

Appendix 2 City Plan Part Two - Scoping Consultation – Summary of formal responses

Numbers of representations received per topic and summary of key issues raised

Chapter Topic	Number of Reprs	Key issues Raised
Housing (21 questions)	1,087	<p>Brownfield sites:</p> <ul style="list-style-type: none"> • Strong support for brownfield site development and allocation of sites through CPP2. • Should review site capacities; increase densities to optimise capacity and boost housing delivery • Support for policy to require optimal use of brownfield sites but also concern this could lead to over-development. • Set out clear design parameters to inform and guide site capacities, heights of buildings etc • Review tall buildings guidance and selective application of Conservation Area policy. • Encourage more innovative forms, models and mechanisms for housing delivery <p>Urban Fringe sites:</p> <ul style="list-style-type: none"> • Some objection in principle to any development on UF sites • Further consideration re. improving links with SDNP, providing GI and open spaces/ connectivity between urban and rural areas • No allotment sites to be built on – allotments must continue to receive protection • Concerns regarding traffic generation and infrastructure impacts and cumulative impacts across sites • Design issues important; protect local character of existing communities • UF sites offer good opportunity for family housing and for affordable housing • Some felt potential of UF sites underplayed; could do more <p>Housing Mix considerations</p> <ul style="list-style-type: none"> • Set out evidence base re. local housing needs • Policy should not be too prescriptive; flexibility required • Mix could be guided through general residential and design policies • Strong need for more family housing, for affordable housing and for older persons housing and supported housing • How to address needs of local residents? • Require student housing to contribute to affordable housing • Build more public sector housing on brownfield sites • Support CLT initiatives and other non-commercial housebuilding • Limit HMOs in areas of high concentration

		<p>Retaining housing</p> <ul style="list-style-type: none"> • General support for policies to resist the loss of existing housing where stock is of reasonable quality and in good repair • Recognition that redevelopment could, in some circumstances, lead to more and better quality housing. • More protection of family housing • Issue of second home ownership raised and ‘party houses’ seeking more control over this. <p>Private Residential Amenity Space</p> <ul style="list-style-type: none"> • General support for policy requiring appropriate private amenity space • Communal space could make appropriate contribution in flatted development • Policy should not be too prescriptive <p>Space and Access Standards</p> <ul style="list-style-type: none"> • Overall, strong support for space standards and higher optional access standards • Needs to be evidence based and viability tested • Flexibility required to facilitate more innovative housing solutions • Site specifics need to be taken into account • Could all the requirements be set out in a Housing SPD? <p>HMOs</p> <ul style="list-style-type: none"> • Considerable concern regarding numbers of HMOs in parts of the city and impacts on communities • Some support for dropping the protection of HMOs (as in 2005 Local Plan) although some respondents recognised that HMOs can offer cheaper form of housing for some. • Deliver more PBSA to take pressure off family homes • Expand Article 4 area and increase licensing • Better enforcement <p>Other Housing Issues:</p> <ul style="list-style-type: none"> • The need to regulate Airbnb in the city • Need to address ‘party house’ issue • Revisit taller buildings policy and guidance • Explore food growing opportunities as part of new development • More monitoring required to include second home ownership, party houses, properties bought by investment companies • Mixed use development should not risk employment space • Prioritise local people, plan for communities where people can interact.
Economy & employment (12 questions)	87	<p>Whilst some support for further office allocations there were also comments on the need to make best use of existing opportunities.</p> <p>General views on how to support delivery – mixed use might</p>

		<p>help some sites but other suggestions made – particularly use of council assets.</p> <p>Whilst support for current A4D not overwhelming support for extension of area.</p> <p>Support for mixed use sites and some suggestions put forward for mixed use site allocations (Hippodrome, Peacock Industrial Estate sites along Davigdor Road) although two respondents thought in response to general question that aspects of EM10 North Laine should be retained</p> <p>General view was that there was a need to avoid over-specific policies on guiding type of new office space, any such policy would need to reflect changing working practices, flexible and future proofed.</p> <p>No consensus in response to whether mixed employment areas needed a specific protection policy.</p> <p>There was demand for industrial space in the city – mixed views at the BHEP event as to whether this should be accommodated in the city or be better directed to warehouses outside city. No specific sites were put forward for consideration for new industrial estate suggestions of extensions to some existing estate; any new provision would need to be fit for purpose based on assessment looking at opportunities on the periphery of the city; use council’s assets; do not release Sackville Road Industrial Estate if sites were needed. Opportunities/ zones for intensification of existing estates should be guided by 2012 Employment Land Study and restrict space lost to car parking in new development.</p> <p>Only 4 respondents thought article 4 directions to safeguard industrial areas should be brought in.</p>
Retail and Town Centre uses (17 questions)	130	<p>Make frontage policies simpler to understand and to apply whilst ensuring there is adequate protection to retail areas.</p> <p>Mixed views on amendments to retail boundaries although review is necessary.</p> <p>Support for specific policies for certain areas (Brighton Marina, North Laine)</p> <p>Clearer definition of primary shopping areas and some changes to frontages (e.g. Brunswick Town).</p> <p>General support for designations of local parades.</p> <p>Mixed responses received regarding keeping a policy that restricts changes of use to new large A3/A4 uses.</p> <p>General support for a policy for permanent markets.</p>
Tourism (4 questions)	45	<p>Concern about impacts of development on seafront (Madeira Drive); the need for further guidance to assess development</p>

		<p>proposals coming forward on seafront (design; heritage and traffic impacts)</p> <p>General view there seemed to be enough hotels, issue was with quality of provision and concern with growth of Airbnb. Some respondents thought provision could be outside the central areas (Rottingdean) and one site put forward for allocation – land adjacent Amex Community Stadium.</p> <p>Some general comments that tourism should not be just focused on central area (role of villages) and could look at the potential of heritage tourism).</p>
Transport and Travel (15 questions)	372	<p>There was a broad consensus on the need for City Plan Part Two to include more detailed policy on transport, building on CPP1 Policy CP9.</p> <p>Air quality was highlighted by a considerable number of respondents as the issue most in need of further policy, with some considering it to be the only issue. There was some support for quantitative thresholds to be included in policy to make it more effective and provide certainty over the Plan's requirements.</p> <p>The need to consider how new development can avoid further deterioration or preferably improve air quality in areas where this is currently a problem was identified.</p> <p>There was strong support for park and ride to relieve congestion in the city centre. There was significant support for looking across the wider city region for site specific transport facilities.</p> <p>Strong support for more clarity around Transport Assessments, Statements and Travel Plans. Slim majority felt this should be through CPP2 policy. General support for transport mitigation policy.</p> <p>A small majority of respondents agreed that there is already sufficient policy on active travel although some key stakeholders took different view. Two thirds of respondents felt it was not necessary to have a specific policy that focussed on equality/mobility and accessibility.</p>
Biodiversity and Open Spaces (12 questions)	348	<p>General support for policy on specifying appropriate development in NIA but no overriding view over what that would be.</p> <p>General support for Green Infrastructure approach joining with neighbouring authorities.</p> <p>Whilst recognised need for a policy on the nature conservation hierarchy and criteria, no clear approach on policy criteria or if one or more policies. BHFOE raised the need to declare all LNR's instead of having some declared and others proposed.</p>

		<p>Overall support for a general policy addressing species several sought a policy similar to QD18 and LBAPs. UF sites were raised and several put forward for protection. RSPB raised the need to protect and encourage swift nesting.</p> <p>SNCI's – support for up to date to policy. Some supported but also sought a mechanism for new sites to be included when evidence available. BHWF submitted a big long list potentially for checking against the 2013 review findings. Some responses sought better protection of sites prior to an application to prevent site clearance.</p> <p>Other sites/features that should be included in a policy – several matters put forward including ancient woodland, aged/veteran trees, geomorphological /geodiversity sites, as well as: allotments, wildlife corridors, increase tree cover; innovative provision</p> <p>New open space sites: many put forward are existing open space sites as well as sites in the National Park.</p> <p>Local Green Space – a number of suggestions made including a number by the Conservative Group and ESCC. Examples included St Aubyn's and several of the UF sites in Ovingdean area and The Oval, Saltdean. Overall support for the four sites included in the Consultation Scoping document – although one respondent did not support Benfield Valley.</p> <p>In respect of the 4 sites listed there was general support for them to be gateways to National Park and some respondents supported gateways generally on sites appropriate.</p> <p>Other issues raised: protect allotments and ecosystem services.</p>
<p>Pollution, Water and Energy (21 questions)</p>	<p>228 [134 Q 1 – Q12 94 for Q13-21]</p>	<p>Majority of respondents felt that air, land and water pollution control and noise nuisance should be treated separately not in one combined policy.</p> <p>Most respondents supported the need for detailed policy to protect quality and potential yield of water resources due to vulnerability of chalk aquifer.</p> <p>Air quality was the most cited 'other pollution issue' the city plan should address.</p> <p>Majority of respondent felt there was a need for a detailed policy to support the provision of water and wastewater infrastructure.</p> <p>Majority of respondents felt an updated SuDs policy was required but it should be appropriate to the location.</p> <p>Majority of respondents felt more detailed guidance was required to guide applications that come forward on seafront –</p>

		<p>most comments related to protection of the marine environment.</p> <p>Majority of respondents felt the presumption against encroachment on the beach should be through a policy.</p> <p>Strong support for further development of policy on low and zero carbon energy. Particular areas that were supported included: Community energy; heat pump technologies; anaerobic digestion; further development of solar policy; energy storage (thermal and electric); and zero carbon technologies, developing pathways to a transition to zero carbon; and applying findings of the Energy Study.</p> <p>Need to strengthen policy support for solar technologies especially photovoltaics.</p> <p>Support for CPP2 to identify and allocate sites for renewable and low carbon energy generation, storage or networks, taking into account Energy Study findings.</p> <p>Consensus that there needed to be further guidance on district heating though fairly evenly split between putting this in the plan or in SPG.</p> <p>The majority of respondents strongly supported development of targets for energy efficiency in smaller developments in CPP2.</p>
Design (9 questions)	102	<p>General consensus that a Place Making Policy should be included in CPP2 and support for such a policy to focus on the assessment of proposals on a street/site scale and incorporate guidance on new and emerging design issues.</p> <p>A wide range of design issues were identified by respondents to inform assessment of design quality on a street/site scale.</p> <p>Broad support for the Protection of Amenity to be addressed through a single consolidated policy and requests for enabling local communities to have more say in what their area looks like and the impact of new development upon their amenity.</p> <p>There was no consensus on whether the Protection of Amenity policy should explore parameters for assessing the effective use of sites or whether the Place Making policy should support or hinder the delivery of tall buildings.</p> <p>Clear support for a specific Extensions and Alterations Policy that replaces and is less restrictive than SPD12. Preference has been shown for such a policy to focus on setting out principles of respect for neighbours and accounting for the key visual characteristics of the area.</p>
Heritage (15 questions)	177	<p>There is a general consensus that a streamlined set of heritage policies would be appropriate but that there should be a separate policy for each type of heritage asset. Policies should be concise but contain sufficient detail to avoid the</p>

		<p>need for too many SPDs.</p> <p>The listed buildings policy should address the need to keep buildings in use and in a good state of repair</p> <p>The policy on conservation areas needs to make explicit the importance of conservation area character statements and management plans. It also needs to be clear about the greater importance of the public frontages and roofscape, with a more relaxed approach to works at the rear.</p> <p>There is a consensus view that there should be a specific policy on the setting of heritage assets.</p> <p>There is also clear support for a specific policy covering the Royal Pavilion estate.</p>
Community Facilities (7 questions)	27	<p>No consensus on type of policy to guide retention of community facility (whether single/ separate policies for different types)</p> <p>Education providers keen to see education as separate type of community facility.</p> <p>No consensus on the best approach to retention of community facilities; lots of suggestions of what should be protected/ key issues</p> <p>Benefits of allotments as community facility.</p> <p>No consensus on the issues a policy for new community facilities should address – suggestion of hubs of activities; ensure provision before completion of development it supports.</p> <p>Consider removing permitted development rights for pubs.</p>
Student Accommodation (7 questions)	36	<p>Broad support for establishing a target for the amount of PBSA; but care in establishing the target and should be monitored.</p> <p>Broad support for additional PBSA – preference for university campuses only/first but significant support for appropriate sites along Lewes Road.</p> <p>Dispersal of PBSA locations only if efficient and reasonably priced public transport.</p> <p>Need for appropriate balance between PBSA and general housing.</p>
Traveller Accommodation (4 questions)	37	<p>Smaller site preference likely to reduce possible negative amenity impacts.</p> <p>Given the likely limited number of suitable sites approach should not be too prescriptive.</p>

		Dealing with the issue through the City Plan Part Two has support as the preferred approach.
General Comment (1 question)	35	<p>A large number of responses to the 'any other issues' question were concerned with housing issues: supportive infrastructure with new housing; protection of allotments; impact on growth of HMOs on family homes; how best to address housing shortfall.</p> <p>Additional comments were made on the need for CPP2 to address food growing; access to healthy food and preventing obesogenic environments. B&H food Partnership keen to develop SPD.</p> <p>General comments on design issue; request for a 'sculpture in the city policy'</p> <p>CPP2 need to be holistic, cohesive and less jargon and clarity about how it will work for ordinary people.</p>
Sustainability Appraisal (7 questions)	36	<p>Support for SA objectives by Environment Agency and ESCC.</p> <p>Suggestions put forward as to how Sustainability Appraisal Framework and decision making framework could be strengthened.</p>

There were also comments/ views that came through the 4 bespoke workshops and the numerous events and meeting undertaken as part of the consultation and these have been collated and are set out in the Consultation Statement.