

## **Summary of External Representations received.**

The following is a summary of external representations received by Brighton & Hove City Council in response to the Regulation 16 publication of the Rottingdean Neighbourhood Plan between **2 February until 16 March 2023** and submitted to the Independent Examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act.

The table below presents a summary of representations and are not verbatim. All original representation documents have been submitted to the Independent Examiner.

**Please note that Brighton & Hove City Council's Regulation 16 comments are set out in a separate document.**

Resp No.	Respondent / Organisation Name	Date received	Method of submission	Policy commented on	Summary of representation
1	Individual	2/2/23	Portal	S1 - Development within and beyond the settlement boundary (page 17)	<p>Object to this policy/part of the plan.</p> <p>I object to the sentences that state:            “In particular development proposals should comply with the following criteria:            • make appropriate use of traditional and vernacular materials in the design and construction of the buildings concerned;            • respect the built character and appearance of the village;”</p> <p>We should avail ourselves of all modern building techniques and materials in order to assure maximum thermal efficiency and minimal cost.</p> <p>Remove all references in the complete document that suggest that traditional is best.</p>
				GOS3 - Wildlife and biodiversity (page 33)	<p>Support this policy/part of the plan subject to modifications.</p> <p>The issue of wildlife corridors needs more detail and should include the requirement for all new developments to not block access for wildlife. Furthermore, no fencing should be introduced to the parish without such access.</p>
2.	Individual	2/2/23	Portal	Appendix 6:Green Spaces Long List	Object to the NP as the green space lying between New Barn Rd and Court Farm Road, is missing from the Green Spaces Long List.

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					<p>This historic green space lies within the settlement area, and is a significant, and attractive with mature trees.</p> <p>It is difficult to understand why this green space was overlooked in the neighbourhood plan.</p>
3.	Historic England	8/2/23	Email		We do not consider it necessary for Historic England to provide detailed comments at this time.
4.	Individual	15/2/23	Portal	Core Strategic Objectives Air Quality and Transport Management	<p>Support this policy/part of the plan with modifications.</p> <p>Para worded as: Support greater use of other forms of transport other than the use of petrol/diesel private cars, to access Rottingdean, including electric vehicles, walking, cycling and increased take-up of public transport</p> <p>Support the aspiration, but there is no mention of "connectivity" that would support sustainable and active travel, benefiting Rottingdean and wider area.</p>
5.	National Highways	17/2/23	Email		In reviewing the information contained in the RPNP, we have no significant concerns and do not object to the Plan
6.	Southern Water	1/03/23	Portal	Policy GOS1: Local Green Spaces (page 29)	Support this policy/part of the plan subject to modifications

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					Suggest replacing the word "expecting" with "excepting" which we understand to be the intended meaning.
				Suggestion of additional new policy to NP	To ensure consistency with the NPPF and facilitate sustainable development, we propose an additional policy on the provision of water and wastewater infrastructure as follows:  "New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan."
7.	Environment Agency	9/3/23	Email	Core Strategic Objectives: Environment and Biodiversity (page 12)	We support the following Intention: "To protect and improve the biodiversity located in Rottingdean's green and open spaces, including existing wildlife corridors."  This Intention could go further by referring to Biodiversity Net Gain (BNG) which is due to become mandatory from November 2023.
				Core Strategic Objectives Housing and Design (page 13)	We are pleased to see the following Intention which will be especially important for ensuring that adequate mains wastewater infrastructure is provided in a timely manner: "To ensure that suitable and adequate infrastructure is provided in a timely manner to match identified needs in a period of expansion."

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				Environment and Biodiversity (page 24)	The Objective “To protect and improve the biodiversity located in Rottingdean’s green and open spaces” could go further and seek to secure BNG.
				Biodiversity, Conservation and our Wildlife Corridor (page 32) GOS3 - Wildlife and biodiversity	This policy could go further to reference BNG and the need for new development proposals to demonstrate delivery of BNG.
				H2 Design (page 42)	<p>Pleased to see that the development proposal design principles reference that culverting of existing ditches would not supported.</p> <p>In addition, in order to comply with the Environment Agency’s culverting policy, the design principle should have a presumption against building over existing culverts (because of health and safety considerations, increased maintenance costs and complexities and because future options to restore the watercourse may be precluded).</p>
8.	Natural England	10/3/23	Email		Natural England does not have any specific comments on the Rottingdean Neighbourhood Plan.
9	Bricycles	14/3/23	Portal	Air Quality and Traffic management page 55	The understanding of the issues affecting residents’ and visitors’ travel to Rottingdean seem to be well understood and the desire to improve things seems sincere. The proposals, however,

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					<p>are desperately weak and ineffectual. To achieve meaningful change, improve the village realm, quality of life within the village, quality of offering for tourists visiting the village and air quality, and to reduce the existing severe impacts of motor traffic on the village centre, much bolder measures are needed.</p> <ul style="list-style-type: none"> <li>● There are no targets for mode shift, car use, car ownership, either for people travelling through Rottingdean or for residents travelling from/to Rottingdean</li> <li>● The only way to reduce congestion is to <i>reduce the number of vehicles, especially the least efficient vehicles</i> (carrying only a small load for their size), ie either by mode shift to a more efficient travel mode, or by reducing the number of vehicles travelling altogether. The second option can be achieved with smarter freight/delivery options, and some work from home, but this will be of limited impact here. Rottingdean needs mode shift.</li> <li>● It ignores <i>issues facing bus user access on the A259</i> - some of the bus stops are very</li> </ul>

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					<p>awkward to get to (have no crossing points)</p> <ul style="list-style-type: none"> <li>This is an opportunity to use guidance from the Department for Transport about reducing motor traffic in places where <i>people are currently displaced because of motor traffic dominance.</i></li> </ul>
10	SDNPA	16/3/23	Email	<p>General comment</p> <p>Foreword para 3</p> <p>Map 1 – The Parish</p> <p>Vision and Objectives Employment and Enterprise</p> <p>Environment &amp; Biodiversity</p>	<p>We would like to congratulate the Parish Council on getting to this stage. It is clear there has been a lot of hard work that has gone into producing this document.</p> <p>Include reference to the July 2021 update to NPPF</p> <p>Amend text to reference South Downs National Park City limits Change colour of SDNP area to make clear where the SDNP exists within the parish</p> <p>Reference sustainable tourism in the Employment and Enterprise objectives</p> <p>Include reference in this objective to the nationally important landscape character of the South</p>

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				<p>Chapter 1. Strategic Development in Rottingdean</p> <p>S1. Development within and beyond the settlement boundary</p>	<p>Downs and the need to conserve and enhance its natural beauty, wildlife and cultural heritage.</p> <p>Include policy clause referencing to assist in referencing policy in decision making.</p> <p>Proposals for infill development within the boundary will be supported, provided they accord with the design and development management policies of the development plans <del>and other policies of the Neighbourhood Plan.</del></p> <p>Include text to highlight the importance of development respecting the sensitive nature of the National Park and it's setting in the policy as suggested in the supporting text. This could be in the form of additional wording at bullet point 4 where there is reference to the character and appearance of the surrounding countryside and rural setting of the parish, which is predominately the National Park. Including wording in this policy clause to ensure development respect the</p>



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				<p>Paragraph 1.8</p> <p>Paragraph 1.14</p> <p>Paragraph 1.12 – 1.14</p> <p>Paragraph 1.14</p> <p>Map 2</p>	<p>character and appearance of the surrounding countryside and rural setting of Rottingdean, <u>including the National Park and its setting</u>, and not generate substantial harm to that character and appearance.</p> <p>Consider whether the criteria identified at paragraph 1.8 are included within the policy S1 or whether they are already adequately addressed in Policy H3</p> <p>This creates a very clear distinction between the built-up parts of the neighbourhood area and the surrounding countryside. In some cases, the gaps between the settlements are both small and highly sensitive. <del>For clarity, the policy only applies within the neighbourhood area.</del></p> <p>Consider whether reference to Policy SD4 of the South Downs Local Plan should be included in support of policy S2.</p> <p>Within the context of the broader functions of this policy, their designation will prevent coalescence between the separate settlements and to protect their distinctive individual character and setting</p> <p>Consider including hatching or colour to make clear where the gaps exist.</p>

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				S2. Strategic Gaps	<p>Provide further clarify in the map key to show which policy the key refers to.</p> <p>Consider providing further justification to support the extent of Gap 2.</p> <p>Minor mods for clarity:</p> <p><del>1 Policy S2 – Strategic Gaps</del></p> <p><del>2</del>The Neighbourhood Plan identifies the following Strategic Gaps:</p> <p><del>3</del> - Beacon Hill Nature Reserve (Gap 1).</p> <p><del>4</del> - Land lying to the west of Falmer Avenue bound by Westmeston Avenue and Dean Court Road, adjacent to Whiteway bridleway (Gap 2)</p> <p><del>and 5</del> 1. Development proposals within the Strategic Gaps should retain the open character and appearance of the Gaps <u>identified on the Policies map. concerned.</u> Proposals for the re-use of rural buildings and agricultural development, playing fields, other open land uses and minor extensions to existing dwellings within the identified Strategic Gaps will be supported where they <del>would preserve the</del> <u>would not undermine the physical or visual</u> separation between the settlements concerned and <u>ensure the individual settlements</u> retain their individual identities. <del>6</del> <u>2.</u> Proposals which would detract from the open character of the Strategic Gaps or which would</p>

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				<p>Chapter 2 Environment and Biodiversity GOS1 – Local green space designation</p> <p>GOS2 - Amenity open spaces</p> <p>GOS3 – Wildlife and biodiversity</p>	<p>result in the coalescence of Rottingdean with a surrounding settlement will not be supported</p> <p>Identify LGS on a map with the policy to allow the reader to see where the LGS are in relation to the settlement and wider parish. The policies map should include the LGS with a clear reference to Policy GOS1. The SDNPA recommend modifications to the Policies map to address this.</p> <p>Show LGS on Policies Map Amend Policy to contain LGS1-9 within the Policy itself.</p> <p>Amenity Open Spaces should be identified on the policies map.</p> <p>Provide further clarification on how the policy will be applied in the supporting text.</p> <p>Minor amendments to the policy are proposed as follows: <del>1. Proposals that contribute to the conservation and enhancement of</del> <u>conserve and enhance</u> the landscape of the South Downs, and its special qualities and conserve wildlife or enhance biodiversity will be supported.</p>

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				<p>Paragraph 2.22 – 2.23</p> <p>Chapter 3 Housing and Design</p> <p>Para 3.3</p> <p>H1 – Balancing the Housing Mix</p>	<p><u>2.</u> Proposals which respect biodiversity and green space in and around developments are encouraged, particularly where the space forms part of, or is adjacent to, the identified wildlife corridors. <del>also refers.</del></p> <p><u>3.</u> <del>New d</del> Development proposals which cause <del>potential</del> harm to the <u>identified</u> wildlife corridors <del>would</del> <u>will</u> only be supported <u>if they cannot be avoided, or when if suitable</u> <u>appropriate</u> mitigation measures are proposed.</p> <p><u>4.</u> <del>New d</del> Developments should avoid causing harm to the special qualities of the National Park, including <del>through</del> development in its setting</p> <p>Consider whether these paragraphs should be relocated to support policy H3</p> <p>Modifications are required to the supporting text to correctly reference policy SD27 and its application in the SDNP part of the Neighbourhood Area.</p> <p>Consider whether policy H1 makes specific reference to the application of this policy in parts of the parish outside the National Park. This would ensure the SDNPA requirements for more</p>

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				<p>Paragraph 3.9</p> <p>Policy H2 Design</p> <p>TO1 – Visitor Accommodation</p>	<p>smaller dwellings in the National Park could be achieved in any development in the Neighbourhood Area within the National Park.</p> <p>Consider moving the heading for Design – local context to appear after Policy H1</p> <p>For all listed buildings, and for alterations or extensions to heritage assets in the Conservation Area</p> <p>Include policy clause referencing to assist in referencing policy in decision making.</p> <p>They are in sympathy with} the relevant geographic</p> <p>Consider revision to policy clause 3</p> <p>Is the fourth policy clause requiring that proposals for new garages, outbuildings etc are subservient to the main dwelling? If so, this could be made clear in the policy wording.</p> <p>Suggest adding further marketing criteria to Policy.</p>

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				Chapter 6 Air Quality and Traffic Management	Consider reference to policy SD22 in the supporting text and reference to the SDNPA parking provision SPD.
11.	Cycling UK (CAN)	16/3/23	Email and Portal	<p>Page 10 Core Strategic Objectives Employment &amp; Enterprise</p> <p>Page 11 Core Strategic Objectives Air Quality and Traffic Reduction</p> <p>Page 12 Core Strategic Objectives Environment &amp; Biodiversity</p> <p>Page 12 To maintain and improve access to green spaces in Rottingdean for public use, for recreation or amenity space.</p>	<p>Suggest Modified text:</p> <p>"To support and encourage improved pedestrian, cycling and disabled access to retail outlets, businesses, amenities and the public realm, and to support and encourage the use of cargo bikes for deliveries instead of motor vehicles."</p> <p>Reducing motor vehicle traffic and improving air quality are essential for public health and safety. We strongly support this.</p> <p>This is essential due to the biodiversity and climate crises. This will improve public health and well being.</p> <p>Improve text to say: To maintain and improve walking/wheeling/cycling access to green spaces in Rottingdean for public use, for recreation or amenity space, and ensure that adequate routes and cycle parking are in place.</p>

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				<p>Page 13 Core Strategic Objectives Housing &amp; Design</p> <p>Page 24 Environment and Biodiversity</p> <p>Page 25 Para 2.2</p> <p>Page 29 GOS2 - Amenity open spaces</p> <p>Page 33 GOS3 - Wildlife and biodiversity</p> <p>H2 – Design</p>	<p>Suggest modified text: Modified text: To improve disabled access &amp; permeability through the village, making it more pedestrian and cycling friendly, and safer for children to walk and cycle.</p> <p>Modified text. Add the following: To ensure that walking/wheeling/cycling routes and cycle parking are provided and that paths are free from obstructive vegetation and that gates are manageable for people of all abilities.</p> <p>Comment only: An area which is not well maintained are the Rottingdean Terraces which suffer from discarded litter, broken glass and dislodged stonework.</p> <p>Important for community and public health and well being.</p> <p>Support this policy/part of the plan</p> <p>Insert the following as the 2nd paragraph under H2 – Design: There will be a presumption in favour of car free</p>

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				<p>Page 46 Employment and Enterprise To foster sustainable trade, tourism and economic development in Rottingdean.</p> <p>Page 46, 4.1 The economic viability of the village is dependent upon a thriving, accessible and safe High Street.</p>	<p>development proposals above those that include car parking or driveways and would therefore increase motor vehicle traffic. Development proposals need to follow modern guidance on high quality cycling and walking infrastructure (Gear Change, LTN 1/20) and inclusive design (<a href="#">Inclusive Mobility, A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure</a>) not simply exclude pavements and kerbs. Developments need to connect and contribute to a high quality network for walking and cycling and the Local Cycling and Walking Infrastructure Plan.</p> <p>Modified text: To support the use of public transport, walking and cycling to access the village.</p> <ul style="list-style-type: none"> <li>• To ensure parking for shoppers and visitors is well controlled and that there is adequate cycle parking.</li> </ul> <p>There needs to be a policy of road traffic reduction.</p>



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				<p>Page 52 Community Facilities</p> <p>Page 54 CF1 - Provision of Community Facilities</p> <p>Page 56 Air Quality and Traffic Management</p> <p>P. 57 [Expected increase in traffic]</p>	<p>Molly's café on the seafront and Rottingdean Terraces should be listed. There needs to be mention of the bike hire hubs which are soon to be stocked with new Beryl Bikes, including e-bikes.</p> <p>Modified text: The new site should be readily accessible from the village on foot, bike or by public transport.</p> <p>Modified text: The safety of people walking, wheeling and cycling will be a paramount consideration in any traffic management scheme.</p> <p>There is a need to urgently and significantly reduce traffic in Rottingdean High Street and to support measures to reduce car journeys both here and along the A259 and Falmer Road. Building more roads is not a solution. There needs to be stricter parking control, demand management, more "Access only" and traffic free streets and support by Rottingdean Parish Council for measures discussed by Brighton and Hove City Council aimed at traffic reduction. This is not a party political matter. The case for traffic reduction is clear. Speeding and fear of traffic danger on Falmer Road prevents adults</p>

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				<p>Page 58, 6.7 Actions to improve public transport</p> <p>Page 58 AQ1 - Reducing Traffic Volume passing through the village</p> <p>Page 59</p>	<p>and children from cycling. This is a vicious circle.</p> <p>Modified Text: Actions to improve public transport together with a longer term strategic plan to <b>reduce motor vehicle traffic</b> will need the concerted effort of the Highways Authority; East Sussex County Council, Lewes District Council and Brighton &amp; Hove City Council, with the involvement of Telscombe and Peacehaven Town Councils. and the Parish Council.</p> <p>Modified text: Car parking will not be assumed to be included with new developments. Car free development proposals will be most welcome, and all proposals must show how the design enables residents to conveniently access walking/wheeling and cycling routes and public transport. The sites should conform with the requirements of City Plan Part II or any future revisions throughout the duration of this Plan with the aim of reducing reliance on motor vehicles and recording vehicle emissions.6.8 The Parish is keen to ensure that Air Quality Monitoring in the High Street continues.</p> <p>Modified text:</p>

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				<p>AQ2 - Improving Air Quality in Rottingdean</p>           <p>Page 59 AQ3 - Electric Vehicle Charging Points</p>	<p>New proposals for residential or commercial development should not contribute to the existing poor air quality in the AQMA in Rottingdean High Street. Their designs and layouts should provide particular support for local residents and employees to travel by cycling/walking/wheeling or by public transport. Development proposals must demonstrate how air quality improvements can be made.</p> <p>6.9 The overall aim is to reduce motor vehicle traffic through the High Street and to reduce air pollution to below the EU legal limit or any new legal limits and to promote further reductions.</p> <p>Whilst EVs are zero emission at point of use, this policy is still building in car use into future developments.</p> <p>Where proposals for residential properties include space for a motor vehicle (or “drive”) the property should be provided with an electric car vehicle charging point to industry standards at the time that the planning application is determined.</p>
12.	Parker Dann on behalf client Pension Trustees Ltd / Nusa Holdings Ltd /	16/3/23	Email	General Comment	Have serious concerns with the Parish Council's submission Plan. The Parish Council appears to have acted unilaterally and tailored its technical evidence base to suit its aspiration to use the Neighbourhood Plan as a tool to much need

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				Policy S2 - Strategic Gaps	<p>prevent growth rather than to foster and shape development. It has failed to adequately engage with the local community, includes policies which fail to have regard to national policies and that add nothing to contribute to the achievement of sustainable development. The Examiner should find that the Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.</p> <p>This policy is not in general conformity with the provisions of the strategic policies of the development plan for the area does not have regard to national planning policy in the NPPF or NPPG and will not result achievement of sustainable development.</p> <p>(see full rep for detailed commentary)</p>