



Rottingdean Parish Council (RPC) feedback on Draft City Plan Part 2

Parish Councillors for Rottingdean believe there is much to be welcomed in the Brighton & Hove City Plan Part 2 and are pleased to have been acknowledged as significant consultees (see specific comment below on 1.8).

Councillors for Rottingdean remain nonetheless deeply worried (Page 5 of Plan introduction) that several aspects of City Plan Part 1 and therefore by implication City Plan Part 2 are predicated upon erroneous traffic counts in Rottingdean High Street and therefore stress the vital importance of early and regular review of City Plan Parts 1 and 2.

Specific comments follow: -

1.8 Duty to Co-operate (page 8) It would be constructive if this section acknowledged benefits from genuine consultation & joint co-operation with other authorities within Brighton & Hove, namely Rottingdean Parish Council, where there is experience of loss of opportunities for two-way exchange on the specific needs and aspirations of a semi-rural/village environment.

DM1 Housing Quality, Choice and Mix (part e) (page 12) Parish Councillors support the policy for 10+ dwellings, 10% of the affordable residential units and 5% of all residential units to be suitable for occupation by a wheelchair user. This is informed by experience of woefully inadequate current provision which allows families to really struggle to care for a child with physical or learning disabilities through not being able to find a suitable home.

RPC highlights also that many reside in properties which will not prove to be 'homes for life' because not enough regard has in the past been given to changing needs as populations age and health issues predominate. Accessible homes benefit everyone, not just people with disabilities.

DM3 2.22 (page 20) RPC is pleased to see recognition of the need for smaller homes and the need to retain and build smaller dwellings. This desire is reflected in the Rottingdean draft Neighbourhood Plan which needs enforcing by Planning Committee when developers come forward with plans for sites. Parish Councillors welcome the pragmatism of exceptions i) to iii).

DM4 2.25 (page 22) Whilst it is statistically correct to argue Brighton & Hove has a relatively small proportion of older age group residents, it should be acknowledged that many wards & peripheral communities have a far greater proportion than Brighton & Hove as a whole (e.g. Rottingdean) and these variations need informed attention when development is being considered. **2.30 (page 23)** is fully supported.

DM10 – Public Houses (page 41) Safeguard Public Houses & recognise their contribution to the character and vitality of communities.

Given the number of pubs in Rottingdean this is particularly relevant both in terms of a community role, economic importance & encouraging visitors to Rottingdean. **RPC** welcome recognition and protection offered by City Plan Part 2 for these valuable community assets.



DM12 2.103 (page 49) An example cites the Lanes but Rottingdean's draft Neighbourhood Plan pursues similar restrictions on the enlargement of shop-fronts to retain the historic & vibrant feel of a Village High Street. RPC note that **DM23 and DM24 (page 76 onwards)** addresses shop-fronts in conservation areas and wishes to see shop signage in conservation areas fully addressed too.

DM22 Landscape Design and Trees (p72) RPC is delighted to read proposals to protect trees on development sites; sadly, recent experience is a marked disregard by builders of these requirements with trees and hedges unlawfully removed to maximise sites and allow better access during construction. RPC ask BHCC to better enforce these requirements that often deprive neighbours of their privacy and 'expose them to the building site next door'.

DM27 (page86) addresses listed buildings and proposed developments. Rottingdean's issues are with the maintenance and repair of listed buildings which need to be more fully addressed.

DM24 – Advertisements (Sign consent not to harm visual amenity.) Rottingdean Parish Council is conscious of a plethora of formal & informal signage across the Village and are endeavouring to rationalise signage to ensure only legal and effective signage prevails. RPC is also aware that local businesses tend to place advertising hoardings on paved areas and recognises the importance of working with local traders to ensure that the proper sign consent is obtained and that signs do not harm the visual amenity of Rottingdean particularly in the Conservation area.

DM30 - Registered Parks and Gardens -how proposals for temporary uses will be assessed. This is of particular relevance to Rottingdean as there are several events throughout the year which take place on The Green, in Kipling Gardens, and on the Recreation Ground. The current system works well but some clarification as regards when an informal event becomes a formal event would be helpful.



Travel and Transport

DM 33 Safe, Sustainable and Active Travel This Development Policy sets out the aim of the City on prioritizing walking, cycling and Active Travel. It is written with a central urban area in mind and does not acknowledge enough that parts of Brighton & Hove may have different characteristics and demographics to consider. Through traffic on the B 2123, Falmer Road, for instance, includes private cars travelling from or to places not well served by public transport to anywhere other than the City Centre and are beyond a normal person's ability to walk or cycle. We are also concerned about the impact of new developments on bus journey travel time and reliability, particularly at peak travel times. Creating a safe cycle route through the Village would prove extremely challenging.

DM 34 Transport Interchanges We welcome this policy and our draft Neighbourhood Plan is permissive re use of the Long Stay Car Park for Park and Ride.

DM 35 Travel Plans and Transport Assessments RPC welcomes this policy but believe 2. Should be amended to make provision for traffic generated by new developments which passes through an AQMA. In the Reasoned Justification paragraph 2.253 it states "Travel Plans and Transport Assessments should seek to reduce traffic generation and mitigate the effect the effect of developments..." RPC consider it fundamental any data used in a TA is robust and current i.e. properly reflects how traffic conditions and transport provision actually affect journey times, economic and environmental impact on the area. See Paragraphs 2.254 and 2.255.

The 2016 Adopted City Plan Part 1 is based on road conditions and traffic generated NO2 pollution in the AQMAs staying within limits up to 2030 and planned for road congestion levels. But in fact, by 2017, road congestion on the B2123 and A259 have already exceeded the planned 2030 levels. The Rottingdean AQMA now has levels of air pollution above the legal limits.

DM37 Green Infrastructure & Nature Conservation (page 109) this is welcome and supported.

DM38 (page 115) RPC is disappointed that BHCC **identify** only four additional Local Green Spaces for added protection.

DM 40 Protection of the Environment & Health – Pollution & Nuisance Whilst RPC welcomes the overall intention of DM40, the Development Management Policies prioritise a City-Centre perspective. They do not adequately acknowledge different needs & characteristics in outlying parts of Brighton & Hove, particularly infrastructure needs and inadequate road capacity in the Rottingdean area. The volume of vehicle traffic using the B2123 and its junction with the A259 already creates serious problems air pollution, congestion and delay in journey times which affect economic prosperity as well as health and environmental harm.

The Rottingdean AQMA, is above the legal limit in the High Street (See AQMA report 2018) This is despite a move to using lower emission buses.



This represents a serious problem for residents impacting their health, safety and quality of life. RPC would like to see the document amended at 2.298 to read '*new development in or near or adding to traffic in an AQMA assists....*'.

The narrowness of Rottingdean's historic High Street (B2123) already carries too much traffic most of which are commuters using the road as a rat run to go further east on the A259.

The mitigations through travel plans etc. of developments will not have a significant impact on these levels despite various efforts.

The City Plan STA's reliance on additional journeys being absorbed by bus services have not been measured so it cannot be relied upon as an offset for the future.

Developments which risk additional journeys by car in an area in which the AQMA is already above the legal limit must be addressed with adequate mitigating measures.

DM42 Protecting the Water Environment (page127) This policy is very welcome. Whilst the case for more homes is well presented in this Plan, RPC observations often conclude a lack of acknowledgement by City Council of the cumulative effects of multiple applications especially with regard to water supply, waste & sewage disposal, air quality, & volume of traffic. Localities such as Rottingdean experience the impact of development in LA areas outside Brighton & Hove, as do other outlying parts of Brighton & Hove.

SSA1 p149 and SSA7 p163 RPC is worried at the potential increase in traffic on the A259 and the B2123 which will inevitably be generated by future developments at the Brighton General Hospital Site, and Land adjacent to the Amex Stadium which are likely to occur within the Plan period. Parish Councillors assume that the cross-authority Transport Working Group is taking account of these proposals and that current or future Planning Briefs will require comprehensive Transport Impact Assessments to be undertaken in conjunction with any planning applications in respect of these sites.

Table 5 Residential Site Allocation (page 166) The indicative number of 40 residential units for the former St Aubyns site is noted and RPC is pleased to see the St Aubyns Planning Brief referenced as a guiding document.

Grid of Urban Fringe Sites (p 175) RPC note the inclusion of land behind Falmer Avenue and land off Ovingdean Road but neither of which are correctly recorded as in Rottingdean Parish.

RPC is pleased to see the omission of the three other potential sites previously identified. However, is concerned at the comment that planning applications could still be submitted in connection with these sites which RPC deem wholly unsuitable for development.

The map on **page 211 Land adjacent to Ovingdean and Falmer Road, Ovingdean** does appear to rightly demonstrate that only a very limited space is suitable for building on.