



**Brighton & Hove  
City Council**

# Overview & Scrutiny

Title:	<b>Environment &amp; Community Safety Overview &amp; Scrutiny Committee</b>
Date:	<b>16 June 2008</b>
Time:	<b>4.00pm</b>
Venue	<b>Committee Room 3, Hove Town Hall</b>
Members:	<b>Councillors:</b> Morgan (Chairman)  Janio (Deputy Chairman), Davey, Davis, Drake, Rufus, Smart and Wells
Contact:	<b>Mary van Beinum</b> Scrutiny Support Officer 01273 - 29 - 1062 mary.vanbeinum@brighton-hove.gov.uk

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## AGENDA

### 1. PROCEDURAL BUSINESS

#### A. Declaration of Substitutes

Where a Member of the Commission is unable to attend a meeting for whatever reason, a substitute Member (who is not a Cabinet Member) may attend and speak and vote in their place for that meeting. Substitutes are not allowed on Scrutiny Select Committees or Scrutiny Panels.

The substitute Member shall be a Member of the Council drawn from the same political group as the Member who is unable to attend the meeting, and must not already be a Member of the Commission. The substitute Member must declare themselves as a substitute, and be minuted as such, at the beginning of the meeting or as soon as they arrive.

#### B. Declarations of Interest

(1) To seek declarations of any personal or personal & prejudicial interests under Part 2 of the Code of Conduct for Members in relation to matters on the Agenda. Members who do declare such interests are required to clearly describe the nature of the interest.

(2) A Member of the Overview and Scrutiny Commission, an Overview and Scrutiny Committee or a Select Committee has a prejudicial interest in any business at meeting of that Committee where –

(a) that business relates to a decision made (whether implemented or not) or action taken by the Executive or another of the Council's committees, sub-committees, joint committees or joint sub-committees; and

(b) at the time the decision was made or action was taken the Member was

(i) a Member of the Executive or that committee, sub-committee, joint committee or joint sub-committee and

(ii) was present when the decision was made or action taken.

(3) If the interest is a prejudicial interest, the Code requires the Member concerned:-

to leave the room or chamber where the meeting takes place while the item in respect of which the declaration is made is under consideration. [There are three exceptions to this rule which are set out at paragraph (4) below].

not to exercise executive functions in relation to that business and  
not to seek improperly to influence a decision about that business.

(4) The circumstances in which a Member who has declared a

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prejudicial interest is permitted to remain while the item in respect of which the interest has been declared is under consideration are:-

for the purpose of making representations, answering questions or giving evidence relating to the item, provided that the public are also allowed to attend the meeting for the same purpose, whether under a statutory right or otherwise, BUT the Member must leave immediately after he/she has made the representations, answered the questions, or given the evidence,

if the Member has obtained a dispensation from the Standards Committee, or

if the Member is the Leader or a Cabinet Member and has been required to attend before an Overview and Scrutiny Committee or Sub-Committee to answer questions.

### **Declaration of Party Whip**

C. To seek declarations of the existence and nature of any party whip in relation to any matter on the Agenda as set out at paragraph 8 of the Overview and Scrutiny Ways of Working.

### **Exclusion of Press and Public**

D. To consider whether, in view of the nature of the business to be transacted, or the nature of the proceedings, the press and public should be excluded from the meeting when any of the following items are under consideration.

*NOTE: Any item appearing in Part 2 of the Agenda states in its heading the category under which the information disclosed in the report is confidential and therefore not available to the public.*

*A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls.*

## **2. MINUTES OF THE PREVIOUS MEETING**

This was the first meeting of the Committee.

## **3. CHAIRMAN' S COMMUNICATIONS**

## **4. PUBLIC QUESTIONS**

a) the closing date for public questions is 12 noon on 6 June 2008

## **5. MEMBER'S LETTERS**

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### 6. NOTICES OF MOTION

### 7. ECSOSC TERMS OF REFERENCE AND PROCEDURE RULES 1 - 18

*Contact Officer:* Mary van Beinum                      *Tel:* 01273 291062  
*Ward Affected:* All Wards

### 8. LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY - REVISED PREFERRED OPTIONS 19 - 90

*Contact Officer:* Mike Holford                              *Tel:* 01273-29-2501  
*Ward Affected:* All Wards

### 9. LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY - BACKGROUND STUDIES 91 - 104

*Contact Officer:* Mike Holford                              *Tel:* 01273-29-2501  
*Ward Affected:* All Wards

### 10. OVERVIEW AND SCRUTINY AND THE COUNCIL'S FORWARD PLAN 105 - 108

*Contact Officer:* Mary van Beinum                      *Tel:* 01273 291062  
*Ward Affected:* All Wards

### 11. TOWARDS A WORK PROGRAMME FOR THE ENVIRONMENT AND COMMUNITY SAFETY OVERVIEW AND SCRUTINY COMMITTEE 109 - 116

*Contact Officer:* Mary van Beinum                      *Tel:* 01273 291062  
*Ward Affected:* All Wards

### 12. LOCAL AUTHORITY CRIME AND DISORDER COMMITTEES 117 - 120

*Contact Officer:* John Adams                              *Tel:* 01273 291064  
*Ward Affected:* All Wards

### 13. ITEMS TO GO FORWARD TO CABINET

### 14. ITEM TO GO FORWARD TO COUNCIL

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For further details and general enquiries about this meeting contact Mary van Beinum, (01273 - 29 - 1062, email [mary.vanbeinum@brighton-hove.gov.uk](mailto:mary.vanbeinum@brighton-hove.gov.uk)) or email [Scrutiny@brighton-hove.gov.uk](mailto:Scrutiny@brighton-hove.gov.uk)

Date of Publication - Monday, 9 June 2008

# **ENVIRONMENT AND COMMUNITY SAFETY OVERVIEW & SCRUTINY COMMITTEE**

## **Agenda Item 7**

Brighton & Hove City Council

**Subject:** Committee Terms of Reference  
**Date of Meeting:** 16 June 2008  
**Report of:** Director of Strategy and Governance  
**Contact Officer:** Name: **Mary van Beinum** Tel: **29-1062**  
E-mail: mary.vanbeinum@brighton-hove.gov.uk  
**Wards Affected:** All

### **FOR GENERAL RELEASE**

#### **1. SUMMARY AND POLICY CONTEXT:**

- 1.1 To set out the Terms of Reference and Procedure Rules for the Environment and Community Safety Overview and Scrutiny Committee.

#### **2. RECOMMENDATIONS:**

- (1) To note the report.

#### **3. BACKGROUND INFORMATION**

- 3.1 Following the adoption of the new Constitution on 15 May 2008, the Council has appointed an Overview and Scrutiny Commission (OSC) and five Overview and Scrutiny committees: Adult Social Care and Housing Overview and Scrutiny Committee (ASCHOSC), Children and Young People Overview and Scrutiny Committee (CYPOSC), Culture Tourism and Enterprise Overview and Scrutiny Committee (CTEOSC), Environment and Community Safety Overview and Scrutiny Committee (ECSOSC) and Health Overview and Scrutiny Committee (HOSC).
- 3.2 The main new scrutiny roles, to be carried out by the Overview and Scrutiny Commission (OSC) and the five Overview and Scrutiny Committees, include monitoring compliance with the Council's Forward Plan of key decisions and the Budget and Policy Framework, and being involved in policy development at an early stage.
- 3.3 The full committee terms of reference and procedure rules (Constitution Part 6.1) are included at Appendix 1 to this report. A

separate report on Overview and Scrutiny and the Council's Forward Plan appears elsewhere on this agenda.

### Work Programme

- 3.7 The committee is responsible for setting its own objectives and work programme in coordination with the OSC. A separate report appears on this agenda.
- 3.8 Each of the Overview and Scrutiny Committees have a responsibility to consider the plans and strategies within the Budget and Policy Framework that relate to their functions prior to their approval by Full Council.
- 3.9 Overview and Scrutiny work programmes may also include examination of items on the Council's Forward Plan.
- 3.10 Any Member of the committees may notify the Head of Scrutiny that he/she wishes an item to be included on the agenda for the next available meeting. The committee will then determine if and how it wishes to pursue the suggested item (see flow chart at Appendix 2).
- 3.11 The committee should also respond, when their work programme allows it, to requests from the Council and if it thinks appropriate, the Cabinet/Cabinet Committees to review particular areas of Council activity.

## **4. FINANCIAL & OTHER IMPLICATIONS:**

### Financial Implications:

- 4.1 Additional staffing resources have been dedicated to supporting the scrutiny function, the Cabinet and the political parties.

### Legal Implications:

- 4.2 The overview and scrutiny arrangements are in accordance with the relevant legislation.

### Equalities Implications:

- 4.3 One of the functions of the OSC is to review and scrutinise all matters, Executive decisions and service provision relating to Equalities.

### Sustainability Implications:

- 4.4 One of the functions of the OSC is to review and scrutinise all matters, Executive decisions and service provision relating to sustainability.



Crime & Disorder Implications:

4.5 None directly in relation to this report.

Risk and Opportunity Management Implications:

4.6 None directly in relation to this report.

Corporate / Citywide Implications:

4.7 Within the new Leader and Cabinet style Council Constitution the Overview and Scrutiny function is extended as set out in the report.

## **SUPPORTING DOCUMENTATION**

### **Appendices:**

1. Overview and Scrutiny Terms of Reference
- 2 Flowchart of scrutiny reviews process

### **Background Documents:**

15 May 2008 Council Constitution



**EXTRACT FROM CONSTITUTION PART 6.1 OVERVIEW AND SCRUTINY  
TERMS OF REFERENCE AND PROCEDURE RULES**

**1. The number and arrangements for Overview and Scrutiny Committees**

- 1.1 The Council will appoint the Overview and Scrutiny Commission and five further Overview and Scrutiny Committees as set out in Article 6. The Overview and Scrutiny Commission will co-ordinate the Overview and Scrutiny function and work programme. The Commission will approve the appointment of Sub-Committees to carry out in depth reviews (Select Committees). Short, sharply focussed scrutiny reviews (Ad Hoc Panels) may be carried out by each Committee at its own instigation.

**2. Terms of Reference of Environment and Community Safety Overview and Scrutiny Committee**

To perform the Overview and Scrutiny function in relation to all matters, Executive decisions and service provision connecting to the Environment function and in particular:-

- Community Safety (including discharging those statutory responsibilities set out in s19 Police and Justice Act 2006)
- Parks and Green Spaces
- Travellers and Gypsies
- Highways Management
- Traffic Management and Transport
- Parking
- Waste
- Conservation & Design
- Coast Protection
- Seafront
- Environmental Health
- Building Control
- Trading Standards
- Planning and Licensing

**3. Functions of Committees**

**3.1 The Overview and Scrutiny Commission will;-**

- (a) Approve an annual overview and scrutiny work programme, to ensure that there is efficient use of the Committees' time and that the potential for duplication of effort is minimised;

- (b) Where matters fall within the remit of more than one Overview and Scrutiny Committee, determine arrangements for dealing with a particular issue;
- (c) Have the power (as do all other Overview and Scrutiny Committees) to call-in and review Executive decisions, or key decisions made by an officer with delegated authority from the Executive, as set out in the procedures in these Rules, particularly on issues that fall between the responsibilities of the separate panels;
- (d) Receive requests from Councillors and suggestions from officers of the council and co-optees for particular topics to be scrutinised and determine the appropriate action;
- (e) Undertake initial explorations on requests/proposals for Select Committee reviews and recommend appropriate action;
- (f) Receive proposals for the appointment of task-orientated, time limited Overview and Scrutiny Select Committees to review in-depth, investigate and report on a particular topic;
- (g) Co-ordinate training and development arrangements for Overview and Scrutiny Committee members and co-optees;
- (h) Identify good practice in relation to the overview and scrutiny role and develop common practices for all Committees that reflect good practice;
- (i) Co-ordinate the production of an annual report to Council on the activity of the Overview and Scrutiny function;
- (j) Have responsibility for the development and co-ordination of the overview and scrutiny of partnerships and external bodies;
- (k) Establish and maintain constructive working relationships with the Executive whilst being mindful of the respective wishes of each;
- (l) Help ensure positive working relationships with partnerships and external bodies;
- (m) Monitor and review the outcomes of its recommendations.

**3.2 Overview and Scrutiny Committees (and the Commission in respect of its specific work area) will:-**

- (i) Be aware of the 'forward plan', the forward work programme and other anticipated decisions of the Cabinet/Cabinet Committees and council services;

- (ii) Develop focused programmes of work and identify the most appropriate means of progressing such work;
- (iii) Scrutinise and make recommendations to the Cabinet/Cabinet Committees/Cabinet Member decisions and any relevant Council Committees in relation to issues arising from its work programme;
- (iv) Monitor the decisions taken by or on behalf of the Cabinet and the activities of service areas;
- (v) Receive requests from Councillors and suggestions from officers of the council and co-optees for particular topics to be scrutinised;
- (vi) Propose to the Overview and Scrutiny Commission Select Committee reviews, Terms of Reference and Membership with a proposed scrutiny brief and resource requirement (see Select Committee Reviews at 4 below);
- (vii) Establish Ad Hoc review Panels reviews (see Ad Hoc Panels at 5 below);
- (viii) Exercise the right to “call-in” and review decisions taken by or on behalf of the Executive as set out in the procedures in the Overview & Scrutiny Rules;
- (ix) Have an overview of the practice and policy of the relevant service areas;
- (x) Identify areas of service practice and implementation or of policy that cause concern to members of the public and councillors and identify what action should be taken;
- (xi) Receive internal and external inspection reports on the services and challenge the action plans drawn up in response to problems that have been identified; monitor progress in implementing the action plans;
- (xii) Ensure that the communities of Brighton & Hove and specific users of services are able to be involved in and inform the work of the Committees;
- (xiii) Promote the work of the Committees, including through the local media;
- (xiv) Monitor and review the outcomes of its recommendations.

#### **4. Select Committee reviews**

- 4.1 The Overview and Scrutiny Commission will consider and where it considers appropriate approve the appointment of task-orientated, time-limited scrutiny Sub-Committees (Select Committees) to review in depth, investigate and report on particular topics related to the functions of the

Council or issues of public concern, with such membership, terms of reference and duration as it considers appropriate having regard to the recommendations of the initiating Committee.

- 4.2 In considering whether or not any matter should be agreed for a Select Committee Review, the Commission will have regard to:
- The importance of the matter raised and the extent to which it relates to the achievement of the Council's strategic priorities, the implementation of its policies or other key issues affecting the well being of the City or its communities;
  - Whether there is evidence that the decision-making rules in Article 11 of the constitution have been breached; that the agreed consultation processes have not been followed; or that a decision or action proposed or taken is not in accordance with a policy agreed by the Council;
  - The potential benefits of a review especially in terms of possible improvements to future procedures and/or the quality of Council services;
  - What other avenues may be available to deal with the issue and the extent to which the Councillor or body submitting the request has already tried to resolve the issue through these channels (e.g. a letter to the relevant Executive Member, the complaints procedure, enquiry to the Chief Executive or Chief Officer, Council question etc.);
  - The proposed scrutiny approach (a brief synopsis) and resources required, resources available and the need to ensure that the Overview and Scrutiny process as a whole is not overloaded by requests.
- 4.3 Select Committees will have Sub-Committee status and the political balance rules in section 15 of the Local Government and Housing Act 1989 will apply.
- 4.4 Membership of the Select Committees will be nominated by the Overview and Scrutiny Committee proposing the in-depth review, taking into account the expertise and experience of available Members, and that no Member may be involved in scrutinising a decision in which he/she has been involved.
- 4.5 When a Member requests for a matter to be scrutinised, that Member should not normally be appointed as a Member of the Select Committee scrutinising the issue. This would not preclude the Member from giving evidence as a lay or an expert witness.
- 4.6 There shall be no provision for substitute Members to attend meetings of

Select Committee reviews.

- 4.7 The Overview and Scrutiny Commission shall ensure that the number of Select Committee reviews which are in existence at any one time does not exceed the capacity of the Member and officer resources available to support their work.

**5. Ad Hoc Overview and Scrutiny Panels**

- 5.1 Each Overview and Scrutiny Committee may appoint Ad Hoc Panels to carry out short, sharply focused pieces of scrutiny work. These may be on issues specific to the Committee but not large enough to warrant a full blown Select Committee approach. As a guide, the work of these Panels should be capable of being conducted within 3 meetings or less.

- 5.2 Ad hoc Overview and Scrutiny Panels will not have Sub-Committee status and the political balance rules in section 15 of the Local Government and Housing Act 1989 will not apply, but they will normally be established on a cross-party basis.

- 5.3 Membership of the Ad Hoc Panels will be agreed by the Overview and Scrutiny Committee appointing it, taking into account the expertise and experience of available Members, and that no Member may be involved in scrutinising a decision in which he/she has been involved.

- 5.4 When a Member requests for a matter to be scrutinised, that Member should not normally be appointed as a Member of the ad hoc panel scrutinising the issue. This would not preclude the Member from giving evidence as a lay or an expert witness.

- 5.5 There shall be no provision for substitute Members to attend meetings of Ad Hoc Panels.

- 5.6 Each Overview and Scrutiny Committee shall ensure that the number of Ad Hoc Panels which it appoints does not exceed the capacity of the Member and Officer resources available to support their work.

**6. Membership of Overview and Scrutiny**

- 6.1 Any Councillor, except a member of the Cabinet, may be a member of the Overview and Scrutiny Commission, Committees, Select Committees or Ad Hoc Panels.

- 6.2 No Member, however, may be involved in scrutinising a decision in which he/she has been directly involved.

6.3 The membership of the Overview and Scrutiny Committees will reflect the political composition of the Council.

**7. Co-optees**

7.1 The Overview and Scrutiny Committees may agree the appointment of non voting co-optees for each Select Committee review or Ad Hoc Panel.

**8. Education representatives**

8.1 The Children and Young People's Overview and Scrutiny Committee and any Select Committee relating to education matters shall include in its membership the following voting representatives in accordance with the provisions of the Local Government Act 2000:

- (a) 1 Church of England diocese representative;
- (b) 1 Roman Catholic diocese representative; and
- (c) 2 parent governor representatives.

8.2 The above-mentioned representatives shall have voting rights only in connection with matters relating to education functions and if the Committee or Panel deals with other matters, those representatives shall not vote on those other matters, though they may stay in the meeting and speak.

**9. Meetings of the Overview and Scrutiny Committees**

9.1 Regular meetings of the Commission and Overview and Scrutiny Committees will be programmed throughout the year. In addition, an extraordinary meeting may be called by the Chair or the Chief Executive at any time if they consider it necessary or desirable.

9.2 The Select Committees and Ad Hoc Panels will be time limited and will meet as required to fulfil the task allocated to them.

**10. Quorum**

10.1 The quorum for overview and scrutiny meetings shall be as set out for committees and sub-committees in the Council Procedure Rules in Part 3 of this Constitution.

**11. Chairmen of Overview and Scrutiny Committees/Panels**

11.1 The Council will appoint the Chairmen of Overview and Scrutiny Committees.



- 11.2 The Overview and Scrutiny Commission will appoint the Chairmen of Select Committees, having regard to the recommendations of the initiating Committee. These Chairmen may be from the membership of the Overview and Scrutiny Committees or other Members of the Council with the necessary expertise.
- 11.3 Each Overview and Scrutiny Committee will appoint the Chairmen of Ad Hoc Panels that it sets up.
- 11.4 If the Council or relevant Scrutiny Committee fail to appoint a Chairman, the Committee, Select Committee or Ad Hoc Panel will make the appointment at its first meeting.

**12. Work programme**

- 12.1 The Overview and Scrutiny Commission will be responsible for setting its own objectives and work programme
- 12.2 The Overview and Scrutiny Committees (subject to the co-ordination and monitoring of the Overview and Scrutiny Commission) shall be responsible for setting their own work programme to overview and scrutinise the work of the Executive, relevant Council Committees and services and the effectiveness of relevant partnerships or other bodies.

**13. Agenda items**

- 13.1 Agenda items shall be set by the Committee identifying issues which they wish to consider, for example through reviewing the Executive's forward work programme of items for consideration or through their overview of service issues and performance, or through calling in particular Executive decisions.
- 13.2 Any Member of the Overview and Scrutiny Committees (including the statutory education representatives) may notify the Head of Scrutiny that s/he wishes an item relevant to its functions to be included on the agenda for the next available meeting. On receipt of such a request the Head of Scrutiny will ensure that it is included on the next available agenda of the relevant Committee. The Committee shall then determine whether it wishes to pursue the item suggested by the Member and in what manner. If appropriate, they will consider whether it should be referred to the Overview & Scrutiny Commission with a proposal for a Select Committee Review.
- 13.3 The Overview and Scrutiny Committees shall also respond, as soon as their work programme permits, to requests from the Council and if it considers it appropriate, the Cabinet/Cabinet Committees, to review

particular areas of Council activity.

**14. Policy review and development**

- 14.1 The Overview and Scrutiny Committees have a function to scrutinise policy outcomes and advise on policy development within their remit. They are key mechanisms for enabling Councillors to represent the views of their constituents and other organisations to the Executive and Council and hence to ensure that these views are taken into account in policy development.
- 14.2 The Executive is responsible for the development and implementation of policy. The Executive will seek the assistance of Overview and Scrutiny, as appropriate, in the development of policy, especially in relation to the budget and policy framework. The minimum role of Overview and Scrutiny in relation to the development of the Council's budget and policy framework is set out in Rules 2 (b) and 7 of the Budget and Policy Framework Procedure Rules and in Rule 14.1 above.
- 14.3 In relation to the development of the Council's approach to other matters not forming part of its Policy and Budget Framework, Overview and Scrutiny may make proposals to the Executive for developments in so far as they relate to matters within their terms of reference.
- 14.4 If there are concerns about the implementation or subsequent outcomes of an agreed policy the Overview and Scrutiny Committees may appoint Ad Hoc Panels or propose Select Committees to hold enquiries and investigate the available options to recommend changes/improvements to the policy to make it more effective.

**15. Submission of reports from Overview and Scrutiny**

- 15.1 Once it has formed recommendations on any matter, an Overview and Scrutiny Committee will prepare a formal report and submit it to the Chief Executive for consideration by the relevant Cabinet Member or Cabinet meeting, or to the Council as appropriate (eg if the recommendation would require a departure from or a change to the agreed budget and policy framework).
- 15.2 The report will include a statement of the corporate, financial and legal implications of any recommendations. If an Overview and Scrutiny Committee cannot agree on one single final report then up to one minority report may be prepared and submitted for consideration by the Executive Member or Cabinet meeting with the majority report.
- 15.3 The Executive Member or Cabinet shall consider the report within six

weeks of it being submitted to the Chief Executive or at its next scheduled meeting, whichever is the later, and shall prepare a response to the findings including any action proposed.

- 15.4 The Overview and Scrutiny report, together with the Executive response, shall be reported to full Council for information.

**16. Call-in**

- 16.1 Call-in is a process by which Overview and Scrutiny Committees can recommend that a decision made (in connection with executive functions) but not yet implemented be reconsidered by the body which made the decision, or recommend that the full Council consider whether that body should reconsider the decision. Call-in does not provide for the Overview and Scrutiny Committee or the full Council to substitute its own decision, but merely to refer the matter back to the decision-maker. A decision maker can only be asked to reconsider any particular decision once.
- 16.2 Call-in should only be used in exceptional circumstances – for example where Members have evidence that a decision was not taken in accordance with Article 13 of the constitution ('Decision making'). Day to day management and operational decisions taken by officers may not be called-in.
- 16.3 Any decision made by the Cabinet, a Cabinet Member, or a key decision made by an officer under delegated powers from the Executive shall be published by means of a notice at the main offices of the Council and where possible by electronic means, normally within 2 working days of being made. All Members of Overview and Scrutiny will be sent, if possible by electronic means, copies of all such decision notices at the time of publication.
- 16.4 Any decision made by the Cabinet, a Cabinet Member, or a key decision made by an officer under delegated powers from the Executive may be called in up to five working days from the date of the meeting at which the decision was taken.
- 16.5 During this period, any Member of Overview and Scrutiny or any 6 Members of the Council may request that a decision be called-in for Scrutiny by the relevant Overview and Scrutiny Committee. Such a request shall be made in writing to the Chief Executive and shall include the reason(s) for the request and any alternative decision proposed. The Chief Executive may refuse to accept a request which in his/her opinion is frivolous, vexatious or defamatory, or where no reason is given.
- 16.6 If the Chief Executive accepts the request he/she shall call-in the decision.

This shall have the effect of suspending the decision coming in force and the Chief Executive shall inform the decision maker e.g. Cabinet, Executive Member, Executive Committee or officer and the relevant Chief Officer(s) of the call-in. The Chief Executive shall then call a meeting of the relevant Overview and Scrutiny Committee as appropriate to scrutinise the decision, where possible after consultation with the relevant Chairman, and in any case within 7 working days of accepting the call-in request, unless a meeting of the appropriate Committee is already scheduled to take place within this period.

- 16.7 In deciding whether or not to refer a decision back, the relevant Overview and Scrutiny Committee shall have regard to the criteria for Scrutiny reviews set out at paragraph 4.2 of these rules. In addition it may take into account:
- any further information which may have become available since the decision was made
  - the implications of any delay; and
  - whether reconsideration is likely to result in a different decision.
- 16.8 If, having scrutinised the decision, the relevant Overview and Scrutiny Committee is still concerned about it, then it may refer it back to the decision making body for reconsideration, setting out in writing the nature of its concerns. If it considers the decision is contrary to the policy framework or budget agreed by the Council, the matter may be referred to the full Council to determine whether or not it should be referred back to the decision making body in accordance with the Budget and Policy Framework Procedure Rules at Part 4 of this constitution.
- 16.9 If the relevant Overview and Scrutiny Committee does not meet within 7 working days of the Chief Executive accepting a call-in request, or does meet but does not refer the matter back to the decision making body or to the Council, the decision shall take effect on the date of the Overview and Scrutiny meeting, or the expiry of the period of 7 working days from the call-in request being accepted, whichever is the earlier.
- 16.10 If the decision is referred back to the decision making body, that body shall then reconsider, either at its next programmed meeting or at a special meeting called for the purpose, whether to amend the decision or not before reaching a final decision and implementing it.
- 16.11 If the relevant Overview and Scrutiny Committee refers the matter to full Council and the Council does not object to a decision which has been made, then no further action is necessary and the decision will be effective in accordance with the provision below. However, if the Council does object, the Council will refer any decision to which it objects back to

the decision making body, together with the Council's views on the decision. In this case the decision making body shall consider, either at its next programmed meeting or at a special meeting convened for the purpose, whether to amend the decision or not before reaching a final decision and implementing it.

- 16.12 If the Council does not meet within two weeks of the matter being referred to it, or if it does meet but does not refer the decision back to the decision making body or person, the decision will become effective on the date of the Council meeting or expiry of that two week period, whichever is the earlier.
- 16.13 If a key decision is to be taken by an officer under the scheme of delegation, all Members and Overview and Scrutiny Committees will have the same rights to information and to use the procedures set out above for the call-in of those decisions.

## **17. Call-in and urgency**

- 17.1 The call-in procedure set out above shall not apply where the decision being taken by the Cabinet, a Cabinet Member, or a key decision made by an officer under delegated powers from the Executive is urgent. A decision will be urgent if any delay likely to be caused by the call-in process would seriously prejudice the Council's or the public's interests. The record of the decision, and notice by which it is made public shall state if in the opinion of the decision making body the decision is an urgent one and subject to the agreement of the Chief Executive, or in his/her absence the officer acting for him, such a decision shall not be subject to call-in. The Chief Executive or the Officer acting on his/her behalf shall consult the leaders of the Political Groups before agreeing to the exemption. Any decision to which the call-in process does not apply for reasons of urgency must be reported to the next available meeting of the Council, together with the reasons for urgency.
- 17.2 The operation of the provisions relating to call-in and urgency shall be monitored annually, and a report submitted (via the Governance Committee) to Council with proposals for review if necessary.

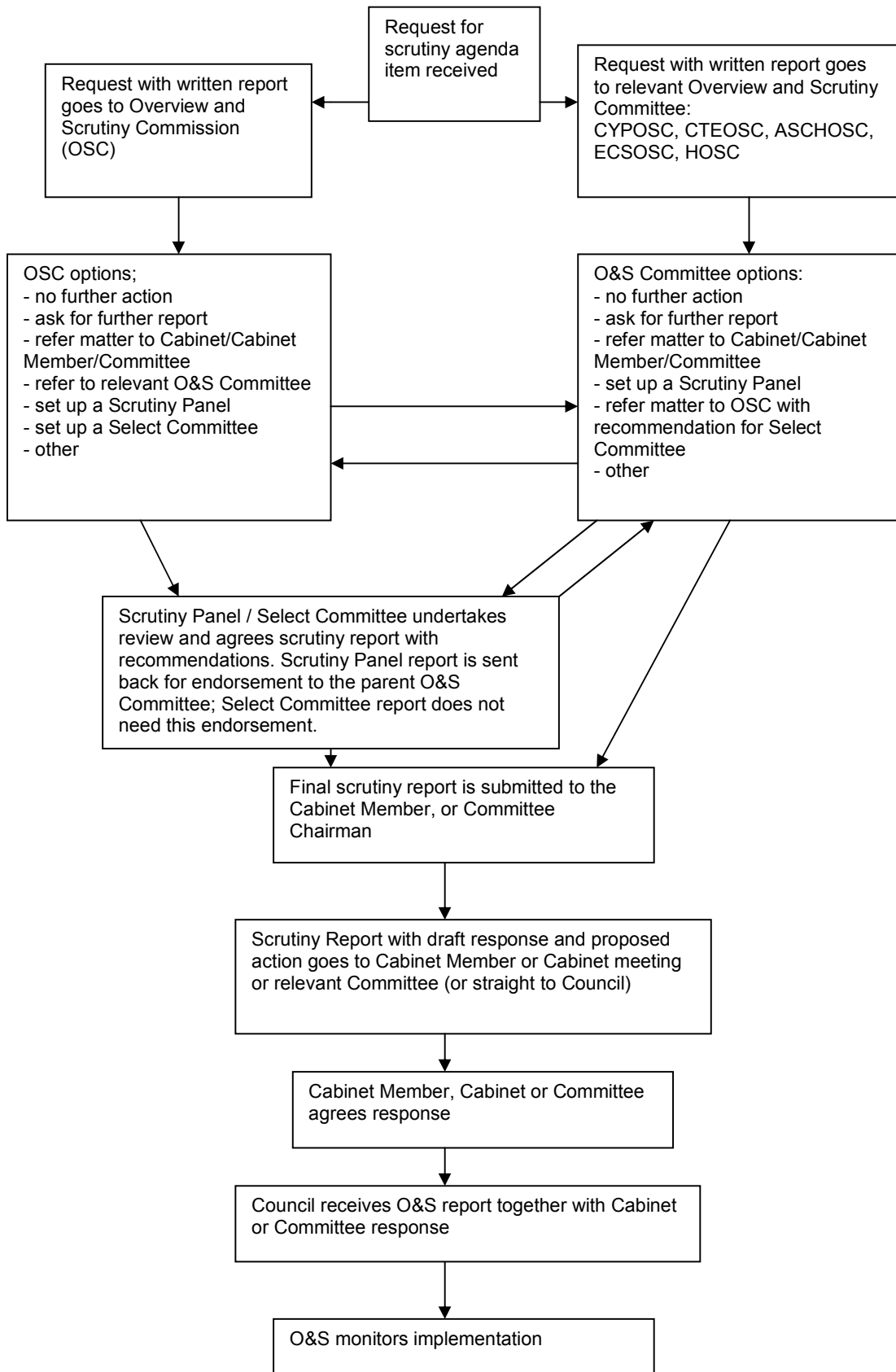
## **18. Call In and Joint Committees**

- 18.1 The principle of call in applies to decisions made by Joint Committees on which the Council is represented. The detailed arrangements relating to call in of Joint Committee decisions shall be agreed between the constituent authorities and included in the Constitution of the Joint Committee.

**19. Matters excluded from Scrutiny**

- 19.1 Overview and Scrutiny Committees should not normally scrutinise individual decisions made in respect of development control, licensing, registration, consents and other permissions. In particular they are not an alternative to normal appeals procedures. However, they may make reports and recommendations on such functions as part of wider Scrutiny reviews.
- 19.2 The Scrutiny process is not appropriate for issues involving individual complaints or cases, or for which a separate process already exists e.g. personnel/disciplinary matters, ethical matters or allegations of fraud.

SCRUTINY REVIEWS – THE PROCESS







# **ENVIRONMENT AND COMMUNITY SAFETY OVERVIEW & SCRUTINY COMMITTEE**

## **Agenda Item 8**

Brighton & Hove City Council

**Subject:** LDF Core Strategy Revised Preferred Options

**Date of Meeting:** 16 June 2008

**Report of:** Director of Strategy and Governance

**Contact Officer:** Name: **Mary van Beinum** Tel: **29-1062**

E-mail: [mary.vanbeinum@brighton-hove.gov.uk](mailto:mary.vanbeinum@brighton-hove.gov.uk)

**Wards Affected:** All

### **FOR GENERAL RELEASE**

#### **1. SUMMARY:**

- 1.1 The attached report on the Local Development Framework (LDF) Core Strategy, Revised Preferred Options is scheduled to be presented to the Cabinet meeting on 12 June.
- 1.2 The LDF is one of the 19 Plans and Strategies forming the Council's Budget and Policy Framework. As set out in the Procedure rules, Full Council is responsible for the adoption of these Plans and Strategies.
- 1.3 The Revised Preferred Options document is a consultation document and approval is being sought to go out to consultation for six weeks between 23 June and 4 August.
- 1.4 The final version of the Core Strategy will be submitted to Cabinet and Council in January 2009. In view of this, there will be further opportunity to comment on the document.
- 1.5 In considering the attached report, ESCOSC has an opportunity to comment on it.

#### **2. RECOMMENDATIONS:**

- 2.1 To make comments on the report.



# CABINET MEETING

12 June 2008

ECSOSC

## Agenda Item 8

Brighton & Hove City Council

**Subject:** LDF Core Strategy Revised Preferred Options

**Date of Meeting:** ECSOSC 16 June 2008

**Report of:** Director of Environment

**Contact Officer:** Name: **Helen Gregory** Tel: **29-2293**

E-mail: Helen.gregory@brighton-hove.gov.uk

**Key Decision:** Yes Forward Plan No.:

**Wards Affected:** All

### FOR GENERAL RELEASE

#### 1. SUMMARY AND POLICY CONTEXT:

- 1.1 This report seeks approval of the Core Strategy Revised Preferred Options Document ('the Revised Core Strategy'), part of Brighton & Hove's Local Development Framework, for a minimum six-week period of public consultation during June and August 2008. Appendix 1 provides a summary version of the document and the full copy of the document has been placed in the Members' rooms.

#### 2. RECOMMENDATIONS TO CABINET:

- (1) Note the nature of the representations made to the original Core Strategy Preferred Options document (appendix 2);
- (2) Approve the officer responses and recommendations to these representations set out in the schedule attached to the Statement of Consultation placed in the Members' rooms.
- (3) Approve the Revised Core Strategy and supporting documents for the purposes of a minimum six week period of public consultation, subject to any minor editorial changes agreed by the Cabinet Member for Environment in consultation with the Director of Environment; and
- (4) Note that the final version of the Core Strategy will be brought back to Cabinet and Council in January 2009 for approval for submission to the Secretary of State following a final formal period of consultation to take place during February and March 2009 (the exact procedure will be subject to the publication of The

Town and Country Planning (Local Development) (England) (Amendment) Regulations anticipated May/June 2008.

### **3. RELEVANT BACKGROUND INFORMATION/CHRONOLOGY OF KEY EVENTS:**

- 3.1 **Background** - The Core Strategy is part of the Local Development Framework (LDF), which will replace the Local Plan. The Core Strategy is the principal planning document that will provide the overall strategic vision for Brighton and Hove through to 2026. All subsequent LDF documents must conform to it. The Core Strategy must conform to national and regional planning policy (the draft South East Plan) and must also have regard to the Sustainable Community Strategy and council and other city-wide plans and strategies.
- 3.2 A wide-ranging debate on the big issues for the city was initiated at the Issues and Options Stage in October 2005. The issues and options were further developed in the first Preferred Options stage document, which was published in October 2006 and was subject to a 6-week period of consultation. Appendix 2 summarises the consultation undertaken.
- 3.3 Following the consultation responses and advice from the Government Office for the South East it was considered necessary to revisit the preferred options and therefore an additional 'Revised' Preferred Options stage was added to the preparation process. The anticipated completion of a final Core Strategy in 2007 was therefore delayed, with the agreement of the Government Office for the South East, for a revised Preferred Options stage to allow:
- further research and evidence gathering to be undertaken required by recently published national planning policy (such as Planning Policy Statement 3 - Housing);
  - a more area-based approach to planning to be incorporated, setting out how the council will respond to the local priorities of specific areas of the city ('place-shaping');
  - more detail to be set out on the location, scale and type of development to be delivered by the Core Strategy during the period to 2026; and the re-examination of the role and potential of Shoreham Harbour in light of emerging proposals by the South East England Development Agency (SEEDA).
- 3.4 The additional time given to prepare the Revised Core Strategy has enabled the commissioning and completion of a number of new pieces of background research to inform the revised document. The timetable also provides for a further round of public consultation which is considered necessary given the significance of changes to the document.
- 3.5 In November 2007, the government published a consultation document on proposed changes to the legislation governing the preparation process for planning documents ('Streamlining LDFs'). It is anticipated that The Town and

Country Planning (Local Development) (England) (Amendment) Regulations 2008 ('the amended Regulations') will become law in May/ June 2008. The form of public consultation will therefore need to conform with the amended Regulations.

- 3.6 In having regard to the proposed regulation changes, it is anticipated that the final version of the Core Strategy will be brought back to Cabinet and Council in January 2008 for approval for submission to the Secretary of State after a final period of formal consultation to take place during February and March 2009 (clearly the exact procedure will be prescribed by the amended Regulations). Should any significant changes be required to the document as a result of the consultation it will require withdrawal for change and an additional six week period of consultation.

### 3.7 **The Core Strategy Revised Preferred Options Document**

The purpose of the preferred options stage is for the council to seek the views of the public and stakeholders on the proposals it is recommending for the Core Strategy before the final version is submitted to the Secretary of State. Where, through consultation responses and background evidence, different options could be considered to address a particular issue, the document sets out the option favoured by the Council as the 'Preferred Option'. The alternative options that were considered are outlined together with a brief explanation of why they were discounted in an Annexe to the document along with a summary of consultation responses and the recommendations of the Sustainability Appraisal. The Revised Core Strategy consists of four main sections:

- Context, Vision and Objectives
- Spatial Strategy
- Core Policies
- Monitoring Indicators and Targets

- 3.8 **Part One - Context, Vision and Objectives** section sets out the key issues facing the city over the next twenty years and the drivers for change and summarises the policy context. It also sets out a vision of the city for 2026 and lists the strategic spatial objectives from which all future planning policies will flow. These objectives have been revised to take account of consultation and the area-based approach now being pursued.

- 3.9 **Part Two - the Spatial Strategy** which sets out the preferred approach and locations for accommodating future development in the city. This includes:
- **Proposed Development Areas** – there were formerly 10 development areas identified based upon an accessibility-led and urban character/capacity-led approach. Following a more detailed assessment of each of the areas the number has now been reduced to 7 areas (Brighton Centre and Churchill Square area, Brighton Marina and Black Rock, Lewes Road, New England Quarter and London Road, Eastern Road and Edward Street, Hove Station area and Shoreham Harbour and South Portslade). The preferred options for the areas detail the type and amount of

development and identify local priorities (place-shaping) priorities. Each development area proposals includes a section on implementation.

- **Special Areas** – these are areas of the city in need of a special planning approach or needing effective policy coordination including The Seafront, Central Brighton, Valley Gardens, the Urban Fringe and the South Downs.

- **Sustainable Neighbourhoods** – these two preferred options seek to co-ordinate policy across the city with the aim of delivering sustainable neighbourhoods and reducing inequalities (Residential Renewal areas). These will cover all predominantly residential areas of the city.

- 3.10 **Part Three - Core Policies** consists of the preferred approach to strategic policy issues such as housing, transport, sport, biodiversity, urban design and shopping. These policies will contribute to the delivery of the spatial strategy.
- 3.11 **Part Four - Monitoring** is set out in tabular form and shows how the revised preferred options will be monitored with targets relating to those in the Annual Monitoring Report, Sustainable Community Strategy, Local Area Agreement and national output indicators and other relevant strategies.
- 3.12 The Revised Core Strategy includes a **key diagram**, which shows the main strategic elements of Brighton & Hove and illustrates the spatial strategy in broad diagrammatic terms. Changes to the current Local Plan Proposals Map that are required following adoption of the Core Strategy will also be indicated in the document.
- 3.13 A 'Quick Guide' to the Revised Core Strategy has been attached to Appendix 1 and this provides a summary of all the proposals set out in Part 2 and Part 3 of the Revised Core Strategy and copies of the full document have been placed in Members' rooms.
- 3.14 **Emerging evidence and background research** - The Revised Core Strategy is underpinned by a number of background studies. A separate report to this Cabinet introduces and summarises the findings and recommendations of these new pieces of research which have been used to inform the revised preferred options and seeks approval for these studies to be noted and endorsed as part of the evidence base for the Local Development Framework. In addition area assessments were undertaken on the proposed development areas and form the basis for the preferred options. These are included within a Supporting Evidence Document which also summarises the background research undertaken. Copies have been placed in the Members' rooms.
- 3.15 **Sustainability Appraisal** - In producing the Core Strategy the aim has been to ensure that the revised preferred options, when taken together, will ensure the sustainable development of the city and the creation of sustainable communities. A Sustainability Appraisal tests the extent to which the Core Strategy meets identified sustainable development principles. This is a separate document produced alongside the Core Strategy, which critically examines its objectives and options and tests them against the principles of sustainable development.

- 3.16 An executive summary of the Sustainability Appraisal has been produced to accompany the Revised Core Strategy and the Appraisal is itself subject to the same six-week consultation period. Copies of the full Sustainability Appraisal and a non-technical summary of the Sustainability Appraisal have been made available in the Members' rooms.

#### **4. CONSULTATION**

- 4.1 **Internal Consultation** - The LDF Steering Group made up of senior cross-departmental representatives and an Internal Officer Advisory Group, which includes representatives across the council, have been involved in the preparation of this revised preferred options document via workshops and consultation on draft versions.
- 4.2 **External Consultation** - The Issues and Options stage involved a six-month period of informal community involvement and other consultation, which ran from October 2005 until the end of March 2006. The approach and the methods used were in accordance with the Council's Statement of Community Involvement (SCI).
- 4.3 The first Preferred Options document was subject to a formal six-week period of public consultation during November and December 2006 in accordance with the SCI. The document was sent out to over 400 stakeholders, organisations and individuals. There were a number of special events and workshops (such as a launch event and area-based event) and workshops and meetings with specific communities (for example the BME Elders Forum, SPECTRUM - the lesbian, Gay, Bisexual & Transgender Community Forum, neighbourhood meetings and a Local Strategic Partnership development morning). Eighty-seven written responses were received alongside views and comments collected from the workshops and events. These have been set out along with an officer response in the Statement of Consultation, copies of which have been placed in the Members' rooms.
- 4.4 Informal consultation has been undertaken with the Government Office for the South East to ensure the new approach had its support and early drafts of the document have received an 'in principle' strong expression of support. Informal consultation has also been undertaken with specific consultees such as the Environment Agency and Highways Agency and adjoining local authorities to ensure that all strategic issues have been fully considered in the Revised Core Strategy. The Local Strategic Partnership has been kept informed of the progress of the Revised Core Strategy through a workshop with the Partnership's Management Group (March 2008) and a presentation to the Public Service Board (March 2008).
- 4.5 It is anticipated that a minimum six week period of consultation on the Revised Core Strategy will commence at the end of June and include a range of more focused consultation events. Those that commented on the first Preferred Options document will be sent a copy of the revised document.

- 4.6 There will be a further statutory six week stage of consultation undertaken during February and March 2009 following publication of the final version of the Core Strategy.

## **5. FINANCIAL & OTHER IMPLICATIONS:**

### Financial Implications:

- 5.1 There are no Capital Expenditure implications. Preparation and consultation costs for the Core Strategy have been identified and a budget has been made for this within the City Planning Division. The Core Strategy and future vision for the city will have a number of property implications that will embrace wider issues and future requirements in the city. These will include regeneration of areas and sites, design quality of proposals affecting the condition and suitability of city sites/properties in general and as part of the council's own portfolio. Decisions will be made on a case by case basis and subject to individual specific reports with reference to the council's Asset Management Plan 2006-09 and Corporate Property Strategy.

### Legal Implications:

- 5.2 The Revised Core Strategy has been prepared in compliance with Section 19 of the Planning and Compulsory Purchase Act 2004 and regulations 13, 15, 25 and 26 of the Town and Country Planning (Local Development) (England) Regulations 2004. In addition the Revised Core Strategy has been prepared with a view to meeting the nine tests of soundness for Development Plan Documents as required by paragraph 4.24 of Planning Policy Statement 12: Creating Local Development Frameworks. It is anticipated that the Town and Country Planning (Local Development) (England) (Amendment Regulations) will become law in May/ June 2008. The amended Regulations will introduce new duties relating to public participation in the preparation and submission of Development Plan Documents. The form of public participation will therefore need to follow the prescribed regulations. No adverse Human Right implications are considered to arise from the report.

### Equalities Implications:

- 5.3 Equalities issues are relevant to a number of the Core Strategy issues, particularly in relation to reducing inequalities, providing community facilities and providing for housing for all, including gypsies and travellers. Community involvement specifically attempted to reach the various Communities of Interest and the preferred options document was subject to an Equality Impact Assessment.

### Sustainability Implications:

- 5.4 The planning system has a clear purpose to contribute towards the achievement of sustainable development. All planning documents will be



appraised for their economic, social and environmental impacts. The Core Strategy has been subject to a full Sustainability Appraisal.

#### Crime & Disorder Implications:

- 5.5 The Revised Core Strategy addresses crime and disorder through the preferred options in the spatial strategy.

#### Risk and Opportunity Management Implications:

- 5.6 The risks within this project are regularly reviewed through quarterly highlight reports.

#### Corporate / Citywide Implications:

- 5.7 The Core Strategy will contribute to delivering plans and strategies across the city council directorates, along with the Sustainable Community Strategy. It will also help to deliver external city-wide strategies, e.g. of the Primary Care Trust.

### **6. EVALUATION OF ANY ALTERNATIVE OPTION(S):**

- 6.1 The purpose of the preferred option stage of the Core Strategy is to test a range of realistic and deliverable options to accommodating growth and development in the city to 2026. This testing includes consultation, a robust and up to date evidence base and a Sustainability Appraisal. The Revised Core Strategy sets out clearly the council's preferred option, what alternatives were considered and why they were discounted. The purpose of the consultation is to seek the views of the public and stakeholders on these preferred options before the final document is prepared.

### **7. REASONS FOR REPORT RECOMMENDATIONS**

- 7.1 To ensure that Cabinet is aware of the extent and nature of comments received on the original November 2006 Core Strategy Preferred Options document and the proposed officer response.
- 7.2 To progress the Core Strategy towards its adoption and ensure the council has an up to date strategic planning framework for the city to replace the current Local Plan. This will assist in bringing forward other local development documents and for the council to meet the Best Value Performance indicator BV200b. Progress towards adoption of the Core Strategy will also facilitate the implementation of other city-wide strategies.
- 7.3 To advise Cabinet that amended regulations for preparing development plan documents are due to be published in May/ June 2008. The likely implication of these amendments is that when the council agrees the next version of the document in January 2009 this will be the final version of the plan which will then be published for consultation and submission to the Secretary of State.

## **SUPPORTING DOCUMENTATION**

### **Appendices:**

1. Revised Preferred Options Document Quick Guide
2. Summary of Consultation Responses

### **Documents In Members' Rooms**

1. Core Strategy Revised Preferred Options Document June 2008
2. Revised Draft Sustainability Appraisal June 2008
3. Sustainability Appraisal Non Technical Summary June 2008
4. Statement of Consultation June 2008
5. Supporting Evidence Document June 2008

### **Background Documents**

1. Local Development Scheme (April 2007)
2. Core Strategy Preferred Options Document (October 2006)
3. Statement of Community Involvement (September 2006)

# The Brighton & Hove Local Development Framework

## *The Revised Core Strategy Preferred Options Document*

### *A Quick Reference Guide*

12 June 2008



City Planning  
Environment Directorate  
Brighton & Hove City Council

## The Revised Core Strategy

- The Core Strategy is part of Brighton & Hove's Local Development Framework, a suite of planning documents that will guide planning and development of the city over the next twenty years and will eventually replace the Local Plan.
- The purpose of the Core Strategy is to provide the overall strategic vision for the future of Brighton & Hove through to 2026. It will set out how the council will respond to local priorities and meet the challenges of the future and identify the broad locations, scale and type of development and supporting infrastructure that will take place.
- It addresses important city-wide matters such as delivering more sustainable development and neighbourhoods and sets out the council's strategic approach to housing, the economy, shopping and transport.
- The council has made good progress in preparing the Core Strategy. A very wide ranging debate was initiated about the city's future, at the 'Issues and Options' stage (October 2005). These ideas were developed into the 'Preferred Options' stage which was published for public consultation in October 2006.
- Following the responses to the consultation and advice from the Government Office for the South East (GOSE), the Revised Preferred Option has been prepared and has taken into account:
  - further research and evidence gathering required by recently published national planning policy;
  - more details on the location, scale and type of development to be delivered by the Core Strategy to the period 2026;
  - a more area-based approach to planning, setting out how the council will respond to the local priorities of specific areas of the city and meet the challenges of the future ('place-shaping').

## Timetable for Preparing the Core Strategy

Issues and Options – early community involvement	October 2005 – May 2006
Preferred Options - formal public consultation	November – December 2006
Revised Preferred Options - informal public consultation	June – August 2008
Submission Document - formal public consultation	February – March 2009
Submission of Core Strategy to Government	May 2009
Examination in public by the Planning Inspectorate	October 2009 (estimated)
Adoption of the Core Strategy	January 2010 (estimated)

## The Preferred Options Stage

The purpose of the Preferred Options stage is for the council to seek the views of the public and stakeholders on the proposals it is recommending for the Core Strategy before the final version is submitted to the Secretary of State for Approval. Where, through consultation responses and background evidence, different options could be considered to address a particular issue, the document sets out the options favoured by the council as the 'preferred options'

## The Structure of the Revised Core Strategy

**Part One - Context, Vision and Objectives.** This section sets out the key issues facing the city over the next twenty years, and summarises the policy context for the Core Strategy. It also sets out a vision of the city that we are aiming for in 2026 and lists our strategic spatial objectives, from which all future planning policies will flow.

**Part Two - Spatial Strategy** sets out our preferred approach and locations for future sustainable development in the city. This is structured as follows:

- **Proposed Development Areas** - details the type and amount of development within each area and identifies place-shaping and development priorities. Each development area includes a section on implementation and delivery.
- **Special Areas** - those areas in need of a special planning approach or needing effective policy coordination.
- **Sustainable Neighbourhoods** - a set of proposals to cover the remaining residential areas of the city with the priority of improving sustainability in neighbourhoods and reducing inequality.

**Part Three - Core Policies** consists of our preferred approach to strategic policy issues such as housing, transport and shopping, listed from CP1- CP19.

**Part Four - Monitoring** - this section will include a table showing all the monitoring indicators and targets for the Core Strategy.

**Annex1** – Summarises supporting evidence for the preferred options; this includes a summary of consultation responses, the alternative options that were considered, the results of a sustainability appraisal of each option and further justification

for choosing the preferred option. The document also includes a **glossary** of terms and a **Key Diagram**, illustrating the broad locations of future development and an indication of changes that will be required following adoption of the Core Strategy.

## This Quick Reference Guide

This quick guide includes the Core Strategy Executive Summary and also includes a table summarising the preferred options of the revised Core Strategy document, allowing quick reference to and a clear identification of where the document is delivering the aspirations of the city's 'Sustainable Community Strategy'. The 'Sustainable Community Strategy' sets out the vision and plans of the organisations, agencies and communities who work together through the 2020 Community Partnership (Local Strategic Partnership) to improve the quality of life in the city. This quick guide also identifies in broad terms, which wards are likely to be affected by the preferred options and provides page references.

## How to Comment on the Revised Preferred Options Document

Whether or not you have already been involved in the Core Strategy at the Issues and Options stage, this is your chance to let us know what you think about our revised preferred options. The full Core Strategy Revised Preferred Options document and supporting documents are available:

- To view or download from the council's website: [www.brighton-hove.gov.uk/ldf](http://www.brighton-hove.gov.uk/ldf)
- To view at: Brighton City Direct Centre, Bartholomew Square, Brighton; Hove City Direct Centre, Hove Town Hall; Jubilee Library, Brighton; Hove Library, Church Road, Hove and all local libraries.

A paper copy of the Core Strategy Revised Preferred Option document can be made available on request. Please look at the full document before sending us your response. Your views are important to us and there is a six-week period, from ##### to ##### 2008, during which written comments may be made.

To help you do so, a **response form** has been produced to accompany this document. If you do not have a copy, it can be obtained from the council's citydirect offices or you can contact us directly. It can also be downloaded from the council's website.

Completed response forms must be received by no later than ##### 2008. Please note that we cannot accept responses received after that date.

**Our contact details are as follows:**

**E-mail:** [ldf@brighton-hove.gov.uk](mailto:ldf@brighton-hove.gov.uk)

**Post:** Local Development Team, Freepost SEA 6776, City Planning, Brighton & Hove City Council, Room 407-410, Hove Town Hall, Norton Road, Hove BN3 3BQ, Fax: 01273 292379

**Website:** [www.brighton-hove.gov.uk/ldf](http://www.brighton-hove.gov.uk/ldf)

## EXECUTIVE SUMMARY

Brighton & Hove's Local Development Framework must reflect the role and importance of the city in the sub-region and the South East and respond to and provide for the needs of a growing population and a growing local economy over the next 20 years. The population is expected to grow to 295,700 by 2026 if current trends continue and 8,000 new jobs will be needed over the next ten years to maintain the city's current employment rate.

Therefore the Core Strategy must plan to provide for the 11,000 new homes required by the draft South East Plan whilst maximising the delivery of affordable housing across the city to address the city's housing need (a target is set in the Core Strategy to achieve 230 affordable housing units per annum). Employment sites need to be safeguarded to meet the forecast need for employment land over the next 20 years with a priority of generating more jobs and more high value jobs and there is an identified need for an additional 20,000 sq m of office floorspace in the city. The creative industries is a growing and dynamic sector in the city, acting as the largest hub of such businesses in the south east outside London. Forecasts suggest that they will continue to require affordable and appropriate workspace. The city is a primary regional shopping centre and there is significant capacity for new food and non-food retail floorspace to the period 2016 (14,256 sq m and 53,675 sq m respectively) and the priority will be to direct additional retail firstly to Brighton regional centre but also to maintain and enhance the existing network of shopping centres.

It will also mean working with health providers to help deliver and protect a sub-regional network of critical care hospitals and a city wide integrated network of health facilities. Sussex University and the University of Brighton play a major role in the economic, social and cultural life of the city and the sustainable redevelopment and expansion of their campuses needs to be supported through the Core Strategy. Further Education establishments also have plans for refurbishment and consolidation/ expansion of their activities and there is the need to ensure parity in the quality of education and access to schools across the city.

The Local Development Framework needs to reflect the role and importance of the major projects at various stages of development for key sites around the city including the replacement of the Brighton Centre, a new arena at Black Rock, a community stadium and redeveloping the King Alfred sports centre along with proposals for Preston Barracks and the Circus Street site. These developments are expected to bring jobs and prosperity to the city, help to regenerate surrounding areas and reinforce the city's role as a cultural and tourism and sporting hub.

A number of neighbourhoods in Brighton & Hove have been identified as facing high level of disadvantage and major priority of the council and the Local Strategic Partnership is working to reduce inequalities between disadvantaged areas and the rest of the city. Issues including worklessness and long term unemployment and health inequalities need to be addressed in the Core Strategy.

All this must be achieved within the physical limits of a coastal city, a scarcity of developable land and a future South Downs National Park which will protect significant areas of the city's remarkable downland countryside which extends around and into the built up area the city whilst meeting and integrating the environmental, social and economic aims of sustainable development.

This means ensuring that new development is delivered in a way which reduces the city's ecological footprint, contributes towards meeting the city's targets for reduction in carbon emissions and are resilient to the predicted local effects of climate change. It also means ensuring that all major new development in the city supports the regeneration of the city and contributes to the creation of high quality, sustainable communities and provides for the demands that it generates, supported by appropriate physical and social infrastructure.

The city is a regional transport hub and although car ownership in the city is one of the lowest nationally congestion remains a significant problem for the city, especially at peak times. Approximately 8,000 commuter journeys are made by car every day within Brighton & Hove, almost half of which are journeys less than 5km. Given the relative absence of major industrial processes in the city, transport is the main cause of poor air quality in the city. The Core Strategy must therefore integrate the priorities of the Local Transport Plan such as the proposed Rapid Transport System to mitigate these impacts and also put forward a strategy for accommodating growth that maximises sustainable transport opportunities in areas of high accessibility.

The council's preferred approach is therefore to accommodate future development by optimising development on brownfield sites throughout the existing built-up area of the city, in order to preserve the countryside.

The council's overarching spatial strategy is as a priority to direct significant development to seven broad areas of the city where it is possible to make full use of public transport/ public transport interchanges and where identified capacity exists to accommodate future development.

The development areas are proposed because they contain opportunities for change, they can deliver development of city wide or regional importance and/or because they are in need of regeneration. These seven areas are:

- Brighton Centre and Churchill Square area
- Brighton Marina and Black Rock
- Lewes Road
- New England Quarter and London Road
- Eastern Road and Edward Street



- Hove Station area
- Shoreham Harbour and South Portslade.

Additional areas of the city are identified as part of the Spatial Strategy as they require a special or coordinated approach to managing future change in these areas and these are the Seafront, Central Brighton, Valley Gardens, the Urban Fringe and the South Downs. Further proposals are set out to improve the sustainability of remaining residential areas of the city with the priority to reduce inequality.

## CORE STRATEGY – QUICK REFERENCE GUIDE TO THE REVISED PREFERRED OPTIONS

P. O Ref.	Page Ref.	Preferred Options Summary	Sustainable Community Strategy Priorities Addressed	Wards Affected
35 DA1	31	<p><b>Brighton Centre and Churchill Square Area</b></p> <p>Secure a redeveloped conference centre in a landmark new building to benefit the city and region and sustain the tourism economy; ensuring the redevelopment benefits the surrounding area through high quality design, townscape, public realm and biodiversity improvements and complements the seafront. Recognises the potential for the extension of Churchill Square shopping centre (c. 40,000 sq m) but seeks to ensure additional car traffic is the minimum necessary, high quality public and sustainable transport is provided and pedestrian and cycle access through area and to the seafront is improved. The preferred option also encourages a more diverse evening economy in the area addressing community safety concerns along West Street and the lower seafront promenade.</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪ Promoting Sustainable Transport</li> </ul>	Regency
DA2	34	<p><b>Brighton Marina and Black Rock Site</b></p> <p>Facilitate the creation of Brighton Marina as a sustainable mixed use district of the city, creating a unique, high quality marina environment that will attract residents and visitors and is well connected to the new leisure and recreation facility at Black Rock. This will involve ensuring a more balanced range of uses in the district centre and a good mix of new housing. Ensuring new residential development is supported by necessary social infrastructure (health, school places and community facilities), a high quality of building design, townscape and public realm, biodiversity improvements, enhanced transport infrastructure and improved pedestrian and cycle access. Opportunities for large-scale renewable energy provision</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> <li>▪ Strengthening communities and Involving People</li> <li>▪ Improving housing and affordability</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪ Promoting Sustainable Transport</li> </ul>	Rottingdean Coastal

P. O Ref.	Page Ref.	Preferred Options Summary	Sustainable Community Strategy Priorities Addressed	Wards Affected
		are set out in the preferred option along with a requirement that new developments are accompanied with a Flood Risk Assessment. The area is likely to accommodate a minimum of 2000 additional residential units.		
36 DA3	38	<p><b>Lewes Road</b></p> <p>Enhance the role of the area as part of the city's academic corridor through working in partnership with the Universities regarding campus expansion plans, appropriate student accommodation and closer links with local communities. Support proposals for the Falmer Academy, the Community Stadium and Preston Barracks recognising the role of key employment sites in the area delivering new employment provision. The need for improved bus, cycle and pedestrian routes along Lewes Road is set out in the preferred option along with the identified need for a comprehensive approach to improving the townscape, public realm and landscaping along the corridor and the need to support and enhance the district centre. The area is likely to accommodate a minimum of 358 additional residential units.</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> <li>▪ Strengthening communities and Involving People</li> <li>▪ Improving housing and affordability</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪ Promoting Sustainable Transport</li> </ul>	<p>St Peters &amp; North Laine</p> <p>Moulsecoomb and Bevendean</p> <p>Hanover &amp; Elm Grove</p>
DA4	43	<p><b>New England Quarter and London Road</b></p> <p>Revitalise London Road town centre recognising the importance of retaining key retail sites and secure their redevelopment/ refurbishment and create a major new business quarter (20,000 sq m of new office floorspace) connecting London Road with the New England Quarter. The preferred option recognises the plans for improvements at Pelham Street campus of City College and the need to maintain and strengthen the creative industries cluster in the area. There is also a need to strengthen links within the area and with North Laine through implementing the Local Transport Plan priorities, high quality streetscapes, pedestrian routes and cycle ways and public realm improvements. The area is likely to</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> <li>▪ Strengthening communities and Involving People</li> <li>▪ Improving housing and affordability</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪ Promoting Sustainable Transport</li> </ul>	<p>St Peters &amp; North Laine</p> <p>Preston Park</p>

P. O Ref.	Page Ref.	Preferred Options Summary	Sustainable Community Strategy Priorities Addressed	Wards Affected
		accommodate a minimum of 795 additional residential units.		
37	47	<p><b>Eastern Road and Edward Street</b></p> <p>Secure improvements to the public realm and townscape making the area more attractive, accessible and safer for residents, employees and visitors and contribute towards increased business investment in the area. Help secure additional high quality employment floorspace in the Edward Street Quarter, more efficient use of employment sites and facilitate a high quality, sustainable mixed-use development on the former Municipal Market, Circus Street. Work with the health authorities to plan for the enlargement of the Royal Sussex County Hospital. The area is likely to accommodate a minimum of 311 additional residential units.</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> <li>▪ Strengthening communities and Involving People</li> <li>▪ Improving housing and affordability</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪ Promoting Sustainable Transport</li> </ul>	<p>Queens Park</p> <p>East Brighton</p>
	51	<p><b>Hove Station Area</b></p> <p>Recognise the long term regeneration opportunity of the Hove Station area to develop as an attractive and sustainable employment-led mixed use area, creating a high quality employment environment. Through redevelopment secure public realm and townscape improvements focusing on the Conway Street area and industrial/ retail frontages along Sackville Road, Old Shoreham Road and Goldstone Lane as well as public safety, environmental and open space improvements in the Conway Street area. Enhance the sustainable transport interchange at Hove Station and protect identified employment sites and the allocated waste site. The area is likely to accommodate a minimum of 295 additional residential units.</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> <li>▪ Improving housing and affordability</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪ Promoting Sustainable Transport</li> </ul>	<p>Goldsmid</p> <p>Stanford</p>
DA7	55	<p><b>Shoreham Harbour and South Portslade</b></p> <p>Major regeneration is proposed with the aim to create a highly sustainable</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> </ul>	<p>South Portslade</p> <p>Wish</p>

P. O Ref.	Page Ref.	Preferred Options Summary	Sustainable Community Strategy Priorities Addressed	Wards Affected
		neighbourhood adhering to the latest standards of sustainable development to be developed through the preparation of an Area Action Plan. The development is expected to include, new and high quality jobs, new homes (a mixture of tenure and type), new retail and leisure facilities and a high quality network of public open space including a significantly improved public beach. Other supporting community facilities will need to be provided such as a secondary school, a package of high quality public transport improvements including extension of the RTS and railway station upgrades as well as improvements to north-south road links and A259 gateway improvements. Opportunities for large-scale renewable energy provision are set out in the preferred option along with a requirement that new developments are accompanied with a Flood Risk Assessment.	<ul style="list-style-type: none"> <li>▪ Strengthening communities and Involving People</li> <li>▪ Improving housing and affordability</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪ Promoting Sustainable Transport</li> </ul>	
38	61	<p><b>The Seafrost</b></p> <p>The council will work with the public and private sector to continue the on-going regeneration of <b>the seafrost</b> in an integrated and coordinated manner to accord with council's vision for the seafrost. Proposals should support the year-round leisure, recreation and cultural role of the seafrost for residents and visitors whilst complementing its outstanding historic and natural landscape value. Proposals should ensure a good marine environment, enhance biodiversity and consider options for small scale renewable energy provision.</p> <p>Priorities are then set out for the Western Seafrost; Central Seafrost; East of Palace Pier to the Marina and East of the Marina.</p>	<ul style="list-style-type: none"> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪ Promoting Sustainable Transport</li> </ul>	Rottingdean Coastal East Brighton Queens Park Regency Brunswick & Adelaide Central Hove Westbourne Wish
	65	<p><b>Central Brighton</b></p> <p>To reinforce central Brighton's role as the city's vibrant thriving <b>regional centre for shopping, tourism, cultural and commercial facilities</b>. Through setting out the approach to the cultural quarter, new retail development, a balanced range of complementary evening and night-time economy uses, mixed use development, safeguarding employment and securing urban realm improvements.</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪ Promoting Sustainable Transport</li> </ul>	Regency St Peter's and North Laine
	69	<p><b>Valley Gardens</b></p> <p>The council will work with public and private sector partners to enhance</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> </ul>	Queens Park St Peters & North

P. O Ref.	Page Ref.	Preferred Options Summary	Sustainable Community Strategy Priorities Addressed	Wards Affected
		and regenerate the <b>Valley Gardens</b> area in an integrated manner that reinforces its strategic significance, emphasises its historic and cultural character, reduces the adverse impact of vehicular traffic, improves air quality and creates a continuous green boulevard that reconnects the area to the surrounding urban realm. The distinct role and character of each green space and priorities for action will be clarified in the preferred option.	<ul style="list-style-type: none"> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪ Promoting Sustainable Transport</li> </ul>	Laine  Regency  Hanover & Elm Grove
SA4  39	73	<b>Urban Fringe</b>  <b>Land between the built up area boundary and the proposed South Downs National Park boundary</b> will be protected and enhanced and the approach to assessing development proposals will be set out along with priorities for enhancement: green network opportunities; improving sustainable transport access, environmental improvements, protecting ground water aquifers and the wider landscape role of the urban fringe.	<ul style="list-style-type: none"> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> </ul>	North Portslade Hangleton & Knoll Withdean Stanford Patcham Hollingbury & Stanmer Moulsecoomb & Bevendean East Brighton Woodingdean Rottingdean Coastal
SA5	75	<b>South Downs</b>  Following the establishment of the <b>National Park Authority</b> , work in partnership with the National Park Authority and adjoining authorities and landowners to protect and enhance the natural beauty of the South Downs recognising the council priorities for the national park land that falls within the city's administrative area.	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Improving health and well-being</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪ Promoting Sustainable Transport</li> </ul>	North Portslade  Hangleton & Knoll  Withdean  Patcham  Hollingbury & Stanmer  Moulsecoomb & Bevendean

P. O Ref.	Page Ref.	Preferred Options Summary	Sustainable Community Strategy Priorities Addressed	Wards Affected
				East Brighton Woodingdean Rottingdean Coastal
SN1  40	78	<p><b>Sustainable Neighbourhoods</b></p> <p>Contribute to creating and maintaining <b>sustainable neighbourhoods</b> by working with partners, developers and local communities. The focus will be for viable local shopping centres and parades, a good balance and mix of uses in local centres, new/enlarged community facilities provided in areas of need/shortfall; appropriate mix of size and type of housing; protecting distinctive and important neighbourhood character; opportunities for safer streets; open space, sports and recreation improvements; encouraging a greater range of services and facilities for learning and training; encourage environmental sustainability improvements and encourage community engagement and neighbourhood arts projects.</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> <li>▪ Strengthening communities and Involving People</li> <li>▪ Improving housing and affordability</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> </ul>	All

P. O Ref.	Page Ref.	Preferred Options Summary	Sustainable Community Strategy Priorities Addressed	Wards Affected
SN2	82	<p><b>Residential Renewal Areas</b></p> <p>Contribute to creating <b>a city of opportunities</b> by ensuring a better quality of life for the most disadvantaged communities by <b>reducing inequalities</b> and addressing the factors which exclude people from full engagement with community life.</p> <p>Work with the <b>Local Strategic Partnership</b>, other partnerships and local communities to reduce inequality in the city by helping to implement priorities through planning policy. Priorities to include community safety, sustainable transport access; safer streets; better balance and choice of housing; open space, sports, cultural and recreation facility improvements in areas of shortfall; increasing good quality employment opportunities and local training schemes; community facility provision in areas of shortfall and support programmes and initiatives aimed at reducing inequalities and promoting healthier lifestyles.</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> <li>▪ Strengthening communities and Involving People</li> <li>▪ Improving housing and affordability</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> </ul>	To be agreed.
CP1	87	<p><b>Sustainable Buildings</b></p> <p>The council will require all development to deliver levels of <b>building sustainability</b> in advance of those set out nationally in order to avoid expansion of the city's ecological footprint and to mitigate against and adapt to climate change. The minimum standards will be set out in the Sustainable Buildings Design SPD.</p>	<ul style="list-style-type: none"> <li>▪ Improving housing and affordability</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> </ul>	All
CP2	91	<p><b>Urban Design</b></p> <p>Set out the <b>general strategic design criteria expected of new development</b> and to require highest standards of design. A city-wide urban design framework will be prepared to set out areas which should generally be preserved, areas of the city suitable for local incremental enhancement/ area-wide enhancement and identify areas which have potential for taller developments.</p>	<ul style="list-style-type: none"> <li>▪ Reducing crime and improving safety</li> <li>▪ Strengthening communities and Involving People</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> </ul>	All
CP3	94	<p><b>Public Streets and Spaces</b></p>	<ul style="list-style-type: none"> <li>▪ Reducing crime and improving safety</li> </ul>	All

P. O Ref.	Page Ref.	Preferred Options Summary	Sustainable Community Strategy Priorities Addressed	Wards Affected
		To comprehensively improve <b>the quality, legibility and accessibility of the city's public urban realm</b> . Proposals will be expected to achieve consistent aims and standards and make an appropriate contribution to achieving these requirements.	<ul style="list-style-type: none"> <li>▪ Improving health and well-being</li> <li>▪ Strengthening communities and Involving People</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪ Promoting Sustainable Transport</li> </ul>	
<b>CP4</b>	96	<p><b>Healthy City</b></p> <p>Ensure developments and programmes and strategies are tested to ensure that they reduce adverse impacts on <b>health</b>, maximise positive impact on health and promote health, safety and active living for all age groups. Safeguard allotments and encourage joint working with health providers.</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> <li>▪ Strengthening communities and Involving People</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪ Promoting Sustainable Transport</li> </ul>	All
<b>CP5</b> 12	98	<p><b>Biodiversity</b></p> <p>Conserve and enhance <b>biodiversity</b> and promote improved access to green spaces through the establishment of a green network which will enable a strategic approach to nature conservation enhancement and by providing detailed guidance in a Nature Conservation and Development SPD.</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Improving health and well-being</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> </ul>	All
<b>CP6</b>	101	<p><b>Open Space</b></p> <p>Safeguard, enhance and promote access to the city's <b>green and open spaces and beaches</b> and promote active living. Local open space standards will be set out and development will be expected to contribute to the provision of and improve the quality, quantity and accessibility of public open space. Opportunities to secure improvements in poor-quality, under-used and low potential open spaces will be considered.</p>	<ul style="list-style-type: none"> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> <li>▪ Strengthening communities and Involving People</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> </ul>	All
<b>CP7</b>	105	<p><b>Sports and Recreation</b></p>	<ul style="list-style-type: none"> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> </ul>	All



P. O Ref.	Page Ref.	Preferred Options Summary	Sustainable Community Strategy Priorities Addressed	Wards Affected
		Safeguard, enhance and promote access to the city's <b>sports and recreation</b> facilities. Local sports and recreation standards will be set out and development will be expected to contribute to the provision of and improve the quality, quantity and accessibility of sport and recreation facilities. Support the delivery of proposed sporting facilities to reflect the city's regional status and aspirations to be a major sporting city.	<ul style="list-style-type: none"> <li>Strengthening communities and Involving People</li> <li>Promoting Sustainable Transport</li> </ul>	
<b>CP8</b>	109	<p><b>Sustainable Transport</b></p> <p>Outline the <b>sustainable transport</b> priorities for the city to ensure that future development in the city does not increase pressure on the city's road network and encourages a shift to non car modes of transport. Ensure new development is located in areas with good transport links and responds to the demand for travel they create and identify opportunities for safer streets and sustainable transport improvements.</p>	<ul style="list-style-type: none"> <li>Reducing crime and improving safety</li> <li>Improving health and well-being</li> <li>Strengthening communities and Involving People</li> <li>Promoting resource efficiency &amp; enhancing the environment</li> <li>Promoting Sustainable Transport</li> </ul>	All
<b>CP9</b> 43	112	<p><b>Developer Contributions</b></p> <p>Require all <b>new development</b> to be accompanied by the necessary provision of <b>social and physical infrastructure</b>. Any infrastructure required before the development is occupied should be provided on time. Further details on the circumstances and range of contributions that may be sought to be set out in a Developer Contributions SPD.</p>	<ul style="list-style-type: none"> <li>Promoting Enterprise and Learning</li> <li>Reducing crime and improving safety</li> <li>Improving health and well-being</li> <li>Strengthening communities and Involving People</li> <li>Improving housing and affordability</li> <li>Promoting resource efficiency &amp; enhancing the environment</li> <li>Promoting Sustainable Transport</li> </ul>	All
<b>CP10</b>	114	<p><b>Flood Risk</b></p> <p>Set out the approach to managing <b>flood risk</b> to accord with the recommendations of the Strategic Flood Risk Assessment and PPS25 and ensure development incorporates where appropriate flood defences and suitable arrangements for sustainable surface water drainage.</p>	<ul style="list-style-type: none"> <li>Reducing crime and improving safety</li> <li>Promoting resource efficiency &amp; enhancing the environment</li> </ul>	All
<b>CP11</b>	116	<p><b>Housing Delivery</b></p> <p>Outline the strategy for the planned location of <b>new housing</b> (in accordance with the South East Plan target of 570 homes annually), the mix of housing (to be guided by current and future local assessment of needs and aspirations) and to ensure proposals for residential development demonstrate how the additional demand for associated infrastructure and local services will be met.</p>	<ul style="list-style-type: none"> <li>Strengthening communities and Involving People</li> <li>Improving housing and affordability</li> </ul>	All
<b>CP12</b>	122	<p><b>Affordable Housing</b></p>	<ul style="list-style-type: none"> <li>Promoting Enterprise and Learning</li> <li>Strengthening communities and</li> </ul>	All

P. O Ref.	Page Ref.	Preferred Options Summary	Sustainable Community Strategy Priorities Addressed	Wards Affected
		To set out a plan wide target to secure an annual average of 230 units of <b>affordable housing</b> over the plan period from all mechanisms. Informed by an updated Viability Study, the council will negotiate with developers to secure up to a 40% element of affordable housing on all larger suitable development sites with criteria set out to assess the proportion and type of affordable housing proposed informed by up to date assessments of local housing needs and site/neighbourhood characteristics.	<ul style="list-style-type: none"> <li>▪ Involving People</li> <li>▪ Improving housing and affordability</li> </ul>	
<b>CP13</b>	126	<p><b>Housing Densities</b></p> <p>Outline the criteria for assessing <b>higher density residential developments</b> and in order to make the full and effective use of land available set a minimum density of 50 dph city wide and 100 dph within Development Areas.</p>	<ul style="list-style-type: none"> <li>▪ Improving housing and affordability</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪ Promoting Sustainable Transport</li> </ul>	All
<b>CP14</b>  44	128	<p><b>Gypsies and Travellers</b></p> <p>Provision will be made to meet the local need for <b>gypsy and traveller caravan pitches</b> in accordance with South East Plan targets. Set out the relevant planning considerations and criteria for the location of gypsy and traveller sites which may be used to guide the formal consideration and allocation of sites.</p>	<ul style="list-style-type: none"> <li>▪ Reducing crime and improving safety</li> <li>▪ Strengthening communities and Involving People</li> <li>▪ Improving housing and affordability</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪</li> </ul>	All
<b>CP15</b>	131	<p><b>Retail Provision</b></p> <p>Maintain and enhance current hierarchy of <b>shopping centres</b>. The regional shopping centre will be the focus of any future significant retail development (cross-reference to DA1) and applications for new retail development within defined shopping centres will be permitted subject to consideration of scale and mix of uses whilst applications for new edge and out of centre retail development will be required to meet the tests of PPS6.</p>	<ul style="list-style-type: none"> <li>▪ Improving health and well-being</li> <li>▪ Strengthening communities and Involving People</li> <li>▪ Promoting Sustainable Transport</li> </ul>	All
<b>CP16</b>	134	<p><b>Strategic Employment Sites</b></p> <p>In order to meet the need of the city to 2026, a strategic list of <b>employment sites</b> will be identified, safeguarded and promoted for industrial and business use for office and high tech uses. The <b>New England Road</b> area will be identified as the location for 20,000 sq m of new office floorspace and the council will promote refurbishment and upgrade of sites and premises through enabling development and encourage the creation of flexible and affordable business space to support</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> </ul>	All  St Peters and North Laine

P. O Ref.	Page Ref.	Preferred Options Summary	Sustainable Community Strategy Priorities Addressed	Wards Affected
		the city's key employment sectors.		
CP17	138	<p><b>Other Employment Sites</b></p> <p>Other <b>employment sites</b> within the city will be protected and not released to other uses unless the site or premise can be demonstrated to be both redundant and incapable of meeting the needs of alternative modern employment uses. Where release is permitted preference will be given to alternative employment generating uses, live/work units or affordable housing.</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪ Promoting Sustainable Transport</li> </ul>	All
CP18	141	<p><b>Culture, Tourism and Heritage</b></p> <p>Set out the standards that will be expected of new <b>visitor, arts and event attractions</b> and support the upgrading and enhancement of existing <b>visitor facilities</b>. Recognise the role of the South Downs as a visitor and recreation asset and promote the provision of arts and creative industry workspaces in regeneration schemes and in major mixed use developments. Preserve and enhance the historic built environment and archaeological assets and their settings, giving greatest weight to national designations. Review the Conservation Strategy to provide a framework for future conservation area management proposals/ future conservation area designations.</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> <li>▪ Reducing crime and improving safety</li> <li>▪ Improving health and well-being</li> <li>▪ Strengthening communities and Involving People</li> <li>▪ Promoting resource efficiency &amp; enhancing the environment</li> <li>▪ Promoting Sustainable Transport</li> </ul>	All
CP19	145	<p><b>Hotel/ Guest Accommodation</b></p> <p>Proposals for new major <b>hotel facilities</b> will be assessed in line with the policies in PPS6 and the sequential approach to site selection for new hotel development directed firstly to central Brighton. The policy also sets out how existing guest house and hotel accommodation will be protected.</p>	<ul style="list-style-type: none"> <li>▪ Promoting Enterprise and Learning</li> </ul>	All

## Supporting Documents

The following supporting documents are also available as part of the consultation process:-

### Sustainability Appraisal Report

In producing the Core Strategy, the aim has been to ensure that the revised preferred options, when taken together, will ensure the sustainable development of the city and the creation of sustainable communities. A Sustainability Appraisal tests the extent to which the Core Strategy meets identified sustainable development principles. This is a separate document produced alongside the Core Strategy which critically examines its objectives and options and tests them against the principles of sustainable development. A non-technical summary of the full Sustainability Appraisal Report has also been produced.

### **Statement of Consultation**

This document details the consultation that was carried out on the original Preferred Options document during November and December 2006. It summarises the comments and views collected during the various consultation events and workshops held and includes a schedule of formal consultation responses received together with an officer response.

### **Supporting Evidence Document**

The Core Strategy Revised Preferred Options Document is underpinned by a number of background studies. These are listed and summarised in the Supporting Evidence Document. In addition, it also includes the area assessments that were undertaken on the proposed development areas and that form the basis of the revised preferred options.



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

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

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

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

### **SPATIAL STRATEGY**

#### General Comments

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

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

accommodate significant development opportunities was questioned.

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

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

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

## **CENTRAL SEAFRONT**

## Formal Responses

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

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

## Consultation Events and Workshops

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

## **BRIGHTON MARINA**

## Formal Responses

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

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

## Consultation Events and Workshops

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



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

## **LEWES ROAD**

### Formal Responses

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

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

### Consultation Events and Workshops

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

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

## **NEW ENGLAND ROAD/ LONDON ROAD**

### Formal Response

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

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

### Consultation Event and Workshops

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

## **EASTERN ROAD AND EDWARD STREET**

### Formal Responses

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

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

### Consultation Events and Workshops

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

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

## **HOVE STATION AREA**

### Formal Responses

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

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

### Consultation Events and Workshops

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

## **SHOREHAM HARBOUR AND SOUTH PORTSLADE**

### Formal Responses

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

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

### Consultation Events and Workshops

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

## **SPECIAL AREA POLICIES**

### **SA1 - THE SEAFRONT**

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

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

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

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

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

## **SA2 CENTRAL BRIGHTON**

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

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

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

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

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

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

### Consultation Events and Workshops

#### **The Retail and Tourism Advisory Panel**

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

#### **SA3 – VALLEY GARDENS**

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

#### **SA4 – URBAN FRINGE**

##### Formal Responses (UF1 Urban Fringe, SS1 Spatial Strategy)

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

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

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

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

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

#### Consultation Events and Workshops

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



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

## **SA5 – SOUTH DOWNS**

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

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

## **SN1 – SUSTAINABLE NEIGHBOURHOODS**

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

Preferred Options **SS1- Spatial Strategy**:

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

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

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

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

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

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

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

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

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

### Consultation Events and Workshops

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

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

## SN2 – RESIDENTIAL RENEWAL AREAS

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

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

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

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

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

## CORE POLICIES

### CP1 SUSTAINABLE BUILDING DESIGN

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

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

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

General comments to the PRE section related to:

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

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

### Consultation Events and Workshops

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

### Site Allocation Preferred Options Consultation

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

### **Responses to Spatial Issue 14 – renewable energy**

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

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

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

## **CP2 URBAN DESIGN**

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

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

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

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

### Consultation Events and Workshops

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

## **CP3 PUBLIC STREETS AND PLACES**

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

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

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

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

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

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

### Consultation Events and Workshops

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

## **CP4 HEALTHY CITY**

### Formal Responses (H1 -H4)

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

**H1 Health Impact Assessments** (6 representations): General support

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

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

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

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



## Consultation Events and Workshops

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

## CP5 BIODIVERSITY

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

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

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

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

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

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

**CP6 OPEN SPACE**  
**CP7 SPORTS AND RECREATION**

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

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

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

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

Comments related to:

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

Other general OS comments were:

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

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

### Consultation Events and Workshops

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

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

### Site Allocations Issues and Option consultation – Open Space Advisory Panel

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

## **CP8 SUSTAINABLE TRANSPORT**

### Formal Responses (PST1-PST5)

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

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

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

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

**PST4 Road safety and air quality measures** – 15 responses were received 5 of support, 5 of qualified support and 5 objections. Supporters considered that cycle transfer should be facilitated and that Park and Ride would cut pollution and congestion and reduce CO<sub>2</sub> emissions thereby improving air quality. The opponent of Park and Ride considered that it could lead to congestion and extra traffic in the urban fringe. Partial supporters were concerned that more than half of visitors/locals still use and need a car which could be kept out of the town centre by effective Park & Ride and other transport modes but that the operation of car parks and parking fines should not be seen as a fiscal measure but seen as a way to encourage visitors. The bus operator noted that 'essential business traffic' may need regulating and enforcement if it impacts on traffic flow of public transport. Network Rail considered that the idea of Rail Transfer Station was proactive in its concept, but requested that a greater explanation of rail transfer stations should be provided since its primary role is to maintain the railway infrastructure and it might not be in a position to fund freight transfer.

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

### Consultation Events and Workshops

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

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

## **CP9 DEVELOPER CONTRIBUTIONS**

### Formal Responses (DC1-DC2)

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

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

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

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

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

### Consultation Events and Workshops

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

## **CP10 MANAGING FLOOD RISK**

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

### **PRE3 Managing Flood Risk:**



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

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

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

## **CP11 HOUSING DELIVERY**

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

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

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

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

#### Consultation Events and Workshops

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

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

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

## **CP12 AFFORDABLE HOUSING**

Formal Responses (AH1, AH3 and AH4)

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

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

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

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

#### Consultation Events and Workshops

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

## CP13 HOUSING DENSITIES

### Formal Responses

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

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

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

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

## CP14 GYPSIES AND TRAVELLERS

### Formal Response

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

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

## CP15 RETAIL PROVISION

**Formal Response** (R1 Retail)

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

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

There was also:

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

### Consultation Events and Workshops

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

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

**Retail and Tourism Advisory panel:**

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

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

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

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

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

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

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

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

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



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

## **CP16 STRATEGIC EMPLOYMENT SITES**

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

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

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

### Consultation Events and Workshops

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

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

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

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

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

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

### **Economic Partnership Sites and Premises Sub-group:**

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

## **CP17 OTHER EMPLOYMENT SITES**

Formal Response (E3 other employment sites)

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

## **CP18 CULTURE, TOURISM AND HERITAGE**

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

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

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

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

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

### Consultation Events and Workshops

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

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

### **Site Allocation Issues and Options Consultation**

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

### **Arts and Creative Industries Advisory Panel comments:**

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

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

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

#### **Retail, Culture and Tourism Advisory Panel comments:**

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

### **CP19 HOTEL/GUEST ACCOMMODATION**

#### Formal Response (CT2 Strategy for Hotel Accommodation)

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

#### Consultation Events and Workshops

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

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

The following suggestions were made:

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





# **ENVIRONMENT AND COMMUNITY SAFETY OVERVIEW & SCRUTINY COMMITTEE**

## **Agenda Item 9**

Brighton & Hove City Council

**Subject:** LDF Core Strategy Background Studies  
**Date of Meeting:** 16 June 2008  
**Report of:** Director of Strategy and Governance  
**Contact Officer:** Name: **Mary van Beinum** Tel: **29-1062**  
E-mail: mary.vanbeinum@brighton-hove.gov.uk  
**Wards Affected:** All

### **FOR GENERAL RELEASE**

#### **1. SUMMARY:**

- 1.1 The attached report on the Local Development Framework (LDF), Background Studies is scheduled to be presented to the Cabinet meeting on 12 June as part of the evidence base for the revised preferred options Core Strategy, the previous report, Item 8 on this agenda.

#### **2. RECOMMENDATIONS:**

- 2.1 That the Committee note the report.



# **CABINET MEETING**

## **12 JUNE**

**ECSOSC**

### **Agenda Item 9**

Brighton & Hove City Council

<b>Subject:</b>	<b>LDF Core Strategy – Background Studies</b>		
<b>Date of Meeting:</b>	<b>12 June 2008</b>		
<b>Report of:</b>	<b>Director of Environment</b>		
<b>Contact Officer:</b>	<b>Name:</b>	<b>Mike Holford</b>	<b>Tel:</b> <b>29-2501</b>
	<b>E-mail:</b>	Mike.holford@brighton-hove.gov.uk	
<b>Key Decision:</b>	<b>Yes/No</b>	<b>Forward Plan No.</b>	
<b>Wards Affected:</b>	All		

## **FOR GENERAL RELEASE**

### **1. SUMMARY AND POLICY CONTEXT:**

This report seeks formal approval of 6 background studies and 4 interim background studies as contributing to the evidence base for the revised preferred options Core Strategy, part of the Local Development Framework (see accompanying report on the agenda).

### **2. RECOMMENDATIONS TO CABINET:**

- 1). To approve the 6 completed background studies and 4 interim background studies as supporting evidence for the revised preferred options Core Strategy, part of the Local Development Framework.
- 2). To note that the final versions of those 4 studies currently at the interim stage will be brought back to Cabinet in November 2009.

### **3. RELEVANT BACKGROUND INFORMATION/CHRONOLOGY OF KEY EVENTS:**

The Core Strategy is part of the Local Development Framework (LDF), which has been introduced by the Government to replace the Local Plan. A report requesting approval of the revised preferred options Core Strategy for public consultation is also on the agenda.

In addition to conforming to national and regional planning policy, the Core Strategy is required to be supported by a sound evidence base. A number of background studies have been prepared which form part of this evidence base. It is important to note that whilst the background studies are important evidence contributing to policy development they cannot in themselves define what the policies should be. In many cases there will be other evidence and considerations to be taken into account.

Other background studies have previously been completed and approved by the Environment Committee. The various studies have all also informed the preparation of a Sustainability Appraisal which must accompany the Core Strategy. A summary of the various background studies is included in an appendix to this report.

#### **4. CONSULTATION**

Consultation has been undertaken appropriate to the content of the relevant study:-

- An event was held for invited participants at Hove Town Hall in February 2008 to discuss issues arising for the Strategic Housing Market Assessment.
- The Environment Agency has given guidance on the preparation of the Strategic Flood Risk Assessment.
- Natural England has been consulted on the preparation of the Appropriate Assessment (of European wildlife sites).
- A steering group oversaw production of the Creative Industries and Workspace Study. A web based survey and a survey of registered social landlords and commercial property agents also informed production of this Study.
- Interested organisations will be consulted on the Green Networks Study and Strategic Housing Land Availability Assessment prior to completion.

#### **5. FINANCIAL & OTHER IMPLICATIONS:**

##### **5.1 Financial Implications:**

Preparation and consultation costs for the various background studies have been identified and a budget allocation has been set aside for this within the Environment Directorate. There are no capital implications.

##### **5.2 Legal Implications:**

The Background Studies have been prepared to conform to the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Development) (England) Regulations 2004.

##### **5.3 Equalities Implications:**

Equalities issues are relevant to a number of the Core Strategy issues, particularly in relation to narrowing the gap between disadvantaged areas and the rest of the city, providing community facilities and providing for housing for all.

##### **5.4 Sustainability Implications:**

The planning system has a clear purpose to contribute towards the achievement of sustainable development. Most planning policy documents will be appraised for their economic, social and environmental impacts. The Core Strategy has been subject to a full Sustainability Appraisal. The evidence provided by these background studies informs the Sustainability Appraisal.

#### 5.5 Crime & Disorder Implications:

Not directly addressed by any of the Background Studies.

#### 5.6 Risk and Opportunity Management Implications:

The risks within this project are regularly reviewed through quarterly highlight reports. Production of a sound evidence base for LDF documents considerably reduces the risk of them being found unsound by a Planning Inspector.

#### 5.7 Corporate / Citywide Implications:

The core strategy will contribute to delivering plans and strategies across the city council directorates, along with the Sustainable Community Strategy. It will also help to deliver external city-wide strategies, e.g. of the Primary Care Trust. The background studies provide the evidence base for the core strategy.

### **6. EVALUATION OF ANY ALTERNATIVE OPTION(S):**

- 6.1. None required as the studies are concerned with the identification of matters of fact. The Studies are required by Government planning guidance requiring plans to be supported by a sound evidence base.

### **7. REASONS FOR REPORT RECOMMENDATIONS**

- 7.1 To ensure that Cabinet is aware of the background studies informing policy development in the Core Strategy.

### **SUPPORTING DOCUMENTATION**

#### **Appendices:**

1. Summary of Background Studies

#### **Documents In Members' Rooms**

1. Affordable Housing Development Viability Study
2. Appropriate Assessment (of potential impact on European wildlife sites)
3. Creative Industries Workspace in Brighton and Hove 2007 -2017

4. Strategic Housing Market Assessment
5. Strategic Flood Risk Assessment
6. Sequential Test and Exception Test (regarding flood risk)
7. Interim Green Networks Study
8. Interim Open Spaces, Sports and Recreation Study
9. Interim Strategic Housing Land Availability Assessment
10. Interim Transport Assessment

### **Background Documents**

1. As for Documents in Members' Rooms

### **LDF Core Strategy; Summary of Background Studies**

#### ***Affordable Housing Development Viability***

The study built on a previous Viability Study in 2004. Developer type appraisals were carried out across a range of notional sites, 10 and 15 units (flatted developments) in sample areas of low, medium and high house prices in the City. Development viability was tested for 40%, 45% and 50% affordable housing to be provided on site. A methodology was also suggested for calculating financial contributions in lieu of on-site affordable housing on sites of 9 units or fewer and appraisals carried out to test the viability of such proposals.

The Study found that for on-site affordable housing, 40% affordable housing remains financially viable. However, the aim should be to secure greater developer subsidy than previously. Secondly, that a financial contribution from sites providing 2 to 9 residential units would be financially viable. All policy positions to be kept under review in light of delivery and wider planning obligations.

#### ***Appropriate Assessment (of potential impact on European Wildlife sites)***

The administrative area of Brighton & Hove includes the Castle Hill Special Area of Conservation, and a number of other European or Ramsar wildlife sites are located in the wider area. The proposals in the revised preferred options version of the Core Strategy have been assessed under the provisions of the Habitat Regulations as to whether they will have a significant adverse affect on any European or Ramsar wildlife sites.

The Appropriate Assessment scoping report concludes that the Core Strategy does not contain any proposal that would have an adverse effect on the integrity of any European or Ramsar site.

#### **Creative Industries Workspace**

The purpose of the Study is to quantify the amount of creative industries workspace that the city will need from 2007-2017 if it is to adequately house and support this sector. It notes the many different types of workspace that creative businesses currently occupy and that many of these do not fit into the traditional B use classes. It researches the number of creative industries businesses in the city and the size of space typically required per employee. It also estimates that the sector is likely to continue growing at a rate of between 2.5 - 5% per annum (if supported).

The Study also provides 23 local and national case studies illustrating a variety of models of creative workspace initiatives and recommends, amongst other things, the encouragement of mixed-use developments to meet the projected need for workspace; suggests that live-work initiatives and various

forms of new investment vehicles are explored. It makes twenty recommendations designed to contribute to the development of affordable creative industry workspaces in the City.

The key findings are:

Creative industries businesses account for 10.7% of total employment in the city (15,800 people in 2007). The sector, if supported, is projected to grow at between 2.5 and 5% a year. 65,000 square foot of additional creative industries workspace is needed annually to accommodate growth at 2.5%.

- There is a demonstrable lack of affordable, appropriate and available workspace to support the growing creative industries sector.
- Creative industries chose to work in close proximity to one another and currently cluster primarily within the city's BN1 post-code area.
- Creative businesses are experiencing a shortage of workspace and premises and the availability of commercial accommodation most affordable by creative industries is in a size of property least suitable and appropriate for occupation by creative enterprises.
- All sub-sectors would benefit from the temporary use of empty spaces and premises for specific projects, especially where employment intensifies for short periods.
- Almost one-third of all creative businesses in the city currently occupy residential accommodation (usually their own) and the development of live/work schemes, particularly in the social rented sector, offer significant potential to secure additional workspace.

Recommendations:

- A strategy for planning for creative industries needs to flow through the local development framework from a strategic approach in the Core Strategy to more detailed policies in subsequent planning documents and in implementation mechanisms.
- The needs, profile and benefits of the arts and creative industries should be reflected in the Core Strategy.
- The LDF should consider a broader view of economic development to ensure that creative industry workspace needs are fully recognised.
- Some creative industries make use of community halls/ churches and other spaces which are not traditionally viewed as traditional employment spaces. An approach to safeguarding these uses should be continued in the Local Development Framework.
- The LDF should recognise that mixed use developments provide an opportunity to provide new creative workspace and this consideration should be taken in developing development briefs, site allocations and supplementary planning guidance.
- The opportunity to review major development sites to investigate potential to provide an element of creative industry workspace should also be undertaken.
- Existing creative industry workspace should be protected/ replaced in any redevelopment/ regeneration schemes.



- There is also the need to avoid displacement of the clustering of current creative industries in certain areas of the city, through rising rent and property prices.

### ***Green Network Study – Interim***

The purpose of the Study is to identify a green infrastructure network, to identify the locations for delivering areas of new habitat under Biodiversity Action Plan targets and to improve access for people to natural green space. The network also links open spaces to establish continuous routes of green through the city and into surrounding countryside. The green infrastructure network has been defined by a partnership of the City Council, Sussex Wildlife Trust and Geospec (a GIS consultancy based at the University of Brighton). The method used reflected the three key aims of the network:

- Access to natural green space method: Using as a baseline a detailed habitat audit of the City, Natural England’s Accessible Natural Greenspace standards (ANGSt) were used to define a ‘buffer’ around each area of known natural green space.
- Biodiversity method:: An alternative method of defining hinterlands around natural green space was devised using ‘generic species’. These were combined with other data to show the parts of the landscape outside the natural green spaces which are most accessible to the generic species.
- A ‘final potential network’ was defined as being all land identified by either method 1 or 2 or both. Expert opinion and local knowledge was then used to identify the most appropriate linkage areas between the ‘baseline’ spaces. This final stage achieved a continuous green network through the city and defined four types of space within the network: i) core areas, ii) potential core areas, iii) biodiversity enhancement areas linking core areas and potential core areas; and, iv) buffer areas where the primary land use is not biodiversity related.

The findings of the study including a map setting out the proposed Green Network to be linked to preferred option CP5 in the Core Strategy. It is anticipated that funding to implement the network will be generated by a combination of off-site developer contributions and external funding. The interim findings of the Study will be subject to consultation which will inform the final version of the Study.

### ***Open Space, Sport and Recreation - Interim***

The Open Space, Sport and Recreation Study is designed to deliver the Council’s statutory requirements – establishing a baseline appreciation of levels of provision in Brighton & Hove and setting standards for quality, quantity and accessibility. The Study aims to provide a clear vision, identify priorities for future open space, recreation and sport provision, and consequently provide direction for the allocation of future Council and developer resources.

The purpose of the Study is to provide a comprehensive assessment of the open space, sports and recreational facilities within the city and recommend open space standards and future strategic options. The Study:

- identifies the current and future needs of the city;
- reviews and analyses the open space and indoor facilities audits;
- recommends local provision standards for all types of open space in terms of quantity, quality and accessibility;
- identifies an appropriate approach to calculating the methodology for developer contributions;
- identifies over and under-supplied areas ;
- proposes strategic options for addressing identified shortfalls in provision, protection and enhancement of existing provision, to relocate or make better use of existing provision and seek new provision.

### ***Strategic Flood Risk Assessment***

The role of a SFRA is to provide the evidence to ensure that flood risk is taken into account at all stages of the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest flood risk. The first part of the document has been prepared as a Level 1 SFRA, to cover all items as listed in the PPS25 Practice Guide. That is:

- Plans showing Brighton and Hove, location of main rivers, ordinary watercourses and Flood Zones together with allocated development sites.
- An assessment of the implication of climate change for flood risk at identified development areas.
- Area at risk of flooding from other sources.
- Location of any flood risk management measures, including flood warning systems.
- Guidance on the preparation of Flood Risk Assessments (FRAs) for allocated development sites and the applicability of the use of sustainability drainage systems (SUDS).

Consideration of the results of this assessment allows the application of a Sequential Test which together with a more detailed investigation of flood hazard of those sites at risk constitutes the Level 2 SFRA. The principal purpose of the Level 2 SFRA is to facilitate application of the exception test (see below). The Level 2 SFRA considers the flood hazard in more detail, taking into account the presence of flood risk management measures such as defences.

### ***Sequential Test and Exception Test***

The Strategic Flood Risk Assessment (SFRA) (see above) provides the basis for applying the Sequential Test. The aim of the Sequential Test is to steer

new development to areas at the lowest probability of flooding. Where areas of lower flood risk are unavailable the Exception Test is applied if the proposal includes certain categories of development. Part of the Exception Test requires development to provide wider sustainability benefits to the community that outweigh the flood risk.

It has not been found possible, consistent with wider sustainability objectives for the city, for all identified Development Areas to be located in areas of low probability of flooding. As a result, the Tests need to be applied to two of the proposed Development Areas: Brighton Marina & Black Rock and Shoreham Harbour & South Portslade. A Sequential Test and Exception Test for the principle of development at Brighton Marina is provided. A Sequential Test for Shoreham Harbour is also included which concludes that the more vulnerable land uses, such as residential development, should be directed to the parts of the Development Area that lie in areas of low flood risk.

### ***Strategic Housing Land Availability Assessment - Interim***

The broad aims for this study, set out in Planning Policy Statement 3 - Housing are to:-

- Assess the likely level of housing that could be provided if unimplemented planning permissions were brought into development.
- Assess land availability by identifying buildings or areas of land (including previously developed land and Greenfield) that have development potential for housing, including within mixed use developments.
- Assess the potential level of housing that can be provided on identified land.
- Where appropriate, evaluate past trends in windfall land coming forward for development and estimate the likely future implementation rate.
- Identify constraints that might make a particular site unavailable and /or unviable for development.
- Identify sustainability issues and physical constraints that might make a site unsuitable for development.
- Identify what action could be taken to overcome constraints on particular sites.

The Interim Report shows that the specific identified supply falls slightly short of PPS3 - Housing requirements but adding a contribution from small windfall site development (which is highly significant in B&H) more than makes up the shortfall. The interim results will be tested through consultation with key stakeholders over the summer.

### ***Strategic Housing Market Assessment***

The main aims of this study are:

- To provide evidence to inform policies aimed at delivering the right mix of housing across the whole housing market area – both market and affordable housing.

- To provide evidence on the need for different sizes of affordable homes (evidence on the level of affordable housing required is already available from the Housing Needs Assessment produced in 2005).
- To support a strategic approach to housing through consideration of the housing need and demand in all housing sectors – owner occupied, private rented and affordable – by assessing the key drivers and relationships within the housing market

The report provides evidence of the demographic and economic drivers of the housing markets within Brighton and Hove, evidence on the stock and supply of housing within the housing market and the implications for affordability.

The report also considers some specific local issues, including questions around the nature of recent development, the buy-to-let market and concerns about “buy to leave” empty, barriers to trading up in the housing market and issues around the current housing stock including the extent of second homes and houses in multiple occupation.

A key finding is that around 60% of household moves within Brighton and Hove each year are internal (Brighton and Hove residents moving within Brighton and Hove). However, Brighton and Hove’s influence extends into adjacent districts, with significant net out-migration to Lewes and Adur. Brighton and Hove receives around 4,000 people who move each year (2001-2007) from London.

### ***Transport Assessment - Interim***

It is essential that the impacts of increased development on the road network can be satisfactorily predicted and understood by the local and national highway authorities. The Transport Assessment [TA] work has been done using the city council’s computer-based transport model. It has tested the predicted transport effects in the morning and evening peak hours for traffic in two future years – 2016 and 2026 - by considering conditions:-

1. without the proposed LDF strategy
2. with the proposed LDF strategy

and then assessed the effects of examples of strategic transport measures that would be expected to minimise the effects of increased movement and activity by providing increased choice in transport alternatives when making journeys.

Without the planned growth proposed in the LDF, the key findings are that :-

- development will still occur within the city through implementation of existing planning permissions, and potential windfall developments.
- without significant measures to encourage and provide alternatives to reduce the demand for travel by car, overall levels of traffic and associated congestion will continue to increase, thereby increasing problems of road safety, air quality and noise. For example, by 2026 the amount of car travel within the city is predicted to increase by nearly 15%, and congestion levels will be some 12% higher than they are today.

With the proposed LDF spatial strategy:-

- the proposed increase in employment is expected to lead to a reduction in the level of outward commuting, and as the majority of these new employment places would be located within/adjacent to the city centre, they will be highly accessible by public transport;
- the increases in traffic levels and congestion in 2026 are minimal (2-3%) compared to the 'without LDF' approach

This is because the proposed Development Areas are sustainably located primarily within the core urban area and adjacent to major public transport corridors, and a substantial proportion of proposed developments within the Development Areas are allocated for employment purposes rather than residential development.

In order to demonstrate how the traffic impacts of the LDF strategy can be minimised, the Transport Assessment has also tested the incremental effects of 3 examples of strategic long-term transport solutions, as identified in preferred option CP8 of the current LDF Core Strategy.

These are:-

- 1) the enhancement and intensification of current policies (including RTS, extension of parking controls, a proportion of car free development and promotion of walking, cycling and other wider travel planning initiatives);
- 2) as above in 1), plus the introduction of a Park and Ride strategy (based on 5 new park and ride sites introduced on the main approaches to the city); and
- 3) as above in 2) plus the introduction of fiscal charging measure that would only be applied as part of a national scheme.

The conclusions drawn from this initial work are that overall levels of traffic flow and congestion with the LDF planned growth approach are similar to or lower, and therefore an improvement over, an 'unplanned' approach.



# **ENVIRONMENT AND COMMUNITY SAFETY OVERVIEW & SCRUTINY COMMITTEE**

## **Agenda Item 10**

Brighton & Hove City Council

**Subject:** Overview and Scrutiny and the Council's Forward Plan

**Date of Meeting:** 16 June 2008

**Report of:** Director of Strategy and Governance

**Contact Officer:** Name: **Mary van Beinum** Tel: **29-1062**  
E-mail: mary.vanbeinum@brighton-hove.gov.uk

**Wards Affected:** All

### **FOR GENERAL RELEASE**

#### **1. SUMMARY AND POLICY CONTEXT:**

- 1.1 The report describes the working of the Council's Forward Plan and how the committee may choose to use it.

#### **2. RECOMMENDATIONS:**

- (1) To note the report.

#### **3. BACKGROUND INFORMATION**

- 3.1 Under the Council's new governance arrangements the Executive produces a Forward Plan of the key decisions expected to be made over the next four months. The Forward Plan is detailed in the Council Procedural Rules Part 8 Section 15.
- 3.2 As set out in Article 13 of the Constitution a key decision is defined as one which is likely to:
- result in expenditure or savings of more than £500k per year
  - or
  - have a 'significant' effect on communities living or working in an area comprising of two or more wards.
- 3.3 The constitution states that, under normal circumstances, no key decision may be taken unless it has been placed on the Forward Plan and at least clear days have elapsed since the publication of the Forward Plan. It is, however, expected that key decisions will be included in the Forward Plan

at least one calendar month prior to the date of the decision. If a key decision is included less than one month prior, the report to the executive shall state the reasons why.

#### Details included in the Forward Plan

- 3.4 The Forward Plan is to be prepared by the Leader of the Council to cover a four month period beginning with the first day of any month. The Plan will be prepared on a monthly basis and subsequent plans will cover the period beginning with the first day of the second month covered in the preceding plan.
- 3.5 As far as possible, the Forward Plan will include matters which the Leader has reason to believe will be the subject of a key decision to be taken by the Cabinet, Individual Members of the Cabinet, officers or under joint arrangements. It will normally include: the matter for decision, name of the decision taker; the date when the decision will be taken; the main groups who are to be consulted and how they will be consulted; how and when any person may make representations to the decision-taker; and the details of any other documents that will be submitted for consideration in relation to the matter.
- 3.6 Exempt information need not be included in the Forward Plan, although an indication of the decision to be taken, even if in Part Two, must be included.

#### Urgency

- 3.7 If a matter which is likely to be a key decision has not been included in the Forward Plan, that decision may still be taken if: it is impractical to defer it; if the Chairman of a relevant overview and scrutiny committee has been *informed* (or each member of that committee and the Leaders/Convenors of all political groups in writing by notice of the matter have been *informed*) if copies of the notice have been made available to the public; and if at least 3 clear days have elapsed since these things were done.
- 3.8 If there are not at least 3 clear days, the decision can only be taken if the Chairman of a relevant overview and scrutiny committee, or the Mayor/Deputy Mayor *agrees* that the taking of the decision cannot be reasonably deferred.

#### Overview and scrutiny committees and the Forward Plan

- 3.9 If an overview and scrutiny committee thinks that a key decision has been taken which was not included in the Forward Plan and was not the subject of the general exception procedure or did not have the agreement of the Chairman (as above), then the Committee may require the Executive to



submit a report to the Council within such a ('reasonable') time as the committee specifies. The Chairman (or any 3 members) may request such a report, or the committee itself may pass a resolution requesting a report.

3.10 The Forward Plan can be accessed on the Wave and the Council's internet site. All Councillors will be able to monitor the Plan and make suggestions for scrutiny to examine items on it.

3.11 It is intended that the Forward Plan will be discussed at OSC Chairman meetings and the Chairman will make recommendations to the OSC on items the Commission may wish to consider further.

#### **4. FINANCIAL & OTHER IMPLICATIONS:**

##### Financial Implications:

4.1 Additional staffing resources have been dedicated to supporting the scrutiny function, the Cabinet and the political parties.

##### Legal Implications:

4.2 The overview and scrutiny arrangements are in accordance with the relevant legislation.

##### Equalities Implications:

4.3 None directly as a result of this report.

##### Sustainability Implications:

4.4 None directly in relation to this report.

##### Crime & Disorder Implications:

4.5 None directly in relation to this report.

##### Risk and Opportunity Management Implications:

4.6 None directly in relation to this report.

##### Corporate / Citywide Implications:

4.7 None directly in relation to this report.

### **SUPPORTING DOCUMENTATION**

#### **Appendices:**

1. Timeline for Key Decisions

#### **Background Documents**

15 May 2008 Council Constitution

## APPENDIX 1

Days before key decision taken	Action on key decisions
Four months or more	Matter for key decision may be included on the Forward Plan
One month or more	Matter for key decision is normally expected to be included on the Forward Plan
Less than one calendar month	Report on the key decision to the executive meeting shall state the reason why the matter was not included on the Forward Plan
Less than one calendar month but at least three clear days (General Exception, Part 8 Paragraph 16)	Key decision may still be taken if the Chairman of a relevant Overview and Scrutiny Committee has been <b>informed</b> (or if there is no such person each Member of that Committee and the Leaders/Conveners of all political groups have been <b>informed</b> ) in writing by notice of the matter and copies of that notice are available to the public at offices of the Council
Less than three clear days (Special Urgency, Part 8 Paragraph 17)	Key decision may still be taken if the Chairman of a relevant Overview and Scrutiny Committee (or if there is no Chairman or he/she is unable to act, the Mayor/Deputy Mayor) <b>agrees</b> that the decision cannot be reasonably deferred. All Leaders/Conveners of political parties must be notified.  Quarterly reports are submitted to Council on decisions made under special urgency rules.

# **ENVIRONMENT AND COMMUNITY SAFETY OVERVIEW & SCRUTINY COMMITTEE**

## **Agenda Item 11**

Brighton & Hove City Council

Subject:	Towards a Scrutiny Work Programme 2008 - 2009		
Date of Meeting:	16 June 2008		
Report of:	Director of Strategy and Governance		
Contact Officer:	Name:	Mary van Beinum	Tel: 29-1062
	E-mail:	mary.vanbeinum@brighton-hove.gov.uk	
Wards Affected:	All		

### **FOR GENERAL RELEASE**

#### **1. SUMMARY AND POLICY CONTEXT:**

- 1.1 For Members to suggest matters to be included in a draft work programme for the committee, based on the terms of reference and functions of the committee as set out elsewhere on this agenda.

#### **2. RECOMMENDATIONS:**

- (1) To note the various ways items can be contributed to the committee's work programme;
- (2) To include in its developing work programme, items brought forward from the former Overview and Scrutiny Organisation Committee; monitoring street trees scrutiny recommendations, and the use of green roofs on new developments.
- (3) To suggest matters to be included in a draft work programme for the committee.

#### **3. BACKGROUND INFORMATION**

- 3.1 It is intended that each Overview and Scrutiny Committee develop its own work programme for the year in coordination with the Overview and Scrutiny Commission. Each Committee has an item on its first

agenda to consider its own work programme. An initial framework with Committee dates is included at Appendix 1.

3.2 There are a number of ways in which items may come to be included into an overview and scrutiny draft work programme;

- All members will have access to the Council's Forward Plan and may wish to suggest key decisions from the Plan for inclusion in the Overview and Scrutiny work programme;
- Additionally, the committee chairman may wish to consider the Council's Forward Plan at each Chairman's meeting and put forward any items he/she sees fit;
- Cabinet Members/Cabinet/Regulatory Committee Chairmen may refer items to the committee for examination and comment;
- Part 6, paragraph 13 of the Constitution states that the overview and scrutiny committees shall also respond, as soon as their work programme permits, to requests from the Council and if it considers it appropriate, the Cabinet/Cabinet Committees to review particular areas of Council activity.
- Any Member of the committee can notify the Head of Scrutiny that they wish to have an item included on the agenda of the next possible meeting. The committee will then determine whether it wishes to pursue the suggested item and in what way.
- The committee may also receive requests from any other Councillors and suggestions from officers for particular topics to be scrutinised. Any Councillor may submit a letter for inclusion on the agenda for any overview and scrutiny committee.
- So- called 'Legacy' items or matters brought forward from 2007-2008; may be included in the OSC or Overview and Scrutiny work programme. More detail on specific legacy items is given below.
- The 19 Plans and Strategies which make up the Budget and Policy Framework are listed in part 3.1 (3.02) of the Council's Constitution and are included at Appendix 2 to this report. Those of particular importance to this committee are: -
  - Crime and Disorder Reduction Strategy;
  - Local Transport Plan;

- Plans with Development Plan Document status which together comprise the Local Development Framework and the Waste and Minerals Development Framework;
- Statement of Licensing Policy pursuant to Licensing Act 2003;
- Statement of Gambling Policy pursuant to the Gambling Act 2005.
- Food Law Enforcement Service Plan
- Health and Safety Annual Service Plan

Although approval of the Budget and Policy framework is a Full Council function, it is envisaged that the appropriate Overview & Scrutiny Committee(s) or the Commission will consider draft proposals before their submission to full Council for approval. The Cabinet should take into account any response from an Overview & Scrutiny Committee or the Commission and from relevant stakeholders when determining its final proposals for submission to Full Council in regard to any of the Plans and Strategies.

- The Community Safety Forum is guided in the constitution to refer scrutiny-type items, in accordance with the meaning of section 19 of the Police and Justice Act 2006, to the committee. It is important to note that section 19 has not yet been brought into force. More information is provided elsewhere on the agenda. See item 12.

3.3 The Overview and Scrutiny draft work programme also needs to allow for flexibility to determine matters as they arise such as requests for scrutiny and call-in.

#### **4. LEGACY ITEMS FOR CONSIDERATION**

##### Update on Street Trees scrutiny review recommendations

4.1 At its January 2007 meeting, OSOC agreed to a request by former Councillor Edmond-Smith to carry out a review of Street Trees in Brighton & Hove. The Councillors nominated to sit on the Panel were Councillor Young (Chair), and Councillor Elgood, and former Councillors Hazelgrove and Paskins. The proximity of the local elections meant that this was designed as a 'light-touch' review and it completed its evidence-gathering before the local elections in May.

4.2 Recommendations related to:-

- a) The arboriculture budget and sources of income
- b) Removal and commercial disposal of hazardous street trees

- c) Draft Tree and Woodland Strategy
- d) Inspection and maintenance of Council-owned street trees
- e) Annual Stock report
- f) Integrated working in areas close to street trees
- g) Education and publicity
- h) Trees on Housing land
- i) Good practice in new street tree planting
- j) Unnecessary application of asphalt to tree bases

4.3 The Scrutiny Panel's report was endorsed, with an addition to a recommendation concerning the budget for tree provision on Council land, by OSOC at its meeting on 16 July. The Environment Committee replied to the recommendations of the final report on 13 September 2007 and an officer report back to overview and scrutiny on implementation of the agreed actions has been requested for around a year after that date.

4.4 It is good practice for action on agreed scrutiny recommendations to be monitored, therefore it is suggested that this is scheduled for the next meeting of this committee on 15 September 2008.

#### Green roofs on new developments

4.5 The 10 March 2008 former Overview and Scrutiny Organisation Committee received a report on Flooding Preparedness. During discussion, the use of 'green roofs' on new developments was raised as a potential way of reducing flood risk. The committee resolved that an officer report be requested on the issue. It is proposed that this committee requests a report for its next meeting on 15 September 2008.

## **5. FINANCIAL & OTHER IMPLICATIONS:**

### Financial Implications:

5.1 None directly in relation to this report.

### Legal Implications:

5.2 None directly in relation to this report.

### Equalities Implications:

5.3 None directly in relation to this report.

### Sustainability Implications:

5.4 None directly in relation to this report.

Crime & Disorder Implications:

5.5 None directly in relation to this report.

Risk and Opportunity Management Implications:

5.6 None directly in relation to this report.

Corporate / Citywide Implications:

5.7 None directly in relation to this report.

**SUPPORTING DOCUMENTATION**

Appendices:

1. Suggested outline OSC work programme for 2008 - 2009
2. List of documents forming the Budget and Policy Framework

Background Documents

15 May 2008 Council Constitution

ENVIRONMENT AND COMMUNITY SAFETY OVERVIEW AND SCRUTINY COMMITTEE

Item Type	Meeting Date				
	16 June 2008	15 September 2008	10 November 2008	26 January 2009	23 March 2009
<b>Substantive Items</b>	Towards a Work Programme	Draft ECSOSC Work Programme			
	Local Development Framework Core Strategy – Revised Preferred Options	Street trees scrutiny review; monitoring			
	Local Development Framework Core Strategy – Background Studies	Green Roofs on New Developments			
		Street Lighting			
<b>Information Items</b>	Terms of Reference and Procedure Rules				
	Scrutiny and the Council's Forward Plan				
	Update on Local Authority Crime and Disorder Committees				



**List of Budget and Policy Framework Documents**

(a) Policy Framework.

The policy framework means the following plans and strategies:-

(i) those required by law to be adopted by full Council:-

- Annual Library Plan;
- Best Value Performance Plan;
- Children and Young People's Plan;
- Community Strategy;
- Crime and Disorder Reduction Strategy;
- Local Transport Plan;
- Plans with Development Plan Document status which together comprise the Local Development Framework and the Waste and Minerals Development Framework;
- Youth Justice Plan
- Statement of Licensing Policy pursuant to Licensing Act 2003;
- Statement of Gambling Policy pursuant to the Gambling Act 2005.

(ii) those which the Council has determined should be adopted by full Council as part of the Policy Framework:

- Food Law Enforcement Service Plan;
- The plan and strategy which comprise the Housing Investment Programme;
- Adult Learning Strategy;
- City Employment and Skills Plan;
- Sustainability (Local Agenda 21) Strategy;
- The Council's Corporate Plan;
- Inclusive Council Policy;
- Health and Safety Annual Service Plan;
- Local Area Agreements.

(b) Budget. The budget includes the allocation of financial resources to different services and projects, proposed contingency funds, setting the council tax and decisions relating to the control of the Council's borrowing requirement, the control of its capital expenditure and the setting of virement limits.



# **ENVIRONMENT AND COMMUNITY SAFETY OVERVIEW & SCRUTINY COMMITTEE**

**Agenda Item 12**  
Brighton & Hove City Council

**Subject:** Update on Local Authority Crime and Disorder Committees

**Date of Meeting:** 16 June 2008

**REPORT OF:** Director of Strategy and Governance

**Contact Officer:** Name: Mary van Beinum **Tel: 29-1062**  
E-mail: mary.vanbeinum@brighton-hove.gov.uk

**Wards Affected:** All

## **FOR GENERAL RELEASE**

### **1. SUMMARY AND POLICY CONTEXT:**

- 1.1 To inform the Committee of the statutory requirement for a crime and disorder committee, the powers of which will be implemented in the future.

### **2. RECOMMENDATION:**

- (1) That the committee notes the contents of this report including the arrangements which currently are in place within the Crime and Disorder Reduction Partnership to achieve accountability to local communities and communities of interest.

### **3. RELEVANT BACKGROUND INFORMATION**

- 3.1 In November 2004 the Government published the White Paper 'Building Communities, Beating Crime: a better police service for the 21st century'. The White Paper set out the Government's strategy for strengthening the ability of the police and their partners to prevent, deter, detect and reduce crime. The Paper set out three broad objectives to achieve this, namely:-
- To spread neighbourhood policing to every community with improved police responsiveness and customer service.
  - Further modernisation of the police to ensure the service is equipped and able to deliver these changes
  - Increased involvement of communities and citizens in determining how their communities are policed.
- 3.2 The Government also announced a review of Crime and Disorder Reduction Partnerships (CDRPs), with the review's aims:

- To make local partnerships more responsive and accountable to their communities
  - To identify key success factors and address low performing CDRPs.
  - To ensure CDRPs are intelligence led and are allocating resources to make the most impact.
- 3.3 The findings of this review and consultation subsequent to the White Paper were published in January 2006 and informed the content of the Police and Justice Bill.
- 3.4 The Bill received Royal Assent in November 2006 to become the Police and Justice Act 2006 ('the Act'). It is a wide-ranging piece of legislation, on aspects of police organisation and resourcing. The part of the Act that is immediately relevant to this committee is Part 3, which includes the requirement for each top tier and unitary local authority to have a 'crime and disorder committee', with responsibility and powers for overview and scrutiny of local crime and disorder matters.
- 3.5 Originally in this Act there was a mechanism outlined whereby members of the public would be able as a last resort to raise a 'community call for action' on a specific crime and disorder matter with their ward member which would be heard at the crime and disorder committee. However, this particular aspect of the new scrutiny powers was subsequently amended by the Local Government and Public Involvement in Health Act 2007, to limit the referral of crime and disorder matters to ward members only. At this authority, this extends members' existing powers very little, since according to both the previous and the new constitution, members are able to submit a letter to any committee on any issue relevant to the remit of that committee.
- 3.5 The Police and Justice Act outlined new 'powers' of the crime and disorder committees that would include powers to require information from certain other partner bodies and organisations, who would also be under a duty to consider and respond to any recommendations made by the crime and disorder committee. It is likely that the partner organisations and bodies included in this power would be those that constitute the local Crime and Disorder Reduction Partnership. However, guidance and regulations pursuant to the Act have not been published due to delays in the implementation of the scrutiny powers.

#### Delays in implementation of Crime and Disorder Committees

- 3.6 It was originally expected that the new scrutiny powers in the Act would come into force by April 2008, with guidance and regulations pursuant to the Act being published in the summer of 2007. However in June 2007, the Home Office wrote to all Crime and Disorder Reduction

Partnerships (CDRPs) giving an update on the implementation of the scrutiny provisions in the Act, an extract from which is given below:

"Local accountability and local involvement in policing are also going to be reviewed by Sir Ronnie Flanagan as part of his broader review of policing, announced by the Home Secretary in April this year. While not explicitly reviewing the role of partnerships or the potential role of Overview and Scrutiny Committees (OSC) / Community Call for Action (CCA), the review has at its core the same aims of improving accountability and local involvement. In view of this, and the need to consider the response to any recommendations coming from the review, Home Office ministers have decided to pause with policy development on crime and disorder OSC and CCA. They remain committed to enhancing local accountability arrangements for policing and crime, but believe that pausing on the implementation enables them to reflect the findings and recommendations of the Sir Ronnie's Review in policy on OSC and CCA."

- 3.7 The Flanagan Review published its final report on 8 February 2008. Although it was expected that the report would address local accountability mechanisms, the report instead discussed various models that could be considered, but failed to specifically make reference to local Crime and Disorder Committees within the meaning of the Police and Justice Act. In fact, after a general discussion about a broad range of accountability issues, the report defers any definite comment to the forthcoming Policing Green Paper, which is due in June 2008.
- 3.8 Upon publication, the Green Paper will be open for public consultation, which will delay further any implementation of the powers, and any accompanying guidance.
- 3.9 As stated above, the Brighton and Hove constitution includes provision for any member of the council to submit a letter to a committee on any issue relevant to that committee's terms of reference. Therefore, although there are currently no new statutory powers related to crime and disorder matters such as the power to compel responses from crime and disorder partners, members will still be able to raise a crime and disorder issue at this committee for members' consideration.
- 3.10 In addition, the Community Safety Forum whose membership includes police and co-opted representatives from all members of the CDRP including neighbourhood Local Action Teams and communities of interest will continue to provide an opportunity for questions to be raised from members of the public and from co-opted organisations. At its meeting on 25<sup>th</sup> February 2008, the Forum considered a comprehensive report on the review of the Crime and Disorder Act and on the potential new arrangements outlined in this report. The Forum

and CDRP are already compliant with new national standards, including for those which require increased visibility and accountability and working towards closer integration between neighbourhood policing and neighbourhood management.

#### **4. CONSULTATION**

- 4.1 The Community Safety Forum will ensure that as appropriate, consultation with local communities and communities of interest will take place about any new scrutiny arrangements which are to be put in place following the introduction of the Policing Green Paper.

#### **5. FINANCIAL & OTHER IMPLICATIONS:**

##### Financial Implications:

- 5.1 There are no financial implications arising as a result of this report.

##### Legal Implications:

- 5.2 The legal implications are set out in the report above.

##### Equalities Implications:

- 5.3 There are no direct implications for equalities.

##### Sustainability Implications:

- 5.4 There are no direct sustainability implications.

##### Crime & Disorder Implications:

- 5.5 The scrutiny powers introduced by Part 3 the Police and Justice Act 2006, that are currently delayed in implementation, are intended to increase local accountability of crime and disorder issues. The Crime and Disorder Reduction Partnership does however, currently manage and deliver arrangements which effectively facilitate accountability for communities in neighbourhoods and communities of interest.

##### Risk and Opportunity Management Implications:

- 5.6 There are no direct risk and opportunity management implications

##### Corporate / Citywide Implications:

- 5.7 There are no direct corporate or citywide implications.

#### **SUPPORTING DOCUMENTATION**

None