service running eastwards along Edward Street. The planning brief will be amended to refer to the desirability of a two way bus service along Edward Street but will stress that the realisation of this aspiration will be entirely dependent on the commercial decisions taken by Brighton & Hove Bus and Coach Company - a private company which operates independently to the city council.</p>	
<p>10. Better transport infrastructure</p>	<p>A few respondents were keen to see better transport infrastructure to support proposed commerce (3).</p>	<p>The brief clearly commits to the provision of improved transport infrastructure in the development area. It states: "Any development proposals should support and enhance the use of public transport through channelling investment towards those aspects of bus provision and transport infrastructure which are unlikely to benefit from BBA funding. This will require close liaison with the Transport Planning Team to ensure</p>	<p>No change</p>

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
		that development proposals do not duplicate planned or existing provision but provide genuine added value”.	
	A few respondents supported the introduction of safe cycle lanes, including Bricycles – a campaign group representing cyclists in the city (5).	The brief recognises the Edward Street area as a black spot for accidents involving cyclists and puts forward some positive suggestions/ measures for addressing cycle safety i.e. dedicated two-way cycle lanes, contraflows etc.	No change
	Support the creation of safe pedestrian routes and crossings in the development area, including Carlton Hill (2).	The brief refers to the creation of safe pedestrian routes and crossings within the development area. However, given the proximity of Carlton Hill Primary School and concerns about child safety, the planning brief will be expanded to refer to the desirability of introducing traffic calming measures in Carlton Hill.	Amend
11. Parking provision	Need for more parking provision to support community facilities i.e. minibuses etc (3).	The brief has identified the development area as being suitable for a lower parking ratio, in recognition that it is within walking distance of the city centre, the seafront and Brighton mainline	Amend

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
		<p>railway station, with good public transport links to London, Gatwick Airport and surrounding towns. However, the area appears to lack parking facilities for larger community vehicles. The planning brief will therefore be amended to reflect this need.</p>	
	<p>Should be enough parking provision to support both proposed commercial and residential development, to prevent encroachment and increased parking pressures on nearby residential streets (2).</p>	<p>The planning brief advocates a lower parking ratio for both the commercial and residential elements of the site to reflect the accessibility of the site in terms of public transport (see above). Any future planning applications will need to include a Transport Assessment to identify the likely effects of the demand for travel they create and include measures to mitigate their impacts by reducing car use.</p> <p>Travel Plans will be an important element of any future planning permissions, including ensuring that future development does not unacceptably increase parking pressures in the local area.</p>	Amend

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
	Support for Car Club provision and related parking (1).	There is no explicit reference in the planning brief to the establishment of a Car Club in this part of the city because this is entirely dependent on the commercial viability of such provision by existing operators in the city. However, the establishment of a Car Club is considered to be desirable and complementary to the delivery of sustainable transport in this quarter of the city. Reference to the desirability for the establishment of a Car Club in the Edward Street Quarter, subject to viability assessment, will be added to the Transport section of the planning brief.	Amend
12. Road safety	Support the creation of safe pedestrian routes and crossings through the site and on the periphery e.g. Carlton Hill, Edward Street, William Street, John Street etc (2).	This was a particular concern raised by Carlton Hill Primary School, particularly in the knowledge that Carlton Hill is used as a rat run to avoid the traffic lights at the western end of Edward Street. The planning brief will be amended to include reference to improved crossings and traffic calming measures in the vicinity of the school.	Amend

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
13. Sustainable development	Support for zero carbon development in this location (1).	Section 16 of the planning brief addresses this issue and states “all developments are expected to exceed Part L Building Regulations by 20% as a minimum, but residential development should aspire towards zero carbon status i.e. emitting no net annual carbon dioxide emissions from energy use”.	No change
	Demolition of old Amex building is not sustainable or energy efficient (2).	The demolition of the former Amex HQ building by 2016, is a requirement of the S106 agreement for the new Amex building which was granted planning permission in 2009. The former Amex HQ building was built in 1977 by Gollins, Melvin, Ward & Partners. It has a significant amount of asbestos and is very energy inefficient. The new building is significantly more environmentally friendly than the old building, with enhancements including rainwater harvesting, brown and green roofs, an energy centre and reduced water appliances.	No change
	Re-use rainwater i.e. toilets	The new building incorporates rainwater harvesting technology. The planning brief also requires:	No change

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
		<ul style="list-style-type: none"> Commercial development – to score at least 60% in the energy and water sections within a minimum overall rating of Excellent for BREEAM. Residential development - to emit no annual net carbon dioxide from energy use, be designed to Lifetime Homes standards and achieve a minimum rating of Level 4 of the Code for Sustainable Homes. <p>There are consequently sufficient mechanisms in place to encourage rain water harvesting in the design process.</p>	
	Do nothing - best carbon neutral outcome	<p>Doing nothing concerning this site and leaving the old building in situ, will not achieve a carbon neutral outcome. The former Amex HQ building is significantly lacking in terms of its sustainable performance, is full of Asbestos and entails high maintenance costs. A key aspiration of the planning brief is to encourage better use of resources, greater energy efficiency through good design</p>	No change

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
<p>14. Extension of Edward Street Quarter development area</p>	<p>Include Kingswood/ Milner flats in development area (2).</p>	<p>and selection of appropriate construction materials.</p> <p>The core purpose of the planning brief is to give certainty to American Express and other future developers of the site about the planning framework to drive forward development in the area. Since it is not clear, at this stage, what the city council's aspirations/ estates strategy is in relation to Kingswood Milner – its inclusion within the brief's development area could cause confusion. It is possible that the Kingswood Milner estate may warrant its own planning brief in the fullness of time when the council's estates strategy becomes clearer.</p>	<p>No change</p>
	<p>Include St James's St in development area (7)</p>	<p>The core purpose of the planning brief is to give certainty to American Express and other future developers of the site about the planning framework to drive forward development in the area. Since it is not clear, at this stage, what the city council's aspirations are in relation to</p>	<p>No change</p>

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
		<p>St James's St – its inclusion within the brief's development area could cause confusion. Any future proposed changes to St James's Street, if and when agreed in principle, would be the subject of a separate future consultation exercise.</p>	
	<p>Brief should integrate Brighton University aspirations for Grand Parade buildings (1)</p>	<p>This was a suggestion emanating from NTR Planning on behalf of Cathedral Group (the developers for the Circus Street site). The core purpose of the planning brief is to give certainty to American Express and other future developers of the site about the planning framework to drive forward development in the area. The University has not revealed that it has development plans in the area that warrant inclusion in a planning brief.</p>	<p>No change</p>

Appendix 1

Age band	No. of people	%
Aged under 18	0	0
18-24 years	0	0
25-34 years	2	5.6
35-44 years	9	25.0
45-54 years	13	36.1
55-64 years	7	19.4
Aged over 65	5	13.9
Total	36	100.0
No response/ prefer not to say	11	

Gender	No. of people	%
Male	28	71.8
Female	11	28.2
Total	39	100.0
No response/ prefer not to say	8	

Sexuality	No. of people	%
Heterosexual / Straight	17	58.6
Lesbian / Gay woman	1	3.4
Gay man	8	27.6
Bisexual	3	10.3
Other	0	0
Total	29	100.0
No response/ prefer not to say	18	

Ethnic origin	No. of people	%
English / Welsh / Scottish / Northern Irish / British	32	86.5
Irish	1	2.7
Any other White background	2	5.4
Other ethnicity	2	5.4
Total	37	100.0
No response/ prefer not to say	10	

Religion or belief	No. of people	%
I have no particular religion	9	33.3
Buddhist	0	0
Christian	16	59.3
Jewish	0	0
Muslim	1	3.7
Agnostic	0	0
Atheist	1	3.7
Other philosophical belief	0	0
Total	27	100.0
No response/ prefer not to say	20	

Day to day activities limited by a health problem or disability	No. of people	%
Yes	8	22.9
No	27	77.1
Total	35	100.0
No response/ prefer not to say	47	

Carer	No. of people	%
Yes	5	13.9
No	31	86.1
Total	36	100.0
No response/ prefer not to say	11	