

London Road Central Masterplan SPD Public consultation report: officer responses to representations

October 2009

The table below indicates the issues raised by respondents in the various categories identified in the London Road Central Masterplan SPD Consultation Report and registers officer response to these issues. As indicated in the Report, the total number of respondents for each category was:

<b>Written responses</b>	65 respondents	<b>Another London Road response form (ALR)</b>	57 respondents	<b>Exhibition comments</b>	410 respondents ('post-it' notes)
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In the ALR category, five issues were "prompted" (i.e. respondents were asked whether they agreed or disagreed with five different statements provided by the ALR group. These are identified in the table below as **ALR prompt**.

In all categories, there were respondents who raised more than one issue. In order to identify recurring issues and contextualise these in terms of the overall number of respondents commenting on each of the SPD topics and within each respondent category the table below identifies:

- a) number of respondents by category registering comments on each SPD topic;
- b) number of respondents by category raising a particular issue within an SPD topic
- c) % of respondents raising a particular issue in relation to the total number of respondents for an SPD topic;
- d) % of respondents raising a particular issue in relation to the total number of respondents within a respondent category.

The right end column of the table addresses the impact consultation responses had upon the final SPD. As the table suggests a number of issues raised already featured in the Draft SPD. In some instances, these were emphasised/highlighted in the context of the document. Wherever possible/applicable, arrangements were made to accommodate suggested changes/amendments to improve the document. In other instances, suggested changes/amendments were passed on to the relevant council services. Invariably resulting actions and explanations are provided.

SPD topic: <b>Masterplan principles</b>		Number of respondents commenting on this topic by category			Written: 37	ALR: 37	ALR prompt: 56	Exhibition: 119
<b>Issues raised</b>	<b>Category</b>	<b>No. resp. raising issue</b>	<b>% resp. raising issue for topic</b>	<b>% resp. raising issue for category</b>	<b>Response in terms of masterplan changes/adjustments</b>			
Support/Make sure space is secured for local, independent, small, low-rent/affordable businesses in the regeneration area.	Written	23	62%	29%	Support for these types of businesses is highlighted in paragraph 6.15 of the masterplan document. However, this will be further emphasised via reference to a need for a wide mix of shops types and sizes in paragraph 1.2 to reflect the large number of respondents raising concerns over this issue.			
	ALR	16	43%	28%				
	Exhibition	56	47%	14%				
Welcome aspirations/approach to area regeneration.	Written	13	35%	20%	Support welcomed. Improving the appearance and range of uses in London Road and attracting new investment are integral elements of the masterplan principles and objectives contained in paragraphs 1.2, 2.5 and 6.15.			
	ALR	2	5%	3%				
	Exhibition	22	18%	5%				
Would like to see look/feel/shopping experience of London Road improved	ALR	8		14%	In response to the many comments received from the local community seeking positive change in the area, an implementation plan has been added to the end of the SPD in order to provide a tangible focus for future incremental improvements. The implementation plan is not definitive in its details and will be added to and amended over time.			
	Exhibition	5	7%	1%				
Would like to see more visitors/customers attracted to and/or staying in the area	ALR	6	16%	10%				
Welcome new investment / large retail	Exhibition	21	16%	5%				
Would like to see 24-hour use encouraged	ALR	3	8%	5%				
The Masterplan should primarily meet the	ALR prompt	51	91%	89%	The masterplan is intended to provide a framework to guide future development and			

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needs of local people living and working in the area.					environmental improvements for the benefit of all who use the London Road area. Such improvements should be of particular benefit to local residents.			
Would like to see the area's character and uniqueness retained	Written	13	35%	20%	The masterplan aims to retain the aspects that contribute positively to the area, whilst improving its quality and providing an economically-viable shopping centre for the benefit of all.			
	ALR	4		7%				
	Exhibition	18	15%	4%				
Support establishment of secondary circuits of active frontages and/or better links with destinations/attractions in and around the area.	Written	9	24%	14%	Support welcomed. Provision of improved links to the surrounding are integral elements of the masterplan as stated in paragraphs 1.2, 2.5 and 6.15.			
	ALR	4	9%	7%				
	Exhibition	13	11%	3%				
Prioritise re-use of existing buildings rather than demolition followed by rebuild.	Written	8	24%	12%	Agree with the principle of refurbishing and existing buildings where this represents the most sustainable option and realises the full potential of the area with regard to realising the objectives of the masterplan. Paragraph 7.6 of the SPD states that 'as part of an approach to minimise resource impacts, sustainable retrofitting and refurbishment of existing development should be fully explored before adopting a 'demolish and rebuild' approach in the masterplan area.' Additionally, the reuse of buildings as a sustainable development option is already covered in council planning policies and documents (e.g. B&HLP policies SU2 and SU13; SPD 03 and SPD 08) as well as emerging Core Strategy Policy CP1. These policies are relevant to any development proposals in the London Road masterplan area. There are instances, however, where the SPD has highlighted certain opportunities where replacement buildings of high quality design, improved configuration and more rational building height could secure some of the masterplan's key objectives (including accommodating additional land uses, improving the townscape and providing a more legible and accessible townscape).			
	ALR	10	27%	18%				
	Exhibition	11	10%	3%				
London Road has many empty shops. Owners need encouragement to refurbish or replace their shops with new ones. Significant number of entirely new shops will only increase closures of existing ones.	ALR prompt	44	79%	77%	The masterplan provides a framework to guide environmental and public realm improvements in order to improve the appearance of the area, encourage investment in existing building stock, reduce vacancies in business properties and generally turn around the fortunes of London Road which has suffered a long term economic decline.			
Need to occupy empty buildings	ALR	2	5%	3%				
Need for better community infrastructure and/or greater community engagement in future.	Written	5	14%	8%	Noted. The requirement for adequate community infrastructure in new developments is covered in Section 8.0 of the masterplan, as well as existing policies in the Local Plan			
	ALR	4		7%				

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					<p>and the emerging LDF. These policies will be applied as appropriate in respect of future development proposals in the area.</p> <p>The procedures for community engagement in the preparation of planning documents are set out in the council's Local Development Framework Statement of Community Involvement (SCI). It should be noted that the level of consultation undertaken in respect of the London Road masterplan has gone above and beyond the level for a supplementary planning document as specified in the SCI.</p> <p>An implementation section will be added to the masterplan and future projects arising from this will require further consultation with local people, groups, businesses and organisations.</p>			
Extend masterplan boundaries northwards up to the southern end of Preston Park, so as to include shops to north of Preston Circus.	Written	5	14%	8%	<p>The intention of the masterplan is to focus on the core London Road town centre shopping area, the need for which forms a specific recommendation of the London Road &amp; Lewes Road Regeneration Strategy (LR2) and which provides the strategic background to the SPD. The Masterplan boundaries were tested during early stakeholder consultation and it was considered that whilst certain areas such as The Level, which are outside the core shopping area, should be incorporated into the boundary as they had a direct role to play in providing important open space provision, Preston Circus provides a logical gateway and northern limit of the London Road town centre. The area to the north of Preston Circus is distinctly different in character and function, its retail units being tertiary to the town centre and outside the core retail area as defined in the Local Plan. Neither the draft masterplan nor the consultation exercise has identified any specific proposals for the area north of Preston Circus. It should be emphasised, however, that keeping the boundary of the masterplan area tightly around Preston Circus would not preclude potential future improvements from coming forward in the area to the north as separate projects within the overall umbrella of 'LR2', if and when the need is identified. An important aspect of the masterplan is to provide improved linkages to the surrounding area. The area to the north of Preston Circus would benefit from the masterplan's objectives of improving connectivity and pedestrian access across Preston Circus.</p>			
Need for provision of sustainable, affordable housing (ideally at least 40% affordable units).	Written	4	11%	6%	<p>Noted. The Local Plan and the emerging Local Development Framework when adopted provide the planning policy framework for seeking the level of affordable housing in developments in the city, including the London Road masterplan area.</p>			
One development should not undermine any future development.	Written	4	11%	6%	<p>This refers to a masterplan principle contained in the document and is therefore taken as an expression of support, which is welcomed.</p>			
Regeneration needed / welcomed	Exhibition	41	34%	10%	<p>Support welcomed.</p>			

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Oppose proposals for regeneration of the area	Written	3	8%	5%	Opposition noted.			
	ALR	2		3%				
Area's poverty/social deprivation has not been addressed in document.	Written	2	5%	3%	Detailed research on social conditions in the masterplan area was undertaken as part of the London Road & Lewes Road Regeneration Strategy (LR2). This is one of the background documents which informed the proposals contained in the masterplan. The masterplan is a design-based document that seeks to address social deprivation issues through improvements in economic activity, the built environment, public realm, land use, open spaces and air quality.			
Incremental improvements are preferable to regeneration through redevelopment.	Written	1	3%	2%	Both incremental improvements and new development are needed to regenerate the area and the masterplan allows for a range of development scenarios to come forward, including small in scale improvements which would take place incrementally over time (e.g. de-cluttering exercises and other public realm improvements, shop front improvements). At the same time, some of the masterplan's aspirations – particularly in attracting improvements and additions to employment floorspace, will require larger scale investment.  An implementation plan has been produced and incorporated into the final version of the document to provide more certainty that positive changes will be realised. This will need to be regularly assessed and monitored.  It should be stressed that the masterplan does not advocate the need for a superstore to aid regeneration. Should a superstore-based proposal come forward in the future, it would need to be carefully assessed against national and local retail planning policy (which would require an assessment to be undertaken in respect of its potential wider impact on London Road and other shopping centres) and against the principles for new development set out in the masterplan.			
	ALR	53		93%				
	ALR prompt	53	95%	93%				
Object to establishment of secondary retail circuit beyond London Road itself.	Written	1	3%	2%	The secondary circuit proposed not only includes retail uses but those that can help create "active" frontages. The purpose of these circuits is to provide a greater level of activity and safety in the backstreets off the main London Road thoroughfare. The circuits are also intended to add to the area's 'offer', thereby attracting increased volumes of people into the area.			
Set up a 'gallery for ideas' for future Brighton in which local schools, colleges, businesses and residents are invited to submit plans to an open exhibition that would then be incorporated into the masterplan.	Written	1	3%	2%	Noted. The early stakeholder workshops were based on a similar idea. Given the resources involved the consultation was targeted at that stage involving the local school, City College, amenity groups and a few residents. Outcomes are summarised in paragraph 2.4 of the document. The council may seek to address this option in the context of future consultations.			

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Make reference to 1990's survey which suggests more is spent by shoppers travelling on foot/bus than by car.	Written	1	3%	2%	Noted. As the survey was undertaken in the 1990s it is not considered desirable to quote it in a document being produced in 2009. Recent research in the UK and Europe suggests that retail vitality may be best served by a range of measures to improve the walking environment in shopping areas. The implementation plan that has been added to the final version of the document includes action towards assessing the current situation with regards to this issue to support future projects in the area.			
Abolish rates or subsidise rents for small shops in the area.	Written	1	3%	2%	Noted. It should be noted that business rates are set nationally as opposed to locally and that most shops are owned privately, not by the council. Moreover, the draft masterplan is a planning document and does not play a role in such issues.			

SPD topic: <b>Planning policy</b>		Number of respondents commenting on this topic by category			Written: 19	ALR: 27	Exhibition: 66
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Concern that London Road has been classified as a Town Centre and not District Centre as this may be based on out-of-date retail data. Believe that District Centre status more accurately reflects current use of London Road, primarily by local residents and would alter the strategic context of the area in Brighton & Hove's Core Strategy.	Written	1	5%	2%	The masterplan seeks to upgrade the quality of London Road in order to maintain and reaffirm its role as a town centre. This should be seen as distinct from Brighton city centre, which has a role as a regional shopping centre. London Road serves an important and distinct role from the city centre in meeting the more day to day needs of local residents and workers, as well as providing relatively low rents for more specialist retailers who are unable or unwilling to pay city centre rents. At the same time, London Road clearly has a higher status role than district centres in the city, with regard to the size and function of its shops and businesses. District centres in the city are Lewes Road, St James's Street, Boundary Road/Station Road and Brighton Marina.		
Would like to see role of London Road as local shopping area kept	ALR	5	19%	9%	It is recognised that the quality and retail-offer of London Road has declined over the years and there have been questions regarding its retail status and whether it should be 'downgraded' in status to a district centre. Nevertheless, retail centre classifications are made through the Development Plan (LDF) process and cannot be made through SPDs. London Road's status as a town centre is considered to be comparable and consistent with the designation of Hove town centre, focussed on and around George Street. Policy CP15 in the emerging LDF seeks to maintain and enhance the city's current hierarchy of shopping centres (which includes maintaining the status of London Road as a town centre).		
Object to new large retail/supermarket outlet in the area.	Written	13	68%	20%	The many comments received regarding a possible superstore relate largely to proposals by St James's Investments in 2008 for a new Tesco store in the area. It should be noted that a superstore does <i>not</i> form a proposal of the masterplan. Nevertheless, given the fact that London Road is a recognised and established town centre, an overly restrictive policy that specifically prevented a new superstore would be difficult to justify and could have a number of undesirable effects; in particular, dissuading much needed investment in the area, thereby putting pressure on unsustainable out-of-centre locations to accommodate such development (to the further detriment of London Road). Any potential planning application for a superstore in London Road would need to be considered on its merits and assessed against local and national retail policies. This would require a retail impact assessment to be undertaken as part of any planning application for a retail development in excess of 2,500 sq m, in order to assess its effects on existing shops and shopping centres in the surrounding area. Any such proposal would also need to be carefully assessed with regard to its ability to meet the key objectives of the masterplan – i.e. providing opportunities for local businesses, improving accessibility, the public realm, townscape etc.		
	ALR	10	37%	17%			
	Exhibition	54	82%	13%			
Support large department store/retail outlet in the area	ALR	4	15%	7%			
	Exhibition	11	10%	3%			
Oppose new shops as area has good variety of shops already	ALR	3	11%	5%			
Concerned that minimum of 500 residential	Written	2	10%	3%	This relates to strategic proposals for the wider area contained in the Local		

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units and 20,000 sqm office floorspace is too high, potentially resulting in high-rise and/or overdevelopment.					Development Framework (LDF) Core Strategy. It does not relate directly or exclusively to the masterplan area. The 500 residential units are largely envisaged for location in the Preston Road area west of Preston Park (and outside the masterplan area). The 20,000 sq m of employment floorspace is an allocation in the emerging LDF envisaged for the area to the east of London Road, which includes the New England Quarter. Representations in respect of these land use allocations were received during the Core Strategy Summer 2008 consultation and will be considered and dealt with through the LDF process.		
Concerned that quantum of proposed net additions in retail floorspace is not detailed in the document.	Written	1	5%	2%	Whilst the masterplan seeks to create opportunities conducive to new investment in the area, any net gain in retail floorspace achievable would ultimately depend on the level of developer interest. An upper of lower cap on new retail floorspace in the masterplan is not considered to be helpful. There is an existing planning framework in place to ensure that the scale of any future retail development in London Road benefits its town centre role. The Brighton and Hove Retail Study (March 2006) indicates that there is capacity for additional convenience and comparison goods floorspace in London Road over the period covered by the Local Development Framework (LDF) and that provision should be "of a scale appropriate to the function of the town centre" (LDF policy CP15). National planning policy guidance (PPS6) requires a retail impact assessment for any retail planning application in excess of 2,500 sq m. This would ensure a full assessment was carried out on the economic impacts on the wider shopping area with regard to any potential major retail proposals. The B&H Retail Study, along with future monitoring and regular shopping centre health checks undertaken by the council, also inform planning application decisions in relation to proposals for retail development. Both local and national planning policy seek to ensure the continued vitality or regeneration of established shopping centres by directing new retail development to these locations, as opposed to less sustainable and competing out-of-centre sites.		
Concerned delivery mechanisms are not detailed to bring forward sites for development and secure additional 20,000sqm of employment space as well as existing employment floorspace.	Written	1	5%	2%	The masterplan provides a framework to guide future development proposals but cannot guarantee delivery mechanisms across the masterplan area. The council will play a role in facilitating and securing assistance as a landlord and development partner where appropriate. In addition, the council's planning division is currently in the process of moving towards a more proactive 'development management' approach to its statutory planning duties. One aspect of this will be to seek and engage in increased dialogue with landowners, developers and communities in providing creative solutions to bringing forward development in accordance with the city's planning objectives. An implementation plan has been added to the masterplan and will be monitored and updated periodically.		
Concerned that leaving employment allocations	Written	1	5%	2%	Noted. 2010 is the year scheduled for the Development Policies and Site Allocations		

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for 2010 Site Allocations document may be too late in the process of regeneration.					Development Plan Document and it is not possible to expedite this work programme. In the meantime, the continued recession has, unfortunately, not resulted in any development pressure to regenerate the London Road area. In the meantime the council is always responsive to any development proposals that might come forward and will consider them in the light of all material considerations, including adopted and emerging planning documents and national planning guidance.		
Keep particular existing shops/services such as the Post Office and Ransoms	ALR	5	19%	9%	<p>The provision of post offices is not controlled by the council, although it does strongly support in principle a post office facility in London Road and would likely use all powers at its disposal to seek a retained presence if this was at threat.</p> <p>The Ransoms hardware shop is located within a wider group of buildings on the lower north side of Ann Street. The masterplan explores the potential for demolition of this block as part of a wider public realm project to create a new public open space and an improved east west link to physically and visually connect the New England Quarter to The Level. In the event of such an ambitious project moving forward, the need for the satisfactory relocation of existing occupiers of any affected occupiers of Ann Street properties is already a requirement of the masterplan. Such a scheme would form a carefully planned project in its own right, carried out in consultation with local landowners and businesses.</p> <p>It should be recognised that such a project would be unlikely to come forward in isolation and would need to be part of a wider redevelopment in the vicinity if it was to be financially viable. The masterplan has therefore been amended to include two additional scenarios in creating an improved public realm, open space and strengthening the east-west pedestrian link between Hanover/Elm Grove/Lewes Road and Brighton Station. The first of these (and the most achievable in the shorter term) is to improve the public realm and “declutter” the bottom of Ann Street (possibly via a shared surface similar to the New Road principle) and reinforce the link to Oxford Street, the Level and beyond though the treatment of crossings and paving. An additional possibility is to seek a public open space on the corner of Oxford Street, in the event of the future redevelopment of the Boots/Somerfield site, where capacity exists for a taller building than at present.</p>		
	Exhibition	7	11%	2%			
Increased and improved recreational facilities for children all age groups are needed in the area	ALR	4	15%	7%	<p>The masterplan aims to create improved linkages to existing open spaces such as The Level and St Peter’s open space, to make them more usable to all age groups. It should also be noted that the council is currently examining The Level with regard to potential improvements for a range of age groups. It should be further noted that the adjacent New England Quarter will also be providing a range of open spaces, with the northern greenway opening at some point in the next few months, the southern</p>		
	Exhibition	10	7%	2%			



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					greenway opening when the Block J site is finally developed and a children's play area still to be built adjacent to the Jury's Inn site.		
More (affordable) housing is needed	ALR	2	7%	3%	Provision is made in the LDF Core Strategy for additional housing in the immediate and wider area.		
	Exhibition	5	8%	1%			
Oppose housing in Elder Place area	ALR	1	4%	2%	Any proposals for housing would need to be considered on their merits, meet the normal range of relevant planning policy requirements and avoid prejudicing appropriate levels of new employment floorspace from coming forward in accordance with Local Development Framework requirements. If these requirements can be met, there appears no reason per se why the masterplan should seek to prevent housing in the Elder Place area.		
A new use is needed for St Peter's Church	ALR	1	4%	2%	It is understood that the Holy Trinity Church Brompton will be taking on St Peter's and ensuring its future use as a place of worship for the foreseeable future.		
The number of off licences and newsagents should be reduced	ALR	1	4%	2%	Noted, although planning documents are unable to 'micro-manage' the range and type of shops in an area – such issues of demand supply are the product of a market economy.		
Bring forward detailing of employment site allocations for the area scheduled for 2010.	Written	1	5%	2%	The council is unable to expedite this work.		
Place a limit on size of future retail units.	Written	1	5%	2%	Existing national and local planning policies provide sufficient guidance for any significant retail developments to be fully assessed with regard to their retail impact.		
Any large retail outlets should go in existing large buildings.	Written	1	5%	2%	It is important to allow for a range of opportunities including refurbishment, rebuild and new build, in order to provide for a range of investment opportunity. This will maximise the economic potential of London Road to the benefit of existing and future businesses and users of the area.		

SPD topic: <b>Land use</b>		Number of respondents commenting on this topic by category			Written: 46	ALR: 21	Exhibition: 109
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Support provision of more flexible/affordable office space and/or for creative industries.	Written	6	13%	9%	Support for policies and masterplan proposals highlighted in paragraphs 4.5 and 6.1 is welcomed.		
	Exhibition	7	6%	2%			
Support redevelopment of various sites identified in the masterplan.	Written	6	13%	9%	Support for policies and masterplan proposals highlighted in paragraph 6.1 is welcomed.		
	Exhibition	11	10%	3%			
Would welcome wider range/variety of shop sizes and types returning to London Rd.	Written	4	9%	6%	Noted. Masterplan seeks to provide for investment opportunities and incentives, including opportunities for a wider range of shop sizes and types.		
	ALR	6	29%	10%			
	Exhibition	23	21%	6%			
Support mixed-use development.	Written	3	6%	5%	Support for masterplan proposals highlighted in paragraph 6.1 of the document is welcomed.		
Need to ensure that Richardson's Scrap Yard metal recycling facilities remain accessible to city residents.	Written	2	4%	3%	Local sites for the recycling of waste (including facilities for scrap metal) are important aspects of sustainability and planning policy. The relocation of Richardson's Scrapyard, or ensuring adequate provision for metal recycling elsewhere in the city, would be important considerations in any potential redevelopment affecting the existing site on New England Street.		
Concerned with potential loss of Brewer's trading.	Written	2	4%	3%	Any necessary interim arrangements in any potential redevelopment affecting the existing site on New England Street.		
Concerned with interim arrangements for existing uses in case of re-location within area.	Written	2	4%	3%	Any necessary interim arrangements would need to be carefully planned and managed and would be informed by consultation and dialogue with affected businesses.		
Concerned that future of Mayflower Court not mentioned in context of redevelopment.	Written	1	2%	2%	Mayflower Court is located above the London Road multi storey car park. The car park has recently been refurbished and there are no current plans for its redevelopment. The masterplan does, however, allow for the potential redevelopment of this site as part of the regeneration of the wider area. Any plans of this nature would need to provide for a considerably improved urban environment and meet key objectives set out in the masterplan and the LDF. If such plans were to come forward in the future, the situation re Mayflower Court would need to be carefully considered and managed, with acceptable replacement provision ensured.		
London Rd car park should be retained/improved.	ALR	2	10%	3%	Recent improvements have been made to the London Road car park to improve its safety, economic viability and appearance. Nevertheless, it continues to act as a major physical barrier to east-west pedestrian movement and also contribute to the poor quality townscape in the Elder Place and New England Street area. Its demolition as part of the comprehensive improvement of this area is an important development option which should be retained in the document. Replacement and improved car park provision would be an essential component of any such redevelopment.		
Include old Woolworth in development sites list.	Written	2	4%	3%	There is no particular reason why the former Woolworth building should be singled out for redevelopment. The masterplan neither encourages nor precludes its redevelopment. Any proposals for its redevelopment would be considered on their own merits.		

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Find new use for St Peter's church (preferably community use).	Written	2	4%	3%	It is understood that the use of St Peter's as a place of worship is secured for the foreseeable future.		
Allow for expansion of health care facilities to cope with influx of new residents/businesses.	Written	1	2%	2%	The council has an ongoing dialogue with the Primary Care Trust in order to ensure that the provision of GP facilities is adequate across the city.		
<b>Co-op</b>							
Support improvement/redevelopment of the site.	Written	3	6%	5%	Support for masterplan proposals highlighted in paragraph 6.1 of the document is welcomed.		
Provide art and/or culture venue at Co-op	ALR	3	14%	5%	There is nothing in the masterplan that would oppose the principle of an arts or cultural use of the Co-op. Such a use, however, is unlikely to be an economically attractive use to the landowner. There is no known proposal for such a project with regard to developer interest.		
Concerned that retail space for this site needs to be of sufficient size to attract a good tenant.	Written	1	2%	2%	Noted. Any net loss of retail floorspace within the Co-op building would need to be adequately justified as part of the overall consideration given to any potential future planning application on this site. Another consideration is likely to be the need to secure an economically viable future for the site that also benefits the wider role of London Road as a retail centre.		
Site should be positively allocated for housing (rather than housing playing an 'enabling' role to support a retail use) as housing is likely to contribute to regeneration outside core hours.	Written	1	2%	2%	It is possible that a mixed use development that incorporated residential use on the site may be acceptable in principle, subject to a variety of planning considerations being satisfied.		
<b>Open Market</b>							
Support improvement/redevelopment of the Open Market.	Written	9	20%	14%	Support for masterplan proposals highlighted in paragraph 6.1 of the document is welcomed. A partnership scheme between the traders, Hyde Housing SRL and the council is currently in the pipeline, for a replacement and improved Open Market with accompanying 'enabling' development in the form of social housing.		
	ALR	9	43%	16%			
	Exhibition	36	33%	9%			
Open Market should not be covered over	ALR	2	10%	3%			
Keep Open Market.	Exhibition	14	13%	3%			
Council will need to take a lead and SPD should provide greater details over processes required to revitalise market.	Written	2	4%	3%	Noted. It is agreed that the SPD could helpfully provide some additional guidance to ensure the revitalisation of the market. The levels of detail should be limited to planning-related issues, as the SPD is a planning document. A project to redevelop the Open Market site is being currently underway as a partnership between the traders, the council and Hyde Housing.		
<b>Fire Station</b>							
Support improvement/redevelopment of the site.	Written	2	4%	3%	Support for masterplan proposals highlighted in paragraph 6.1 of the document is welcomed.		

SPD topic: <b>Land use</b>		Number of respondents commenting on this topic by category			Written: 46	ALR: 21	Exhibition: 109
<b>Issues raised</b>	<b>Category</b>	<b>No. resp. raising issue</b>	<b>% resp. raising issue for topic</b>	<b>% resp. raising issue for category</b>	<b>Response in terms of masterplan changes/adjustments</b>		
<b>St. Bartholomew's School</b>							
Object to/Concerned over re-location/redevelopment of the school.	Written	4	9%	6%	Noted. Reference to this has been removed.		
<b>Vantage Point</b>							
Support improvement/redevelopment of the site.	Written	2	4%	3%	Support for masterplan proposals highlighted in paragraph 6.1 of the document is welcomed.		
<b>City College</b>							
Support improvement/redevelopment of the site.	Written	2	4%	3%	Support welcomed. Recent plans for the comprehensive redevelopment of City College have faltered following funding over-commitments nationally by the Learning & Skills Council. The council will continue to support the principle of improving the City College campus and will work with the college in seeking an improved built environment and educational facilities in any future projects affecting the site.		
<b>New England House</b>							
Support retention/refurbishment of building.	Written	22	48%	34%	Support for masterplan proposals highlighted in paragraph 6.1 of the document is welcomed. Decisions regarding the future of New England House will be taken by the council in its role as landlord of this building. Any potential scheme to demolish the building would be carefully assessed by the council in its role as local planning authority, with regard to the amount and type of replacement business floorspace being provided. From a landlord and economic development perspective, the council is well aware of the value to small local businesses provided by the range and affordability of the floorspace within NEH. The need for this type of accommodation is reflected in the masterplan and this will help guide any future corporate decisions made by the council in relation to NEH.		
	ALR	3	14%	5%			
	Exhibition	5	5%	1%			
Support retention of building as creative 'hub' and community.	Written	21	46%	32%			
	Exhibition	8	7%	2%			
Concern that raised rental rates post-redevelopment may destroy and/or break up cluster/community.	Written	10	22%	15%	The masterplan supports the provision of affordable accommodation for small local businesses. As accommodation of this nature is currently provided in New England House, any replacement provision would need to continue to provide an appropriate level of accommodation for this sector of the market.		
Support improvement/redevelopment of the site.	Written	4	9%	6%	Support for masterplan proposals highlighted in paragraph 6.1 of the document is welcomed.		
	ALR	1	5%	2%			
	Exhibition	5	5%	1%			

SPD topic: <b>Movement and access</b>					
Number of respondents commenting on this topic by category    Written: 28    ALR: 28    ALR prompt: 54    Exhibition: 99					
<b>Issues raised</b>	<b>Category</b>	<b>No. resp. raising issue</b>	<b>% resp. raising issue for topic</b>	<b>% resp. raising issue for category</b>	<b>Response in terms of masterplan changes/adjustments</b>
Regret vagueness of detail regarding strategic traffic management and/or Transport Appraisal as there is a need to solve traffic problems before any development can go ahead in the area.	Written	11	39%	17%	There are no plans to change the area's role, which includes a major transport corridor. This was previously recognised in the London Road Lewes Road Regeneration Strategy (LR2). The council is in the process of commissioning transport modelling for the wide city area and is also engaged on a site search for park and ride sites. Any resultant future decisions concerning a wider strategic transport strategy for the city would need to accommodate the masterplan's aspirations to improve the quality, appearance and safety of the London Road masterplan area.
	ALR	11	40%	19%	
	Exhibition	34	34%	8%	
Improve traffic flow / Less congestion	ALR	1	4%	2%	
	Exhibition	7	7%	2%	
Make reference to effects of traffic upon conservation areas identified in recent English Heritage Conservation Areas at Risk survey (CAARS).	Written	2	7%	3%	Part of the Masterplan area falls within the Valley Gardens Conservation Area, which has been identified as being 'at risk' in the English Heritage study. The Valley Gardens area has a specific policy within the emerging Core Strategy (Policy SA3) and that policy acknowledges the need to address the effects of traffic on the area. However, any significant and detailed proposals will be dependent upon the outcome of an assessment of those proposals using a transport model for the city as a whole.
<b>Car parking</b>					
Object to increase in parking spaces.	Written	4	14%	6%	There are no proposals in the masterplan to significantly increase car parking spaces.
Reduce parking spaces.	Exhibition	4	4%	1%	There is no intention by the council to reduce car parking spaces.
Object to car parking spaces going out of council control.	Written	1	4%	2%	There are no proposals in the masterplan to withdraw car parking spaces from council control.
Concerned that no maximum number of parking spaces is specified in the document.	Written	1	4%	2%	The document provides a framework to guide future townscape and public realm changes. Future car parking levels are dependent on future planning proposals along with any future changes to the council's strategic transport policies or parking strategies.
Provide more car parking	ALR	2	7%	3%	The amount and location of additional car parking would be an issue for consideration commensurate with the scale on any future development. As London Road is a town centre, it is not considered appropriate to limit car parking provision for locals only, as this would limit access to the centre and have a consequent negative impact on the local economy.
Avoid reduction in car parking provision	ALR	1	4%	2%	
Provide parking for locals only	ALR	1	4%	2%	
More (cheap) parking	Exhibition	11	11%	3%	
Limit size of delivery vehicles to keep disturbance to residents to a minimum.	Written	2	7%	3%	
					This is probably an unrealistic objective, given the number of large food chain stores and the area's role as a town centre. Planning applications for new retail development are carefully assessed, however, with regard to environmental health issues, including the need to manage servicing arrangements. The council's European-funded CIVITAS project includes initiatives that are related to freight/delivery vehicles.

SPD topic: <b>Movement and access</b>					
Number of respondents commenting on this topic by category    Written: 28    ALR: 28    ALR prompt: 54    Exhibition: 99					
<b>Issues raised</b>	<b>Category</b>	<b>No. resp. raising issue</b>	<b>% resp. raising issue for topic</b>	<b>% resp. raising issue for category</b>	<b>Response in terms of masterplan changes/adjustments</b>
Introduce free parking in London Road and The Level.	Written	1	4%	2%	This request has been passed on to the council's Sustainable Transport division for consideration. Any decisions policy on future car parking charges are made by the council with regard to a wide range of corporate concerns, many of which (such as budgetary considerations) are outside the influence of planning policy documents. It should be noted, however, that the council uses car parking income to administer the car parking system and also to invest in, and encourage the use of, more sustainable forms of transport.
<b>Pedestrian and cyclist priority</b>					
Support better pedestrian routes/ more links / improvement of facilities for pedestrian and cyclists.	Written	14	50%	22%	Support for masterplan proposals highlighted in paragraphs 6.5 and 6.14 of the document is welcomed. A key objective of the masterplan is the need for "facilities for all users with priority given to pedestrians and cyclists" (pages 4-5 of draft SPD). At the same time, the document aims to improve the location of and access to public car parks in the area to assist in its economic regeneration. The masterplan also states the need for further modelling work to test potential traffic options to ensure that any likely impacts could be managed or minimised.
	ALR	10	36%	17%	
	Exhibition	56	50%	14%	
Developments and improvements should prioritise pedestrians, cyclists and public transport rather than attracting more private cars into the London Road area.	ALR prompt	53	98%	93%	
Urban design priorities on pages 25, 27 and 29 states 're-assess priority given to pedestrians and cyclists'. This is a much weaker statement than elsewhere in the SPD and suggests that the priority being assigned to walking and cycling is not as strong as indicated previously.	Written	1	4%	2%	The reassessment of priority to pedestrians and cyclists refers to key vehicular access nodes (such as Preston Circus) identified in the masterplan. These nodes need to be carefully examined with regard to the balance between pedestrian and cycle access on the one hand and motorised traffic on the other. The council will be seeking inventive solutions that improve pedestrian and the cyclist facilities whilst recognising the need to prevent or minimise traffic congestion on key access points through the area.
Paragraph 2.5 and 6.10 add cycling/cyclists.	Written	1	4%	2%	Agreed. Paragraphs 2.5 and 6.11 will be amended to accommodate this suggestion.
Mention health benefits of reducing car use and increasing walking, cycling and public transport.	Written	1	4%	2%	Support for the need to assess the health impact of new development highlighted in 7.23, 7.24 and 7.25 is welcomed.
<b>Public transport</b>					
Support better bus stop arrangements and facilities for bus users.	Written	1	4%	2%	Support for masterplan proposals highlighted in paragraph 6.5 of the document is welcomed.
	ALR	4	14%	7%	
	Exhibition	9	9%	2%	
Give more emphasis on need to improve/promote public transport infrastructure, particularly bus users.	Written	2	7%	2%	The document promotes a balance between public and private transport. The movement and access section includes the objective of improving arrangements and facilities for bus users.
<b>Traffic reduction</b>					
Support reduction in traffic and/or in traffic-related pollution, noise and carbon emissions.	Written	17	61%	26%	Noted. Traffic is a major contributor to the levels of pollution experienced in the city. The council wishes to reduce carbon levels and will pursue appropriate transport measures to assist in doing so.
	ALR	11	39%	19%	
	Exhibition	35	35%	9%	

SPD topic: <b>Movement and access</b>					
Number of respondents commenting on this topic by category    Written: 28    ALR: 28    ALR prompt: 54    Exhibition: 99					
<b>Issues raised</b>	<b>Category</b>	<b>No. resp. raising issue</b>	<b>% resp. raising issue for topic</b>	<b>% resp. raising issue for category</b>	<b>Response in terms of masterplan changes/adjustments</b>
Believe action is needed to significantly reduce through traffic – no amount of landscaping or street furniture will make London Road a pleasant place to shop or visit unless this happens.	ALR prompt	45	83%	79%	Noted. There are no proposals in the masterplan to change the existing routing system (although neither are such changes precluded). If any such changes are proposed in the future they would need to be fully modelled and the subject of widespread consultation before being agreed.
Remove reference to 'moving traffic around' in favour of measures to reduce car traffic.	Written	1	4%	2%	
<b>Traffic movements</b>					
Object to changes to existing one-way system.	Written	1	4%	2%	There are no proposals in the masterplan to change the existing routing system (although neither are such changes precluded). If any such changes are proposed in the future they would need to be fully modelled and the subject of widespread consultation before being agreed.
	ALR	1	4%	2%	
Concerned that no details are provided of alternative route for northbound traffic.	Written	2	7%	3%	
A number of respondents submitted specific proposals for changing in traffic routing and movement in the area.	Written	4	14%	6%	Any detailed changes to traffic movements would need to be considered in the light of strategic transport issues and tested using a new transport model for the city.
	Exhibition	31	31%	8%	
Pedestrianise various areas/streets.	Exhibition	8	8%	2%	

SPD topic: <b>Urban design</b>		Number of respondents commenting on this topic by category			Written: 22	ALR: 19	Exhibition: 75
<b>Issues raised</b>	<b>Category</b>	<b>No. resp. raising issue</b>	<b>% resp. raising issue for topic</b>	<b>% resp. raising issue for category</b>	<b>Response in terms of masterplan changes/adjustments</b>		
Support for more cultural/social activities in the area	Exhibition	9	12%	2%	Support a range of activities to be attracted to the area as highlighted in paragraphs 1.2, 2.5 and 6.1 of the document is welcomed.		
Include good practice example large office development in Netherlands	Written	1	5%	2%	The council promotes sustainable building design through its planning policies and SPDs. Good practice examples are routinely referred to by planners in discussions with developers. These have to be regularly updated as the sustainable agenda continually moves forward. The Netherlands example is interesting and will be noted for possible future reference.		
<b>Key townscape buildings</b>							
Object to proposals that impact upon setting of St Bartholomew's Church	Written	1	5%	2%	St Bartholomew's is highlighted in the document as both a key landmark and a listed building. The views of listed buildings are important considerations under both national and local planning guidance. There are no proposals in the document that would obviously impact adversely on the church. Any proposals that might impact on such views would need to be carefully assessed.		
Support the aim to enhance setting of St Bartholomew's and/or St Peter's Churches	Written	2	9%	3%	Support for masterplan proposals highlighted in paragraph 6.6 of the document is welcomed.		
Support preserving buildings identified in the document and/or more, in particular original facades along London Road.	Written	9	41%	14%	Support for masterplan proposals highlighted in paragraphs 6.6 and 6.9 of the document is welcomed.		
	ALR	11	58%	19%			
	Exhibition	20	41%	5%			
Support proposals to enhance views of St Bartholomew's Church.	Written	1	5%	2%	Support for masterplan proposals highlighted in paragraph 6.6 of the document is welcomed.		
Create new London Road conservation area.	Written	1	5%	2%	Creating a conservation area would be difficult to justify given the incremental nature of development, changes to built fabric over the decades and relatively poor townscape in London Road. There are, however, some historic and attractive buildings in the masterplan area, including some of the shops on the western side of London Road itself (albeit they have been visually damaged at ground floor level as a result of ground floor forward projections and unsympathetic shopfronts). The positive aspects of these buildings are referred to in the document as are the potential for improvements at ground floor level and a shopfront design code for London Road as a whole. It is also recommended that these buildings be considered for inclusion on the 'local list' in order to provide additional planning policy support for their future safeguarding and improvement.		
	ALR	1	5%	2%			



SPD topic: <b>Urban design</b>		Number of respondents commenting on this topic by category			Written: 22	ALR: 19	Exhibition: 75
<b>Issues raised</b>	<b>Category</b>	<b>No. resp. raising issue</b>	<b>% resp. raising issue for topic</b>	<b>% resp. raising issue for category</b>	<b>Response in terms of masterplan changes/adjustments</b>		
Identify key strategic city views relative to the area using baseline information in Brighton & Hove Urban Characterisation Study and Valley Gardens Study for ascribing and judging setting (see English Heritage's History in View) and highlight the need to consider impact upon South Downs.	Written	2	9%	3%	The council will be producing a separate Urban Design Framework SPD for the city as a whole, which will identify the key strategic views from outside and within the city that should be protected and/or enhanced. English Heritage is also due to issue specific guidance on the subject of strategic views and that will inform the drafting of the SPD.		
In 6.6 replace the term 'locally listed dwellings' for 'Buildings of Local Interest'.	Written	1	5%	2%	Buildings of Local Interest is a nationally used and understood term and is used in the relevant Local Plan policy. It would be confusing to introduce a new term within this SPD.		
Define 'quality' buildings	Written	1	5%	2%	In the context of a building, 'quality' normally refers to issues around its integral design and appearance. The masterplan seeks to retain such buildings and improve them where appropriate. By way of contrast, the masterplan also refers to "poor quality" buildings, where redevelopment could provide some net benefits to the area and realise important objectives of the masterplan.		
Include unprotected buildings identified and more in Buildings of Local Interest list	Written	1	5%	2%	The council is considering a proposal to bring forward a review of the current Buildings of Local Interest list and is awaiting the publication of new guidance on the subject from English Heritage, which is due in the Spring of 2010		
<b>Design principles</b>							
Object to box-like concrete and glass buildings.	Written	1	5%	2%	Noted. Details on how the masterplan addresses the issue of quality in urban design is contained in paragraph 6.14 of the document.		
Support design principles, particularly street presentation and design out crime.	Written	3	14%	5%	Support for masterplan proposals highlighted in paragraph 6.14 of the document is welcomed.		
Support for good quality new buildings	Exhibition	6	8%	2%			
Support combination of old and new buildings	Exhibition	4	5%	1%			
Support flexible use of public spaces.	Written	1	5%	2%	Support welcomed. This is highlighted as good practice in the <i>Urban design: quality in new development</i> section of the document (page 22).		
Recommend use high-quality materials in new and/or retrofit buildings.	Written	1	5%	2%	The quality of materials is an essential planning consideration of all new development and refurbishment proposals and is covered in the local plan (as well as the emerging LDF).		
<b>Building lines</b>							
Object to changing/pulling building line back.	Written	2	9%	3%	The SPD refers only to the possibility of "pulling back" the building line at a few key points to achieve wider objectives (such as new public space and improved air quality) or where it would reinstate the original building line. Any specific proposals for this would need to be carefully considered in relation to individual development proposals.		

SPD topic: <b>Urban design</b>		Number of respondents commenting on this topic by category			Written: 22	ALR: 19	Exhibition: 75
<b>Issues raised</b>	<b>Category</b>	<b>No. resp. raising issue</b>	<b>% resp. raising issue for topic</b>	<b>% resp. raising issue for category</b>	<b>Response in terms of masterplan changes/adjustments</b>		
Support pushing back building line, particularly if back to original façade line.	Written	3	14%	5%	Support for masterplan proposals highlighted in paragraph 6.16 of the document is welcomed.		
Bring building line back to original façades to increase public space/widen pavements.	Written	2	9%	3%	This is an option that the masterplan allows to be explored.		
<b>Building heights</b>							
New buildings should be sympathetic to the scale and style of existing ones.	Written	3	14%	5%	Support for masterplan proposals highlighted in paragraph 6.14 of the document is welcomed.		
Object to any tall buildings.	Written	2	9%	3%	Noted. There are no proposals in the masterplan to build higher than prevailing building heights and 'key reference points' (based on existing buildings that are identified in the document).		
Concerned that heights proposed could be lower (no higher than existing buildings) as this might be associated with overdevelopment.	Written	4	18%	6%	Whilst the masterplan provides some guidance on indicative heights and massing, individual proposals will need to be assessed on their own merits with reference to their impact on their surroundings.		
Retain height references in document	ALR	1	5%	2%			
<b>Secondary circuits and active frontages</b>							
Include in para. 6.13: "contributing to the aspirations of residents" and clarify that providing increased 'active frontages' does not necessarily include more shops.	Written	1	5%	2%	The context of paragraph 6.14 concerns the council's aspirations for quality and innovative building design. As this may not be the aspiration of all residents, it is considered preferable to amend the sentence to read "contributing to the Local Development Framework's aspirations for quality and innovative building design," as the LDF has been subject to public consultation and informed by public opinion. "Active frontages" does not necessarily refer to shops. A glossary of terms has been added to the masterplan which includes a definition of this term.		
<b>Co-op</b>							
Object to retention of building.	Written	1	5%	2%	The proposal to retain this building attracted a significant degree of support from respondents. The masterplan also provides a scenario for the redevelopment of the building if a refurbishment scheme is financially unviable, the financial case can be proven and a replacement building of sufficient high quality was proposed.		
Support retention of original building.	Written	8	36%	12%			
	ALR	8		14%			
	Exhibition	34	36%	8%			
Support proposed height restrictions.	Written	1	5%	2%	Support for masterplan proposals highlighted in paragraph 6.16 of the document is welcomed.		
Concerned that proposed height restrictions will not allow flexibility for realising site's potential.	Written	2	9%	3%	Any proposal for a taller building would need to be carefully considered on its merits, with reference to its visual impact and townscape role, as well as being justified in respect of proving the financial viability of retaining the existing building.		
A taller building could be explored through massing studies.	Written	1	5%	2%	Any taller building would also need to be carefully assessed and justified with regard to its urban design role in the wider townscape.		

SPD topic: <b>Urban design</b>		Number of respondents commenting on this topic by category			Written: 22	ALR: 19	Exhibition: 75
<b>Issues raised</b>	<b>Category</b>	<b>No. resp. raising issue</b>	<b>% resp. raising issue for topic</b>	<b>% resp. raising issue for category</b>	<b>Response in terms of masterplan changes/adjustments</b>		
Height should be guided by what is acceptable in planning terms (sunlight/daylight studies).	Written	1	5%	2%	Townscape, considerations regarding street scene and land use are also important factors in guiding what is acceptable in planning terms.		
<b>Duke of York and Fire Station</b>							
Support expansion of Duke of York cinema	ALR	2	11%	3%	Support for uses that can help attract new and/or enhance the experience of visitors to the area as highlighted in paragraph 1.2 of the masterplan is welcomed.		
Create cultural gravity point for area around having the Duke of York as centrepiece.	Written	1	5%	2%	Noted. The masterplan suggests public realm improvements in this area that would assist with such a proposal.		
<b>Core Development Area</b>							
Support idea of/concept supporting proposal for central square.	Written	5	23%	8%	Support for masterplan proposals highlighted in paragraph 6.16 of the document is welcomed. Options 1 and 2 will be added to Urban Design section featuring central square area to account for opportunities to strengthen Ann St and Oxford St via retention of existing buildings and developing square in the context of the redevelopment of the Boots/Somerfield site.		
	ALR	1	5%	2%			
	Exhibition	6	5%	2%			
Support retention of Post Office service in area	Written	2	9%	3%	Noted. The provision of post offices is not controlled by the council, although it does strongly support in principle a post office facility in London Road and would likely use all powers at its disposal to seek a retained presence if this was at threat.		
Object to proposal of central square.	Written	1	5%	2%	If the concept of the square was to be advanced as a project it would be undertaken in consultation with local stakeholders, including affected landowners and businesses. It would need to secure positive benefits for the wider area and the relocation of existing affected businesses. Other issues relating to ownership and compensation would need to be fully explored and agreed. Further options have been added to the masterplan, one of which involves zero demolition, although this would produce a much smaller public open space.		
Oppose demolition of buildings to create central square.	ALR	2	11%	3%			
Square should not result in demolition of buildings.	Written	3	14%	4%			
Achieve connectivity without demolition of existing buildings (see good practice example: Milsom St development in Bath).	Written	1	5%	2%	The masterplan proposes a range of development options to promote movement through the area and to improve legibility. Demolition is not a major aspect of the masterplan's strategy, although the document does suggest some areas where small scale demolition or larger scale redevelopment could provide some significant net gains in respect of urban design. The Milsom Street example in Bath will be examined with reference to its relevance to the London Road masterplan area.		
Turn Francis Street into city allotment.	Written	1	5%	2%	Probably not a viable concept.		
<b>Elder Place Development Area</b>							
Object to introduction of 'local landmark building' at proposed location (Preston Circus).	Written	1	5%	2%	A local landmark could help to reinforce a sense of place in this location, although the masterplan only identifies the potential of this location, rather than the form any such landmark might take. The latter factors would need to be carefully assessed in the event of any eventual development proposal.		
Add green roof and walls to New England	Written	1	5%	2%	Green roofs and walls are interesting concepts which could be explored as part of any		

SPD topic: <b>Urban design</b>		Number of respondents commenting on this topic by category			Written: 22	ALR: 19	Exhibition: 75
<b>Issues raised</b>	<b>Category</b>	<b>No. resp. raising issue</b>	<b>% resp. raising issue for topic</b>	<b>% resp. raising issue for category</b>	<b>Response in terms of masterplan changes/adjustments</b>		
House.					redevelopment or refurbishment option. Supplementary planning advice is being produced by the council to provide advice on such issues.		

SPD topic: <b>Public realm</b>		Number of respondents commenting on this topic by category			Written: 37	ALR: 15	Exhibition: 112
<b>Issues raised</b>	<b>Category</b>	<b>No. resp. raising issue</b>	<b>% resp. raising issue for topic</b>	<b>% resp. raising issue for category</b>	<b>Response in terms of masterplan changes/adjustments</b>		
Strategy supported and/or better quality public realm welcomed.	Written	8	44%	12%	Support for masterplan proposals highlighted in paragraph 6.20 of the document is welcomed.		
Support introduction of trees.	Written	4	22%	6%			
	ALR	11	73%	19%			
	Exhibition	29	26%	7%			
More and/or better open/green spaces.	ALR	5		9%			
	Exhibition	26	23%	6%			
Improve public realm - public art / interesting street furniture	ALR	2	13%	3%			
Better/Quality surfaces/materials.	Exhibition	5	4%	1%			
Support provision of more pavement space and seating.	Written	5	28%	8%			
	ALR	2	13%	3%			
	Exhibition	11	10%	3%			
Support removal/reduction of street clutter.	Written	3	17%	4%			
	Exhibition	8	7%	2%			
Support introduction of clear signage.	Written	3	17%	4%			
Tackle/Reduce anti-social behaviour in the area.	Written	3	17%	4%	The masterplan seeks to reduce incidences of anti-social behaviour through promoting urban design solutions that will increase activity, 'passive surveillance' (overlooking) and safety in the area.		
	ALR	1	7%	2%			
	Exhibition	10	9%	2%			
Support greater permeability including re-opening of currently closed routes.	Written	2	11%	3%	Support for masterplan proposals highlighted in paragraph 6.20 of the document is welcomed.		
Support improvements to York Place.	Written	1	6%	2%			
Concerned over impact of central reservation on congestion and/or bus stop arrangements.	Written	1	6%	2%	As indicated in the masterplan, the objective is to seek design solutions that can cater for the various needs of London Road users. The details of any future central reservations would need to be carefully designed to improve crossing conditions for pedestrians without adversely affecting traffic flows and bus stop arrangements.		
Start implementing public realm principles first.	Written	1	6%	2%			
Cheapside should be included in the public realm strategy.	Written	1	6%	2%	Cheapside has been identified for 'greening' in the document. This needs to be reflected in the diagram showing opportunities for change in the public realm on p32.		

SPD topic: <b>Public realm</b>		Number of respondents commenting on this topic by category			Written: 37	ALR: 15	Exhibition: 112
<b>Issues raised</b>	<b>Category</b>	<b>No. resp. raising issue</b>	<b>% resp. raising issue for topic</b>	<b>% resp. raising issue for category</b>	<b>Response in terms of masterplan changes/adjustments</b>		
Better links St Peter's / Open Market.	Written	1	6%	2%	Noted.		
Add case studies and/or reference to English Heritage's Streets for All.	Written	1	6%	2%	Noted. A case study has been added to the <i>Urban design: quality in new development</i> section of the document.		
Add to Street category, item 5 'well designed narrow fascia boards'.	Written	1	6%	2%	Noted. The item 5 the <i>Public realm: illustrated design principles by road type</i> section of the document (page 31) has been amended to accommodate this suggestion.		
Minimise light pollution in street lighting.	Written	1	6%	2%	Noted. Paragraph 6.20 has been amended to accommodate this suggestion.		
Differentiate between car parking and cycle parking in paragraph 6.19 "off-street rather than on-street".	Written	1	6%	2%	All cycle parking in public areas would be on-street in positions which maximise overlooking.		
When designing shared surface spaces, consider the needs of visually impaired people.	Written	1	6%	2%	Noted. Disability groups will be consulted as a matter of course and their needs carefully assessed in respect of any public realm improvements.		
<b>Public art</b>							
Support public art	Written	2	11%	3%	Support for masterplan proposals highlighted in paragraph 6.20 of the document is welcomed.		
Support artistic influence/ activity in the area	Exhibition	6	5%	2%			
Make sure proper care is given to introduction of artistic elements, perhaps better to concentrate on trees.	Written	1	6%	2%	Increasing the number of trees is a masterplan proposal, as is engaging artists early to influence the public realm and successfully incorporate artistic elements.		
Create 'graffiti area'.	Written	1	6%	2%	The council has a policy of carefully monitoring and controlling graffiti across the city in order to reduce its adverse effects as far as possible. The issue is fairly complex but the desirability or otherwise of graffiti area could be explored. If taken up, it would need to play a positive role as part of a wider strategy for graffiti prevention and removal in the area.		

SPD topic: <b>Sustainability</b>		Number of respondents commenting on this topic by category			Written: 15	ALR: 6	Exhibition: 10
<b>Issues raised</b>	<b>Category</b>	<b>No. resp. raising issue</b>	<b>% resp. raising issue for topic</b>	<b>% resp. raising issue for category</b>	<b>Response in terms of masterplan changes/adjustments</b>		
Principles welcomed / supported.	Written	2	13%	3%	Support welcomed.		
Give consideration to a small anaerobic digester in the area collecting food waste from commercial and residential units and turning it back into power for the community.	Written	1	7%	2%	Suggestion noted. There are many issues with AD technology that make it difficult to implement economically especially small scale and in urban settings, however, it potentially provides many resource savings and feasibility studies with a view to installation would be welcomed through the SPD. Additionally, work is underway on the council's Waste Development Framework (being produced jointly with East Sussex County Council) and this suggestion will be referred to the relevant team.		
<b>Green infrastructure</b>							
Support for biodiversity and green infrastructure.	Written	8	53%	12%	Support for proposals highlighted in paragraphs 7.17 to 7.20 is welcomed.		
	Exhibition	5	50%	1%			
Mention Brighton & Hove becoming an urban biosphere and how SPD can contribute towards that.	Written	1	7%	2%	A reference has been added to paragraph 7.3 to account for the possibility of the city being designated a UNESCO Biosphere Reserve.		
Make stronger reference to links between greening and noise reduction in buildings.	Written	1	7%	2%	Noted. Paragraph 7.19 already makes reference to the broader benefits of a greener urban environment to 'quality of life' under which air quality, noise and pollution, among other things, are implicitly included. However, reference to the impact of noise will be added where applicable throughout the document.		
Creating a greener urban environment has benefits for air quality; noise; flooding/climate change adaptation and biodiversity so should be positively encouraged.	Written	1	7%	2%			
<b>Sustainable building design</b>							
Support sustainable building design and/or zero carbon development.	Written	6	40%	11%	Support welcomed.		
	ALR	1		2%			
	Exhibition	7	70%	2%			
Provide advice on planting and maintaining green roofs and walls.	Written	1	7%	2%	This would be more appropriately undertaken separately, outside the masterplan, as it would be applicable across the city. Websites offering this kind of advice include <a href="http://www.livingroofs.org/">http://www.livingroofs.org/</a> and <a href="http://www.building-green.org.uk/">http://www.building-green.org.uk/</a>		
Make grants available for improving existing buildings (including energy efficiency).	Written	1	7%	2%	The Council offers an extensive grants programme for energy efficiency improvements. Developer contributions (secured via Section 106 agreements) allows for the possibility of seeking funding for retrofitting existing buildings for increased energy efficiency.		
<b>Water quality</b>							
Support protection of water quality / aquifer	Written	2	13%	3%	Support for proposals highlighted in paragraphs 7.21 to 7.22 is welcomed.		

SPD topic: <b>Sustainability</b>		Number of respondents commenting on this topic by category			Written: 15	ALR: 6	Exhibition: 10
<b>Issues raised</b>	<b>Category</b>	<b>No. resp. raising issue</b>	<b>% resp. raising issue for topic</b>	<b>% resp. raising issue for category</b>	<b>Response in terms of masterplan changes/adjustments</b>		
<b>Air quality</b>							
Support aim/measures to reduce air pollution and/or improve air quality and noise levels.	Written	4	27%	6%	Support for proposals highlighted in paragraphs 7.13 to 7.16 is welcomed.		
	ALR	5	83%	9%			
	Exhibition	31	31%	8%			
Concern over promotion of development where there are existing air quality concerns.	Written	1	7%	2%	Masterplan seeks design solutions to help improve air quality.		
Deliver improvements to air quality via reduction in traffic levels rather than via setting back new buildings.	Written	2	13%	3%	Council is currently committed to maintaining the area's role as a major urban corridor for motorised traffic.		
<b>Noise</b>							
Concerned that the document contains no references to the impact of noise.	Written	1	7%	2%	Noise issues are dealt with in generic policies via Local Plan Policy SU10 and emerging Local Development Framework.		
In 6.13 add 'Deliver improvements in the noise climate' and 'use horizontal and vertical emphases to create appropriately designed façades, which are greened wherever practicable'.	Written	1	7%	2%	Noted. Paragraph 6.14 has been amended to accommodate this suggestion in a generic way.		
Add Traffic Noise in section 7 – in the coming months Brighton and Hove will be engaged by Defra in the Noise Action Planning process.	Written	1	7%	2%	Noted. It would not be appropriate to add a section on noise. The DEFRA initiative refers to noise mapping. It is a central government run initiative and at present there are no duties which come to the local authority. Planning Policy Guidance PPG24 is a key planning document which is used as part of the planning process when looking at the traffic noise impact on new residential accommodation.		
Care should be taken in the design of mixed use developments that noise problems are not created.	Written	1	7%	2%	Noted. There are numerous planning tools available to deal with new developments and principally PPG24 deals with affording residents protection from noise sources. Noise issues are examined with regard to Local Plan Policy SU10 and emerging Local Development Framework. The council's Environmental Health team have regard to noise sources and impact and condition as appropriate with the ultimate aim of designing out noise problems. Additionally, increasingly the team engage at pre-application stage with developers to ensure that noise issues are designed out as appropriate. It is important to note, however, that under the provisions of the Environmental Protection Act 1990 and the statutory noise nuisance legislation traffic noise is exempt and can not be deemed a statutory noise nuisance.		
Add to support objective 6.13: To manage and mitigate the impact of traffic noise by means of transport and land use planning, and design for noise protection where appropriate.	Written	1	7%	2%			
<b>SUDs</b>							
Make sure developers make arrangements for long-term maintenance of SUDS, so that their effectiveness is maintained in perpetuity and	Written	1	7%	2%	Noted.		



SPD topic: <b>Sustainability</b>		Number of respondents commenting on this topic by category			Written: 15	ALR: 6	Exhibition: 10
<b>Issues raised</b>	<b>Category</b>	<b>No. resp. raising issue</b>	<b>% resp. raising issue for topic</b>	<b>% resp. raising issue for category</b>	<b>Response in terms of masterplan changes/adjustments</b>		
ensure surface water is separated from existing foul or combined sewers.							

SPD topic: <b>Community and funding</b>		Number of respondents commenting on this topic by category			Written: 6
<b>Issues raised</b>	<b>Category</b>	<b>No. resp. raising issue</b>	<b>% resp. raising issue for topic</b>	<b>% resp. raising issue for category</b>	<b>Response in terms of masterplan changes/adjustments</b>
Support for proposed approach.	Written	1	17%	2%	Support for proposals highlighted in paragraphs 8.1 to 8.3 of the document is welcomed.
Concern ad-hoc outcomes should developers seek to reduce contributions to overall regeneration plan.	Written	1	17%	2%	The plan will not be easy to deliver in the current economic climate, but provides a long term framework that should prove beneficial in guiding future development during an economic upturn. The masterplan will need to be monitored and opportunities sought wherever possible to aid its implementation.
Concern over funding needed to support masterplan implementation (only from new development?).	Written	2	33%	3%	
Funding for investment for strategic infrastructure can normally be obtained through the periodic review of prices, subject to approval by Ofwat. However, if investment is required to local water or sewer networks, Ofwat takes the view that water and sewerage companies should seek to finance this work through contributions from developers. Development which is permitted to proceed before the necessary capacity is made available may lead to unsatisfactory levels of service to both new and existing residents.	Written	1	17%	2%	Noted. These issues are covered in existing policies in the Local Plan.
Create fund for maintaining the outside of buildings.		1	17%	2%	This would be impractical to allocate and administer.

Masterplan appendices		Number of respondents commenting on this topic by category			Written: 7	ALR: 5	Exhibition: 10
Issues raised	Category	No. resp. raising issue	% resp. raising issue for topic	% resp. raising issue for category	Response in terms of masterplan changes/adjustments		
<b>Shop front design guidance</b>							
Support for shop frontage improvements / Guidance welcomed.	Written	6	86%	9%	Support is welcomed.		
	ALR	5	100%	9%			
	Exhibition	6	60%	2%			
Scale geared to the Lanes and North Laine. Guidance should include good examples of modern retail design such as Panter Hudspith in York.	Written	1	14%	2%	The guidance sets out common principles that should apply to all shop units, irrespective of the scale or period of the building, though it should be noted that many of the shops in London Road are within Victorian buildings. The guidance nevertheless specifically states that “innovative, contemporary designs will be welcomed provided they relate well to the building and to adjoining buildings and shop fronts.”		
<b>Safer places statement</b>							
It is good that the document addresses this issue. However, avoid use of acronyms which may not mean anything to non-planners. Correct spelling mistakes and grammatical errors.	Written	1	14%	2%	Noted. Further editing will be undertaken prior to publication of the final document.		

Additional comments		Number of respondents commenting on this topic by category			Written: 17	ALR: 11	Exhibition: 138
Issues raised	Category	No. resp. raising issue	% resp. raising issue for topic	% resp. raising issue for category	Response in terms of masterplan changes/adjustments		
More public toilets needed.	Written	1	6%	2%	Noted.		
	Exhibition	4	3%	1%			
Suggest creation of London Road Appreciation Society	ALR	1	9%	2%	Noted.		
<b>Sustainability Appraisal</b>							
It has not fully set out all the implications of the SPD's desire to improve access for all modes to all places.	Written	1	6%	2%	Concern noted. As part of an iterative process, the SA will re-assess the revised version of the SPD and ensure that the potential implications are acknowledged and highlighted.		
Needs to acknowledge impact of school demolition and as complementary use for Church activities.	Written	2	12%	3%	There are no plans to redevelop the school although the draft masterplan suggests its consideration could be given to its replacement if the wider area was to be comprehensively redeveloped. The Sustainability Appraisal will acknowledge this further and outline the potential implications.		
<b>Masterplan document</b>							
Confusing for non-planners: document contains too much jargon	Written	3	18%	4%	The document by necessity includes terms associated with urban design and planning issues, as it will ultimately be used as a planning policy document primarily by planners, architects, developers and others familiar with the concepts explained and illustrated in the document. It was for this reason that during the public exhibition, concerted and largely successful efforts were made to ensure that visitors understood the plans and concepts as set out on the display boards, which also included a glossary of terms to explain some of the 'design language'. Nevertheless, the point is noted that the language of urban design contains a fair amount of 'jargon' and further work will be undertaken to the final version of the document in order to make the masterplan accessible to as wide an audience as possible.		
A clearer planning document is required as SPD is too difficult to understand	ALR	2	18%	3%			
Concern that the council may not be able to deliver proposed improvements.	Written	3	18%	4%	The delivery of masterplan proposals will depend on a range of factors. Some of risks and opportunities are acknowledged in the SWOT analysis contained in the masterplan.		
Explain how economic viability is to be demonstrated.	Written	1	6%	2%	Issues of economic viability are sometimes material considerations that might be taken into account by the local planning authority when considering development proposals that are unable to meet the full range of appropriate planning policies. Where viability is a factor, a common course of action is for a developer to provide financial information on their development proposal in confidence to the District Valuer, who will provide an independent assessment of the viability issues to the local planning authority.		
It would be good to have graphics/artist's impressions of some proposals.	Written	1	6%	2%	The use of artistic impressions can be helpful when detailed design has been agreed. Given the masterplan has not reached this stage, a range of images reflecting good practice examples in and outside Brighton & Hove have been provided to illustrate		

Additional comments		Number of respondents commenting on this topic by category			Written: 17	ALR: 11	Exhibition: 138
Issues raised	Category	No. resp. raising issue	% resp. raising issue for topic	% resp. raising issue for category	Response in terms of masterplan changes/adjustments		
					various issues covered in the document without misleading readers of the document.		
Analysis should be kept separate from proposals.	Written	1	6%	2%	Suggestion noted. It would not be appropriate to change the document given the approach taken to the masterplan was to make a more direct connection between existing and proposed under the various themes structuring the document. However, information has been added to the document to highlight such a distinction within the existing structure of the document.		
Glossary of terms would be helpful and use of plain English too.	Written	1	6%	2%	The masterplan appendices has been revised to include a glossary of terms.		
Add list of figures and plans with numbers and indicate where photos were taken from.	Written	1	6%	2%	A list of figures and maps has been added to as the document..		
Use of checklists: how many does the authority require? Could the Council consider a simplified/condensed single version of all these?	Written	1	6%	2%	This refers to the requirement for developers to submit a Sustainability Checklist as part of any planning application involving new residential development. This, however, is the only checklist required by the council for completion as part of a planning application. Any other checklist used by the council is normally intended to help developers/planning applicants consider various aspects of local plan policy that may be relevant to their planning application.		
Better to produce documents in "black and white" (easier, cheaper and less environmental impact too) also because greater contrast in the graphics are more legible for the visually impaired.	Written	1	6%	2%	As this particular document includes plans and maps, it was considered more appropriate to produce the document in colour, in order to aid clarity. Past experience has shown that graphical depictions of multiple land use designations on a plan are particularly difficult to shown with clarity in a black and white format. The document is available for download or viewing on the council's website, allowing individuals to tailor viewing or printing options to meet their own needs and preferences.  It should be noted that whilst details concerning its availability were advertised, copies of the document were printed individually and sent out on an 'as requested' basis. Experience has shown that this dramatically reduces printing costs for the council, cutting down on the printing of unnecessary copies.		
Include older map of the area to show how the current morphology of the area has been arrived at.	Written	1	6%	2%	This exercise was undertaken as part of the London Road & Lewes Road Regeneration Strategy and Urban Characterisation Study. While the masterplan has taken into account the information contained in these documents, it has avoided reproduction of such information in order to provide a more concise document. This is so the masterplan was kept brief.		
<b>Exhibition</b>							
Found it useful / good work so far.	Written	1	6%	2%	Support welcomed.		
	Exhibition	7	5%	2%			
Panels/Plans short on specifics and generally very confusing.	Written	1	6%	2%	The exhibition was unusually well attended and officers were on hand to explain exhibition board content and concepts. Feedback is appreciated and will help inform		
	Exhibition	15	11%	4%			

Additional comments		Number of respondents commenting on this topic by category			Written: 17	ALR: 11	Exhibition: 138
Issues raised	Category	No. resp. raising issue	% resp. raising issue for topic	% resp. raising issue for category	Response in terms of masterplan changes/adjustments		
Add plans/drawings of what area would look like and/or more information on how to achieve aims.	Exhibition	7	5%	2%	and guide future masterplanning exhibitions.		
<b>Consultation</b>							
Consultation process flawed / not long enough / more engagement with local community needed.	Written	4	24%	6%	The consultation and the exhibition were promoted in the local media and email alerts were sent to a range of businesses, landowners, residents and amenity groups, among others. The exhibition in the Co-op was very successful with over 1000 attending over the 3 days. This reflected the fact that the exhibition had been well-publicised and also well located (in the former Co-op and on the route within the building to the still-operating Post Office). The exhibition was well-staffed with council officers. This and the continual flow of visitors ensured a continued dialogue over the course of the exhibition in order to explain and discuss the masterplan and the content on the exhibition boards with individual attendees. The exhibition placed a significant demand on staff resources, however, and three days (which included a Saturday) was considered to be the upper threshold in terms of making efficient use of council staff.  The duration of the consultation (time allowed for comments to be made) was six weeks. Consultation on this document has gone above and beyond the minimum requirements for a supplementary planning document (SPD) as specified in the Statement of Community Involvement.		
	ALR	1	9%	2%			
	Exhibition	8	6%	2%			
<b>New England Quarter (NEQ) redevelopment</b>							
NEQ is a good example of development.	Written	1	2%	6%	Noted. It should be noted that the NEQ is not yet completed and some of the key benefits for the wider community are yet to be completed (e.g. the pedestrian link has yet to be completed all the way to Brighton Station; the play area is yet to be built and the northern and southern greenway have not yet been completed, although the northern greenway will be opened in the next few months).		
NEQ is not a good example of development.	Written	1	2%	6%			
	ALR	1	9%	2%			
	Exhibition	9	7%	2%			
<b>Tesco</b>							
Object to Tesco development in the area	Written	10	59%	15%	Noted. There is no proposal for a Tesco development in the masterplan.		
	ALR	6	55%	10%			
	Exhibition	90	66%	22%			
Welcome new investment / large retail (some include Tesco).	Exhibition	21	16%	5%			