

Appendix 2 – City Plan: Summary of Consultation Responses

i) Summary of 77 Written Responses

HOUSING DELIVERY

43 representations in total

Option	Respondents	Key issues
Option 1: 9, 800 homes	Support: 1 (2%) South Downs Society	Lowest growth option supported – least impact on the conservation and enhancement of the South Downs – and object to Toads Hole Valley inclusion.
Option 2: (Preferred Target) 11,200 homes Including Toads Hole Valley Strategic Allocation.	Support: 22 (53%). 14 clear support; 8 partial support BHEP, City Employment and Skills Steering Group, Brighton Housing Trust, Brighton & Hove Bus Company, Brighton Society, Hove Civic Society, Adur District Council; NCLA, Roedean Residents Association, CPRE, Kemp Town Society, Kingscliffe Society, JW Cook Estates Ltd & Pecla Investments, a number of individuals, City Sustainability Partnership.	<ul style="list-style-type: none"> • Support for a balance between housing provision and opportunities for economic growth to ensure city does not become a dormitory settlement for other major employment locations (eg. Crawley, London). • Recognition that because the city is tightly constrained it cannot achieve the full extent of projected housing requirements. • Recognition of city's historic assets in terms of architecture and green spaces. • Need to explore wider geographic and economic functional area to help achieve this – through 'duty to cooperate'. • Development should be ambitious in terms of development standards and making best use of site at Toads Hole Valley. Could be scope for more housing. • Question amount of public space required at THV given proximity to National Park and adjacent accessible SNCI.

Option	Respondents	Key issues
Options 3 and 4 13,500 - 15, 800 homes	3 representations clearly support Options 3 or 4 (7%) 1 implies support for Option 4 (2%)_ Hargreaves – Option 4 X Leisure – Option 3 National Grid Properties Ltd – Option 3 Mid Sussex DC – implies Option 4	<ul style="list-style-type: none"> • The City Plan should aim to meet housing requirements in full. Preferred Options approach is ‘constraints based’ and therefore flawed. • The preferred option underestimates the capacity of the city’s urban sites, some sites could deliver more, eg. at Marina (Inner Harbour). • Preferred option does not address how shortfall of requirements will be addressed through duty to cooperate.
General Comments (some object to preferred option 2; others are general and state no alternative preference).	14 comments in total (33%)	<ul style="list-style-type: none"> • Welcome the recognition that higher housing numbers present particular challenges in terms of retention of green, amenity, habitats space (Natural England). • Investment in water supply infrastructure will be planned for whatever housing option adopted. Some concerns regarding capacity of WWTW at Shoreham (Southern Water). • Purpose built student accommodation offers a positive contribution to housing supply in Brighton; more purpose built student accommodation frees up housing for general market use (Unite Group Plc). • If Toads Hole Valley is to be developed then it should be to the highest quality; support Biosphere bid; be zero and carbon and neutral in water impact; maximum use of site should be made (B&H FoE). • Lower quotas for housing; use redundant houses (Individual) • Representations from Marine Gate Action Group - will continue to

Option	Respondents	Key issues
		<p>resist the estimated output of 1,000 dwellings at Brighton Inner Harbour. Soundness concerns re. SHLAA with regard to capacity of Marina, Black Rock and Gas Works sites.</p> <ul style="list-style-type: none"> • Would like to see more information on type, form of housing to be developed; criteria for new housing will vary with locations of the city; acknowledge that densities likely to increase over the next 20 years (Brighton Society) • Suggested additional urban fringe sites for future consideration (Collins Planning Services) • Policies should encourage optimum use of existing housing stock (Regency Society) • Like to see a commitment to high quality design and consideration of townscape in all aspects of City Plan (Regency Society). • Plan needs to be visionary - needs to be a good city vision – areas of the city need complete re-design to bring us into step with other modern cities (individual). • Need for a robust and realistic approach to the delivery of homes in the city's part of Shoreham Harbour (Kingsway and West Hove Residents Association). • Concern regarding any taller buildings – adverse impacts of past development (Montpelier and Clifton Hill Association). • How does option 2 scenario compare with that modelled in the 2009 version of the Brighton & Hove TA (Highways Agency).

STUDENT HOUSING

32 representations in total

Option	Respondents	Key issues
<p>ISSUE A - HMOs (Option 1) addressing the over concentration of HMO's through article 4 direction and threshold above which no further changes of use permitted.</p>	<p>12 people agreed with the preferred approach (38%) 3 respondents objected (9%) 7 respondents stating that they had no position (22%)</p> <p>CESSG, BHEP, Professor Neil Hawke, Southern Water, Watkins Jones, Kingscliffe Society, Mrs Alzbeta Johnson, Mr Richard Paul-Jones</p>	<ul style="list-style-type: none"> • Support – sensible, proactive policy. • Of those objecting, concerns were raised that HMOs are not only occupied by students, there are a lot of young professionals and other people who live together as house sharers. • This approach will reduce the amount of affordable housing for all low paid residents of the city. • The existing standards are adequate, but are currently not being applied. <p>There were also concerns with landlords being able to absorb the costs of additional licensing.</p>
<p>ISSUE B Issue B - Purpose Built Student Accommodation (Option 3) – criteria policy for assessing applications and 4 sites identified as suitable.</p>	<p>11 people agreed with the preferred approach (34%) 5 respondents objected (16%) 8 of respondents stating partial support (25%)</p> <p>BHEP, CESSG, CPRE, Regency Society, City Sustainability Working Group, Unite Plc, Your Student Room Ltd, CSMA Club</p>	<ul style="list-style-type: none"> • Note: There seemed to be some confusion with some respondents with regard to Issue B). Some seem to suggest an amalgamation of options 2 and 3 when option 3 already contains a criteria based policy. • Of those objecting, 3 preferred a criteria based policy with the market being allowed the flexibility to bring forward appropriate sites in partnership with academic institutions or third party student accommodation providers (Unite Plc, Your Student Room Ltd, CSMA Club). They were concerned that if the city council adopt a policy approach aligned solely with the two universities aspirations and waiting for the development of the larger schemes then decades may pass before issues

		<p>identified in the consultation paper are resolved.</p> <ul style="list-style-type: none"> • 2 objectors were concerned that large concentrations of students in specific residential areas will not solve the problem but is likely to create and exacerbate the problems. • Of those partial support comments were raised on sites identified or sites considered needed to be included (Buxton Site, London Road, Co Op London Road and Saunders Glass Works, Sussex Place and Falmer Retained Land Site). Whilst Varley Halls was considered by one respondent to be at capacity and Pelham Street would create over concentration of student accommodation if proposal for the Co Op London Road allowed.
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EMPLOYMENT

25 representations in total

Options	Respondent	Key issues
<p>Issue 1 – Identifying central Brighton as the city’s primary office location (preferred option)</p>	<p>7 respondents in support (28%) 2 showed partial support (8%) 1 objection (4%)</p> <p>Brighton & Hove Bus Company, Brighton & Hove Economic Partnership, JW Cook Estates Ltd &</p>	<ul style="list-style-type: none"> • Those that supported preferred option recognised the locational advantages. • However there were concerns that policy should not be overly restrictive and inflexible around redundancy and change of use. • 1 respondent indicated that whilst city centre was the preferred location, it should not exclude peripheral locations if they offer a <i>superior</i> economic,

	Pecla Investments, Investec Private Bank, City Sustainability Working Group, CSMA Club and Hargreaves	<p>environmental and social benefit. This would allow for the development of office accommodation at Toads Hole Valley in addition to housing office/ high tech uses at Patcham Court Farm and Hangleton Bottom, currently allocated for a materials recovery facility, should be allocated for homes and employment use (BHEP).</p> <ul style="list-style-type: none"> • The preferred approach was also generally supported at the events
Issue 2 - Identifying a range of sites within the New England Quarter and London Road Area to accommodate the needed 20,000 sq m of office floorspace post 2016 (preferred option)	<p>6 respondents in support (24%) 1 respondent showed partial support (4%) 4 respondents objected (16%)</p> <p>Brighton & Hove Bus Company, Brighton & Hove Economic Partnership, JW Cook Estates Ltd & Pecla Investments, Investec Private Bank, Spen Hill Developments Ltd, CSMA Club and Hargreaves, City Employment & Skills Steering Group.</p>	<ul style="list-style-type: none"> • Support for spreading the delivery of new floorspace across a wider range of sites and viability taken into consideration. • The partially supported respondent (JW Cook Estates & Pecla Investment) felt that the approach to new B1 floorspace should allow for other sites to come forward other than sites identified within the New England Quarter and London Road area. Toads Hole Valley was indicated as having the potential for research based/ university linked eco-technology campus. • Those that objected (Hargreaves, Investec Private Bank and Unite Group Plc) felt that Option 2 (the previous Core Strategy approach of 2 broad locations) would allow the market to respond flexibly to market demand.
Issue 3 – Secondary Office Accommodation protected unless redundancy proved and alternative employment uses/ affordable housing the preferred alternative	<p>7 respondents in support (28%) 4 respondents objected (16%)</p> <p>BHEP, CESSG, NLCA, CPRE B&H, Hargreaves, Investec Private Bank, Spen Hill Developments Ltd and Unite Group plc</p>	<ul style="list-style-type: none"> • Of those that supported the preferred option the wording of redundancy required greater clarity. • Those that objected (Hargreaves, Investec Private Bank, Spen Hill Developments Ltd and Unite Group plc) felt that there should be the maximum flexibility for change of use in response to market requirements, a fresh approach was required for these sites, and secondary

uses.		office sites could be easily adapted to residential uses to meet housing delivery targets.
Issue 4 - including Strategic Employment Allocations within Development Areas	<p>11 respondents in support (44%) 4 respondents objected (16%)</p> <p>National Grid Properties LTd, JW Cook Estates Ltd & Pecla Investments, Hove Civic Society, NLCA, Kingsway and West Hove Residents Association, CPRE B&H, CESSG, Arts Commission, Hargreaves, CSMA Club, Investec Private Bank, University of Brighton</p>	<ul style="list-style-type: none"> • Of those that supported there were specific comments on individual sites: <ul style="list-style-type: none"> Toads Hole Valley should be included as a strategic employment allocation Melbourne Street should be retained for employment uses (NLCA) The role of Aldrington Basin and its relationship to South Portslade Industrial Estate and the priorities for Shoreham Harbour regeneration do need to be referenced in the plan notwithstanding the preparation and role of the JAAP. • Of those who objected (the main concerns was whether such an approach would be too prescriptive as to specific uses and suggested: <ul style="list-style-type: none"> Freshfield Road and Gala Bingo Hall – potential for residential, retail and other uses (Hargreaves). Blackman Street site – residential, B1 uses and student accommodation (CSMA Club) Circus Street – not an employment allocation, a mixed use allocation with a focus on education and student accommodation use preferred (University of Brighton). <ul style="list-style-type: none"> • One respondent felt it should be left to the City Plan Part 2 to allocate sites (Investec Private Bank plc).

<p>Issue 5 – Allocating a hierarchy of industrial sites and allowing further flexibility of permitted use on industrial sites.</p>	<p>9 respondents supported the preferred approach regarding the hierarchy of sites (36%) 2 respondents objected (8%)</p>	<ul style="list-style-type: none"> • Of those supporting the approach: <ul style="list-style-type: none"> - 1 respondent felt Bell Tower Industrial Estate should be included in those sites suitable for mixed use employment led redevelopment. - 1 respondent felt Toads Hole Valley could be identified as employment-led mixed use redevelopment. - Freshfield Road and Bell Tower areas would be better used for residential accommodation and a new school. • Of the 7 respondents who answered the issue around allowing further flexibility of uses beyond B1, B2 and B8 uses there were mixed views. 3 respondents wanted to see further flexibility (National Grid Properties Ltd, Newsquest and Hargreaves); 2 were concerned that flexibility should be limited to allow for certain types of business and employment activities, or best suit needs of local residents and 2 respondents objected. • Of those objecting, it was felt that safeguarding industrial sites to B1, B2 and B8 was too restrictive and further flexibility should be allowed in response to market requirements (Hargreaves) and to recognise that a wider range of commercial/ employment uses can generate jobs and unlock development and subsidise lower value uses (Newsquest). Hollingbury Industrial Estate not really in industrial use any more. <p>With regard to sites where employment led mixed use sites were identified, 3 respondents considered the issue of no net loss of employment floorspace may be better considered</p>
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		on a site by site basis; that there may be instances where it would be difficult to replace the same quantum of development and that job generation should also be a consideration.
Issue 6 – Secondary Industrial Accommodation - protected unless redundancy proved and alternative employment uses/ affordable housing the preferred alternative uses.	5 respondents in support (20%) 5 respondents objected (20%) Adur District Council, BHEP, the Kingscliffe Society, Kingsway and West Hove Residents Association, CESSG, National Grid Properties Ltd, Hargreaves, NLCA. JW Cook Estates Ltd & Pecla Investments.	<ul style="list-style-type: none"> • Those that supported the preferred option wanted to see greater clarity around test of redundancy. • Of those that objected, 2 preferred Option 3 (no general protection) and 3 preferred Option 1 (no preference to alternative uses if sites found redundant).

TRANSPORT - PARK AND RIDE

26 representations in total

Options	Respondent	Key issues
Preferred Option 1 - Removal of Park and Ride	9 respondents in support (31%) B&H Friends of the Earth; Bricycles; City Sustainability Partnership; NCLA, ESCC, Highways Agency, Montpelier and Clifton Hill Association and	<ul style="list-style-type: none"> • Reasons – costs, bad use of land, costs outweigh benefits, can encourage driving • More detail on alternatives to Park and Ride • This approach needs to be more positive about alternatives to park and ride with a clearer Transport Framework. • Set out how removal of Park and Ride will help to deliver

	<p>Martin Lawrence</p>	<p>other strategies – health, environmental, social and economic priorities.</p> <ul style="list-style-type: none"> • Tie the changes to transport into the Sustainable Community Strategy targets, eg on schools, education (university and further education) and health. <p>The Highways Agency is keen to understand supporting measures to achieve a reduction in car based transport and wanted an assurance that congestion on the A27 and A23 will be no worse at the end of the plan period.</p>
<p>Option 2: Criteria-based Park and Ride policy</p>	<ul style="list-style-type: none"> • 10 in support (39%) <p>Economic Partnership; City Employment and Skills Steering Group; Brighton & Hove Bus Co. ; Hargreaves, B&H Arts Commission; Kingscliffe Society; Andrew Coleman; Richard Cleminson</p>	<ul style="list-style-type: none"> • The Economic Partnership and CESSG indicated that though Park and Ride is likely to be undeliverable that Option 1 was not supportable due to the lack of detail and vagueness of the alternative measures proposed. • Most comments were that Park and Ride should be retained as an option for the future as part of a Transport strategy for the city alongside the alternative measures. • Support for the idea of using existing car parks on the periphery of the city, suggestions include Asda, Amex Stadium, Holmbush, the Marina. • Look at sites outside B&H including station car parks and bus station car parks. • Evidence of informal park and ride at a number of locations, e.g. Coop, Nevill Road. • Business sector as well as other groups and individuals raised concerns about the impact of raising parking charges. • Arts Commission raise concerns that removing P&R will have on theatres and arts in the city.

		<p>Brighton & Hove Bus Company – makes detailed comments that question the reasons given for not proceeding with Park and Ride and that raise concerns about the alternative measures proposed (as well as them providing very little detail. The comment goes on to suggest sites for Park and Ride (Toads Hole Valley is cited) and suggestions for tackling the unacceptable levels of congestion in the city at weekends. Option 3 is not favoured as unviable.</p> <p>South Downs Society – also makes well informed and detailed comments on park and ride and suggests that the alternative measures in Option 1 should be provided alongside and Option 2 policy. Cost and deliverability should be one of the criteria in the policy. More than one site appropriate – as commuters mainly travel into city from east and west and tourists/shoppers from the north.</p>
Option 3 - Retain Core Strategy approach	<ul style="list-style-type: none"> • 3 respondents in support (12%) <p>Natural England CPRE</p>	<ul style="list-style-type: none"> • More detail needed • Multiple site approach will reduce impact on the environment and be more deliverable as no one site is large enough to serve B&H. <p>Intercept a number of routes into the city.</p>
No Preference	<p>2 respondents (8%)</p> <p>Adur District Council The Theatres Trust</p>	<p>Adur District – wants confirmation of detail on whether the proposal will affect the future of the Coastal Transport System. If so, this will have a harmful impact on the future on development in Adur</p> <p>The Theatres Trust – concerned that the proposal should not undermine access to the city centre which would have a harmful effect on Theatres.</p>

SUSTAINABILITY APPRAISAL

Respondents	Key Issues
<p>8 representations received (10% of respondents)</p>	<ul style="list-style-type: none"> • Concern that the SA has omitted certain information from the Sustainability Issues, Plans, Policies and Guidance, and Baseline Information sections, such as: information on the Biosphere Reserve Status, information on the issue of air quality, areas of the city covered by the South Downs National Park, and reference to the National Parks and Access to the Countryside Act 1949. • Concern expressed that there are some errors in the SA including incorrect references • Various recommendations were made in relation to: carrying out an assessment of young people’s open space/play needs, re-assessing how the health impacts of policies are scored, presenting information in the assessment summary tables, amending the SA objective that relates to flood risk, changing certain indicators, suggestions for monitoring, suggestions for measures of mitigation, and requesting information on cumulative impacts. • The accuracy of some statements in the Baseline Information section was questioned, including information relating to air quality. • The accuracy of some statements in the appraisals were questioned. The statements that there are less opportunities to incorporate biodiversity features in to high density development, and that development within the built up area of the city is unlikely to impact on the SDNP, were both considered to be inaccurate by the respondent. In addition, the strength of the appraisal concerning park and ride was not considered to be strong enough. • One respondent suggested there needs to be a full SA of the approach to development at Shoreham harbour. • One respondent suggested that the connection between the sustainability issues and the SA objectives should be clearer and that some issues were not covered by the objectives. • One respondent suggested that the SA assessment should include a restriction on height of development at the Marina. Various other recommendations relating to the status of the Marina and the types of development permitted there were made.

ii) Summary of comments from stakeholder events and workshops

Event	Paper	Key comments
Local Strategic Partnership, Tuesday 20 September 2011	All	Raising awareness of consultation on Policy Options Papers
B&H Housing Partnership, Tuesday 18 October 2011	All	Update at meeting. No presentation.
Strategic Housing Partnership, Tuesday 25 October 2011	Housing Delivery and Student Housing	<ul style="list-style-type: none"> • A discussion around controlling studentification, HMO definition and possible drop in student numbers. • Suggestion made that transport links in the city could be opened up and provide access to wider areas where housing could be identified.
BHCC Overview and Scrutiny Commission Tuesday 1 November 2011	Employment	<ul style="list-style-type: none"> • Support for the public sector in enabling and safeguarding employment land • Recent reductions in feed-in tariffs is one example of rapid changes to potentially have a serious impact on the local economy and should be considered

Event	Paper	Key comments
BHCC Members briefing, Tuesday 1 November 2011	All	<p>Housing Delivery</p> <ul style="list-style-type: none"> • Concern about the lack of family accommodation • Concern about the amount of high rise flatted development delivered in recent years • Identification of need for infrastructure e.g. public transport • Concern over the allocation of and access into Toads Hole Valley <p>Park and Ride:</p> <ul style="list-style-type: none"> • Support options for continuation of Park & Ride <p>Student Housing</p> <ul style="list-style-type: none"> • Support for an Article 4 Direction that has the potential to safeguard family housing Query over whether this can be used to count towards meeting housing numbers • Acknowledgement of importance of students to the city and support of pro-active policies
City Sustainability Partnership, Monday 7 November 2011	All	<p>Housing Delivery</p> <ul style="list-style-type: none"> • Concern raised over impact of housing targets on other aspects of the plan such as loss of green space • Responses included how empty properties could be used better such as compulsory purchase or full council tax charged on second homes • Query over whether Community Infrastructure Levy Payments could be used to redress negative impacts on biodiversity • Query over how City Plan considers link between increasing housing and impact on services e.g. healthcare – to be addressed through the Infrastructure Delivery Plan. • Query over whether Toads Hole Valley (THV) will be mixed use – Partnership informed that provision will be made for a school, transport facilities and a mix of housing types. • Concern over whether traveller population had been accounted for in allocating THV. Other sites being considered for travellers • Concern over increasing density of B&H

Event	Paper	Key comments
		<ul style="list-style-type: none"> • Support for waste management to be considered at an early stage to achieve Code Level 6 for housing • Support for CIL to allow CO2 levels to be offset elsewhere <p>Student Housing</p> <ul style="list-style-type: none"> • Query over how tuition fees has impacted upon student numbers • Concern over sustainability impacts of both dispersal of students across the city or in concentrations and potential for anti-social behaviour • Partnership informed that student numbers are likely to remain stable or grow by up to 20%. City plan would seek at 10% threshold on HMOs in affected areas • Query over whether housing released back into the market by an increase in student housing could be counted towards housing numbers. Partnership informed that this was not permissible at the moment <p>Employment</p> <ul style="list-style-type: none"> • Query over whether number of jobs created by allocating THV was as important as the quality of jobs <p>Other issues</p> <ul style="list-style-type: none"> • Support for the release of THV. Alternative may result in poorer development on other sites. Encourage most sustainable form of development on THV • Query over whether the consultation was premature ahead of the publication of the NPPF
Public Service Board, Tuesday 8 November 2011	All	<p>Toads Hole Valley</p> <ul style="list-style-type: none"> • Petitions against development raised <p>Employment</p> <ul style="list-style-type: none"> • Support for allocations outside of city centre

Event	Paper	Key comments
		<p>Student Housing</p> <ul style="list-style-type: none"> • Support for the benefits of student housing in the city but concern over lack of student housing allocation in London Road area • Opportunity for partnership working with the council welcomed <p>Park & Ride</p> <ul style="list-style-type: none"> • Concern over abandoning park & ride and the alternatives being suggested
Stakeholder event, Wednesday 9 November 2011	Housing Delivery	<ul style="list-style-type: none"> • Support for proactive promotion of mixed-use sites including promoting the use of 'Brownfield'/vacant land • Encourage growth at sites such as Portslade Station and Toads Hole Valley • Ensure strategic sites can deliver required infrastructure including schools to meet the needs of future population • Promote sustainable development of strategic sites including sustainable transport options and technology to facilitate 'green' development • Ensure a balanced mix of housing types including family housing and flats, including the use of empty/second homes • Support the use of Planning Briefs to managing development trajectory in designated development areas
	Student Housing	<ul style="list-style-type: none"> • Strong support for a policy to address student accommodation in the City Plan • Robust comments that the current approach to student housing/HMOs concentrations is not working in affected areas with high concentrations e.g. 'The Triangle' and parts of Lewes Road • Strong support for a city-wide approach as well as separate policies to address over concentrations of student housing/HMOs in the 5 most affected areas/wards • Concern expressed about specific sites allocated for student housing. Support for better

Event	Paper	Key comments
		<p>management of concentrated sites so problems in other areas are not replicated. Ensure accommodation is predominantly for undergraduates</p> <ul style="list-style-type: none"> • Promote consideration of language/music students and ensure, if living in HMOs, that the accommodation is well managed and maintained. • Manage student accommodation jointly between local authorities, service providers, universities and businesses and to provide guidance and education for students • Manage anti-social behaviour through controlling levels of off-licences, sufficient refuse management and provision of services • Concerns over how tenancies are arranged and impact of changes to housing benefit on hostel and bedsit accommodation
	Employment	<p>Central Brighton and primary office area:</p> <ul style="list-style-type: none"> • Promote clarity for defining 'central' • Support to allow tall buildings, enabling development, change of use of lower ground floor could all aid refurbishment and upgrade of offices • Concern over limited opportunities in central Brighton • Impact of government consultation on consultation on allowing commercial to go to residential – use of other planning tools – article 4 direction. <ul style="list-style-type: none"> • Recognise demand for some parking • Concern that rents are generally not high enough in the city for refurbishments – allow more flexible change of use • Encourage provision of affordable office space although occupiers looking for Grade A, flexible space and flexible leasing. <p>Issue 2 Approach to employment led mixed use development:</p> <ul style="list-style-type: none"> • Recognised that SPDs will be carried forward

Event	Paper	Key comments
		<ul style="list-style-type: none"> • Welcomed approach for undertaking briefs/SPDs jointly with developer/owner setting realistic expectations • Encourage certainty for how much employment expected on mixed use sites– 50% - 50% or 70 – 30 %. • Welcome better access along main roads e.g. Preston Road • Promote proposals to ensure deliverability – floorplates of 500 sq m are most flexible for developers and a range of office sizes are required for the city
	Park & Ride	<p>Importance of provision of Park and Ride for managing traffic and congestion in the city:</p> <ul style="list-style-type: none"> • Support for both P&R and alternative measures • Welcome investment in changing behaviour. • Concern over whether it will work • Politics has prevented delivery of key sites • Increasing road capacity outside Brighton lead to more visitors to the city • Further detail in P&R policy welcomed to alleviate worsening conditions. <p>Priority for P&R and alternative measures to reduce traffic:</p> <ul style="list-style-type: none"> • Welcome measures to set parking charges to manage congestion without harming economic performance and growth and tourist potential of city • Support to consider underused car parks, such as supermarkets, for low key P&R • Strong support for gathering information provided on journey type and distance and how P&R can influence this in terms of intercepting traffic • Promote other measures such as travel plans and integrated event management particularly for weekend events. P&R just one tool • Concern over impact of affordability and rising costs of public transport • Concern raised over suitable site and impact on delivery of P&R

Event	Paper	Key comments
Partnership Managers Group Meeting of LSP, Wednesday 16 November 2011	All	<ul style="list-style-type: none"> • Concern raised over land availability and implications for promoting tall buildings. There are several identified areas in the city suitable for tall buildings. • Point was raised that consideration needs to be given to the city's supply of underused land e.g retail sheds with car parks and how these sites will be more efficiently used when they come up for redevelopment
Shoreham Airport Consultative Committee (requested by committee), Wednesday 16 November 2011	All	<p>Housing Delivery</p> <ul style="list-style-type: none"> • Clarification of whether the 400 homes stated for Shoreham Harbour were within the administrative area <p>Park & Ride</p> <ul style="list-style-type: none"> • Concerns around potential proposals for park and train – no funding available to increase capacity at stations or the number of stations • Need to recognise the many businesses that use Shoreham Airport. The A259 is not an attractive route from the Airport into the city. Sends out a negative image. Pricing out parking is not a sustainable solution. The council's Transport Strategy is flawed. It is easier to go shopping to Portsmouth and Southampton than it is to drive into Brighton • Transport infrastructure needs to be in place to support the growth of Shoreham Airport – sustainable business aviation units and good public transport links. <p>Employment</p> <ul style="list-style-type: none"> • Reference to employment growth in the city – clarify around whether that was net growth and need to see reference to Local Economic Partnership • Need to see link between employment and housing policies – role of home working and internet access.
Brighton & Hove	All	<p>Housing Delivery</p> <ul style="list-style-type: none"> • Links between housing and employment acknowledged. Concern over high house prices and

Event	Paper	Key comments
Economic Partnership (BHEP) – Business consultation workshop on policy options papers, Wednesday 16 November 2011		<p>the impact this has on in/out migration for work</p> <ul style="list-style-type: none"> • Support for preferred option and the release of Toads Hole Valley (THV) but concern that this will be insufficient. Some support for the higher targets • Housing mix an important consideration especially for lower income and young people/families • Concern raised over challenging residential densities • Participants welcome greater policy flexibility to make change of use easier/quicker, e.g. from office to residential • Balance between employment floor space and residential allocations. Promote workspace at home and live/work units <p>Employment</p> <ul style="list-style-type: none"> • Promote mixed use development on all employment sites and encourage enabling development to refurbish old or poor quality businesses premises and revitalise existing businesses and allow them to remain in the city • Support policies that promote the creation of flexible and affordable business space in a range of sizes to encourage growth or that cultivate spin-off uses. • Support for strategic employments sites within development areas as provides certainty for developers/employers • Encourage hubs for key sectors and council to clarify what kinds of businesses they wish to attract e.g. THV good location of high tech businesses • Acknowledge challenging financial environment in bringing forward commercial development and lack of business growth. • Participants welcome greater policy flexibility to enable more responsive decisions to commercial planning applications • Expressed importance of partnership working between public service providers, education and businesses/landowners

Event	Paper	Key comments
		<ul style="list-style-type: none"> • Concern over unimplemented permissions and their contribution to the overall floorspace targets <p>Park & Ride</p> <ul style="list-style-type: none"> • Support for P&R to be back in the City Plan and to link P&R with access to the South Downs National Park • Key concern over volume of traffic entering the city and resulting congestion and its impact on businesses • City's good public transport system acknowledged but suggested it needs further support • Controlled parking zones need managing and monitoring to ensure balance of users e.g. less residential only areas near seafront to attract visitors
Sustainability Working Group (sub group of Sustainability Partnership), Thursday 17 November 2011	All	<p>Housing Delivery</p> <ul style="list-style-type: none"> • Agree that Preferred Option 2 is best option. Support ambitious development at Toads Hole Valley in that it should be a zero-carbon development and also could be opportunity to create an Eco-village. • Concern expressed over whether 750 homes uses the site efficiently. Potential to achieve more housing there, while still providing a high quality family environment. Not to be constrained by traditional approaches to housing development. • Query how much public space is required at Toads Hole Valley given the closeness of the National Park and the adjacent SNCI. • Support for policies that encourage housing to be adaptable and that encourage mixed use for future flexibility and multiple needs • Needs to consider the impact on transport and services of increases in population and recommendations for extra provision. Expressed importance of links between transport and economic development.

Event	Paper	Key comments
		<p>Student Housing</p> <ul style="list-style-type: none"> • Group is in agreement with the preferred Policy Option • Concern over whether the plans are ambitious enough and if greater density of development could be achieved at the sites. • Housing should be built for flexibility and adaptability allowing for units to be converted for private use if need be. • Promote inclusion of language Students in total number of students needing accommodation – group estimates a further 12,000 per year • Infrastructure needs to be in place (such as cycle tracks) before new student accommodation brought forward <p>Employment</p> <ul style="list-style-type: none"> • In broad agreement with the recommendations detailed in the Employment Policy Option Paper, particularly around protecting Central Brighton as the city’s primary office area. • Group would like to see that central Brighton will not be the sole focus for employment / business accommodation. • Promote more detail on how refurbishments are to be secured • Expressed importance of drawing out the interrelationship between housing options and employment options. <p>Park & Ride</p> <ul style="list-style-type: none"> • Agreed with the Preferred Policy Option 1 to remove Park and Ride from the sustainable transport policy as: <ul style="list-style-type: none"> i) It is a poor use of land (which is in short supply in the city) ii) It is expensive iii) It is possibly not deliverable as previously envisaged with the National Park now confirmed.

Event	Paper	Key comments
		<p>iv) It can reduce journeys in and out of town (if accompanied by a reduction in city centre car parking) but has little impact on reducing the amount of in-city journeys</p> <ul style="list-style-type: none"> • Strong support for a more ambitious and positive approach to alternative measures, i.e. trains, sustainable modes of travel
<p>Transport Partnership, Monday 14 November 2011</p>	<p>All</p>	<ul style="list-style-type: none"> • The City Sustainability Partnership had concluded the options were right but welcomed a more positive approach to the alternatives • Sought more explanation as to why the city council is recommending the removal of Park + Ride from the policy • Suggested alternatives to Park + Ride are not clear and advocate more radical alternatives • Public transport fares have to be set within a commercial market. Query the appropriateness of the term 'affordable'. • Support the need for improved links between bus and train. Query whether Brighton Station Gateway proposals will achieve this • Redevelopment of Toad's Hole Valley could be a possible Park + Ride site • Highlighted need for consideration of the National Park's own transport strategy and likely requirement for more additional transport infrastructure • Intercepting travellers at the start of their journey is important e.g. there is a London transport campaign poster on the A12 in Southend. • Mitigation measures are needed to offset travel generated by big developments • Reference was made to the city's Air Quality Management Area and Low Emission Strategy, in terms of mitigation measures such as addressing lorry deliveries and further investment in electric vehicles, and how they feature in the City Plan and LTP. • Encouraging more cars into the city does not necessarily mean more money/business coming into the City • Support the approach to incentivising and to make more appealing the use of public transport for businesses

Event	Paper	Key comments
City Employment & Skills Steering Group, Thursday 24 November 2011	All	<p>Housing Delivery</p> <ul style="list-style-type: none"> • Expressed concern over inclusion of Toads Hole Valley regarding objections and scenarios should the site not come forward • Support for preferred option housing numbers although leaves shortfall in housing numbers • Close partnership working with neighbouring local authorities considered essential to achieve a balance of housing given the city's constraints <p>Employment</p> <ul style="list-style-type: none"> • Support development of office space in city centre although not to exclude other sites to enable delivery of social, economic and environmental benefits • Balance between housing delivery and protection of employment sites. Support hierarchy of sites but would welcome an approach that treats each site on a case-by-case basis • Eco-tech park a long term aspiration of CESSG. Group not it would be deliverable on basis of inclusion of Toads Hole Valley • Concern over governments proposal to relax change of use from employment to residential. Designate city as business district to protect employment uses and trigger test of redundancy <p>Transport</p> <ul style="list-style-type: none"> • A27 by pass severs links with South Downs • Toads Hole Valley access and transport links needs consideration as it is mostly accessed by car
Conservation Advisory Group (CAG), Tuesday 13 December		<p>Housing Delivery</p> <ul style="list-style-type: none"> • Group supports more intensification of low density areas before consideration of a Greenfield site. Some members supported both strategies • Support for Option 2 but concerns raised about the mix of unit sizes and the need for more family-sized units, adequate room sizes and mixed uses

Event	Paper	Key comments
2011		<ul style="list-style-type: none"> • Query whether the last housing needs study in 2005 was up to date enough to make informed decisions. Group informed that it was. <p>Student Housing</p> <ul style="list-style-type: none"> • Strong support for the preferred option • Comments raised regarding the need for devoted student houses so others can be used by single people but stressed that these sites should be identified as having minimal impact on neighbouring properties <p>Employment</p> <ul style="list-style-type: none"> • Comment raised that the natural progression for home workers is to a business centre and that this should be provided for in the policy– e.g. Tower Point was raised as a good model for small businesses. • Support for vacant sites to be refurbished and upgraded for mixed use e.g. Preston Road. • Query raised whether the council are looking at reducing retail space in the town centre <p>Park & Ride</p> <ul style="list-style-type: none"> • Concerns over the loss of park and ride. Support for an alternative to reduce the amount of traffic in the town centre, seafront and historic areas. The group suggested removing the signs directing to the seafront parking. • Support for greatly improved bus and train services if park & ride is dropped. Like to see safer cycle lanes that join together • Concerns raised with regard to the policy to be 80% CO² reduced by 2050 and felt the group needed to consider what the city will look like in the future and to prepare for this reduction

