

## Appendix 2: Summary of consultation issues, responses and amendments

Comments / Issues	Officer Response	Amendments to the Brief
<b>General Comments</b>		
Comments generally supporting the proposals.	Comments noted.	No change
Concern over financial expenditure on project.	The work is being funded by a central Government grant (Growth Points Programme). Jointly agreed governance procedures are in place to ensure funds are spent appropriately, wisely and in accordance with the grant conditions.	No change
Question over the planning policy status of the Development Brief.	The Development Brief is not a Development Plan Document (DPD) or a Supplementary Planning Document (SPD). However it will be afforded weight as a material consideration in planning decisions given the amount of technical background and engagement undertaken. The contents of the brief will be shortly subsumed in to the harbour-wide Joint Area Action Plan (JAAP) where key issues raised through the brief process will be tackled in further detail through the further public consultation processes and technical work to follow during 2014/2015. The JAAP will eventually be subject to public examination and DPD procedures. Please note that the brief has been subject to Sustainability Appraisal and the	Further clarity provided in Introduction.

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	consultation undertaken has exceeded the requirements for an SPD.	
Concern about the lack of detail in the brief.	The purpose of the brief is to set out a high level illustrative framework and provide a mechanism for consulting and reaching consensus over key issues. Further detail will be provided through the emerging JAAP process and subsequent smaller area projects and proposals.	Further clarity on scope provided in Introduction.
<b>Vision and Objectives</b>		
Concern over whether the vision and objectives are realistic in the current economic climate.	The plans for the harbour are long term during which the economy is likely to fluctuate. The plans need to remain flexible.	No change.
<b>Illustrative Framework</b>		
Concern over the appropriate height of buildings, particularly above the Kingsway level.	Technical modelling of appropriate building heights was undertaken by the consultant team in preparing the Draft Development brief. Following the consultation period and in response to concerns about overshadowing impacts, the recommendations within the briefs were subsequently independently peer reviewed by the Building Research Establishment Ltd. (BRE). The analysis found that recommendations were appropriate and within the BRE's	Refined text within SPAB27 (Development form) and SPAB29 (Building heights and townscape considerations).

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	<p>guidance parameters. The brief wording is clear that proposals must demonstrate high quality design and incorporate sufficient spaces between buildings to accommodate sufficient light through and maximise opportunities for views.</p> <p>In accordance with National Planning Policy (part 6) and Submission City Plan policies CP14 (Housing Density) and CP12 (Urban Design), given the city's physical constraints there is a need to increase density on existing brownfield land in a sustainable manner. The planning authority is obliged to make full and efficient use of sites in order to deliver much needed housing development including affordable housing.</p>	
<p>Questioning as to whether the number of residential units is an over development of the area.</p>	<p>Comments noted. The brief has provided a balance between the need to maximise opportunities for development on previously developed land with local townscape and setting considerations. Technical assessment has been undertaken to peer review the building heights proposed.</p>	<p>Refined text within SPAB27 (Development form) and SPAB29 (Building heights and townscape considerations).</p>
<b>Port / Security</b>		
<p>Concern that the maritime / port character</p>	<p>The Overview section highlights the</p>	<p>Addressed in principles: SPAB10</p>

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of the area should be strengthened through the briefs.	importance of the marine / port character of the area and states that this has been considered during the preparation of the brief. Strategic Objective 2 is to 'Support a growing, thriving Port. Agree that this should be brought out more strongly in the final document.	(Proximity of new development to Shoreham Port operations) and new principle SPAB25 (Facilities for boat users).
Concern that safety and security considerations in relation to port uses need to be highlighted.	Agreed – text amended accordingly.	Addressed in principle SPAB10 (Proximity of new development to Shoreham Port operations).
<b>Employment</b>		
Concern as to impacts on existing businesses in the short term.	The brief highlights the important role that South Portslade Industrial Estate, Aldrington Basin and the wider Port currently play in the local economy and promotes a carefully managed approach to the redevelopment of sites. The aim of the brief is to promote a balanced approach to land use which will ultimately improve the business environment. However agree that wording around this issue needs to be refined and strengthened.	Refined wording at 4.1, 4.1.9, 4.2.2 and principles SPAB10 (Proximity of new development to Shoreham Port operations), SPAB12 (Managed release of sites and protection of core employment capacity), SPAB 13 (re-provision of employment floorspace), SPAB14 (Impact on existing business operations), SPAB16 (Improvement of the business environment), SPAB19 (Co-location with employment uses).
The need to highlight the importance of training and skills and harnessing opportunities locally.	Strategic objective 3 (Economy and Employment) includes equipping local communities with training and skills. Through the JAAP process and subsequent rounds of consultation,	A new principle has been added, SPAB15 (Training and skills).

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	officers will continue to work with local service providers and further education providers to identify needs and initiatives to harness benefits. Agree wording around this issue needs to be refined and strengthened.	
<b>Residential</b>		
Need to provide greater clarity over affordable housing provision.	Comments noted. SPAB2 requires that new residential developments include a range of tenures and sizes. This is also addressed in the emerging Brighton & Hove City Plan.	Affordable housing is addressed in principle SPAB18 (Affordable housing, tenure, size and unit types).
<b>Transport / Parking</b>		
Need for greater detail in relation to parking provision.	Principle SPAB2: Residential Uses in the Draft Development Brief requires the inclusion of innovative solutions for car and cycle parking. The plans and illustrations are indicative and do not show detailed parking arrangements. The brief requires development proposals to be accompanied by a Sustainability Checklist. This includes the provision of sufficient car parking spaces in accordance with BHCC parking guidance. Local standards for parking provision will be summarised in the emerging Shoreham Harbour Transport Strategy	Parking is now addressed in principles SPAB21(Promoting Sustainable Travel) and SPAB25 (Design of Residential Areas).

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	which will form part of the JAAP.	
Need to improve transport infrastructure to accommodate new development.	<p>Principle SPAB17 in the Draft Development Brief includes the requirement for development proposals to contribute towards sustainable transport measures.</p> <p>The Shoreham Harbour Transport Study will inform the consideration of sustainable transport options to adequately mitigate the impact of strategic development. Preliminary results indicate that with appropriate mitigation measures the existing road network will be able to cope with the proposed level of new development.</p> <p>This study will inform the emerging Shoreham Harbour Transport Strategy, currently being prepared by West Sussex County Council. The strategy will contain a set of integrated transport measures that will guide the provision of transport infrastructure in the area for the next 15 years. The Strategy will include improvements to the existing highway network and measures to encourage the use of sustainable modes of transport.</p>	Following completion of Transport Study, further detail addressed in principles SPAB21 (Promoting sustainable travel) and SPAB22 (Transport infrastructure contributions).
The need to widen the A259	Whilst development at Shoreham Harbour will require some investment in the local	No change.

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	highway network, substantial new road building or widening is not currently part of the spatial strategy.	
A new link road is needed between the A259 and A27	At present neither WSCC nor BHCC intend to build a new access road between the A259 and the A27. Earlier analysis showed that the benefits that could be achieved through a new link road are significantly outweighed by the cost and environmental implications.	No change
<b>Sustainability</b>		
Passivhaus standards should be applied.	The Development Brief and the emerging Brighton & Hove City Plan set minimum standards in relation to the Code for Sustainable Homes (CSH). This is the national standard for the sustainable design and construction of new homes. It aims to reduce carbon emissions and promote higher standards of sustainable design above the current minimum standards set out by the building regulations. The code provides nine measures of sustainable design and uses a 1 to 6 star system to rate the overall sustainability performance of a new home against these 9 categories.	No change

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	<p>Passivhaus sets a high standard in relation to energy use and CO2. Although it does not cover all measures of sustainability included in the CSH, Passivhaus is considered equivalent to CSH levels 4 or 5. Development Proposals applying the Passivhaus principles would be welcomed, although they would also be required to demonstrate that they meet the other sustainability requirements in the appropriate brief or local plan.</p>	
<b>Biodiversity</b>		
<p>Include recreational disturbance as an impact on designated sites.</p>	<p>Agreed</p>	<p>This is now addressed in principle SPAB24 (Ecology and Biodiversity).</p>
<b>Infrastructure and Utilities</b>		
<p>Impacts on infrastructure, including water and sewerage, need to be acknowledged.</p>	<p>The brief states that development proposals will be required to make contributions to infrastructure. This includes water distribution and sewerage.</p> <p>Policy CP7 in the emerging Brighton &amp; Hove City Plan requires development to provide or contribute to the provision of facilities, infrastructure and services through S106 Planning Obligations or a</p>	<p>Infrastructure delivery and provision of utilities are addressed in principle SPAB9 (Infrastructure and Utilities).</p>



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	future CIL.	
<b>Social Infrastructure</b>		
Impacts on social infrastructure, including schools, youth facilities, community buildings and open space, need to be acknowledged.	<p>The brief states that development proposals will be required to make contributions to social infrastructure. Principle SPAB5 addresses the provision of social infrastructure.</p> <p>Policy CP7 in the emerging Brighton &amp; Hove City Plan requires development to provide or contribute to the provision of facilities, infrastructure and services through S106 Planning Obligations or a future CIL.</p>	Social Infrastructure is now addressed in principle SPAB20 (Contributions to Social Infrastructure). This includes reference to schools, youth facilities and community buildings. Open space is addressed in SPAB26 (Public Open Space).
<b>Leisure / Recreation</b>		
The need to provide and improve marine-related facilities for boat-users such as public hard and slipways to better utilise the river.	Comments noted. Additional detail will be added.	A new principle has been added, SPAB22 (Facilities for boat users).

