

Appendix 2



Core Strategy Preferred Options Document - November 2006 Summary of Consultation Responses

This document provides a summary of the formal responses to the Core Strategy Preferred Options Document (November 2006) and summarises the results of the various events and workshops carried out during the six week formal consultation on the 'Preferred Options' document which took place between November 2006 and December 2006. For full details of the range of consultation exercises, workshops and events please refer to the Statement of Consultation.

This summary is arranged under the headings of the Revised Core Strategy Preferred Options Document. However reference is also made to the original preferred option to which the comments were submitted. It summarises the 87 **formal responses** to the document and sets out the main areas of consensus arising from the **consultation events and workshops**. It highlights those significant areas of comment where there are mixed or conflicting views. It does not summarise all comments made.

The consultation responses have assisted the council in revising the preferred options document and this is set out in Annexe 1 of the Revised Preferred Options Document June 2008. The Revised Core Strategy Preferred Options document will be subject to public consultation during June and August 2008.

SPATIAL STRATEGY

General Comments

Of the 57 representations on SS1, in general there was broad support for the principle of the approach that was undertaken that led to the identification of the broad areas for future development

- However consultation responses and views expressed at events questioned whether there was sufficient information on the likely development expected to come forward in those areas to allow a full view to be taken of their acceptability.
- In particular at the various workshop events the suitability of the Old Shoreham Road, Portland Road and the Hove Station areas to

accommodate significant development opportunities was questioned.

- The Government Office for the South East raised concerns that the Spatial Strategy did not provide sufficient detail on the amount and type of development that the 10 areas were expected to accommodate.
- Concern was also expressed at events and through written responses, at the level of development anticipated to take place along the seafront.
- The Highways Agency and others queried whether there had been sufficient assessment of the transport implications of the significant development within these broad areas.
- The Environment Agency felt that without a strategic flood risk assessment (SFRA) the spatial strategy could risk being found unsound. This would be on the grounds that no SFRA had informed the options and the Sustainability Appraisal; and that the sequential test had not been applied to the selection of broad locations.

With regards to the alternative option of allowing development to take place within the urban fringe, the consensus of opinion on the preferred option UF1 was that it should be supported. However comments made in relation to the discarded alternative option of allowing development on the urban fringe as part of the spatial strategy raised a mix of responses. Some respondents were very clear that development should not take place in the Urban Fringe/ AONB. Others felt that there may be benefits from limited developments under certain circumstances. Some respondents felt that development of some urban fringe must be included as part of the overall spatial strategy for the development of the city. To exclude this option would unreasonably limit opportunities for a variety of development needs for the wider city and beyond.

Other suggestions were to ensure that the preferred approach made the best use of all railway stations and potential development opportunities around minor stations; and that more development should be directed to selected suburban modes around the city as these would help to create the demand for public transport between suburban nodes. In relation to the discarded approach of directing growth to regeneration/ renewal areas, comments were raised around the need to prioritise all the neighbourhood renewal areas and that residential and mixed use development in the East Brighton area could help diversify type and tenure of housing. High density development should also be encouraged outside the broad areas and along the city's main transport routes. However overall, no alternative approach to the spatial strategy was put forward.

CENTRAL SEAFRONT

Formal Responses

In response to SS1 – Spatial Strategy which included **Central Seafront** as an area appropriate for development:

- The area is a focal point along the seafront so development must be of the highest quality.
- Central seafront being mainly a leisure/visitor destination is inappropriate for higher density mixed use development.
- The emphasis on 'key seafront sites' puts the future of the whole area at the mercy of large-scale development projects, with all their attendant risks. To enhance the seafront as a sustainable year round tourist attraction a distinction should be made between the busy central seafront and the more tranquil wings of the East Cliff stretch and the Hove Lawns/esplanade.
- Reference in the Local Plan to tranquility of the eastern seafront must be preserved and strengthened.
- Comments on **CT3 Brighton Centre** (7 representations) - were generally supportive of the proposals but concerns related to the exact proposals of the Brighton Centre (whether the Conference Centre would be replaced within the SPD area) and its relationship to proposals for the Black Rock site.
- Concerns were also raised in relation to **SR1 Seafront Regeneration** around high buildings and allowing greater density along the seafront; that there should be a presumption against development south of the A259 and that congestion along the A259 should be considered.

Consultation Events and Workshops

At the **Economic Partnership - sites and premises event**, the need for a state of the art development to provide for international events, conferences etc was raised by one participant and another felt that the Brighton Centre SPD should have been specific about the uses and limit these to convention centre and retail. At the **LSP development morning** however one participant questioned whether it was too late to regain the city's conference centre position through the redevelopment of the Centre. At the **Retail and Tourism Advisory Panel** it was felt that the Brighton Centre redevelopment would help draw international events/conferences to the city but that the city needed to do more to attract visitors to the city during the week; other facilities such as ice rinks were needed. The Brighton Centre redevelopment should include potential for retail in conjunction with Churchill Square and concern was raised with the poor links between the central shopping area and the seafront.

BRIGHTON MARINA

Formal Responses

In response to SS1 – Spatial Strategy which included **Brighton Marina** as an area appropriate for development:

- Support is given to the Council's Preferred Option for accommodating significant mixed use, higher density development at the Marina. The policy should specifically recognise that this is the most suitable location for significant new retail development along with other uses.
- Appropriate to identify a number of locations within which development is to be concentrated including Brighton Marina. Support potential of the Marina to accommodate additional housing and the opportunity, which exists for new development to deliver the regeneration of this key site in the city.
- Concern about concentration of development being served from one access. Concern about visual impact on the coastal landscape, especially on views of the cliffs from further east.
- Development should not be visible above the cliff.
- Consider that given the close proximity of the gasholder site to Brighton Marina this site falls within that broad area.
- The Kemp Town Society deplored the gross overdevelopment of the Marina site and its adverse effect on the neighbouring Grade 1 Listed Kemp Town Estate.
- The PCT wanted to work with the council to identify suitable sites within the new development area.
- Specific representations regarding the regeneration opportunities for the Gas Works site and its links to the Brighton Marina area.
- Of those who responded to **SR1 Seafront Regeneration**, Brighton Marina raised the most comments; its shopping status should be clarified, the boundary should be widened to include the Gas Holder site, there should be better reflection of its emerging status as a priority regeneration area, the need to maintain and enhance biodiversity/ nature conservation features and ensure development does not erode views of the cliffs.

Consultation Events and Workshops

At the **Area-based event**, the East Area workshop considered that that access to the Marina is a serious concern. There is a poor mix of uses within the Marina, quite different from what was originally intended with a concentration of housing development. An associated concern was that a lot of the dwellings being built in the Marina and wider city are not meeting the need of residents of Brighton & Hove but providing second homes. At **the Older People's Feedback Session**, there was concern raised with the lack of community facilities at the Marina. At the **Economic Partnership sites and premises events**, it was suggested

at one workshop that the Marina is increasingly becoming a regeneration area and there is the potential to integrate the Marina more directly with the city. The planned development of Madeira Drive would help this and this needs to be strategic not ad-hoc. The area's potential is not being realised and there should be more tourism attraction for families. Safety at the marina was raised at the **Schools Feedback sessions**.

LEWES ROAD

Formal Responses

The responses to the consultation on the spatial strategy for **Lewes Road** were:

- The triangle area (Lewes Road/Upper Lewes Road and Union Road) has a distinct character that new development should respect and there is an identified demand for small workshop space.
- Regeneration of Lewes Road is urgently required to include retail/employment units, new housing and refurbishment of good existing office stock.
- Southern parts of Lewes Road would not be suitable for tall buildings.
- There are some highly sensitive green/parkland areas along the Lewes Road corridor not suitable for development.
- The preparation of the LR2 study and subsequent policy documents and guidance must have full regard to the current scheme coming forward for Preston Barracks.
- Support policy to direct significant mixed-use, high density development within the Lewes Road Corridor.
- There is no scope for development over and above that in the Planning Brief.
- A necklace of sites along Lewes Road could benefit from redevelopment but it should not be high rise, including Preston Barracks.
- For any sites in the 'Lewes Road corridor', would support an appropriate mix of residential, retail and office use but not high-density development.
- The Lewes Road corridor should be emphasised as a place in its own right with direct and effective transport links.

Consultation Events and Workshops

At the **Area based events**, the **central area** workshop suggested that more student housing should be concentrated, potentially around the academic corridor (perhaps via intensification of Pavilion Retail Park) to avoid current conflicts between student lifestyle and that of families in the Coombe Road/Bear Road neighbourhood. Lewes Road area was

the heart of the city's manufacturing economy. Economic functions needs to be intensified and the University should attract more economic activity (small business and workshops) and that more intensive use could be made of Preston Barracks site for employment uses. The **East area** workshop supported this growth area and identified a number of sites along the road. It was agreed that there was some scope for taller buildings. It was considered suitable for a mix of use and it would benefit from community uses. There are issues in the area of student housing concentration. At the **LSP development morning** it was queried by one participant whether more parking would be provided if growth occurs along Lewes Road and another suggested that the links between the Universities and the regeneration areas could be improved.

NEW ENGLAND ROAD/ LONDON ROAD

Formal Response

The responses to the consultation on the spatial strategy for **Brighton Station/New England area** and for London Road/Preston Road corridor were:

- Brighton Station could form part of a larger regeneration programme in the area. The station is close to its pedestrian capacity and without enhancement to cope with growth; the station will likely suffer from health and safety problems as well as operational inefficiency.
- Only support with huge qualification.
- Support the proposals in SS1, which includes the London Road/Preston Road Corridor. London Road is identified elsewhere within the LDF, and within the LR2 study, as an appropriate location for such development and investment.
- Support the principle of Preferred Option SS1 which identifies areas including the London Road/Preston Road corridor for mixed use, high density development. Also support the objectives of regeneration and renewal to bring about sustainable communities in that area.
- Various unsightly vacant and underused sites facing Preston Park could benefit from well designed development. The setting of the Park is important and high rise buildings could reduce the apparent size of the Park to its detriment as a major historic and recreational feature in the city. Development at Preston Circus should not exacerbate the already critical traffic congestion.
- Regeneration of London Road urgently required including retail/employment units, new housing and refurbishment of good existing stock.

Consultation Event and Workshops

At the **Area-based event**, the Anston House strip, Co-op site, Sainsbury's and Somerfield sites along London Road were seen as having potential for mixed use development, Vantage Point and New England Quarter area for redevelopment and the London Gate area suitable for more intensification. At **the Economic Partnership sites and premises event**, one workshop considered that Preston Road was not a secondary location and could see high quality office developments happening there in conjunction with housing. The council needed to take a lead on forcing refurbishment of poor quality/eyesore buildings to support the regeneration process. Buildings like New England House need urgent external refurbishment (though it was acknowledged that this cheap business space was popular with new and growing local businesses.). New England House's role in providing cheap flexible space for new businesses was also mentioned at another workshop and it was considered impossible to provide 'new' space for same cost.

EASTERN ROAD AND EDWARD STREET

Formal Responses

The following comments were made in response to the preferred options consultation on the spatial strategy (SS1) for **Eastern Road and Edward Street**:

- There is little scope for further development as the corridor is already overloaded with health facilities. Tall blocks on the north side, east of Lower Rock Gardens, could be redeveloped to improve the street scene and the skyline from the south.
- The PCT would like to work with the council to identify suitable sites within the new development area.
- Tree planting to hide 'the horrors', demolition of St James's House, and other tower blocks, replace with small terrace houses.
- The area around Edward Street /Eastern Road could provide a new Civic area. The town hall in Hove would then be free for redevelopment.

Consultation Events and Workshops

There was consensus at the **Area-based event, east area** workshop, that the area is already overdeveloped and should not be a regeneration and renewal area – there is too much traffic particularly around the hospital. Two of the group felt there was potential to improve the appearance of the area particularly the flats (comprehensive development). The **Brighton & Hove Arts Commission** felt the area would benefit from better landscaping and public realm improvements that would help to keep businesses there. It also felt that

the benefits arising from including arts/ culture within mixed use developments and links to regeneration and public realm are established. Circus Street is a good practice example of links with regeneration areas and Bristol Estate example of bringing arts out into community. The **Sustainability Advisory Panel** suggested that large sites/comprehensive development areas, such as the Edward Street Quarter and Hospital sites, should utilise combined heat and power plants

HOVE STATION AREA

Formal Responses

The following comments were made in response to the preferred options consultation on the spatial strategy (SS1) for the **Hove Station Area**:

- Could potentially be in conflict with the East Sussex and Brighton & Hove Waste Local Plan, which allocates sites for road to rail transfer of waste.
- Any development should ensure an improved interface between modes of transport, particularly between rail and bus connections to the Hove suburbs. Opportunities for improvements in the conservation area, and the former industrial/railway land adjoining the station.
- Questioned whether there capacity for action in the area near Hove Station (west and north west).
- Only support Hove Station and then not without huge qualification.
- Have severe reservations about the impact of this strategy on the south-side of Hove Station, leading down to Blatchington Road. The road is already a busy thoroughfare.

Consultation Events and Workshops

At the **Area-based Event** - Hove Station was discussed by the West area workshop as an area with real potential (Sackville Road, Victoria Road, Goldstone Retail Park and other retail units on Old Shoreham Road next to Leighton Road). The shortage of health facilities in Hove and the difficulty of getting to them was discussed. It was suggested that the Hove Station area has potential to house health facility and new school, encouragement to look at co-location of facilities (e.g. Health with the Children's Centre on Sackville Road). However the potential for Hove Station area to be a growth area was queried at the **Older People's Council Feedback session**.

SHOREHAM HARBOUR AND SOUTH PORTSLADE

Formal Responses

The following comments were made in response to the preferred options consultation on the Preferred Option for **Shoreham Harbour** (SH1):

- Would be better utilised as employment and residential land rather than as a port. Many of its current activities could be transferred to Newhaven.
- The spatial strategy should include reference to Shoreham Harbour as a major regeneration area. Whilst there are constraints to be overcome for bringing forward development at Shoreham Harbour, relevant agencies and bodies, including SEEDA are working together to unlock its regeneration potential.

Consultation Events and Workshops

At the **Area-based Event**, the **west area** workshop felt that the potential of Shoreham Harbour should be looked at more closely. However it was agreed that issues of access to the site need to be considered carefully and more something for the latter part of the plan period.

SPECIAL AREA POLICIES

SA1 - THE SEAFRONT

Formal Responses (Preferred Options SR1 Seafront Regeneration and PRE4 Shoreline Management and SS1 Spatial Strategy)

- Of the 16 representations received on **SR1 Seafront Regeneration**, Brighton Marina raised the most comments; its shopping status should be clarified, the boundary should be widened to include the Gas Holder site, better reflect the area's emerging status as a priority regeneration area, the need to maintain and enhance biodiversity/nature conservation features and ensure development does not erode views of the cliffs.
- The Brighton & Hove Economic Partnership felt that there should be a seafront masterplan whilst those who objected to the policy felt that there should be no further development along the seafront.
- It was felt that the status of certain major development sites referred to in the background were misrepresented as they did not have planning permission they should not be referred to as commitments.
- It was felt by one respondent that the discussion of the preferred option and the 'no alternatives' was misleading. It was felt that several alternatives to certain aspects of the major development sites had been put forward and this balance of views should be better reflected in the Core Strategy.

- Need to address chronic congestion along the A259 which should be properly assessed alongside major development.
- **PRE 4 - Shoreline Management Plan:** limited comment (5 representations). One respondent expressed concern over rising sea levels.

SS1 - Spatial Strategy also received relevant representations on the seafront:

- The area is a focal point along the seafront so development must be of the highest quality.
- Central seafront being mainly a leisure/visitor destination is inappropriate for higher density mixed use development.
- The emphasis on 'key seafront sites' puts the future of the whole area at the mercy of large-scale development projects, with all their attendant risks. To enhance the seafront as a sustainable year round tourist attraction a distinction should be made between the busy central seafront and the more tranquil wings of the East Cliff stretch and the Hove Lawns/esplanade.
- Reference in the Local Plan to tranquility of the eastern seafront must be preserved and strengthened.

SA2 CENTRAL BRIGHTON

Formal Responses (S1 Safer City, CT4 Cultural Quarter and R1 Retail Development)

S1: Safer City– 12 responses all broadly support the preferred option subject to good management and monitoring. 2 objections regarding need to address city wide safety (e.g. also in urban fringe) and access to leisure, sporting and cultural facilities within the city more generally and provision for the elderly.

At the **LSP Development morning** – with regards to central Brighton the comments generally supported the approach of S1 to better co-ordinate public safety, licensing and planning policy with the aim of diversifying the night time economy and taking a cumulative approach to late night uses.

CT4 Cultural Quarter – 6 responses, Whilst there was general support for the intentions of the cultural quarter it was thought the option may lead to a view that only a limited area of the city was perceived as being important culturally and underplays the importance of the cultural and creative industries that exist across the city.

R1 Retail Development - 32 responses. Support for larger new shopping units in Brighton Regional Centre, possibly through the expansion of Churchill Square in conjunction with the Brighton Centre redevelopment, with a need for more department store representation. Concerns regarding city centre parking provision associated with future new retail development. One respondent

queried whether it was appropriate to focus significant retail development to Brighton regional centre at the expense of other centres.

Consultation Events and Workshops

The Retail and Tourism Advisory Panel

- Brighton Centre redevelopment does provide potential for retail in conjunction with Churchill Square – there is demand for additional retail space in Churchill Square and a department store.
- Opportunities in regional centre are limited and must not be isolated. Possible opportunities included West Street, Bartholomew Square, Black Lion Street and Western Road.
- Independent retail role of North Laine needs to be protected.

SA3 – VALLEY GARDENS

No specific proposed option for the Valley Gardens area was included in the Core Strategy Preferred Options document in 2006 but it was specifically referred to in the Spatial Vision as a focus for improvements and was mentioned as a priority under Preferred Option **UDC2 Urban Design Framework**. One formal response on the Spatial Vision, from the bus company, made the point that Valley Gardens has an accessible transport corridor and that greater accessibility there should not be to the detriment of this. UDC2 was generally supported during consultation.

SA4 – URBAN FRINGE

Formal Responses (UF1 Urban Fringe, SS1 Spatial Strategy)

20 individuals and organisations responded to preferred option **UF1 - Urban Fringe**, the consensus of opinion on the preferred option was that it should be supported. Half sought no development in the urban fringe. 2 respondents wanted development to be considered only 'as a last resort', 2 representations suggested park and ride sites within the urban fringe and 3 sought the use of the urban fringe for housing and employment uses. A number of correspondents only partially supported or objected to the policy because:

- the policy did not go far enough in protecting the urban fringe and there were concerns that the preferred option would lead to inappropriate development,
- the green network should be supported in the urban fringe which should specifically protect biodiversity and geology.

When considering what development could be accommodated, there were comments both supporting and opposing the use of the urban fringe for a site for travellers.

Other consultation comments related to the urban fringe were raised in relation to the **Spatial Strategy (SS1)**:

- Limited development and expansion on the urban fringe could be included with care.
- Development on the urban fringe is not unacceptable in principle, but emphasise that any such development should deliver clear improvements for nature conservation.
- Strongly oppose any office development on the urban fringes.
- Should review the outdated AONB boundaries and release land for development that no longer adheres to the AONB criteria. In addition, there should be better management of the Greenfield sites on the urban fringe. In some cases, these sites would be suitable for commercial use and residential developments.
- Very much against the city extending its physical limits into the Sussex Downs AONB/South Downs National Park.
- The South Downs AONB Management Plan should also be taken into account.
- Recognise the potential benefits of urban fringe development 'under certain circumstances'.
- Notwithstanding the outcome of the South Downs National Park Inquiry, development of some urban fringe must be included as part of the overall spatial strategy for the development of the city. To exclude this option would unreasonably limit opportunities for a variety of development needs for the wider city and beyond.
- View the urban fringe as being multifunctional and would expect development to be considered only as a last resort and not involve any greenfield sites, i.e. any future development on the urban fringe should be restricted to brownfield sites.
- Approach is sound in principle but should not rule out some development on greenfield sites on the urban fringe that are of poor landscape quality. Some would be enhanced, both in terms of biodiversity and accessibility to the public, by limited development in return for better stewardship of the remaining green space and creation of new parkland. The number of brownfield sites for housing is now limited. Reliance on brownfield sites for a major contribution to Brighton & Hove's strategic housing requirements means that we have to accept intense development at high densities of the few available sites.

Consultation Events and Workshops

There was a discussion of the role of the urban fringe at one workshop at the **LSP Development Morning**, one participant felt it should be protected and enhanced whilst another participant noted that this

constraint would result in increased densities within the built-up area. At the **Area-based event**, the west workshop discussed whether certain uses – such as un-neighbourly uses, recycling centres and shopping uses could be relocated to the urban fringe and free up central sites for development and easing traffic congestion. At the **Economic Partnership sites and premises event**, one workshop discussing opportunities for new employment floorspace raised the issue of urban fringe sites.

SA5 – SOUTH DOWNS

Formal Responses (OS2 – AONB/future South Downs National Park)

Preferred Option **OS2 – AONB/future South Downs National Park** (9 representations) – general support for this preferred option but concerns were raised for the need for adequate protection for areas of AONB that may not fall within proposed National Park boundary and non-AONB countryside also not included within the proposed National Park boundary. Two respondents felt that some areas of AONB could be reconsidered for development. Comments in relation to the AONB/ National Park were also made in representations to **UF 1 Urban Fringe and SS1 Spatial Strategy**.

SN1 – SUSTAINABLE NEIGHBOURHOODS

Formal Responses (SS1 Spatial Strategy, L1 and L2 Employment training and wider facilities/learning for local communities, SC1 Supporting neighbourhood renewal plans/ New Deal Area Delivery Plan and SC2 Contributions to community facilities where there is a shortfall, S2 Safer streets)

Preferred Options **SS1- Spatial Strategy**:

- to allow some development at local centres/parades giving priority to deprived neighbourhoods;
- development potential around the all minor stations Portslade, Aldrington, London Road, and Moulsecoomb should also be fully explored
- More development should be directed to selected suburban nodes around the city as these would help to create the demand for public transport between suburban nodes.
- Priority should be given to all neighbourhood renewal areas, particularly Central Areas such as Turner (South Hanover), which includes the Circus Street market site.
- Should encourage high density development outside of the Broad Development Corridors/Broad Development Areas where the opportunity arises. This should include the intensive use of existing

brownfield sites on the City's main routes including the A23 and Carden Avenue, Hollingbury.

- Support residential and mixed use development in EB4U area and diversified housing type and tenure- key worker housing in area.
- Sites in Patcham, Hollingbury and Hollingdean could be used for mixed use development. These areas are monotonously low density, though they do provide comparatively low-cost family housing.

Relevant comments were also made to **Preferred Options L1 and L2 Employment training and wider facilities/learning for local communities:**

- Need good bus links to education establishments to increase links to the New Deal for Communities Area.
- Links between University and deprived areas required limited provision of buildings predominantly taken form of outreach.
- Wilson Avenue and Community Stadium can become centres of excellence for construction training and engineering.
- Provision of student housing and integration with local community is an increasing problem in East Brighton.

Relevant comments were also made to Preferred Options **SC1 Supporting neighbourhood renewal plans/ New Deal Area Delivery Plan and SC2 Contributions to community facilities where there is a shortfall:**

- All options generally supported strengthening communities and neighbourhoods and contributing to health improvements and reducing health inequalities. Several respondents felt that developer contributions for community facilities should not be limited to NDC and NRA areas. Whilst those areas may need investment, other communities in the city should also be given opportunities from developer funding.
- It was suggested that provision of facilities for young people should be emphasised. Also that provision could be linked with Preferred Options OS1-4 Countryside and Open Space, for example by providing facilities such as open air sports courts, and by improving access to biodiversity on regeneration sites. This could also help to reduce pressure on the South Downs.
- Welcome the references to community safety as this is important part of the regeneration process in renewal areas.
- Whilst the rationale to focus on NRAs is understood, concern was raised by several respondents that pockets of deprivation in otherwise prosperous areas could be marginalised by that Preferred Option. Several respondents commented that the contributions from developers should not be overly onerous on developers as that could detract from investment and regeneration in renewal areas. For example, there is no indication of what is considered 'major' new development. It was also suggested that wording in SC2 be

amended to clarify that contributions to the community other than built facilities (which require ongoing maintenance) could be acceptable in some circumstances.

Preferred Options S2 Safer streets – main comments were that this was supported but should be extended to all neighbourhoods not just deprived areas.

Consultation Events and Workshops

At the **Local Strategic Partnership Development Morning** one workshop felt that the issue for East Brighton is to ensure that the most disadvantaged are included and trained/ have access to jobs. There are a number of different ways of achieving the outcomes, focus on the pockets of deprivation/ individuals and be realistic about the cost. The links between the Universities and the regeneration areas can be improved, partly by making people more aware of what is going on at the moment with individual students going out to the community as part of research or with funded programmes. Need also to dispel the myths around students in the local communities in terms of impacts on housing and local pubs/ shops. At the **Economic Partnership Sites and Premises Meeting** it was raised in one workshop that the current local plan makes specific reference to the contribution the universities can make to generating employment and bringing employment to the city and need an equivalent in the new plan. **Spectrum** opposed SC2 on the basis that LGBT communities are not geographically based. The Preferred Option should be broadened to include not just geographical communities within areas of social and economic deprivation, but should also seek not to exclude, by default, non-geographically based communities of interest within the City by focussing solely or even primarily on a neighbourhood approach to services. One **MOSAIC** interviewee felt that there was a lack of reference to the specific needs of minority ethnic communities. This is seen to be a vital element of any work which will be carried out to strengthen communities and involve people.

Brighton & Hove Arts Commission – The use of arts and culture can be tremendously effective in the implementation of planning policy in terms of strengthening communities and involving people. There are a number of recent projects Brighton and Hove Arts Commission has been involved with in the city that are excellent examples of this. Participatory, consultative public art projects for example that have been drawn from neighbourhood action plans help to improve local environments and enable local ownership and pride. Public art should have a role to play in enhancing districts/city neighbourhoods, high quality design, design and integration of sports, conference and recreation facilities.

SN2 – RESIDENTIAL RENEWAL AREAS

Formal Responses (S2 Tackle community safety and road safety in deprived areas; H5 Community facilities in deprived neighbourhoods, DC1 Developer Contributions Priorities)

The Strengthening Communities preferred options were generally supported; concerns related to widening the application to all communities not just deprived areas and concern that contributions should be appropriate to the development.

S2 Tackle community safety and road safety in deprived areas – seven representations supporting child-friendly streets, one representation suggested the core strategy should go further and champion Living Streets concept. 2 respondents felt these issues were city wide issues

H5 Community facilities in deprived neighbourhoods - five representation of support but sought reference to access to play in all areas lacking access to public open space not just deprived neighbourhoods.

DC1 Developer Contributions Priorities - general support for the principle that developers should contribute towards providing the necessary physical, social and community infrastructure.

CORE POLICIES

CP1 SUSTAINABLE BUILDING DESIGN

Formal Responses (PRE 1 need for high sustainability standards, PRE 2 preparation of more detailed guidance)

Of the 23 representations to **PRE1 need for high sustainability standards** and 11 representations to **PRE2 preparation of more detailed guidance** there was:

- General support given to specify minimum performance standards and targets for development in the city.
- However some developers expressed need for the 'highest standards' specified to be viable/achievable.

General comments to the PRE section related to:

- the lack of mention of biodiversity/ links to biodiversity
- the need for energy targets to be included in line with the draft South East Plan
- Inclusion of a commitment to minimise pollution and to actively seek improvements in water and air quality and reduce noise pollution in line with South East Plan.

- In relation to the Construction and Demolition Waste SPD the need for clarification of its implementation – which DPD will deal with which waste streams.

Consultation Events and Workshops

The **area based events** did not cover sustainability issues in detail. **MOSAIC consultees** felt there is uneven access to free recycling facilities across the city, the fact some items are not accepted for recycling (e.g. hard plastic, containers and batteries) and that the city need to reduce its environmental footprint. Comments at the **LSP event in Whitehawk** focused largely around sustainable transport issues. One participant suggested urban fringe should be maintained and enhanced. **Older People's Council consultees** suggested Lifetime Homes should be promoted but accessibility needs to apply to the wider public realm to provide more for people with disability and older people (transport facilities, provision of seats etc). At the feedback sessions with **Schools (Dorothy Stringer and Blatchington Mill)** the common feeling was that sustainability is high on their agenda. In the Dorothy Stringer session it was suggested that solar powered public street lighting and wind turbines (on the Downs) are a good idea. In the Blatchington Mill session it was suggested more waste reduction and recycling is needed.

Site Allocation Preferred Options Consultation

Written responses to Spatial Issue 14 – renewable energy included support for the principle for renewable energy sources, provided this did not have a detrimental impact on the surrounding housing (both existing and proposed new housing) or stifle regeneration. A number of contributors stressed the need for a flexible approach that allows for responses to different locations, visual impact of technologies and development sizes. The need for placing energy efficiency at the forefront and using S106 to secure sustainable features was also mentioned. Some considered that potential for CHP (combined heat and power) units should be further explored. One participant suggested the production of policy guidance on micro generation. Shoreham Harbour (CHP), Circus Street regeneration (CHP), Brighton Pier, University of Sussex (CHP), Brighton Marina (marine power) City College, London Road/Lewes Road and Brighton Station were mentioned as sites with potential for renewable energy generation depending on the kind and use of technologies. National Park (AONB) was not the best option for wind turbines.

Responses to Spatial Issue 14 – renewable energy

The **Advisory Panel on Renewable Energy** indicated that identification of sites for large-scale renewable/sustainable energy different parts of the city will depend on geography, topography, micro-climate,

ecology, designated area status and environmental impact of technologies upon air quality and neighbourhood amenity. The use of different technologies or combinations of technologies will follow from that. However, in general:

- Brighton Marina and Shoreham Harbour are considered the most promising sites for the implementation of large-scale marine, wind and CHP technologies;
- existing large-scale buildings with boilers such as hospitals and large office buildings (particularly council offices) as having great potential for incorporating CHP technologies;
- the South Downs was not considered a realistic option for large-scale wind resource; and
- off-shore wind farm is an option that could be explored by the local authority.

CP2 URBAN DESIGN

Formal Responses (UDC1 standard, design and density of development, UDC2 city wide urban design framework)

UDC1 (standard, design and density of development) – There were 27 responses. Overall this proposed option was generally supported to varying degrees. The Lewes Road and London Road corridors and the Marina were largely supported as suitable for taller buildings. Some respondents supported higher densities in the built up area generally but were opposed to tall buildings whilst some respondents objected to tall buildings in particular areas, especially along the seafront. Reasons given were the inability of the transport infrastructure to cope; the adverse impact on pedestrians, cyclists and air quality; and inappropriate visual impact on the landscape. Care was urged if tall buildings are proposed in the Hove Station area. Three respondents considered the policy too restrictive in terms of areas and in relying on key strategic views. It was suggested that Shoreham Harbour and Station Road/Boundary Road should also be included as tall building areas. One respondent felt that 6 storeys or 18m is an arbitrary figure. One respondent stressed the importance of a vision for the city's skyline and seafront. One respondent stressed the importance of tall buildings being mixed use, not just residential. English Heritage drew attention to the revised guidance on tall buildings due to be published jointly by English Heritage and CABI.

UDC2 (city wide urban design framework) – There were 11 responses. This proposed policy was largely supported. The council was urged to be visionary and not be restrictive on appropriate uses. The Police urged the addition of areas of improved design to prevent crime and anti-social behaviour. One respondent thought that the priorities listed

under category 2 (c) are too restrictive for a 20 year period. One respondent wished to see reference to open space in this policy.

Consultation Events and Workshops

The **Area based events** did not specifically discuss urban design but there was acknowledgment in the central area event that there is scope for increased height and density in the Lewes Road and London Road corridors as part of mixed use development. The east area event also supported tall buildings in the Lewes Road corridor and noted that Eastern Road needs physical improvements. At the **Economic Partnership Sites and Premises Sub Group** events, one workshop agreed that there is a need to ensure new developments exhibit a high standard of architecture, with incentives for developers to promote it. At the **Spectrum** event concern was expressed about high density developments and impact on light and space.

CP3 PUBLIC STREETS AND PLACES

Formal Responses (UDC3 public realm, PST5 urban realm and transport schemes, S1-S4 Safer City preferred options, H4 Healthy food options)

UDC3 (public realm) – There were 11 responses. This proposed policy was largely supported. Two respondents considered that tall buildings can aid legibility in the public realm by acting as landmarks. Brighton & Hove Arts commission stressed the importance of art and artist led design to the urban realm. One respondent mentioned the need to take account of the Public Space Public Life Study. One would like to see greater emphasis, and clarity, on accessibility for the disabled in the policy. One felt that the priorities are unduly specific for a 20 year period. One respondent considered the wording ambiguous and therefore objected, but did not explain why.

PST5 (urban realm and transport schemes) – There were 5 responses. Three responses supported the proposed policy. The other respondents questioned why the proposed policy was there and noted that there was no reasoning for it in the preceding pages and that it had failed to address issues of east-west connectivity and severance.

S1 – S4 (safer city preferred options) – Brighton & Hove Arts Commission referred to the positive role of culture in creating safer community and public spaces, through lighting schemes for example, by working with local users.

H4 (healthy food options) – 8 responses. The PCT confirmed that city design makes a contribution to health outcomes. One respondent commented that the development of healthy streetscapes is closely linked to the provision of healthy living options and that public spaces should encourage community and human interaction. One

respondent referred to the need for more benches/seating facilities in public places.

Consultation Events and Workshops

The **Area based events** did not specifically discuss public realm issues but the **Older People's Council** event stressed the importance of accessibility and designing for the elderly in the public realm. This was also mentioned in the **BME Elders Forum** event in relation to lack of seating around Churchill Square. This forum event further mentioned the poor appearance of Pool Valley. Children and young people at the **schools** events particularly commented on the poor appearance, and lack of lighting, of the Marina public realm around the cinema/car park area. At the **Retail, Culture and Tourism Advisory Panel**, the representative from Tourism South East suggested that environmental improvements in St James's Street, linked to pedestrian priority measures, should be considered to enhance the tourism offer.

CP4 HEALTHY CITY

Formal Responses (H1 -H4)

Most comments broadly supported the policies but several sought minor amendments to wording:

H1 Health Impact Assessments (6 representations): General support

H2 Health and community facilities (11 representations) General support, comments sought reference to accommodating larger GP practices and Poly clinics, ambulance service needs, the contribution to healthy lifestyles of cultural facilities (e.g. dance) and BME groups noted the need for appropriate cultural facilities for different cultural communities.

H3 Promoting healthy and active living (13 representations) – Majority supported policy, comments sought reference to importance of biodiversity, spots, walking and cycling, access to countryside and open space contributing to health. Others requested amendments emphasising access issues; **SPECTRUM** sought LGBT healthy living/support centre.

H4 Allotments and farmers markets (8 representations) – general support but comments sought strengthening of protection of allotments and possibility of expansion; reference to securing relocation of allotments. One respondent sought reference to redeveloping unused allotments.

H5 Community facilities in deprived neighbourhoods - five representation of support, one respondent sought reference to access to play in all areas lacking access to public open space not just deprived neighbourhoods, others sought reference to access to green open space and biodiversity.

Consultation Events and Workshops

SPECTRUM sought an amendment that developer contributions for community facilities for communities with demonstrable levels of unaddressed need should not exclude, by default, non-geographically based communities of interest within the city, also provisions for an LGBT Healthy Living centre and accessible meeting/cultural spaces, (e.g. day care centres and surgeries) in a safe environment relevant to different cultural communities with culturally appropriate food, games and reading material. The **Area based event** (West) noted the shortage of health facilities in Hove and difficulty of getting to them, Hove Station area has potential to house health facility, encouragement to look at co-location of facilities (e.g. Health with the Children's Centre on Sackville Road). Lack of GP surgeries, the potential for co-location and the need to ensure facilities are provided north of the railway. The inclusion of health and well-being in the Core Strategy was welcomed by members of **MOSAIC**. Some individuals mentioned that there were not enough culturally appropriate facilities in the city and that this needed to be reflected in the document. Examples mentioned were doctor's surgeries and Day Care Centres, where the provision of culturally appropriate food, games and reading materials (e.g. newspapers aimed at minority ethnic people) would contribute to making people feel welcomed and at home. Some individuals mentioned that Brighton had a big drug problem that it needed to deal with, both in terms of preventative work and education, and in terms of treatment and advice options available to those addicted to drugs. Free provision for the elderly was seen as very important issue, pensioners can't afford entry prices, on top of transport costs. The **BME Elders Forum** felt that there should be more free and accessible sports facilities. The older population have contributed a lot to the city and this should be better recognised. They welcomed the provision of walk-in surgeries. **At the LSP Development Morning** - one group felt that health inequalities to be a significant issue for certain areas of the city (East Brighton) and for certain groups – gypsies and travellers. Good to see the LDF's recognition and support in this area. Also there was a need for healthy local food, should take into account the specific dietary needs of the BME diets. The other group felt that it was important to promote healthy lifestyles. Health is a major aspect that should feature specifically in objectives. The role of walking and cycling should feature as a strategic objective. At the **Older People's Council** session it was raised that sheltered housing including new developments is not located in the easiest places for accessing buses. Nursing homes are closing. Older people are living longer and need support to get out and about. New schemes should deal better with public transport issues.

CP5 BIODIVERSITY

Formal Responses (OS3 City-wide open space framework and the promotion of biodiversity)

Of the 11 representation, there was general support for Preferred Option **OS3 City-wide open space framework and the promotion of biodiversity conservation**, more general comments on open space which related to biodiversity fell into six categories but the common objection was that biodiversity had not been adequately addressed in the Preferred Options document:

- Development should prevent harm to local biodiversity in accordance with Biodiversity Action Plan objectives and biodiversity policies in the South East Plan. Brighton & Hove should be monitoring its contribution towards the national BAP objectives.
- Biodiversity is highly mobile, and cannot be conserved exclusively in predefined areas. Therefore opportunities for biodiversity and habitat enhancements at a range of scales need to be identified and realised.
- All development should result in net biodiversity increase, not only “major” schemes.
- Biodiversity should be enhanced by actively creating and managing for greater connectivity. This should take account of the urban fringe, the council’s Downland Initiative, interconnected urban green spaces and urban fringe land.
- Policies should promote improved access to, enjoyment of, and understanding of biodiversity and should recognise the value of urban biodiversity for promoting community cohesion and quality of life.
- Developer contributions are likely to be crucial to the successful delivery of the Green Infrastructure Network and Local Biodiversity Action Plan.

One respondent felt that the core strategy had failed to address the biodiversity policies in the draft South East Plan, in particular Section D5 and NRM4.

In relation to Preferred Option **PRE1 (need for high sustainability standards)** it was felt that more could have been said regarding gains in ecological properties and it was suggested that the Core Strategy should include a policy that requires all developments to conserve and enhance the natural environment and biodiversity, including the delivery of a network of accessible, natural green space (Green Infrastructure Network) and Local Biodiversity Action Plan objectives.

No specific comments relating to biodiversity conservation were made at the consultation events.

CP6 OPEN SPACE
CP7 SPORTS AND RECREATION

Formal Responses (OS3 Preferred Option OS3 City-wide open space framework, OS4 enhancing open space provision through new development)

There were 11 representations and general support for **Preferred Option OS3 City-wide open space framework**, key issues related to:

- Lack of a completed open space audit to inform the preferred option
- The need to avoid OS3 becoming a catch all policy to prevent development of any greenspace regardless of quality or future commercial needs
- The need to make open spaces more existing and interesting, and to minimise anti-social behaviour and promote safety.
- The need to recognise the value of private open space visually, for wildlife and for enjoyment and pride in the city.
- Role of careful management and enhancement of nature space to maintaining ecosystems and to meet the aspirations to become an Urban Biosphere Reserve.

There were 11 representations mainly supporting **Preferred Option OS4 Enhancing open space provision through new development**.

Comments related to:

- The need to complete the open space audit and produce a Developer Contributions SPD
- Need for green and open spaces with higher housing density to provide leisure and sport facilities, lack of new provision could increase recreational use of AONB.
- The one objection related to the need for a balance to be sought between the overall benefit of providing residential development and lack of open space provision.

Other general OS comments were:

- Would welcome the move towards an urban design led approach to assessing the need for open space requirements and enhancements. Current approach can work against the delivery of high quality, high density schemes.
- Important to take into account the links between city open space and the surrounding countryside, rather than purely focussing on the urban element.
- Support for better public access to the countryside, particularly for disabled and elderly people.

- Whilst important to safeguard environment and open space it is equally important to measure potential for economic gain for allocating sites for employment uses in current climate of businesses struggling due to lack of sites.
- The open spaces study should take greater account of the intrinsic virtue of the shingle beaches and prevent development encroaching onto them.
- Consider in more detail the areas with inadequate open space and seek to address that through planning agreements for the creation of new and enhancement of existing green spaces.
- Regard should be to Natural England Guidance and Public Space Public Life Study

Consultation Events and Workshops

Various comments relating to open space, sport and recreation were made at the consultation events. Some participants at the **Area Based Event** felt that the central area and shopping areas could benefit from additional leisure facilities, others felt care needed to be taken to ensure facilities were not all centralised so that everyone had access to leisure facilities within their neighbourhood including the elderly, disabled and young people. Mixed use development should include open space provision. In the East of Brighton participants felt there is need for youth facilities in areas for development. The **BME Elders Forum** felt that parks do need to be made safer, for everyone, to feel that they can go there. Elderly people enjoy parks and there needs to be more visible patrol in parks. Free leisure provision for the elderly was seen as very important issue, pensioners can't afford entry prices, on top of transport costs with the example of the new sports centre at Croyden cited. Members of **MOSAIC** felt that the city has parks that are generally well-maintained but these are not well-utilised by all sections of the community. An example was given in Hastings (Alexander Park), where the council organises events and activities to take place in it every month. In Brighton, such activities could include running health eating promotions. It was noted that parks tended to be used by 'middle class' families and that more outreach was needed in order to get families of all backgrounds to see the park as a resource for them also. Finally, it was noted that more free toilets were needed in parks. A member of **SPECTRUM** raised concern with high density developments, the need to ensure that light and space is maintained. At the **LSP Development Morning** one participant noted that in the outer areas need to make more of access to the Downs and put rural edges to greater use for walking. Parks and outlying areas need outside space for young people to hang about. At the **Older Peoples Council** session one participant raised the issue of football pitch availability, especially for younger teams who are squeezed out by the older players. At the **Economic Partnership Sites and Premises Sub Group** - it was considered

by one group that there are sites where if development was allowed adjoining green space the space could be improved as a green park. The city needs to do more to attract visitors to the city during the week as well as weekends – needs other facilities such as an Ice Rink, etc.

Site Allocations Issues and Option consultation – Open Space Advisory Panel

- The need for open space to be completed to inform approach.
- Mix of views as to whether new/ sites facilities are required or whether people make use of access to multi-functional open space.
- Some suburban areas/ deprived areas – many residents are not making full use of open space/ proximity to Downs/ countryside.
- Innovative provision should be sought when trying to increase capacity, not just rely on artificial pitches.
- Avoid 'sporting deserts' by natural planting/ features. Natural England standards for residents to be within 300m of a natural green space.
- Developer contributions could be spent on 'naturalising' sites to increase recreational/ sporting capacity of site and also for community play/sports warden to raise awareness and use of open space.
- Provision for children not necessarily equipped playspace – needs to be safe and welcoming.

CP8 SUSTAINABLE TRANSPORT

Formal Responses (PST1-PST5)

PST1 Sustainable transport strategy – 18 responses were received and respondents generally supported the sustainable transport policies although there was concern that over intensification of development could attract more private car journeys and worsen the environment for pedestrians and cyclists. Developers supported sustainable transport improvements to serve their development schemes. SEERA sought greater expression of support for Regional draft policy T3 regarding "spokes" to adjacent areas.

PST2 Contributions to sustainable transport facilities – 9 responses received, four of which support the option and sought increased awareness of links outside the city and the need for financially sustainable transport; two representations of partial support seeking assurances regarding support for cycling and walking in the urban fringe giving access to the AONB/ proposed National Park; and three objections. The objections were to the current operation of sustainable transport contributions, sought under existing Local plan policies, rather than to the principle of contributions. The second were from a developer seeking reassurance that transport contributions would not

prejudice the viability of new developments. The third raised concerns of east-west connectivity and severance across the city.

PST3 Transport assessments – 8 responses were received including 6 of support and two objections; from a developer seeking reassurance concerning the scope of contributions for sustainable transport and concerns of east-west connectivity and severance across the city.

PST4 Road safety and air quality measures – 15 responses were received 5 of support, 5 of qualified support and 5 objections. Supporters considered that cycle transfer should be facilitated and that Park and Ride would cut pollution and congestion and reduce CO₂ emissions thereby improving air quality. The opponent of Park and Ride considered that it could lead to congestion and extra traffic in the urban fringe. Partial supporters were concerned that more than half of visitors/locals still use and need a car which could be kept out of the town centre by effective Park & Ride and other transport modes but that the operation of car parks and parking fines should not be seen as a fiscal measure but seen as a way to encourage visitors. The bus operator noted that 'essential business traffic' may need regulating and enforcement if it impacts on traffic flow of public transport. Network Rail considered that the idea of Rail Transfer Station was proactive in its concept, but requested that a greater explanation of rail transfer stations should be provided since its primary role is to maintain the railway infrastructure and it might not be in a position to fund freight transfer.

PST5 Public realm – Five representations were received to preferred option PST5, three of support and two objections; the option did not relate to transport section and concerns of east-west connectivity and severance across the city.

Consultation Events and Workshops

At the **Area Based events** the following comments were made; the rail network could be better used, more/moved stations to serve the north of the city more effectively. City centre congested and east-west transport links need improving. Too much traffic around the RSCH. Need to take development pressure off seafront and A249. Difficult to get around Hove by public transport and the railway acts as a north-south barrier. 'Rat runs' and traffic issues around some industrial areas in Portslade were also mentioned. Members **of MOSAIC** viewed sustainable transport as the key priority. Parking is a problem; buses are expensive with real time information less available in East Brighton. There should be more night time buses and better weekend train services between Brighton and London. The **BME Elders Forum** felt public transport had improved and free bus travel helped to go shopping in the city centre. There was need for park and ride. At the **SPECTRUM** event it was felt that greater thought should be given to the route of night time buses – going through unsafe areas e.g. West Street.

At the **Economic Partnership Event** one group felt that transport was a major issue; need greater synchronisation between major projects and transport infrastructure; park and ride (3 sites north, east and west) is essential to the future success of the city in terms of business and tourism. Another group felt the city centre office developments still need car parking provision and development opportunities should be on sustainable transport corridors. At the **LSP Development Morning** – transport was the focus of one group's discussion. Several were concerned that increased densities would lead to greater traffic and there is not enough road space or parking space. Others felt that public transport should therefore be improved, better public transport links to outlying areas rather than relying on cars. At the **Older People's Council** session the need for new development schemes to deal better with transport issues was raised. There was concern that in 20 years time the city's road would be gridlocked. There was support for park and ride. At the Schools Feedback sessions the need for more and cheaper bus services and better real time information was raised. An issue of road safety was also raised – better pedestrian crossing and safer cycling.

CP9 DEVELOPER CONTRIBUTIONS

Formal Responses (DC1-DC2)

DC 1 Developer Contributions Priorities (7 representations) - General support for the principle that developers should contribute towards providing the necessary physical, social and community infrastructure:

- Support for links with policies (EQIA), and necessary development across the city.
- Support for evidence base of current sports provision and a Playing Pitch Strategy.
- Support for contributions that will be crucial for the successful delivery of the Green Infrastructure Network and Local Biodiversity Action Plan, and improved access and interpretation in the countryside.
- Suggestion for contribution towards strategic transport rail links.
- The need for compliance with government guidance and recognition of the need to achieve a balance between aspirations of investment within regeneration areas and potential benefits arising from such proposals.

DC 2 Developer Contributions approach (16 representations and 6 more general DC related representations) Support generally on ensuring contributions are secured and identified within an SPD:

- Support for cultural facilities requirements identified in SPD.
- Need for completed open space audit to support developer contributions for open space and sports facilities.

- Concern that funding for utilities infrastructure from new development should be sought from developers rather than burdening existing customers with increase in charges.
- Objection to any blanket approach to developer contributions and that these should not affect viability.
- Network Rail felt that where it has been identified that rail patronage has increased as a direct result of new developments contributions to transport links including station enhancements should be sought. Would also welcome the commitment of the council of pooling planning obligations from numerous developments to mitigate their combined impact upon the railway.
- The PCT objected, they felt that if would be more effective for health care provision if in key areas, the council reduces affordable housing requirements and insists on adequate space being made available for a large GP surgery.
- The Brighton & Hove Housing (RSL) Partnership felt a lower tariff should be set for affordable housing to reflect the lower development values and because it services the needs of existing residents rather than newcomers. To incentivise affordable housing provision they propose for change of use sites which deliver 100% affordable housing, commuted sums should be waived and for standard projects, tariff set should not undermine the overall development viability.

Consultation Events and Workshops

At the **LSP development morning** it was suggested that developer contributions should be used to fund these community facilities such as playspace. At the **SPECTRUM event** it was felt that when developer contributions are considered for major new developments, space for community facilities be sought for communities with demonstrable levels of unaddressed need where a shortfall of such facilities has been identified. This might focus on geographical communities within areas of social and economic deprivation, but should also seek not to exclude, by default, non-geographically based communities of interest within the city by focussing solely or even primarily on a neighbourhood approach to services. Developer contributions should be supported by planning policy development, subject to proper consultation with the communities of interest around their specific needs, and based on available statutory and community research.

CP10 MANAGING FLOOD RISK

Formal Response (PRE3 Managing Flood Risk, SS1 Spatial Strategy)

PRE3 Managing Flood Risk:

Of the seven representations, 6 supported the preferred option to manage flood risk.

- However the Environment Agency objected to **SS1(spatial Strategy)** as it did not demonstrate how the selection of broad locations has been informed by the sequential test (particularly the location at Brighton Marina) and therefore had major concerns regarding the soundness of the Core Strategy and the Sustainability Appraisal. Their objection was on the grounds that no SFRA has informed the options and the sequential test had not been applied to the selection of broad locations. The SFRA should be used to inform the broad location of development in the Core Strategy and the location of sites in the site allocations DPD and other LDDs at the preferred options stage. A flood risk assessment (FRA) should be undertaken prior to any re-development due to the risk of flooding in the Shoreham Harbour area.
- Southern Water suggested that new development tends to extend the area of impermeable ground, which can increase the risk of flooding as a result of higher total and peak run-off. Development must therefore incorporate suitable arrangements for surface water drainage to minimise the risk of flooding and to ensure that the risk of flooding is not increased elsewhere Also that in locations where SUDS are not appropriate all new development should drain surface water separately from the foul sewerage system, to provide for more efficient use of the foul sewer, and reduce the risk of foul water flooding. This is consistent with PPS25, Annex F, and The Interim Code of Practice for Sustainable Drainage Systems, published by the National SUDS Working Group, July 2004. Southern Water would welcome the opportunity to comment on the detailed policy text before the document is submitted to the Secretary of State.
- One respondent was concerned about the capability of the infrastructure, such as water and sewerage; to cope with the increase in development, suggest this may be should have been addressed in the preferred options.
- SEEDA felt it would be useful if the Core Strategy had a commitment to minimise pollution and to actively seek improvements in water and air quality and to reduce noise pollution, in line with policies NRM1, NRM2, NRM7, T1 and NRM8 of the draft South East Plan.

No comments were raised on this issue at the consultation events.

CP11 HOUSING DELIVERY

Formal Responses (AH1 New housing provision, mix and standard, AH2 Necessary facilities to serve new developments)

AH1 New housing provision, mix and standard (24 representations) - consultation demonstrated a wide acceptance that the city should

plan to meet its own future housing needs. The proposal to provide new housing in accordance with Regional Spatial Strategy requirements was generally well supported at the Preferred Options stage. There was a general acceptance and understanding that the overall target for new housing development for Brighton and Hove as set out in the South East Plan was a requirement providing the appropriate context for the amount of new housing development over the plan period. The development industry expressed concern that there should be some flexibility for the market itself to determine the appropriate mix of housing types and sizes in individual schemes and that PPS3 housing mix and type policies could be too stringent and inflexible. Some specific groups were identified for special consideration, for example, the housing needs of students and the elderly.

AH2 Necessary facilities to serve new developments (11 representations) was generally well supported and people expressed strong concerns regarding the need to provide/secure physical and social infrastructure that new residential development creates additional demand for (see also CP9 Developer Contributions).

Consultation Events and Workshops

At the **area-based events**, those in the central and east areas both raised concerns with student housing. The need to ensure there was more provision near the campuses to avoid over-concentration in Lewes Road and to avoid conflicts with families living in Coombe Road/ Bear Road neighbourhood. In the West area workshop there was concern about the loss of family houses to flats in Hove and that housing sizes were getting smaller. **SPECTRUM** felt that the Core Strategy needed to think about the provision for young, old and for LGBT families and also to recognise that elderly men are unhappy in mainstream sheltered housing as they often are excluded and face homophobic behaviour. At the **LSP development morning** one workshop discussed the need to improve housing tenure and type. The **Older People's Council** response to the Core Strategy raised the concern of the location of sheltered housing, the need for these to be located in areas easily accessible by buses. Another suggestion was that families should be encouraged to move to areas with appropriate family housing e.g. Whitehawk to give a better social housing. There was also a concern about the impact of student housing on family housing. At the feedback session with **Blatchington Mills School**, it was felt that the city needed more places for homeless people.

Site Allocations Issues and Options Consultation - Advisory Panel Meeting - Housing and Major Mixed Use Site Development

- Mixed use development provides good opportunities for further residential development within the city but city centre sites don't often lend themselves to securing family-type housing and associated facilities. PPS3 requirements may help to strengthen negotiations for securing a more diverse mix in residential development.
- Issues regarding the form and mix of housing – matching this to household types and what people want. Difficulty regarding the provision of family-sized dwellings in high density developments – which are frequently flat/apartment type. Raises the question of low/medium density development on the urban fringe.
- Issues regarding open space quality and use – consider whether there are situations where some open space could be lost and/or reorganised and residential development intensified alongside improvements to public open space.
- Flexibility on employment sites may not always be advantageous in terms of residential enabling development – all associated policy requirements may render residential development not helpful. Need to retain some of the 'not so shiny' employment premises – provide for services/business that help the city to function.
- Issue of student accommodation – needs to be taken account of alongside other housing/accommodation demands in the HMA. Providing bespoke student accommodation could free up family units within existing housing stock but need to consider how to encourage provision.
- Residential development in outlying/neighbourhood areas – in order to change image, raise profile and secure greater mix in terms of tenure balance may need to consider a waiver on affordable housing requirements. However, the need for key-worker housing for young couples/families is also a factor to consider (recruitment issues facing health/education organisations).

CP12 AFFORDABLE HOUSING

Formal Responses (AH1, AH3 and AH4)

Preferred Option AH1 New housing provision, mix and standard (24 representations) consultation demonstrated a wide acceptance that the City should plan to meet its own future housing needs.

Preferred Option AH3 Allowing 'flexibility' on some employment sites to allow enabling residential development (8 representations) was generally well supported at Preferred Options stage as this would help secure additional affordable housing for the city. Any enabling residential development on employment sites, like all residential development, would be subject to policy requirements for affordable housing. Some groups felt that if this helped avoid some sites remaining

undeveloped for long periods of time this would be an advantage. Brighton & Hove Economic Partnership and Sussex Enterprise were concerned that there should be no net loss of employment land/space in enabling schemes.

Preferred Option AH4 Increase proportion of affordable housing from new sites (24 representations) - there was strong support for a higher percentage of affordable housing (higher than the current adopted local plan policy which seeks 40% affordable housing on appropriate sites) and also support for smaller schemes making provision towards affordable housing from many local community groups and individuals. The development industry had strong concerns regarding development viability and delivery issues should a higher percentage be proposed. Other groups were concerned that affordable housing is not really that affordable and that a lower percentage requirement might make the affordable housing more affordable. The developing RSLs (Registered Social Landlords) in the city expressed particular support for the current local plan target of 40% which has enabled the delivery of significant amounts of affordable housing and is now clearly accepted by the development industry in Brighton and Hove. They believe a higher percentage would undermine viability (and confidence) at individual scheme level and reduce the overall amounts of affordable housing gained across the city. This group also support commuted sums for smaller and have indicated that they would support higher levels of affordable housing on employment sites.

Consultation Events and Workshops

At the **Area-based Event**, the central area workshop felt that the council should go further than its 40% requirement for affordable housing. At the East area workshop it was felt that the Eastern Road area needed more affordable housing and an empty buildings strategy to bring more buildings back into use. **MOSAIC** interviewees agreed with the focus of housing and affordability in the core strategy. However they felt not enough was being done to address the housing problem and making cheaper housing accessible to all. Many families are finding it difficult to access affordable accommodation large enough for their needs. The **BME Elders** had concern with private developers providing affordable housing, and whether in the long-term they would remain affordable. There should be flexibility so that families could move to smaller houses if they wanted and there should be new council housing. **SPECTRUM** supported the preferred option on affordable housing as this has a big impact on LGBT community - particularly young people moving into the city. There is a myth of the pink pound; housing inequality is a problem for the LGBT community. There was also a concern that new HMO legislations may result in a decline of provision.

CP13 HOUSING DENSITIES

Formal Responses

No specific preferred option on housing density was included in the Preferred Options document but the supporting text to the **Spatial Strategy (SS1)** and **Preferred Option UDC1** addressed the issue of raising density. Responses to **Preferred Option AH1** are also relevant.

SS1 Spatial strategy – the general approach of raising density on brownfield land in then city, and of identifying key areas for significant development at higher density, was broadly supported.

UDC1 Standard, design and density of development- the general approach of raising density within the built-up area of the city was largely supported, subject to a mixed-use approach to major sites.

AH1 Housing provision, mix and standard – planning to provide new housing to meet the target set for the city in the draft South East Plan was largely supported. Securing an appropriate mix of accommodation in terms of type and size was also largely supported, though the development industry want to ensure that there is some flexibility for the market itself to determine the appropriate mix of housing types and sizes in individual schemes. Several respondents stressed the need to provide sufficient family homes. One respondent referred to the need to reflect Government guidance on housing density levels.

CP14 GYPSIES AND TRAVELLERS

Formal Response

At the Core Strategy Preferred Options stage (November 2006 – December 2006), the City Council approached representative groups for advice regarding appropriate and effective ways to involve gypsy and traveller groups in the consultation process.

Preferred Option AH1c was supported the national organisation Friends, Families and Travellers (FFT) based in Brighton. FFT advised the council that it would be more meaningful to engage with gypsies and travellers once potential sites were being considered. FFT also advocate a separate Development Plan Document specifically for gypsies and travellers and a more pragmatic approach to site identification allocation.

CP15 RETAIL PROVISION

Formal Response (R1 Retail)

Whilst out of the 32 representations to **R1 Retail** there was support in general for the city's existing hierarchy of shopping centres, with regular monitoring to check their performance and ability to serve their purpose and support for new development within the boundaries of our shopping centres:

- One respondent queried whether it was appropriate to focus significant retail development to Brighton Regional Centre at the expense of other centres;
- Another respondent queried whether London Road Town Centre should be re-designated as the northern part of Brighton Regional Centre.
- The suggestion of designating a new district centre in the area including and surrounding the Co-op/ Coral Greyhound Stadium on Neville Road, North Hove was also put forward by another respondent.

There was also:

- Support for a sustainable mix of shops and other uses, avoiding major concentrations of other uses such as restaurants and cafes.
- Support for a sustainable network of local centres and parades to allow local communities equal access to fresh food and services.
- Support for larger new shopping units in Brighton Regional Centre, possibly through the expansion of Churchill Square in conjunction with the Brighton Centre redevelopment, with a need for more department store representation.
- The need for any new edge or out of centre retail development to be assessed in accordance with the national guidance on Planning for Town Centres – PPS6.
- One respondent suggested that support should be given to proposals for new retail floorspace in other locations (including retail parks) that are accompanied by improvements to public transport and accessibility.
- Concern regarding City Centre parking provision associated with future new retail development.

Consultation Events and Workshops

The retail issue was not widely discussed at the events. At the **Area-based Event**, the west workshop felt that there needed to be better opportunities to serve the people in the north of Hove, and the potential for shopping areas on the fringe to strengthen neighbourhoods (especially for older people) by providing more accessible local facilities. At the **BME Elders Forum discussion** it was noted that the BME community had some of the healthiest form of cooking – one member welcomed the commitment to support local food and allotments. At the **SPECTRUM** event, one attendee felt that the role of St James Street shopping area should be emphasised and

the importance of sustaining its leisure, retail and business role should be acknowledged and recognised in the Core Strategy. At the **LSP development morning** one workshop discussed whether outlying areas should be more self-contained with local shops for everyday convenience needs or whether people would use them. There was a similar discussion at the **Older People's Council** feedback session. At the **schools feedback session**, children from Dorothy Stringer School also raised the importance of using local shops but also that Churchill Square could be improved with more benches and landscaping.

Retail and Tourism Advisory panel:

- Brighton Centre redevelopment does provide potential for retail in conjunction with Churchill Square – there is demand for additional retail space in Churchill Square and a department store.
- Opportunities in regional centre are limited and must not be isolated. Possible opportunities included West Street, Bartholomew Square, Black Lion Street and Western Road.
- Independent retail role of North Laine needs to be protected.
- Before new retail site opportunities need to have a cohesive transport strategy. Need for park and ride.
- Recognised linked tourism and retail trips made to the regional centre.
- Need to spread retail growth between Hove, Brighton and Marina with a clear strategy.
- London Road – opportunities for new retail formats and niche formats.
- Hove Town centre – becoming more attractive - viable for a department store opportunities limited although unless Hove Town Hall became available.
- Retail warehouse opportunities along Lewes Road e.g. Pavilion Retail Park.
- Seafront – there were seen to be opportunities for retail – arches and redevelopment of West Pier. However this needs to be balanced with tourism/ leisure opportunities and there were considered to be poor links between the seafront and shopping areas.
- St James Street and Portland Road were also seen as having opportunities more intensified retail development.

Responses to Site Allocations Issues and Options Document - Responses to Spatial Issue 13 – finding new sites for retail development

New retail facilities should be focused at the **city centre**, around Churchill Square/Western Road, including consideration of the redevelopment of the Brighton Centre site and Russell Square car park. One respondent (Standard Life) noted that focusing major retail development in Brighton City Centre is key to maintaining its role as a

primary town centre and regional hub, especially in the face of competition from centres such as Crawley. The redevelopment of the Brighton Centre was supported in this respect, and should be identified as the preferred location for major new retail development. Large retail development in other centres in Brighton would be resisted in accordance with the 'scale' arguments set out in PPS6. The only appropriate location would be in the city centre, reinforcing the attraction of Churchill Square.

Potential for **London Road, Lewes Road and Hove town centre** to increase the density of their retail floorspace. One respondent notes that concentrating development on the London Road/Lewes Road Corridors could increase pollution, parts of which are already AQMAs. Support for prioritisation for AAPs for London Rd/Lewes Rd. Several respondents would like to see a new department store. One suggested that premises already exist, e.g. Co-Op London Road. Many stated that the redevelopment of the Co-Op site with retail-led mixed use should be supported. St James's Investments responded that the northern part of London Road centre would be most appropriate for department store or large foodstore to provide regeneration and key attractor, and again suggested the potential to re-designate the centre as the northern part of Brighton regional centre.

Lewes Road - small sites regularly become available in this area, and would welcome initiatives to improve the variety and quality of retail in this area.

The Marina is an appropriate place for new retail floorspace. The proposed Asda redevelopment and other new units will help enhance its district centre role.

There were mixed views on the need for **out of town retail opportunities**. Some felt that the council should recognise the role that existing out of centre facilities play in serving local communities, such as the Co-op at Nevill Road, and consider designating such areas into the retail hierarchy. Cathedral Group was keen to establish that Circus Street has the capacity to accommodate an element of retail provision as part of a mixed use regeneration scheme. Legal & General noted that due to high capacity and limited sites, the council should consider well connected edge or out of centre sites such as existing retail parks, such as the Gallagher and Carden Avenue Retail Parks, where accessibility could be improved for no-car modes, improvements to the design of existing buildings and more retail and other uses intensifying the use of the sites.

Whilst Adur District Council commented that there are a number of retail outlets on the A259, which generate traffic and new retail

development should be located within existing centres. The Highways Agency felt that large scale out of town development would not be appropriate in terms of sustainable development principles. Others could not see the need for further retail park type developments. Preston Barracks was considered as an appropriate location for retail development in order to enable successful regeneration (Crest Nicholson/Hyde).

CP16 STRATEGIC EMPLOYMENT SITES

Formal Responses (E1 protecting employment sites, E2 new office floorspace, E4 encouraging flexible affordable business space)

- **E1 - protecting employment sites** (12 responses) – enabling development is critically important for regeneration sites. Suitable enabling development must be identified in the Site Allocations DPD; Greater flexibility; if it is shown that there is not sufficient financial return to invest in poor quality stock or if there is little real demand for occupiers then alternative uses should be considered; should be more no restrictions on moving between different use classes relating to employment which allows the city's stock to meet the demand of employment space uses on a flexible basis. This would prevent market restraint and enhance the sub-region. The clause prohibiting enabling developments from prejudicing other businesses in the vicinity was not supported by the Economic Partnership.
- **E2 new office floorspace** (11 responses) - of two who objected it was suggested that the: preferred option should indicate the broad locations considered for new employment and regeneration to include Shoreham Harbour, this should provide a clearer policy steer; compared to the issues raised at the issues and options stage the preferred option is less flexible. Appropriate urban fringe locations can and should serve as a complementary option and can assist in delivering long term needs of the city i.e. business park and mixed use proposals. Of those who partly supported they suggested; potential sites should not blight the existing property, sequential approach should be adopted and factors such as the potential for economic regeneration and the level of market demand for office development in these locations should be considered; should also consider mechanisms for encouraging refurbishment of existing buildings.
- **E4 – encouraging flexible affordable business space** (11 responses) there were no objections but of those that partly supported, the following comments were made: more should be done to support creative industries, provide better jobs and less land intensive,

greater emphasis should be given to them in policy development, site briefs and planning conditions. Mix of business spaces can have agglomeration benefits which should be recognised in LDF.

Consultation Events and Workshops

The **Area-based event** raised employment issues. At the Central Area discussion of opportunities for mixed use development, redevelopment and intensification – many around London Road and Lewes Road. Many office spaces in the city were suggested not to meet current flexible/ technological requirements. The Universities should attract more economic activity. Similar sites were raised at the **Eastern Area** discussion where all use options should be explored. At the **SPECTRUM** event the importance of St. James Street area as the city's Gay Village needed to be recognised. A **MOSAIC** interviewee raised issues around business support, affordable rates, mentoring and support for first time businesses and support for artisans and crafts people. At the **LSP development morning**, the issues of skills training and access to jobs for local people were discussed in particular for East Brighton. Importance of tourism to the economy was raised in one group – making the city an attractive place. It was queried whether there is a role for planning in directing business investment, and whether this city is more a leader than a catalyst in the wider region. It was agreed in one group that planning can help to safeguard the employment sites. Need to ensure small, affordable workspace is protected. At the **Dorothy Stringer Schools feedback** session, the need for work experience and job opportunities to be better advertised was raised.

Responses to Site Allocations Issues and Options Spatial Issue 7 – how should employment land and premises be promoted in the LDF?

There was no consensus on which of the three options should be pursued by the 17 respondents. 2 respondents felt the third option was the most appropriate.

Generally in terms of specifying employment uses, the need for the flexibility in how employment land and premises were promoted in the LDF was most often supported. Several respondents commented that employment functions should be considered in mixed use developments and specific sites were suggested.

With regards to enabling development there were a variety of suggestions; that the market should be left to decide how a particular site comes forward; if there was not sufficient financial return to make reinvestment in low quality stock/ low demand then alternative uses should be considered; that qualitative improvements in employment floorspace could in certain circumstances justify a reduction in the

quantum of employment floorspace. Others were more cautious; adequate employment sites should be protected from conversion; displacement of necessary and existing uses could undermine mixed communities. ESCC suggested that there did not appear to be any justification for allowing enabling development on all allocated sites. There may be sound site planning reasons why a wider mixed use scheme on a particular site but this would be better achieved by specific allocations on specific sites rather than criteria based policy that might lead to an erosion of employment potential in the city. Adur DC felt that the city should not rely on neighbouring authorities for any industrial/ warehouse floorspace needs.

Economic Partnership Sites and Premises Sub-group:

Flexibility of uses was a common theme; the market should not be constrained by use classes. Queried whether there would be future demand for B2 space, B8 had been constrained by Local Plan policies yet these could employ as many as B2 and are expanding. Need space that can be used for different uses. There was also support for enabling development. It was felt to have a role by all of the groups: can take risk out of speculative development, can help on regeneration and renewal sites to deliver housing, jobs and transport. No consensus as to whether it should apply to all or some sites. One group felt that enabling development didn't necessarily mean housing. Housing could end up pricing out employment. Opportunities should be considered on a site by site basis. Another group suggested that enabling consents should be judged against specified criteria.

CP17 OTHER EMPLOYMENT SITES

Formal Response (E3 other employment sites)

E3 – other employment sites (9 responses) one respondent objected to this preferred option: policy should allow the redevelopment of existing employment sites where the benefits outweigh any harm caused by loss of employment sites particularly where there are other employment generating uses proposed. Of those that support/ partly support, clarity was sought: it was suggested that policy should indicated length of marketing; test of redundancy must be strong and evidence based; sufficiently flexible to allow a range of business modes to be. If E1 is not amended to introduce flexibility then the restriction to alternative employment generating uses followed by affordable housing is too prescriptive.

CP18 CULTURE, TOURISM AND HERITAGE

Formal Responses CT1 existing tourism facilities, CT4 cultural quarter and UDC4 historic built environment)

Preferred Option CT1 existing tourism facilities (12 representations) - this option should be widened as a generic approach to cover new cultural/ tourist facilities.

Preferred Option CT4 the cultural quarter (8 representations)- led to a view that only a limited area of the city was perceived as being important culturally and underplays the importance of the cultural and creative industries that exist across the city. Preferred Option needed to reflect role in regeneration projects and strengthen references to cultural/creative industries in the Core Strategy.

Preferred Option UDC4 historic built environment (16 representations) - the proposed policy was largely strongly supported. There was a wide range of individual comments, some expressing opposing views: insufficient reference to contemporary design; need to be flexible about micro-technologies for renewable energy; conservation should not be confined to the 'listed stuff'; in principle conservation should take priority over major development in some areas; and 'conservation creep' should not impede local business enterprise. One respondent felt that the proposed policy does not reflect the positive impact of conservation areas. Also concerned that loss of corner shops and small groups of shops can have very detrimental impact on the character of conservation areas. English Heritage gave detailed comments on refining and clarifying the wording, including the need to reflect the hierarchy of national and local designations.

General – Several respondents felt that the city's potential as a gateway to the proposed South Downs National Park had not been adequately reflected in the culture and tourism section, nor had the need to proactively integrate the city with its rural hinterland and promote and recognise important archaeological sites such as Hollingbury and Whitehawk Hill. The needs of older people should not be ignored.

Consultation Events and Workshops

A **MOSAIC** interviewee raised the need for support for diversity in terms of cultural heritage, skills and capabilities; and ensure more culturally diverse events are accessible to the wider community. Comments at the **Economic Partnership sites and premises event** suggested that the Marina needs more tourism attractions. Some felt the city was not guaranteed to be a tourist destination. It was generally felt that the Brighton Centre redevelopment would help draw international events/conferences to the city but that the city needed to do more to attract visitors to the city during the week, other facilities such as ice rinks were needed. Brighton needed to be a balanced community drawing in people as tourists, visitors and workers. At the **LSP development morning** the importance of tourism to the economy and making the city an attractive place was noted although one

participant queried whether the city could regain its conference trade. Although difficult to manage tourism, higher value tourism was considered to be better. At the **SPECTRUM** event, the role of the St James Street area as the city's 'gay village' and the need to sustain its leisure, retail and business role needed to be recognised in the Core Strategy. The Count Me In survey indicated great support from respondents (80%) for the presentation of LGBT community history. At the feedback sessions with **Schools (Dorothy Stringer and Blatchington Mill)** the common feeling was that there was not much for children to do in the city, they needed more sports and leisure opportunities. The area based events did not specifically discuss conservation issues but the **BME Elders Forum** mentioned the need to clean/restore the Indian Gate to the Royal Pavilion.

Site Allocation Issues and Options Consultation

Cultural/ tourism facilities should be encouraged as part of regeneration schemes and in mixed use developments and located both centrally and spread to outlying areas. One view expressed was that the city needed a range of venues/locations to host and attract leisure and tourism events if this sector is to grow and develop. Measures should be considered that promote and stimulate the cultural and creative economy and the importance of theatres should be better reflected. The Theatres Trust made the connections with former cinemas/theatres and the cultural quarter and suggested an entertainment quarter. More direct reference to the role of the South Downs was suggested alongside the need to ensure more attractive sustainable links to the South Downs and better provision of information and facilities. The idea of adapting existing buildings such as Foredown Tower and Stanmer House to improve gateway facilities to the Downs was put forward. The need to ensure widened access and provision for the elderly and disabled was also raised. One individual expressed concern about the amount of modern architecture in the city and the erosion of the city's historic character; considered that new buildings should all be of traditional design and in traditional materials. Brighton & Hove Arts Commission stressed the important link between the cultural facilities/infrastructure of the city and architecture, both old and contemporary.

Arts and Creative Industries Advisory Panel comments:

- Need to build in flexibility in the plan to manage the change in demand for space from the wider creative industries. There is a role for showcase/ exhibition space/ higher end creative industry space in the city centre. However there is a lack of cheap, vacant workspace/ units for arts, production/ rehearsal space in the rest of the centre.
- Need to consider whether there is a mechanism to allow the temporary uses of spaces and sites in the city whilst waiting to be

developed. Some potential for shared use of community buildings but not suitable for all arts.

- Need to move away from traditional use class approach to protecting employment sites that enable opportunities for arts and creative industries.
- The LDF needs to reflect the principles of the benefits of including arts/ culture within mixed use developments and links to regeneration and public realm.

Retail, Culture and Tourism Advisory Panel comments:

- There is a clear and recognised relationship between retail and tourism in Brighton, trips are often linked.
- Need to be clear about what the city wants to be before thinking about space and sites. For some it was difficult to see the city as a cultural destination, there were not sufficient museum/gallery offer. Others thought there was a lot in the fringes, of the festival but perhaps this was hidden by the image of the nightclub culture and not widely known about compared with Edinburgh. It was discussed whether the city needs to have a regional art gallery. Need to think about more modern, contemporary offer e.g. film. Need to make the most of who lives in the city and need to make existing venues more accessible.
- It was noted that the city's historic architecture is a big tourism draw. It was suggested that environmental improvements in St James's Street, linked to pedestrian priority measures, should be considered to enhance the tourism offer.

CP19 HOTEL/GUEST ACCOMMODATION

Formal Response (CT2 Strategy for Hotel Accommodation)

Of the 6 representations to **Preferred Option CT2 – Strategy for Hotel Accommodation**, the general response was that the preferred option needed to reflect the findings of the Hotel Futures Study (then underway) in order to give people a better opportunity to comment. However some comments were made suggesting a wider spread of hotel accommodation, linked to regeneration schemes.

Consultation Events and Workshops

At the **LSP Development morning** it was suggested that the impact of new hotel developments on existing stock could be unexpected but positive as existing hoteliers would need to invest or diversify in their offer.

Response to Site Allocations Issues & Options Document – Spatial Issue 6 - areas suitable for new hotel accommodation

The following suggestions were made:

- Specific sites should not be allocated; a sequential approach should be followed, with each site identified on its merits which would better reflect and respond to natural generators throughout the city including regeneration areas (Circus Street currently excluded);
- PPS6 guidance should be applied to the selection of all town centre uses including arts, cultural and tourism facilities; new hotels should be retained in the city centre close to visitors and public transport;
- If the provision is well located it could be a resource for visitors to the South Downs and;
- Additional provision to the current Hotel Core Zone e.g. Brighton Station may be a more sustainable solution to parking demand in the Hotel Core Zone;
- Site selection should be informed by up-to-date environmental information, linked with sustainable transport and discourage car use and contribute positively to the city's ecological network.
- One respondent felt that with 4 large hotels proposed/ being development this was sufficient new provision.
- Adur District Council wanted to ensure that Brighton & Hove's hotel strategy takes account of development in Adur and sustainable transport links are essential.

