

Respondent Number DP001

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 2
Response Date 05/07/18 21:40
Status Submitted
Submission Type Web
Version 0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . Yes

Organisation Name

Organisation Name (if not applicable please put n/a) Pavilion Architecture

Name

Name

Address

Address

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding

- . Housing, Accommodation and Community
- . Employment, Tourism and Retail
- . Design & Heritage
- . Transport and Travel
- . Environmental and Energy
- . Site Allocation - Special Areas policies
- . Site Allocations - Strategic Site Allocations
- . Site Allocations - Housing Sites
- . Site Allocations - Employment Site
- . Make general comments

DM1 - Housing Quality, Choice and Mix

a) Do you Support or Object to policy DM1? Support

DM2 - Retaining Housing

a) Do you Support or Object to policy DM2? Support

DM3 - Residential Conversions & Retention of Smaller Dwellings

a) Do you support or object to policy DM3? Object

DM4 - Housing & Accommodation for Older Persons

a) Do you support or object to policy DM4? Object

DM5 -Supported Accommodation

a) Do you support or object to policy DM5? Support

DM6 - Build to Rent Housing

a) Do you support or object to policy DM6? Support

DM7 - Homes in Multiple Occupation

a) Do you support or object to policy DM7? Support

DM8 - Purpose Built Student Accommodation

a) Do you support or object to policy DM8? Object

DM9 - Community Facilities

a) Do you support or object to policy DM9? Support

DM10 - Public Houses

a) Do you support or object to policy DM10? Support

DM11 - New Employment / Business Floorspace

Click here to read: [Employment Tourism & Retail Chapter](#)

a) Do you support or object to policy DM11? Support

DM12 - Primary, Secondary and Local Centre Shopping Frontages

a) Do you support or object to policy DM12? Support

DM13 - Important Local Parades, Neighbourhood Parades and Individual Shop Units

a) Do you support or object to policy DM13? Support

DM15 - Special Retail Area - The Seafront

a) Do you support or object to policy DM15 ? Support

DM16 - Markets

a) Do you support or object to policy DM16? Support

DM17 - Opportunity Areas for New Hotels & Safeguarding Conference Facilities

a) Do you support or object to policy DM17 Support

DM18 - High Quality Design & Places

a) Do you support or object to policy DM18? Support

DM19 - Maximising Development Potential

a) Do you support or object to policy DM19? Support

DM20 - Protection of Amenity

a) Do you support or object to policy DM20? Support

DM21 - Extensions & Alterations

a) Do you support or object to policy DM21? Support

DM22 - Landscape Design & Trees

a) Do you support or object to policy DM22? Support

DM23 - Shopfronts

a) Do you support or object to policy DM23? Support

DM24 - Advertisements

a) Do you support or object to policy DM24? Support

DM25 - Communications Infrastructure

a) Do you support or object to policy DM25? Support

DM26 - Conservation Areas

a) Do you support or object to policy DM26? Support

DM27 - Listed Buildings

a) Do you support or object to policy DM27? Support

DM28 - Locally Listed Heritage Assets

a) Do you support or object to policy DM28? Support

DM29 - The Setting of Heritage Assets

a) Do you support or object to policy DM29? DM30 - Registered Parks & Gardens	Support
a) Do you support or object to policy DM30? DM31 - Archaeological Interest	Support
a) Do you support or object to policy DM31? DM32 - The Royal Pavilion Estate	Support
a) Do you support or object to policy DM32? DM33 - Safe, Sustainable & Active Transport	Support
a) Do you support or object to policy DM33? DM34 - Transport Interchanges	Support
a) Do you support or object to policy DM34? DM35 - Travel Plans & Transport Assessments	Support
a) Do you support or object to policy DM35? DM36 - Parking & Servicing	Support
a) Do you support or object to policy DM36? DM37 - Green Infrastructure & Nature Conservation	Support
a) Do you support or object to policy DM37? DM38 - Local Green Spaces	Support
a) Do you support or object to policy DM38? DM39 - Development on the Seafront	Support
a) Do you support or object to policy DM39? DM40 - Protection of Environment and Health - Pollution & Nuisance	Support
a) Do you support or object to policy DM40? DM41 - Polluted Sites, Hazardous Substances & Land Stability	Support
a) Do you support or object to policy DM41? DM42 - Protecting the Water Environment	Support
a) Do you support or object to policy DM42?	Support

DM43 - Sustainable Urban Drainage

a) Do you support or object to policy DM43? Support

DM44 - Energy Efficiency & Renewables

a) Do you support or object to policy DM44? Support

DM45 - Community Energy

a) Do you support or object to policy DM45? Support

DM46 - Heating & Cooling network infrastructure

a) Do you support or object to policy DM46? Support

SA7 - Benfield Valley

a) Do you support or object to policy SA7? Support

SSA1 - Brighton General Hospital Site

a) Do you support or object to policy SSA1? Support

SSA2 - Combined Engineering Depot, New England Road

a) Do you support or object to policy SSA2? Support

SSA3 - Land at Lyon Close, Hove

a) Do you support or object to policy SSA3? Support

SSA4 - Sackville Trading Estate & Coal Yard, Hove

a) Do you support or object to policy SSA4? Support

SSA5 - Madeira Terrace & Madeira Drive

a) Do you support or object to policy SSA5? Support

SSA6 - Former Peter Pan Leisure Site (adjacent Yellow Wave), Madeira Drive

a) Do you support or object to policy SSA6? Support

SSA7 - Land Adjacent Amex Community Stadium, Falmer Way

a) Do you support or object to policy SSA7? Support

H1 - Housing Sites & Mixed Use Sites

a) Do you support or object to policy H1? Support

H2 - Urban Fringe Housing Sites

a) Do you support or object to policy H2? Support

H3 - Purpose Built Student Accommodation Sites

a) Do you support or object to policy H3? Object

E1 - Opportunity site for new industrial, business & warehouse uses

Click on the link to read: E1 Opportunity site for business and warehouse uses

a) Do you support or object to policy E1? Support

Any other comments

Click on the links below to access supporting documents to the CPP2:

- . Proposed CPP2 Implementation and Monitoring Targets [PDF, 506Kb]
- . Sustainability Appraisal [PDF, 8MB]
- . Sustainability Appraisal Non-Technical Summary [PDF, 385 KB]
- . Consultation Statement [PDF, 8.6 MB]
- . Appendix 7 to Consultation Statement [PDF, 20MB]
- . CPP2 East Policy Map [PDF, 11MB]
- . CPP2 West Policy Map [PDF, 14MB]
- . CPP2 Central Policy Map [PDF, 9.4MB]
- . Habitats Regulation Assessment [PDF, 18MB]

Background Studies and Topic Papers are also available on the City Plan Part Two website:

<https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two-background-studies-topic-papers>

AO1 Do you have any other comments on any other part of the plan or its supporting documents? If you are commenting on more than one supporting document / background study please make this clear in the box below by using headings.

I would like to see the council using S106 to ensure that future purchasers of new homes will have to demonstrate a local connection to the area. I also feel that there is a strong need for live/work units in the city due to the high levels of self employed residents in the city.

Equalities

The council has a duty under the Equalities Act 2010 to eliminate discrimination and advance equality of opportunity for people with the following protected characteristics: age, disability, race, religion, sex, sexual orientation, gender reassignment, marriage and civil partnership, and pregnancy and maternity. In addition the council has a duty to foster good relations between all communities.

A Health and Equalities Impact Assessment on the Draft City Plan Part Two has been undertaken and is available to view here [PDF, 2.8MB]

AO2 Do you consider the City Plan Part Two to have any equalities implications, positive or negative? If so, please provide further details.

There are negative implication along the lines of direct discrimination against students by imposing restrictions on car ownership when no car ownership restrictions will apply to other types of housing/accommodation.

Respondent Number DP002

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 3
Response Date 06/07/18 12:07
Status Submitted
Submission Type Web
Version 0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . Yes

Organisation Name

Organisation Name (if not applicable please put n/a) Brighton YIMBY

Name

Name

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding

- . Housing, Accomodation and Community
- . Employment, Tourism and Retail
- . Design & Heritage
- . Transport and Travel
- . Site Allocations - Housing Sites
- . Make general comments

DM1 - Housing Quality, Choice and Mix

a) Do you Support or Object to policy DM1? Support

DM1 Support Reasons

b) Please explain why you support this policy?

Improving the quality of housing is always a good thing, provided it is done in a proper way.

DM2 - Retaining Housing

a) Do you Support or Object to policy DM2? Support

DM2 Support Reasons

b) Please explain why you support this policy?

There is a need to address the shortage of residential homes in the city

DM3 - Residential Conversions & Retention of Smaller Dwellings

a) Do you support or object to policy DM3? Support

DM3 Support Reasons

b) Please explain why you support this policy?

There is a chronic shortage of family accommodation in this city, any rule that seeks to preserve/increase the number will be welcome.

DM3 Support Wording Changes

c) If you support this policy but have some suggested wording changes please outline these clearly below

The policy could also have a provision for compensating the loss of family homes to conversion by encouraging new development of family homes. Also the phrase 'and retains' should be dropped, there is no choice in housing for most people in the city as all the appropriate housing is too expensive, implying there is any choice is an insult to these people.

DM4 - Housing & Accommodation for Older Persons

a) Do you support or object to policy DM4? Support

DM4 Support Reasons

b) Please explain why you support this policy?

Older people need appropriate homes

DM4 Support Wording Changes

c) If you support this policy but have some suggested wording changes please outline these clearly below

loss should be replaced with 'net loss'.

DM5 -Supported Accommodation

a) Do you support or object to policy DM5? Support

DM6 - Build to Rent Housing

a) Do you support or object to policy DM6? Support

DM6 Support Reasons

b) Please explain why you support this policy?

Tenants rights are extremely important, they should be protected.

DM6 Support Wording Changes

c) If you support this policy but have some suggested wording changes please outline these clearly below

Ensuring affordable homes is important, there may be a chance to insert a clause a cracking down on loopholes that stop larger developers providing them.

DM7 - Homes in Multiple Occupation

a) Do you support or object to policy DM7? Object

DM7 Object Reasons

d) Please explain why you object to this policy?

Homes in multiple occupation are simply a symptom of our housing shortage, not actually a cause. Because of a lack of supply of new housing, existing housing becomes more expensive and people on lower incomes, particularly younger people, are forced into shared living. Limiting this option will simply reduce accommodation option of the poorest and push them out of this city. To deal with the shortage of family homes it is simply necessary to construct more, not penalize the most vulnerable members of our society.

DM8 - Purpose Built Student Accommodation

a) Do you support or object to policy DM8? Support

DM8 Support Reasons

b) Please explain why you support this policy?

Acceptable standards are extremely important.

DM9 - Community Facilities

a) Do you support or object to policy DM9? Support

DM10 - Public Houses

a) Do you support or object to policy DM10? Support

DM11 - New Employment / Business Floorspace

Click here to read: [Employment Tourism & Retail Chapter](#)

a) Do you support or object to policy DM11? Support

DM12 - Primary, Secondary and Local Centre Shopping Frontages

a) Do you support or object to policy DM12? Support

DM13 - Important Local Parades, Neighbourhood Parades and Individual Shop Units

a) Do you support or object to policy DM13? Support

DM14 - Special Retail Area - Brighton Marina

a) Do you support or object to policy DM14 ? Support

DM14 Support Wording Changes

c) If you support this policy but have some suggested wording changes please outline these clearly below

Needs a clause on the important of improving public transit to the marina.

DM15 - Special Retail Area - The Seafront

a) Do you support or object to policy DM15 ? Support

DM16 - Markets

a) Do you support or object to policy DM16? Support

DM17 - Opportunity Areas for New Hotels & Safeguarding Conference Facilities

a) Do you support or object to policy DM17 Support

DM18 - High Quality Design & Places

a) Do you support or object to policy DM18? Support

DM18 Support Reasons

b) Please explain why you support this policy?

Good design is extremely important for securing local consent

DM19 - Maximising Development Potential

a) Do you support or object to policy DM19? Support

c) If you support this policy but have some suggested wording changes please outline these clearly below

'efficient use of land' is too vague. Could be replaced with a clause promoting increased density of housing and accessibility of public space. Also consider mixed use developments as efficient land use.

DM20 - Protection of Amenity

a) Do you support or object to policy DM20? Object

d) Please explain why you object to this policy?

Visual privacy must be protected. However consistently the desire to preserve light has been constantly misused by local residents to block new developments. This clause must be significantly reworded giving specific examples to prevent this from happening. Areas near the center of the city (approximately 15-20 minutes walk) should expect mid-rise development. Shadows are no longer a good enough reason to discourage desperately needed housing in areas of the city which need it .

DM21 - Extensions & Alterations

a) Do you support or object to policy DM21? Support

c) If you support this policy but have some suggested wording changes please outline these clearly below

Additional clause actively encouraging extension of existing properties as long as it adheres to local design.

DM22 - Landscape Design & Trees

a) Do you support or object to policy DM22? Support

b) Please explain why you support this policy?

Trees are extremely important for good design, they make developments far more attractive, and also reduce pollution and provide desperately needed shade in summer.

c) If you support this policy but have some suggested wording changes please outline these clearly below

A clause encourage the addition of trees in new developments would be welcome.

DM23 - Shopfronts

a) Do you support or object to policy DM23? Support

DM24 - Advertisements

a) Do you support or object to policy DM24? Support

DM25 - Communications Infrastructure

a) Do you support or object to policy DM25? Support

DM26 - Conservation Areas

a) Do you support or object to policy DM26? Object

d) Please explain why you object to this policy?

Conservation areas in this city are too large and some are of dubious quality. Clearly grade I listed buildings on the seafront and areas like Denmark Villas should be preserved, however there should be far more leeway in what development is permitted with regards areas like Preston Park and Patcham, particularly the areas near public transit. Equally extensions in keeping with the design of the area should be explicitly allowed for up to 5 stories in all conservation areas.

DM27 - Listed Buildings

a) Do you support or object to policy DM27? Object

d) Please explain why you object to this policy?

Some liberalisation , for example making it easier to change outdated windows on listed buildings, should be considered.

DM28 - Locally Listed Heritage Assets

a) Do you support or object to policy DM28? Object

d) Please explain why you object to this policy?

If it is not listed then it should not be considered a heritage asset. If it is valuable, it should be listed.

DM29 - The Setting of Heritage Assets

a) Do you support or object to policy DM29? Object

d) Please explain why you object to this policy?

This city has a housing crisis, not a views crisis. The majority of people in this city will accept having their view of a non listed building slightly damaged in return for more homes built.

DM30 - Registered Parks & Gardens

a) Do you support or object to policy DM30? Object

DM31 - Archaeological Interest

a) Do you support or object to policy DM31? Support

DM32 - The Royal Pavilion Estate

a) Do you support or object to policy DM32? Support

DM33 - Safe, Sustainable & Active Transport

a) Do you support or object to policy DM33? Support

DM33 Support Reasons

b) Please explain why you support this policy?

Cycle routes and public transport are the future of transit, they take up less space, give less pollution and improve the character and quality of life of the city.

DM33 Support Wording Changes

c) If you support this policy but have some suggested wording changes please outline these clearly below

Perhaps insert a clause about promoting cycle lanes and considering their extension.

DM34 - Transport Interchanges

a) Do you support or object to policy DM34? Support

DM34 Support Wording Changes

c) If you support this policy but have some suggested wording changes please outline these clearly below

Suggest more favorable wording for a park and ride scheme, and a clear distinction between park and ride and the other options in terms of contribution to the city environment

DM35 - Travel Plans & Transport Assessments

a) Do you support or object to policy DM35? Support

DM35 Support Reasons

b) Please explain why you support this policy?

Very important for our cities environment

DM36 - Parking & Servicing

a) Do you support or object to policy DM36? Object

DM36 Object Reasons

d) Please explain why you object to this policy?

Far more in our cities must be done to discourage car transport and parking. The council should consider reducing the areas available for parking and increasing charges. If our city is to increase in population sustainably then car transport must be reduced as a priority.

H1 - Housing Sites & Mixed Use Sites

a) Do you support or object to policy H1? Object

H1 Object Reasons

d) Please explain why you object to this policy?

Brownfield sites listed in the city plan will not yield anything close to what is expected without major improvements in transit to and from the sites. Brownfield sites with size under 10 should also be considered as part of the development programme as small sites are crucial in improving housing capacity. The target of 13,200 is also far too low considering recent population growth and the council should plan for a more appropriate number of homes.

H1 Housing Site Allocations

f) If you wish to comment on any specific housing site allocations listed in the policy please do so below making clear which site(s) you are commenting on and give your reasons...

The brownfield sites with inadequate transit I was referring to are Shoreham harbour and the Marina

H1 Housing Site Omissions

g) Are there any other sites that could be allocated as housing sites ?

Council should place greater emphasis on finding small sites (sites less than size 10) around the city and encouraging extensions of existing property.

H2 - Urban Fringe Housing Sites

a) Do you support or object to policy H2?

Object

H2 Object Reasons

d) Please explain why you object to this policy?

With the current housing situation in the city not enough of the urban fringe is being used. The entire area under the councils jurisdiction should be earmarked for some form of housing. Sites on the urban fringe could also be built at an increased density, and this should be encouraged. We are also surrounded by a national park, the provision of any open space (aside from parks and areas of public recreation) are entirely unnecessary and a waste of the limited land we have available.

H3 - Purpose Built Student Accommodation Sites

a) Do you support or object to policy H3?

Object

H3 Object Reasons

d) Please explain why you object to this policy?

Council should consider higher density for the sites. There should also be a greater emphasis on encouraging the local universities to build far more on-campus housing near Falmer.

H3 Purpose Built Student Housing Omission Sites

g) Are there any other sites that could be allocated as purpose built student housing sites ?

Areas near Falmer and the university campus should be explored. Particularly areas near the AMEX stadium and station.

Any other comments

Click on the links below to access supporting documents to the CPP2:

- . Proposed CPP2 Implementation and Monitoring Targets [PDF, 506Kb]
- . Sustainability Appraisal [PDF, 8MB]
- . Sustainability Appraisal Non-Technical Summary [PDF, 385 KB]
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<https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two-background-studies-topic-papers>

AO1 Do you have any other comments on any other part of the plan or its supporting documents? If you are commenting on more than one supporting document / background study please make this clear in the box below by using headings.

In its current form the CPP2 is inadequate in address the needs of the inhabitants of this city. We are planning for far too few homes. We should instead take our lead from cities in a similar position, such as Bristol and assume a realistic projection to our cities projected population growth. This will mean planning for perhaps two to three times the number of homes in the city plan. This is easily possible , the council has achieved such feats in the past, we can do it again.

As mentioned before a more comprehensive approach to transit is necessary, especially in increasing access to brownfield sites. In the long term the council should also consider increasing transit access to other areas of the region, unlocking new areas for housing. This could be done in Ovingdean and Rottingdean for example. Equally

improving transit between Brighton, Shoreham and Eastbourne would make commuting far easier and allow people greater choice in where to live.

For this proposal to work the council should consider allowing greater density nearer train stations and bus stops, to allow for easier commuting around the South coast while providing extra housing. Though this may be unpopular in certain areas, particularly conservation areas such as Preston Park, an appropriate design code would blunt the most serious opposition and would fulfill the definition of enhancing the area. If this plan is to work it will also require a more realistic approach to the office space in the city, and will require certain areas to be built at a higher density and include office space. The Churchill Square site and surrounding area would be a good candidate for this, as would New England road.

I am also disappointed to read the lack of interest in community projects and small sites. Working with local organisations such as the Brighton and Hove Community Land Trust would do a lot to help increase the supply of affordable housing and unlock the appropriate land for development. Far more work needs to be done in supporting small and medium sized builders in this city as well, finding the appropriate small and medium sized sites for them to work. These builders generally provide more affordable housing than large scale developers. We cannot always rely on volume builders to produce what our city requires.

If we are to build the houses we require this will also require densification of existing residential areas of the city, it should be investigated how this can be achieved while maintaining the existing character of the city. I have previously mentioned extensions and design codes, however I am happy to hear any other proposals. Our city will also have to use land from other regional authorities. We should look into the potential of outer city golf courses as potential development sites and begin discussing development proposals with the national park. It is not right that so much land is used for so little value while people live in cramped and unsanitary accommodation in this city.

Equalities

The council has a duty under the Equalities Act 2010 to eliminate discrimination and advance equality of opportunity for people with the following protected characteristics: age, disability, race, religion, sex, sexual orientation, gender reassignment, marriage and civil partnership, and pregnancy and maternity. In addition the council has a duty to foster good relations between all communities.

A Health and Equalities Impact Assessment on the Draft City Plan Part Two has been undertaken and is available to view here [PDF, 2.8MB]

AO2 Do you consider the City Plan Part Two to have any equalities implications, positive or negative? If so, please provide further details.

As we are effectively planning to exacerbate our cities already chronic housing shortage we should look at who the main victims are. Generally those who benefit from this policy are the people who already own property, as this artificial shortage pushes their property values up still further. These people are predominantly older and whiter than the general population. The people who lose out due to this policy are those without the luck to have bought their own property when things were cheaper and therefore have to rent. These people are the younger, the poor, ethnic minorities and recent immigrants. These people will now be struck with increasing rents and a steadily diminishing chance of ever owning a home.

Thus I consider our cities housing policy heavily discriminatory against all minority groups in our city and call for it to be revised extensively on these grounds.

Respondent Number DP003

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	4
Response Date	09/07/18 22:00
Status	Submitted
Submission Type	Web
Version	0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . Yes

Organisation Name

Organisation Name (if not applicable please put n/a) n/a

Name

Name

Address

Address

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Housing, Accomodation and Community

DM10 - Public Houses

a) Do you support or object to policy DM10? Support

DM10 Support Reasons

b) Please explain why you support this policy?

Excellently worded, solid policy

Received 10th July 2018
Respondent Number DP004

Draft CCP2
Policy Projects & Heritage Team
Brighton & Hove CC
First Floor
Hove Town Hall
Norton Road
Hove BN3 3BQ

7 July 2018

Dear Sir/Madam,

Brighton & Hove CC – City Plan Part 2 – Consultation Draft
July 2018

These representations are submitted on behalf of the British Sign and Graphics Association (BSGA) in response to the above draft Local Plan.

The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure that emerging Local Plan Policies do not inappropriately apply more onerous considerations on advertisements than already apply within NPPF, PPG and the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended).

The BSGA consider that Policy DM24 and accompanying text is mostly sound.

We would, however, offer two points of concern. Policy DM24(a) to (i) set out the criteria on which the Council will assess advertisement proposals, following the preamble which accepts that advertisements can be controlled only in the interests of amenity and public safety, Our first concern is with the third paragraph of the policy, particularly the stipulation that advertisements “outside the built-up area” should not be illuminated. The supporting text (paragraph 2.184) recognises that advertising is “important” to the viability of commercial enterprises (we would suggest “essential” is preferable to “important” – what business can survive without any advertising?), so how do the Council think that businesses outside the built-up area (particularly those that trade at night, eg pubs, hotels, garages etc) can survive without any illuminated advertising? If you pass a darkened public house, you will assume it is closed. We therefore suggest that “and should not be illuminated” be deleted and replaced with “. Illumination should be carefully designed so as to avoid light pollution to intrinsically dark areas.”

In paragraph 2.185, the text suggests that, “as a general rule”, advertisements above first floor window cill level will be considered “inappropriate”. Firstly, the Council must bear in mind that the fittings for any advertisement are part of the advertisement (by statutory definition – see section 336(1) of the Town and Country Planning Act 1990, as amended). The Council’s SPD07 “Advertisements” recognises a number of circumstances where higher level signs may be acceptable. The SPD also advises that hanging signs should be set to hang at fascia level or just above. This will often (almost always) entails the bracket to be set above the first floor cill level. A very brief look around Brighton shows that there are many thousands of such signs throughout. It would therefore seem rather pointless (and contradictory) to offer advice that such signs “will be considered inappropriate” when they are actually totally appropriate and accord with the Council’s SPD advice. Since the first paragraph of Policy DM24 already refers to consideration of “siting”, this will encompass whether the position on the building is appropriate both to the character and appearance of the building and the area. We therefore suggest that the last two sentences of paragraph 2.185 are unnecessary and potentially misleading and should be deleted.

It is hoped that these comments are found to be useful and informative. If you have any further questions, please contact me.

Yours faithfully

Respondent Number DP005

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	6
Response Date	11/07/18 20:10
Status	Submitted
Submission Type	Web
Version	0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . Yes

Organisation Name

Organisation Name (if not applicable please put n/a) N/A

Name

Name

Address

Address

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Site Allocations - Housing Sites

H1 Housing Site Allocations

f) If you wish to comment on any specific housing site allocations listed in the policy please do so below making clear which site(s) you are commenting on and give your reasons...

46-54 Old London Road, Patcham BN1 8XQ

Letter lacks specifics so difficult to respond. Need further info on proposed timescale/formula for calculating purchase offer(?) etc.

Respondent Number DP006

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 7
Response Date 13/07/18 12:33
Status Submitted
Submission Type Web
Version 0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . Yes

Organisation Name

Organisation Name (if not applicable please put n/a) n/a

Name

Name

Address

Address

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Housing, Accommodation and Community
. Transport and Travel

DM7 - Homes in Multiple Occupation

a) Do you support or object to policy DM7? Support

DM7 Support Reasons

b) Please explain why you support this policy?

I live in an area with a high density of HMOs(29%) and my family house is sandwiched, with an HMO on one side, and a continuous row of 3 HMOs on the other side. So I welcome the plans as these would prevent further HMOs being licensed in my area.

I would like some clarification about reversion to C3 housing from an HMO. For example if the owner of an existing HMO in an area already exceeding the permitted number of HMOs (like where I live) would the buyer have to revert to C3?

DM33 - Safe, Sustainable & Active Transport

a) Do you support or object to policy DM33? Support

DM33 Support Reasons

b) Please explain why you support this policy?

I agree with your point 2.242 about encouraging walking and cycling for short journeys.

However, this relates directly to parking zones. When you allow parking zones to grow too large(like my area J) you are actually encouraging people to drive short distances within the parking zone. My road is almost always full of cars, many of which are vehicles belonging to people who have driven to my street from Fiveways and Roundhill areas to park close to the station and London Road shops.

DM33 Support Wording Changes

c) If you support this policy but have some suggested wording changes please outline these clearly below

See above. I think you need to consider the detrimental effect of your large parking zones which actually encourage people to drive short distances rather than walk or cycle

Respondent Number DP007

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	8
Response Date	14/07/18 10:50
Status	Submitted
Submission Type	Web
Version	0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . No

Organisation Name

Organisation Name (if not applicable please put n/a)

Name

Name

Address

Address

Email Address

Email Address

Agent Email

Agent Email

Please tick all of the sections you would like to comment on before proceeding . Housing, Accommodation and Community

DM8 - Purpose Built Student Accommodation

a) Do you support or object to policy DM8? Object

DM8 Object Reasons

d) Please explain why you object to this policy?

It is intolerable for residents near Lewes Rd to not have student blocks dispersed to other areas. Although they are staffed (unlike HMO's), they still imbalance any mixed-demographic neighbourhood, starving primary schools of children and encouraging the idea of "student areas". There is no reason why students can't travel on bus or bicycle from e.g. Woodingdean, E Brighton or Hove.

DM8 Object Wording Changes

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

That developers are encouraged to site blocks away from Article 4 wards, where the new 20% rule for HMO's should also apply to blocks.

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 9
Response Date 25/07/18 09:30
Status Submitted
Submission Type Web
Version 0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . Yes

Organisation Name

Organisation Name (if not applicable please put n/a) A259 Action Group

Name

Name

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Housing, Accommodation and Community
. Transport and Travel
. Environmental and Energy

DM38 - Local Green Spaces

a) Do you support or object to policy DM38? Object

DM38 Object Reasons

d) Please explain why you object to this policy?

I do not object to the policy, but I do strongly object to the omission of St Aubyns Playing Field in Rottingdean which was agreed as a designated site for Local Green Space in 2015. When the first document relating to City Plan Part 2 was first published (I believe this was in 2016), I pointed out to the relevant B&HCC officer that St Aubyns Playing Field was not included in the list below despite its designation as a Local Green Space (see link to ED&C minutes below). I was assured this would change once the next draft was published. I'm concerned to see that 2 years on, this has not happened. Please can you reassure that this is an oversight which will be corrected with St Aubyns Playing Field

being included within the next publication. It was originally thought that the Neighbourhood Plan would be forthcoming before City Plan 2, but this is looking increasingly unlikely and it would appear prudent to include the designation of St Aubyns Playing Field as a Local Green Space in City Plan Part 2. Otherwise there is the very real risk that the agreed designation at the earliest opportunity will not be carried out as agreed by Councillors / Committee.

<https://present.brighton-hove.gov.uk/ielssueDetails.aspx?IId=47462&Opt=3> The following green areas, as defined on the policies map, are designated and protected as Local Green Spaces: • Hollingbury Park • Three Cornered Copse • Ladies' Mile • Benfield Valley

DM38 Object Wording Changes

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

When the first document relating to City Plan Part 2 was first published (I believe this was in 2016), I pointed out to the relevant B&HCC officer that St Aubyns Playing Field was not included in the list below despite its designation as a Local Green Space (see link to ED&C minutes below). I was assured this would change once the next draft was published. I'm concerned to see that 2 years on, this has not happened. Please can you reassure that this is an oversight which will be corrected with St Aubyns Playing Field being included within the next publication. It was originally thought that the Neighbourhood Plan would be forthcoming before City Plan 2, but this is looking increasingly unlikely and it would appear prudent to include the designation of St Aubyns Playing Field as a Local Green Space in City Plan Part 2. Otherwise there is the very real risk that the agreed designation at the earliest opportunity will not be carried out as agreed by Councillors / Committee.

<https://present.brighton-hove.gov.uk/ielssueDetails.aspx?IId=47462&Opt=3> The following green areas, as defined on the policies map, are designated and protected as Local Green Spaces: • Hollingbury Park • Three Cornered Copse • Ladies' Mile • Benfield Valley

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 10
Response Date 30/07/18 16:04
Status Submitted
Submission Type Web
Version 0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations Yes

Organisation Name

Organisation Name (if not applicable please put n/a) n/a

Name

Name

Address

Address

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding Make general comments

Any other comments

Click on the links below to access supporting documents to the CPP2:

- . [Proposed CPP2 Implementation and Monitoring Targets \[PDF, 506Kb\]](#)
- . [Sustainability Appraisal \[PDF, 8MB\]](#)
- . [Sustainability Appraisal Non-Technical Summary \[PDF, 385 KB\]](#)
- . [Consultation Statement \[PDF, 8.6 MB\]](#)
- . [Appendix 7 to Consultation Statement \[PDF, 20MB\]](#)
- . [CPP2 East Policy Map \[PDF, 11MB\]](#)
- . [CPP2 West Policy Map \[PDF, 14MB\]](#)
- . [CPP2 Central Policy Map \[PDF, 9.4MB\]](#)
- . [Habitats Regulation Assessment \[PDF, 18MB\]](#)

Background Studies and Topic Papers are also available on the City Plan Part Two website:

AO1 Do you have any other comments on any other part of the plan or its supporting documents? If you are commenting on more than one supporting document / background study please make this clear in the box below by using headings.

My concern is with the development of the KAP garage site on Newtown Rd and associated probable development up to the Old Shoreham Rd. The proposals that I have seen have asked for high rise development up to 16 stories. I understand that this has already been reduced to 12 stories. This is not in keeping with the area. All of the buildings in this area are low rise. The new development currently being built on Newtown rd is already excessively high as it looks down into our bedrooms on Fonthill rd, that is only 6 stories high. I understand that this was allowed as it was only level with the top of the church roof. This is a ridiculous argument, no one lives in the top of the church and no one is overlooked or over shadowed by the church.

There are no tall structures on this side of the railway line and all of the current proposals will change the living environment for the worse for the current residents. There is a lot of support for the new developments as extra housing is needed and there is not a "not in my backyard" attitude with the current residents but if approval for 6 stories plus is given there will be a lot of negative reaction and resistance.

Please keep the new development within the character of the existing area as a generally low rise area not a high rise canyon.

From:
Sent: 29 July 2018 11:51
To: PlanningPolicy
Cc:
Subject: City Plan Part Two Consultation

2% of the Land Mass of the United Kingdom is used for housing, we have a population density double that of France and yet Councils still force High Density accommodation onto local Residents. Now if this policy is to please the Green Supporters of this town then please think again. We need communities and destroying more of them just causes more problems. Remember people come 1st before Grass and Trees. Why would anyone want to destroy the Patcham community by implementing High Density Living and removing family housing on land currently occupied between 46 to 54 Old London Road. Too many houses with gardens that are ideal for families are being destroyed by Local Government in Brighton. Do you want all children to be brought up in Tower Blocks? Your continued drive towards High Density living will turn Brighton into a Replica of the current London Ghetto where Crime and Fear have altered people quality of Life.

Why not let the community decide if this will be a positive or negative contribution to Patcham. Housing should be built on Greenfield sites on Land that has been over farmed and is of little use to the farmers. It is time that Councils realised that it is the community that is important and that the council should represent the community and Forcing anything onto the community that will negatively impact their lives is not acceptable.

My Wife and I both object to your inclusion of any changes being made to buildings between 46 to 54 Old London Road Patcham.

Thanks



DP011

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 12
Response Date 31/07/18 10:39
Status Submitted
Submission Type Web
Version 0.2

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . No

Organisation Name

Organisation Name (if not applicable please put n/a) n/a

Name

Name

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Site Allocations - Housing Sites

H1 - Housing Sites & Mixed Use Sites

a) Do you support or object to policy H1? Object

H1 Housing Site Allocations

f) If you wish to comment on any specific housing site allocations listed in the policy please do so below making clear which site(s) you are commenting on and give your reasons...

46-54 Old London Road, Patcham

As this site was not suitable last year for Old Peoples Home I fail to see how it is suitable for a block of flats, there is very little space in Old London Road and buses have a hard time trying to drive down it, the other reasons which applied to the home must also apply to this situation . Flooding has always been a problem here.

From:
Sent: 29 July 2018 19:14
To: PlanningPolicy
Subject: City Plan Part Two Consultation Re: Site 46-54 Old London Road, Patcham BN1 8XR

To City Planning,

We understand that the above sight is included in the list of sites allocated for development by city planning.

We have lived in the village of Old London Road, Patcham for 25 years and the above site has been refused planning three times since we've lived here, the last time being last year by McCarthy & Stone which was also objected by the planning inspector.

We object to this site due to several reasons as stated below:-

The site which has 5 family homes is far too small for 30 houses or flats, the density of houses/flats will spoil the village look and appearance of the area. It has already been proved that further development on this site will increase the flood risk even further as with the 5 existing houses in year 2000 sewage overflowed into the road. This will also intensify the parking problems as during the week old London road is completely full and will increase congestion volume as well.

Existing site has many trees, mature gardens and wildlife which will be replaced by intensive buildings and parking which is also not in keeping in the village.

We strongly object to this planning.

Yours faithfully

From:
Sent: 30 July 2018 07:16
To: PlanningPolicy
Cc:
Subject: City Plan Part Two Consultation: Council allocation for development of 46 to 54 London Road

To whom it may concern

I would like to object strongly to the Council's decision to allocate 46 to 54 London Road for development of 30 units of residential accommodation. I am extremely concerned that the Council has also indicated that 'the numbers of residential units may be exceeded if this can be justified through detailed examination of site specific considerations'. This site currently accommodates 5 family homes, and is too small for 30 houses or flats. It is too many homes on too small a piece of land. In particular, this density of housing will spoil the Village look & feel, and materially detract from the character and appearance of the area. It will also cause problems with parking and congestion in the area. The developers who wish to build on this land have no respect for the local people or area, and I have no doubt they will attempt to maximise their profits at the expense of the local area and community.

As a local resident, I would like to request that the Council removes 46 to 54 London Road from the list of properties allocated for development in the City Plan. There are many more appropriate open spaces and derelict buildings in Brighton and Hove that could be re-developed in the city for housing. It is difficult to understand why this site would be chosen as an appropriate place for this type of high density development.

Yours sincerely

From:
Sent: 30 July 2018 09:54
To: PlanningPolicy
Subject: 46-54 OldLondon Road, Brighton

City Plan Part 2 consultation.

I object to the inclusion of 46 - 54 Old London Road in the list of sites allocated for development in the City Plan, for the same reasons that the Planning Inspector rejected the planning application on the site in 2017.

I have been living in Brighton for the past 36 years of which the first 13 years I lived in the Preston Park area. I used to make frequent visits to the bakery and shops in Patcham Village using the Old London Road which, as driving through, gave me so much pleasure, particularly the unique ambience of No's 40-54. This charming row of detached houses going back to the early part of the last century has a very special atmosphere. The properties are well set back from the road and generally quite low creating a lovely feel of openness. The beautiful little well established front gardens and picturesque verges are generously planted with an array of some very mature flora that changes with beauty through the seasons. The rear gardens contain a number of mature trees that also contribute to the general suburban village atmosphere. It was this that charmed and allured me to move here.

I appreciate that there is pressure to create new housing for the city though feel that we as residents and the council as our representatives also want to protect areas of neighbourhoods that contribute unique character and charm to our environment and city as a whole.

Much of Patcham Village is in a conservation area and relates the evolution of the village, through earlier periods to the post first world war era, of which these houses are prime contributors to the village's character. The developers' proposal last time stated that these houses are of no particular architectural value. I could not disagree more. I feel they are a charming and complementary combination of homes.

The drainage in the area is already insufficient and has caused huge problems and although the developers state they are making changes to this large development this will potentially exacerbate the problems with a huge potential adverse effect.

Generally parking is very difficult in the village and regularly the Old London Road is totally full with visitors having to park far out and walk back in. The traffic is also heavy for an area like this it is sometimes very difficult for the residents to move their cars off the drives waiting for a gap in congestion or trying to manoeuvre around badly parked cars across drives and on yellow lines.

The village makes a very charming transition, it gently introduces the countryside to its north, through the old village and then on to this beautiful row of houses with their pictures gardens and verges, in this small suburban area, and on to the City of Brighton. Please let us not ruin this area with huge inappropriate overdevelopment.

I don't want to sound embittered but I'm bitterly depressed and have sleepless nights worrying about the thought of the ruination of this beautiful area and the village ambience.

I very much hope the planning application committee will take these views into account and the views of the very many other distressed and troubled residents of the neighbourhood and surrounding district and that this area be removed from the list of sites allocated for development in the City Plan.

Thank you

From:
Sent: 30 July 2018 18:53
To: PlanningPolicy
Subject: City Plan Part Two Consultation.

Dear Sirs,

As a resident of Patcham Old Village, I strongly object to the plan that 46 to 54 Old London Road should be demolished in order to make way for a new development.

The reasons for my objection are as follows:

1. The site is too small for a development of 30 units.
2. Parking along this area is already inadequate. Old London Road is a bus route, and more traffic would make it very dangerous.
3. The removal of the trees would spoil the look and feel of the Village (as was admitted by the Planning Inspector last year.)
4. The area is at grave risk of flooding, as has been seen in the past.

Please remove 46 to 54 Old London Road from the list of sites allocated for development in the City Plan.

Yours faithfully,

Respondent Number DP017

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	18
Response Date	31/07/18 19:53
Status	Submitted
Submission Type	Web
Version	0.1
I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations	<input type="checkbox"/> Yes
Organisation Name	
Organisation Name (if not applicable please put n/a)	n/a
Name	
Name	
Address	
Address	
Email Address	
Email Address	
Please tick all of the sections you would like to comment on before proceeding	<input type="checkbox"/> Housing, Accomodation and Community
DM1 - Housing Quality, Choice and Mix	
a) Do you Support or Object to policy DM1?	Support
DM2 - Retaining Housing	
a) Do you Support or Object to policy DM2?	Support
DM3 - Residential Conversions & Retention of Smaller Dwellings	
a) Do you support or object to policy DM3?	Support

DM4 - Housing & Accommodation for Older Persons

a) Do you support or object to policy DM4? Support

DM7 - Homes in Multiple Occupation

a) Do you support or object to policy DM7? Support

DM8 - Purpose Built Student Accommodation

a) Do you support or object to policy DM8? Support

Respondent Number DP018

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 19
Response Date 01/08/18 09:07
Status Submitted
Submission Type Web
Version 0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . No

Organisation Name

Organisation Name (if not applicable please put n/a) n/a

Name

Name

Address

Address

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Site Allocations - Housing Sites

H1 - Housing Sites & Mixed Use Sites

a) Do you support or object to policy H1? Object

H1 Housing Site Allocations

f) If you wish to comment on any specific housing site allocations listed in the policy please do so below making clear which site(s) you are commenting on and give your reasons...

46-54 Old London Road, Patcham.

I object to the inclusion of these properties in the City Plan Part Two as suitable for redevelopment with 30 housing units on the following grounds:

- 1 This density of housing would destroy the still semi-rural character of this part of the village.
- 2 30 new homes will intensify parking problems in road and increase the traffic
- 3 It should be noted that the road is a bus route and too narrow for two buses to pass each other as it is.
- 4 Neighbouring homes will lose privacy due to overlooking.
- 5 No extra load should be put on the existing sewage system which is liable to overflow in flood conditions.

From:
Sent: 01 August 2018 17:25
To: PlanningPolicy
Cc:
Subject: City Plan Part Two Consultation - 46 to 54 Old London Road, Patcham

Dear Sirs,

City Plan Part Two Consultation - 46 to 54 Old London Road, Patcham

I am writing to express my objection to – and, indeed, my amazement at – the proposal to replace the five family homes located at 46 to 54 Old London Road (“the site”) with a development of 30 residential units.

As far as I can tell, the decision to identify the site as one that might be suitable for such intensive development appears to have been based purely on the historic decision of the owners to sell so that the development proposed by McCarthy & Stone could proceed.

The proposed development would appear closely to resemble the development proposed by McCarthy & Stone in terms of population density. Furthermore, to build 30 residential units on the site would mean that, although the architectural details might differ, the scale of the proposed development would also have to resemble the scale of the development proposed by McCarthy & Stone. Accordingly, some of the comments made by the Planning Inspector in respect of the development proposed by McCarthy & Stone, namely:

“I consider that the proposed building would, by virtue of a combination of its scale, density, massing and width, be a dominant and over-bearing feature that would detract from the attractive suburban character of this part of Old London Road.... I consider that the proposed development would cause significant harm to the character and appearance of the area.

... it would cause significant harm by virtue of its impact on the character and appearance of the area. Overall, having carefully considered all of the evidence before me, I consider that the aforementioned benefits of the scheme, taken as a whole, do not outweigh the significant harm that I have identified in this case.”

would appear to apply equally to the present proposal to build 30 residential units on the site.

The present proposal to build 30 residential units on the site raises some interesting questions. First, the Planning Inspector expressed a considered view of the development proposed by McCarthy & Stone. It would appear inappropriate for Brighton & Hove City Council (“the Council”) to disregard that view.

Second, I am concerned that both the population density and the scale of the proposed development would set an unwelcome precedent, act as a benchmark, and lead to further intensive developments in the area.

Third, were I in McCarthy & Stone’s shoes, and I were to learn of the present proposal to develop the site, then I would certainly be asking why the Council opposed the development proposed by McCarthy & Stone, yet now appears to be considering a development that is not significantly different.

Sadly, it is not surprising that the Council should now be considering a development that is materially similar to a development that generated a good deal of local opposition; a development that the Council opposed; and which the Planning Inspector also opposed. Perhaps, in the interests of not wasting its own time – and therefore our money – the Council should look at generating proposals that might be acceptable, perhaps even welcome, rather than attempting to resurrect a proposal altogether too similar to one that has already been so publicly discredited.

Regards,

From:
Sent: 01 August 2018 21:26
To: PlanningPolicy
Subject: City plan part two 46-54 Old London Road, Patcham

Dear sir/madam

Last year in August, we object and rejected.

Here we go again, same developer Mccarthy and Stone's creeping out with same old greedy plan.

As a resident of Patcham community, I strongly believe this development is unacceptable, due the following facts. Scale of density, wild life and natural beauty , mature trees, cutting a tree is like cut you r own arms and legs, how many years those tress were, providing, heaven to birds, environment, not to mention the beauty, privacy and destroy birds nests.

Flood risk, crime, rubbish, traffic, noise pollution, more crowed , simply current peace and quite life will be vanished. Council is not doing any favours to Patcham residents, we are become life time hated residents. Why Old London Road, they can go somewhere?

We are ready for the fight again, I hope council planing personal has a to think over before the final decision. Too much greediness which is not belongs to you or developer.

Yours sincerely

Sent from my iPad

Draft CPP2 Policy Projects & Heritage Team
Brighton & Hove City Council
First Floor Hove Town Hall
Norton Road
Grand Avenue
Hove
BN3 3BQ

Sent by email to:
planningpolicy@brighton-hove.gov.uk

3 August 2018

Dear Sir / Madam

**Brighton and Hove City Council: Consultation on the Draft City Plan Part Two
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:



From:
Sent: 03 August 2018 15:25
To: PlanningPolicy
Subject: Draft City Plan Part Two Consultation

Hello

<https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two>

I refer to the above consultation planned by B & H Council for redevelopment of Old London Road, Patcham (houses number 46 to 54 which I believe is Site number 13). I am a local resident of Patcham Old Village and this is, of course, the exact plot that so many of us objected to recently when McCarthy & Stone proposed to redevelop this site for 'assisted living' flats for the elderly.

I believe this new proposal is completely wrong for the area for largely all the reasons that we objected to with the McCarthy & Stone plan; scale of the development which is inappropriate and will completely destroy the feel of the Village, increased traffic and parking - already an increasing problem in the small village, flooding potential, lack of privacy to the surrounding neighbours and destruction of trees, green space and wildlife. In fact I would suggest this new proposal is even more intrusive, destructive and inappropriate to the village than the previous one proposed by McCarthy Stone.

I would like to raise my objection and request that this site is not allocated as a site for development in the draft City Plan Part Two.

Regards

From:
Sent: 05 August 2018 13:00
To: PlanningPolicy
Subject: City Plan Part Two Consultation

Dear Sir/Madam

Re: 46 to 54 Old London Road, Patcham

I wish to raise my concerns as to why 46 to 54 Old London Road should be removed from the list of sites allocated for development in the City Plan.

I live in the Park Court flats next to the proposed area of development. I feel that developing this area would be disastrous for the village for the following reasons:

- the proposed area is too small to accommodate 30 units. This density of housing will forever alter the character and appearance of the village
- the village already suffers from serious flooding issues and having more properties will only add to that
- there is a wealth of mature trees that may have to be cut down to accommodate the new buildings
- traffic and parking is already at full capacity in the village with the current homes and shops. More traffic will have a detrimental impact on the village with both the 'look and feel' of the place and pollution and noise

Kind regards,

From:
Sent: 06 August 2018 14:40
To: PlanningPolicy
Subject: CITY PLAN PART TWO

46-54 OLD LONDON ROAD, PATCHAM

I believe the above site is too small to accommodate such a large development i.e. 30 units, which number could be exceeded if it can be justified.

This area was rejected for development only last year by both the Council and Planning Inspector and should therefore be deleted from the draft City Plan Part Two.

Yours faithfully

Sent from my iPad

From:
Sent: 06 August 2018 16:10
To: PlanningPolicy
Subject: Objection - 46 to 54 Old London Road - City Plan Part Two Consultation

RE: City Plan Part Two Consultation

I would like to object to the inclusion of 46 to 54 Old London Road in the City Plan Part Two.

The council already rejected application to build a block of 44 retirement flats at 46 to [54 Old London Road](#) (opposite Patcham House School) and this was supported by the Planning Inspector.

We would not like to see the area over developed and so ruining our village.

Thanks,

From:
Sent: > 30 July 2018 18:05
To: PlanningPolicy
Subject: planning old london rd

I wish to object to planning 46-54 old london rd patcham



Virus-free. www.avg.com

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 28
Response Date 08/08/18 08:51
Status Submitted
Submission Type Web
Version 0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . Yes

Organisation Name

Organisation Name (if not applicable please put n/a) n/a

Name

Name

Address

Address

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Site Allocations - Housing Sites

H2 - Urban Fringe Housing Sites

a) Do you support or object to policy H2? Object

H2 Object Reasons

d) Please explain why you object to this policy?

Land at and adjoining Horsdean Recreation Ground, Patcham

This area is an essential public amenity popular with dog walkers, many teams who use the cricket pitch. The allotment s are very popular and oversubscribed, many plot holders have tended they plots

for numerous years. While other brown field sites are suitable for development the destruction of green field recreational space cannot be justified.

Any development must protect the existing allotments and cricket pitch and immediate surrounding area

The exit from Vale avenue onto the roundabout junction with the A27 and A23 is extremely congested in peak times and additional commuters will only make this worse.

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 29
Response Date 08/08/18 12:32
Status Submitted
Submission Type Web
Version 0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . Yes

Organisation Name

Organisation Name (if not applicable please put n/a) n/a

Name

Name

Address

Address

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Housing, Accomodation and Community
 . Design & Heritage
 . Transport and Travel

DM1 - Housing Quality, Choice and Mix

a) Do you Support or Object to policy DM1? Support

DM2 - Retaining Housing

a) Do you Support or Object to policy DM2? Object

DM2 Object Reasons

d) Please explain why you object to this policy?

The only issue raised in relation to holiday lets is noise and disturbance to neighbours. There is no mention of residential properties being used solely for holiday lets. The air bnb site indicates that over 300 homes in Brighton are now used exclusively for holiday lets, ie the whole property is let, not simply a spare room in the owner's home. In order to keep within the law, these homes are let only at weekends and are empty during the week. I would like to see this steps taken to prevent any expansion of this, preferably with a view to preventing loss of permanent homes, but at the very least so as to generate business rate revenue from the owners.

DM3 - Residential Conversions & Retention of Smaller Dwellings

a) Do you support or object to policy DM3? Support

DM4 - Housing & Accommodation for Older Persons

a) Do you support or object to policy DM4? Support

DM5 -Supported Accommodation

a) Do you support or object to policy DM5? Support

DM6 - Build to Rent Housing

a) Do you support or object to policy DM6? Support

DM7 - Homes in Multiple Occupation

a) Do you support or object to policy DM7? Support

DM8 - Purpose Built Student Accommodation

a) Do you support or object to policy DM8? Support

DM9 - Community Facilities

a) Do you support or object to policy DM9? Object

DM9 Object Reasons

d) Please explain why you object to this policy?

I am concerned that loss of community facilities due to 'the facility is no longer needed' and 'it has been demonstrated that there is no current need' could result from the facility receiving insufficient maintenance, eg parks and playgrounds falling into disrepair.

DM9 Object Wording Changes

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

It must be demonstrated that decline in use of the facility is not due to poor maintenance or reduced maintenance budgets, and that use of the facility would not be increased if repairs were carried out.

DM10 - Public Houses

a) Do you support or object to policy DM10? Object

DM10 Object Reasons

d) Please explain why you object to this policy?

I don't understand why so much attention is given to retaining pubs when there is an acknowledged health crisis due to excessive alcohol consumption. While this isn't wholly due to pubs, it does undermine the argument that pubs provide a social benefit.

It is also disturbing that one of the envisaged ways of retaining pubs is to grant live music licences. These can be a menace, creating huge disturbance to neighbours.

The main benefit of keeping a pub in business is usually to the brewery, which is usually located somewhere other than Brighton and Hove.

DM10 Object Wording Changes

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

There needs to be recognition that a lot of pubs, including those in town centres, are in the midst of residential areas. The needs of the pub to change the way it operates in order to increase profits must be balanced against the rights of neighbouring residents to enjoy their homes.

DM18 - High Quality Design & Places

a) Do you support or object to policy DM18? Support

DM19 - Maximising Development Potential

a) Do you support or object to policy DM19? Support

DM20 - Protection of Amenity

a) Do you support or object to policy DM20? Support

b) Please explain why you support this policy?

I very strongly support this policy.

DM21 - Extensions & Alterations

a) Do you support or object to policy DM21? Object

DM22 - Landscape Design & Trees

a) Do you support or object to policy DM22? Support

DM23 - Shopfronts

a) Do you support or object to policy DM23? Support

DM24 - Advertisements

a) Do you support or object to policy DM24? Support

DM25 - Communications Infrastructure

a) Do you support or object to policy DM25? Support

DM26 - Conservation Areas

a) Do you support or object to policy DM26? Support

DM27 - Listed Buildings

a) Do you support or object to policy DM27? Support

DM28 - Locally Listed Heritage Assets

a) Do you support or object to policy DM28? Support

DM29 - The Setting of Heritage Assets

a) Do you support or object to policy DM29? Support

DM30 - Registered Parks & Gardens

a) Do you support or object to policy DM30? Support

DM31 - Archaeological Interest

a) Do you support or object to policy DM31? Support

DM32 - The Royal Pavilion Estate

a) Do you support or object to policy DM32? Support

DM33 - Safe, Sustainable & Active Transport

a) Do you support or object to policy DM33? Object

DM33 Object Reasons

d) Please explain why you object to this policy?

There is no mention of the need to improve the space for pedestrians and wheelchair users in the main thoroughfares. There needs to be enough pavement space for pedestrian and wheelchair traffic. At present, businesses are given too much freedom to encroach on pedestrian space with tables, chairs, A boards. There are some roads (west side of Queens Road between Church Street and Air Street) where pedestrians are routinely forced into the road because businesses have colonised the pavement.

Similar problems apply to cycle parking - businesses use the cycle parking facilities to store their trade waste bins.

DM34 - Transport Interchanges

- | | |
|---|---------|
| a) Do you support or object to policy DM34? | Support |
| DM35 - Travel Plans & Transports Assessments | |
| a) Do you support or object to policy DM35? | Support |
| DM36 - Parking & Servicing | |
| a) Do you support or object to policy DM36? | Support |

From:
Sent: 09 August 2018 11:48
To: PlanningPolicy
Cc:
Subject: 46 to 54 Old London Road BN1 8 XQ

I'm XXXX,

I live at XXXXXXXX I visit Old Patcham Village daily to shop and attend events at Patcham Memorial Hall.

Last year I protested at the proposals tabled by McCarthy and Stone for sheltered care on this site. The planning inspector rejected the proposals as they were out of character for the village setting.

Now I learn that the Council has declared 46 to 54 Old London Road a brown field site. It has now included this site as capable of providing 30 new housing units.

The site is already occupied by five single family dwellings so there will only be a net gain of 25 housing units.

I believe that the site which currently accommodates 5 family homes is too small for 30 housing units unless they are flats. Such as the flats next door.

Placing so many homes on a small site creating such a density of housing will spoil the Village look & feel, and materially detract from the character and appearance of the area.

30 houses will mean increased parking requirements in an already stressed parking environment will mean more congestion and pollution near an early year's Center.

Why does the council believe that if the Planning Inspector rejected last year's planning application on the site for these reasons that the proposal will be approved. That can only occur if the council already has deemed that the village area can support such an increased density

Sent from my iPhone

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 31
Response Date 12/08/18 10:24
Status Submitted
Submission Type Web
Version 0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . Yes

Organisation Name

Organisation Name (if not applicable please put n/a) Na

Name

Name

Address

Address

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Site Allocations - Housing Sites

H1 - Housing Sites & Mixed Use Sites

a) Do you support or object to policy H1? Support

H1 Support Reasons

b) Please explain why you support this policy?

I support the policy to create much needed additional housing in Brighton and Hove, however I disagree with inclusion of the development of c. 30 dwellings on the site of 46-54 Old London Road, Patcham. This is far too intensive for the surrounding area and not in keeping with the village look/feel of Patcham

village. In 2017 the council and the Governments Planning inspector rejected a planning application from developers and I firmly believe this position should be held. The additional traffic from so many dwellings and the demand on already stretched local services such as GPs would be untenable. The area is also known to flood and development of such scale could impact this further.

H1 Housing Site Allocations

f) If you wish to comment on any specific housing site allocations listed in the policy please do so below making clear which site(s) you are commenting on and give your reasons...

I disagree with inclusion of the development of c. 30dwellings on the site of 46-54 Old London Road, Patcham. This is far to intensive for the surrounding area and not in keeping with the village look/feel of Patcham village. In 2017 the council and the Governments Planning inspector rejected a planning application from developers and I firmly believe this position should be held. The additional traffic from so many dwellings and the demand on already stretched local services such as GPs would be untenable. The area is also known to flood and development of such scale could impact this further.

H2 - Urban Fringe Housing Sites

a) Do you support or object to policy H2? Support

H3 - Purpose Built Student Accommodation Sites

a) Do you support or object to policy H3? Support

Respondent Number DP031

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 32
Response Date 13/08/18 13:14
Status Submitted
Submission Type Web
Version 0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . Yes

Organisation Name

Organisation Name (if not applicable please put n/a) NLCA

Name

Name

Address

Address

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Housing, Accomodation and Community
. Employment, Tourism and Retail
. Design & Heritage
. Transport and Travel
. Environmental and Energy
. Site Allocation - Special Areas policies
. Site Allocations - Strategic Site Allocations
. Site Allocations - Housing Sites
. Site Allocations - Employment Site
. Make general comments

DM1 - Housing Quality, Choice and Mix

a) Do you Support or Object to policy DM1? Support

DM1 Support Reasons

b) Please explain why you support this policy?

Space standards should be adopted as suggested, but feel these should also apply to student accommodation.

DM1 Support Wording Changes

c) If you support this policy but have some suggested wording changes please outline these clearly below

Should also apply to student accommodation.

DM2 - Retaining Housing

a) Do you Support or Object to policy DM2? Support

DM2 Support Reasons

b) Please explain why you support this policy?

Support

DM3 - Residential Conversions & Retention of Smaller Dwellings

a) Do you support or object to policy DM3? Support

DM5 -Supported Accommodation

a) Do you support or object to policy DM5? Support

DM6 - Build to Rent Housing

a) Do you support or object to policy DM6? Support

DM6 Support Reasons

b) Please explain why you support this policy?

Support as the present shorthold system does not provide good quality property for rent in that sector.

DM6 Support Wording Changes

c) If you support this policy but have some suggested wording changes please outline these clearly below

We would support further measures to ensure that the present provision of private housing is regulated by the means of licensing and other measures to ensure that the provision is made by suitable persons. This is at present providing very poor quality housing with practically no ability of the tenants to improve matters given the present shorthold tenancy arrangements.

DM7 - Homes in Multiple Occupation

a) Do you support or object to policy DM7? Support

DM7 Support Reasons

b) Please explain why you support this policy?

Regulation should be introduced to ensure that private holiday lets, party houses and Airbnb should be included with the HMO rules. We acknowledge that there are statutory issues regarding this but there is proliferation of these types of lets taking over residential areas, particularly in North Laine which results in the change of demographics.

DM7 Support Wording Changes

c) If you support this policy but have some suggested wording changes please outline these clearly below

2(a): 20% should be 10%.

DM8 - Purpose Built Student Accommodation

a) Do you support or object to policy DM8? Support

DM8 Support Reasons

b) Please explain why you support this policy?

We support PBSA with two provisos: 1) meets adequate space standards and 2) location which does not affect nearby residential areas.

DM9 - Community Facilities

a) Do you support or object to policy DM9? Support

DM10 - Public Houses

a) Do you support or object to policy DM10? Support

DM11 - New Employment / Business Floorspace

[Click here to read: Employment Tourism & Retail Chapter](#)

a) Do you support or object to policy DM11? Support

DM12 - Primary, Secondary and Local Centre Shopping Frontages

a) Do you support or object to policy DM12? Support

DM13 - Important Local Parades, Neighbourhood Parades and Individual Shop Units

a) Do you support or object to policy DM13? Support

DM14 - Special Retail Area - Brighton Marina

a) Do you support or object to policy DM14 ? Support

DM15 - Special Retail Area - The Seafront

a) Do you support or object to policy DM15 ? Support

DM15 Support Reasons

b) Please explain why you support this policy?

Although we support DM15, we are concerned about the retention of the arches and structure. Whilst not objecting against development which would incorporate the arches, we would be concerned if a development obscured sea views and have a harmful impact on the amenity of local residents and visitors.

DM16 - Markets

a) Do you support or object to policy DM16? Support

DM17 - Opportunity Areas for New Hotels & Safeguarding Conference Facilities

a) Do you support or object to policy DM17 Support

DM18 - High Quality Design & Places

a) Do you support or object to policy DM18? Support

DM18 Support Reasons

b) Please explain why you support this policy?

Although we support the policy, our concern is that the design process has been taken out of local hands and has been sub-contracted to Design South East which does not represent the interests of local people. We would like to see this process reversed and that the interests of the local residents made paramount as they should according to the planning directions. The NLCA continues to be concerned about planning applications that seriously affect the form of the local environment and without due consideration for the historic character of the area. The addition of extra storeys on the corners of current buildings should be resisted.

DM20 - Protection of Amenity

a) Do you support or object to policy DM20? Support

DM21 - Extensions & Alterations

a) Do you support or object to policy DM21? Support

b) explain why you support this policy?

We would like some provision retained similar to the prescriptive formula within SPD12 as this is more easily understood by anyone proposing development.

DM23 - Shopfronts

a) Do you support or object to policy DM23? Support

b) Please explain why you support this policy?

We agree that in conservation areas and in listed buildings shop front proposals must preserve or enhance the special architectural and historic interest of the area or building. Good quality traditional shop fronts or surviving elements must be retained and where necessary restored. New or replacement shop fronts in traditional buildings should be based upon historic evidence or nearby historic examples wherever possible. Where two or more adjacent units are being combined to form one unit, the shopfront should be designed so as to retain the appearance of separate units, especially within a conservation area or on a listed building. We are pleased that solid shutters should be resisted. Unfortunately in North Laine there are a number of solid shutters in existence.

c) If you support this policy but have some suggested wording changes please outline these clearly below

However, the combining of two shop units into one unit should be resisted in North Laine to protect the historic character of the area. (See North Laine Character Area Study 1995)

DM26 - Conservation Areas

a) Do you support or object to policy DM26? Object

d) Please explain why you object to this policy?

As with DM18 the downgrading of conservation is obvious when dealing with Planning and the reduction in staffing in the area. We feel that this is getting to a danger level which together with the changes of consultation reduces the ability of residents to be able to discuss or influence design decisions. We also consider that demolition in North Laine should be resisted at all costs, along with applications to raise rooflines (one or two storey extensions).

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

On corner sites, for instance, such buildings can be used to give a strong sense of enclosure to the surrounding spaces and to provide local landmark. THIS SENTENCE SHOULD BE REMOVED as it would be the death knell to North Laine, a very densely residential area.

DM27 - Listed Buildings

a) Do you support or object to policy DM27? Support

b) Please explain why you support this policy?

We support the context but the NLCA feels the emphasis should be on retention rather than allowing change. If a building is listed why would changes be necessary. The wording is ambiguous.

c) If you support this policy but have some suggested wording changes please outline these clearly below

Change will be considered where it is essential to retain the building and its use.

DM28 - Locally Listed Heritage Assets

a) Do you support or object to policy DM28? Support

DM29 - The Setting of Heritage Assets

a) Do you support or object to policy DM29? Support

DM30 - Registered Parks & Gardens

a) Do you support or object to policy DM30? Support

DM31 - Archaeological Interest

a) Do you support or object to policy DM31? Support

DM32 - The Royal Pavilion Estate

a) Do you support or object to policy DM32? Object

DM32 Object Reasons

d) Please explain why you object to this policy?

This reflects the present consultations carried out by the estate. We consider that apart from the visibility of the estate from New Road which could be improved most of the problems arise from a lack of management and supervision of the estate. The NLCA feels that the anti-social issues arise from budget restrictions and that the proposal to fence the estate is not a suitable solution.

We are further concerned that any plans regarding the estate must take into account the needs of the local population who use the gardens and cafe as one of the only useable green space within the city and the North Laine.

SSA5 - Madeira Terrace & Madeira Drive

a) Do you support or object to policy SSA5? Object

SSA5 Object Reasons

d) Please explain why you object to this policy?

The NLCA is concerned about any potential hotel development which obscures the views from the main road.

H1 - Housing Sites & Mixed Use Sites

a) Do you support or object to policy H1? Object

H1 Object Reasons

d) Please explain why you object to this policy?

Draft City Plan Part 2 (Table 6) mentions the 300 student bedspaces which were in CP21. This application was withdrawn. We feel therefore that no mention should be made of student bedspaces as this could be taken as a precedent for upcoming development on Pelham Street east side.

H3 - Purpose Built Student Accommodation Sites

a) Do you support or object to policy H3? Support

H3 Support Reasons

b) Please explain why you support this policy?

We support in principle, but feel provisos should be put in place that students remain in PBSA for their time at university. If students stay just for one year on campus, or in PBSA, this puts pressure on HMO provision.

H3 Student Housing Site Allocations

f) If you wish to comment on any specific student housing site allocations listed in the policy please do so below making clear which site(s) you are commenting on...

The NLCA is concerned about the redevelopment of Boots and the Coop site on London Road as a suitable site which we consider unacceptable given the high density with the adjoining building, the existing student (Coop) development, and the Circus Street development.

Within a half mile radius within North Laine there are more students than residents. Demographics in the area are changing. This has had an affect on St Barts Primary School where only 20 pupils have enrolled for September. We understand this has also happened in Moulsecoomb and Bevendean areas.

Respondent Number DP032

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 33
Response Date 13/08/18 21:30
Status Submitted
Submission Type Web
Version 0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . No

Organisation Name

Organisation Name (if not applicable please put n/a) N/a

Name

Name

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Site Allocations - Housing Sites

H1 - Housing Sites & Mixed Use Sites

a) Do you support or object to policy H1? Object

H1 Object Reasons

d) Please explain why you object to this policy?

Because of the inclusion of 46-54 Old London Road, Patcham BN1 8XQ for a suggested 30 residences

H1 Object Wording Changes

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below...

Remove this site from the suggested list/table and leave the existing housing level as per current - 5 family homes

H1 Housing Site Allocations

f) If you wish to comment on any specific housing site allocations listed in the policy please do so below making clear which site(s) you are commenting on and give your reasons...

The removal of 46-54 Old London Road, Patcham BN1 8XQ for suggested 30 residences.

I believe that the site which currently accommodates 5 family homes is too small for 30 houses or flats. Many of reasons which led 350 people to object to the previous McCarthy and Stone's last application continue to apply. For example:

- 1 **Scale & density** - this density of housing will spoil Village look & feel, and materially impact the character and appearance of the area.
- 2 **Parking** - 30 new homes will intensify parking problems in road
- 3 **Traffic** - increase in congestion volume
- 4 **Trees, mature gardens & wildlife** - replaced by intensive building and parking
- 5 **Privacy** - loss of privacy to surrounding neighbours, plus unsightly outlook
- 6 **Flood risk** - sewage system capacity (sewage overflowed into the road in 2000)

H2 - Urban Fringe Housing Sites

a) Do you support or object to policy H2? Support

H2 Support Reasons

b) Please explain why you support this policy?

Because it takes into account the existing use of the land and seeks to maintain some balance.

From:
Sent: 13 August 2018 20:30
To: PlanningPolicy
Subject: Fwd: City plan part two consultation, 46-54 Old London Road, Patcham

To whom it may concern,

I XXXXXX object to the proposed planning at the above address. This is due to the following:

1. Village roads already congested
2. Lack of parking for current residents, this will only get worse
3. Noise of build
4. Additional pollution, traffic/ build
5. Distruption during construction
6. Changes to the village aspect
7. Patcham Village is not an estate
8. May have an impact on current property value
9. Potential increase of antisocial behaviour, this is increased by multiple occupant sites
10. Pressure on local amenities
11. Traffic in village on-going
12. Loss of mature gardens
13. Distruction of habitat
14. Additional sewage concerns
15. The character of "Patcham Village" will be spoilt by the look and feel of a new development
16. Area more prone to flooding, due to more hard standing

Please let me know if you have any queries. Thanks

Get [Outlook for iOS](#)

From:
Sent: 14 August 2018 12:30
To: PlanningPolicy
Subject: City Plan Part Two Consultation

Re; City Plan Part Two Consultation

We are concerned about the proposed redevelopment of 46 - 51 Old London Road, Patcham

The parking in the road is horrendous now - more properties will increase the hazard

The Old London Road is currently used as a rat run - there is no pavement proposed in the redevelopment - making it extremely dangerous when walking across the road, particularly for elderly/disabled people

The new development will be opposite a school

The Old London Road is liable to flooding when sewage has surfaced - an increase in residents will increase the problem

This amount of housing development will destroy Patcham village's appearance

Respondent Number DP036

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 37
Response Date 15/08/18 12:12
Status Submitted
Submission Type Web
Version 0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . Yes

Organisation Name

Organisation Name (if not applicable please put n/a) Badgers Tennis Club

Name

Name

Address

Address

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Housing, Accomodation and Community
. Design & Heritage

DM9 - Community Facilities

a) Do you support or object to policy DM9? Support

DM9 Support Reasons

b) Please explain why you support this policy?

The landlords of Badgers Tennis Club have stated that they purchased the site for 'development.' The site is a thriving tennis club, providing a service to the community and no alternative site is possible.

DM20 - Protection of Amenity

a) Do you support or object to policy DM20? Support

b) Please explain why you support this policy?

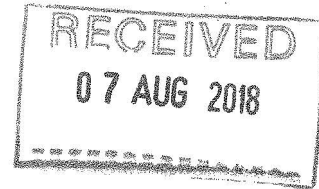
Development of the badgers Tennis Club site would be 'detrimental to human health.'

DM28 - Locally Listed Heritage Assets

a) Do you support or object to policy DM28? Support

b) Please explain why you support this policy?

The walls of Badgers Tennis Club are locally listed-any development would be difficult.



1st August 2018

City Development & Regeneration
Hove Town Hall
Norton Road
HOVE
BN3 3BQ

Dear Sirs

City Plan Part Two Consultation

We understand that the Re-development of 46-54 Old London Road, Patcham, is being considered for inclusion in the City Plan Part Two.

In 2017 McCarthy & Stone made a planning application to build a block of retirement flats at this location, and the application was rejected by both Brighton Council and the Planning Inspectorate. We were, therefore, shocked and concerned to learn that a similar proposal for this location is being considered as part of the City Plan. We wonder what the present owners of these five family homes think of the possibility of their properties being included in the Plan!

In view of the previous decisions taken in this matter we feel that the Old London Road location should not be included in the City Plan. Any future applications for re-development would be strongly opposed – the same objections would apply based on density, pressure on local services and the effect it would have on the area and community.

We trust you will consider this matter very carefully in the forthcoming consultation.

Yours faithfully

CPP2 Policy Projects and Heritage Team.

Brighton and Hove City Council, First Floor Hove Town Hall,

Norton Road,

Hove,

BN3 3BQ

8th August 2018



Formal Objection from _____ to
46-54 Old London Road (site number 13) allocated as a site for development in the draft City Plan
Part Two

Dear Sirs,

Please may we object to the development of the above site which currently accommodates 5 family homes as being too small for 30 houses or flats for the following reasons.

- Scale and density – this density of housing will spoil the look and feel of Patcham village and materially impact the character and appearance of the area.
- Parking – 30 new homes will intensify parking problems in the Old London Road.
- Traffic – there will be a significant increase in congestion volume.
- Trees, mature gardens and wildlife will be replaced by intensive buildings and parking.
- Privacy – loss of privacy to surrounding neighbours plus unsightly outlook.
- Flood Risk – sewage system capacity (sewage overflowed into the road in the year 2000).

1.
Brighton & Hove
Planning Dept.
Policy Projects & Heritage Team
City Plan part two
consultation.

RECEIVED
07 AUG 2018

Hove Town Hall
Nauken Rd
Hove
BN3 3BQ

2.8.2018.

To: the Planning Officer in charge of the
City Plan Part 2
Old London Rd Patcham

I'm concerned to learn the Planning Dept.
of Brighton + Hove (as above) is again proposing
that five very nice existing houses (private
homes + gardens) should be demolished in the
Old London Rd nos. 46 to 54 Patcham Brighton -
the same area that was turned down
about 18 months or so ago as unsuitable
for further building development.

I have only just heard about this.
I live in Ridgeside Ave Patcham & have
lived here for many many years and
seen the historical Patcham old village
get more & more crowded & swamped
with traffic etc.

I would like to ask for more information
of this new plan by the planning Dept.
Surely a large no - I believe 30 houses
or flats would be far too many where
there had only been five houses before!

I was very surprised this area

is thought a possible site for development as it was previously turned down so short a time ago as unsuitable.

Trees would undoubtedly be felled & the old London Rd would be even more congested - flooding of the road frequently happens there to a greater or lesser degree most winters. There is no bank, no surgery & there are already 6 to 7 ^{blocks of} flats for care of the elderly people in the area around, if the plan is for flats or houses to be designed for that purpose or indeed if the plan is simply to build warehouses.

I would be concerned about safety particularly for children on that site so near such a congested road with traffic or wheel chairs etc.

There is a descent but up a steep hill!

I would wish to object to more housing development in the old London Rd

I hope the planning Dept will reject this site as unsuitable for further redevelopment. I would like to ask why this area is being ^{possibly} ~~thought of~~ ^{thought of} now, as suitable for development & where I can find information about who would develop the site & what type of design of building would take place.

o How the local community

3.

who live here & care for its their area
will have a chance to meet & ask
questions & be informed before any such
development were to be allowed to begin

I have tried to phone to speak
to someone at the Planning Dept but
was told that no ^{Planning} officer dealing with
this was taking phone calls for three
months! However I have received a
phone call from someone at the
department yesterday who suggested
I email my concerns etc. to Dept.

I would be grateful for further
information about all this - I feel
it is so important to preserve
the character of this old village
which was mentioned as far back
as twice as the Norman invasion of
1066 & before!

I would be grateful for a reply
and answer to my queries either by
email - address above or, of course,
I would prefer a written reply about
my concerns.

Yours faithfully,

P.S. I did send an email to the Planning Dept,
yesterday but find it did not arrive - so this letter
is a copy of that email, P.T.O.

I will hope the points I have
~~made~~ in this letter will be considered
 by the relevant planning Dept in
 their consultations - I would prefer
 perhaps, that this letter does not go
 on line. Thank you.

[Faint, illegible handwritten notes and bleed-through from the reverse side of the page.]

for the attention
 of Ms. Helen Gregory

City Plan Part Two
 Consultation

Brighton & Hove City Council
 First Floor Hove Town Hall
 Norton Rd. BN3 3BP

29th August 2018

I attended the meeting
 held in Patcham community centre
 at 7pm yesterday regarding areas
 being considered ~~in the area~~ for
 future building development,
 flats/houses in Patcham.

The hall where the meeting
 was held was large & filled with
 local people anxious to know about
 these future plans in their area
 many of whom (myself included)
 found it extremely difficult to hear

② what was said. The two people from the planning Department did not speak loudly enough or 'throw' their voices & there were no microphones available for use in scenes.

At the end of the meeting we were asked to write to let the planning Department know our views about further housing development here.

I have already written a letter of my concerns about the Old London Rd area in Patcham but I now gather other areas in Patcham are being considered too. Would the planning department be considering building on more than one area in Patcham or all the areas mentioned ?? This did not seem to be clear to me at all.

I would feel that should all sites be ^{released or} deemed suitable for houses flats etc This would simply 'SWAMP'

Patcham & the roads already

congested with parked cars, vans, lorries, buses etc would be unreasonable. The number of people in the new buildings would not have the facilities needed. It would be an overdeveloped area & the old village of historical interest that was here would simply disappear. I and even perhaps

I returned hence very concerned about the future of Purbroam that has been a pleasant area to live in & now seems targeted by the planning Dept. in Brighton/Hove, for further development.

I hope the planning Dept will reply to my query & I hope the points I have made will be taken into consideration - both these in

(K)

this letter & my previous letter.
during the consultation period.
I trust the Department to
consider the devastating effect
further building development
houses/flats etc would have on
the lives of the people already
living here who care for their
homes, gardens, & the whole area
itself.

yours faithfully

I would be most grateful for a reply Thank
you.
P.S. I would feel another meeting
& even a letter making clear to local
people exactly what is being considered
& I do think local people should
be fully informed of the conclusion
of the Planning Department's consultation
period on 13th Sept 2018 & the outcome.

I do not use my iPod for close reading
& so I would request a letter from the Department
in answer to my query please

29th Aug. 2018

I have just spoken to a Ms Helen Gregory on the phone.

Thank you for answering some of my queries. My letter was written before I spoke to you. I hope some of those points I've made will be put forward for consideration.

I am, of course, hoping the Planning Department will refuse to sanction building on those plots of land in P. Tolson.

From:
Sent: 14 August 2018 20:17
To: PlanningPolicy
Subject: 46-54 Old London Road (site number 13) allocated as a site for development in the draft City Plan Part Two - objection

Dear sirs,

I would like to make an objection to the proposed development due to the site being too small for 30 houses or flats. There are many reasons such as, the scale and density of housing will spoil Village look & feel, and materially impact the character and appearance of the area, 30 new homes will intensify parking problems in road, increase in congestion volume, intensive building and parking will affect trees, mature gardens and wildlife, loss of privacy to surrounding neighbours, plus unsightly outlook and increase the flooded risk from the sewage system being at capacity (sewage overflowed into the road in 2000).

Your faithfully,

From:
Sent: 15 August 2018 16:19
To: PlanningPolicy
Subject: City Plan Part Two Consultation

re: 48-54 Old London Road, Patcham

Dear Sirs,

I object strongly to the proposed plans to build approx. 30 dwellings on the above site for the same reasons that I objected to the McCarthy & Stone project

1. Far too many dwellings for such a site.
2. Cutting down trees etc when it is a well known fact that we should be planting more trees to help the environment, not cutting them down and concreting areas over.
3. I am a member of the Memorial Hall committee and also a volunteer gardener in the Peace Gardens. We need to extend the Conservation Area of Patcham to include the Hall and the Gardens not demolish the country feel of the village.
4. I have lived in Patcham for almost 60 years and have experienced the flooding in the Old London Road. As far as I know those sewers have not been renewed or enlarged to accommodate the flats in Park Gate, will they be enlarged for these proposed buildings bearing in mind the flooding extended right down the main London Road. Have those sewers been enlarged to accommodate all the blocks of flats which have been erected in place of a residential house?
5. Parking - this is a nightmare for the residents with people leaving their vehicles in Old London Road all day whilst working in Brighton. The Memorial Hall is a thriving venue for old and young alike but this is being undermined by the difficulty in parking.

Why is Patcham being picked on again? what about that ugly brown site next to British Telecom? in London Road, how many years has that been a derelict site?

I cannot go on as I am getting too distressed.

Respondent DP042

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 43
Response Date 16/08/18 14:19
Status Submitted
Submission Type Web
Version 0.4

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . No

Organisation Name

Organisation Name (if not applicable please put n/a) na

Name

Name

Address

Address

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Housing, Accomodation and Community
. Design & Heritage

DM2 - Retaining Housing

a) Do you Support or Object to policy DM2? Object

DM2 Object Reasons

d) Please explain why you object to this policy?

The Council does nothing to prevent the loss of existing residential accommodation to holiday flats, particularly air b&b, which is not regulated at all. A number of adjacent properties have transferred to air b&b following the departure of the previous householders. This erodes community cohesion. Similarly

many houses have converted to party houses or student houses. The Council does not consider the impact on communities of the loss of long term residents -it should do.

DM4 - Housing & Accommodation for Older Persons

a) Do you support or object to policy DM4? Object

DM4 Object Wording Changes

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

I would like to see regulation of the whole air b&b and party house market

DM7 - Homes in Multiple Occupation

a) Do you support or object to policy DM7? Object

DM7 Object Reasons

d) Please explain why you object to this policy?

Party Houses, air b&b and private holiday lets should be regulated. They can have a huge negative impact on people's lives but the Council seems powerless to do anything to deal with anti-social behaviour when it occurs. These properties should therefore be regulated.

DM8 - Purpose Built Student Accommodation

a) Do you support or object to policy DM8? Object

DM8 Object Reasons

d) Please explain why you object to this policy?

The escalation of the number of students in the city is having a negative impact on the lives of those living in the city centre. The demographics show that older people are moving away from the city centre (compare the census results for 2001 and 2011) and the area is becoming studentified. Valley Gardens is becoming effectively a student campus. The universities may be of benefit to the city's economy but the unregulated increase in numbers is having an impact on the quality of life of those living in the town centre. A study on 'Students in the Community' was produced by the Council a number of years ago since when the problems have multiplied. The number of beds will always be below that required given the continued rise in numbers. Brighton is popular with students. that should not mean that the city accepts uncontrolled escalation in numbers.

DM10 - Public Houses

a) Do you support or object to policy DM10? Object

DM26 - Conservation Areas

a) Do you support or object to policy DM26? Object

d) Please explain why you object to this policy?

This all sounds fine but the reality is that the Council pays lip service to Conservation. There is little enforcement so that inappropriate changes when made without permission are not stopped even after residents have informed Planning. With large scale developments Planning Committees simply ignore the Conservation argument. In my locality, North Laine, the Council does nothing to promote understanding of the historical environment. There are signs showing the way to shops but nothing to point out why the area is a Conservation Area. The reduction in the number of Conservation Area officers is indicative of the importance the Council gives to conservation and heritage.

From:
Sent: 17 August 2018 09:55
To: PlanningPolicy
Subject: RE: City Plan part 2 consultation..

Yes for the housing allocation for London road ..

Yes add me for news please

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Respondent DP044

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	45
Response Date	17/08/18 23:02
Status	Submitted
Submission Type	Web
Version	0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . No

Organisation Name

Organisation Name (if not applicable please put n/a) N/a

Name

Name

Address

Address

Email Address

Email Address

Agent Name

Agent Name N/a

Agent Address

Agent Address N/a

Agent Email

Agent Email N/a

Please tick all of the sections you would like to comment on before proceeding

- . Site Allocations - Housing Sites
- . Make general comments

H1 - Housing Sites & Mixed Use Sites

a) Do you support or object to policy H1?

Support

H1 Support Reasons

b) Please explain why you support this policy?

I support the Development to Fawsett site for council housing the area would just be extending the old boat corner development to make a opportunity for more local people to have homes in their area to live especially young couples but I would only support this IF the entrance to the development was on Carden Avenue during the structural build & after I would be against any entrance on Ladies mile road as it would cause an over load of traffic to the local small roads especially during the development so I would be happy to see this plan passed

H1 Housing Site Allocations

f) If you wish to comment on any specific housing site allocations listed in the policy please do so below making clear which site(s) you are commenting on and give your reasons...

As above

From:
Sent: 18 August 2018 14:48
To: PlanningPolicy
Subject: City Plan Part Two Consultation

Dear Sir/Madam

As part of the above consultation I wish to register my objection to the inclusion of 46-54 Old London Road, Patcham as a site allocated for development. It indicates that you would expect to see 30 residential flats or houses built to replace the 5 family homes currently on the site.

I object to this on the same basis as I objected to the McCarthy and Stone planning application to build 44 retirement flats on the same site last year. The site is far too small for 30 houses or flats, and the substantial size would spoil the village look and feel of Patcham Village that exists today. It would significantly and materially detract from the character and appearance of the area, and this was the reason too that the Government's Planning Inspector rejected McCarthy and Stone's planning appeal on the site stating "I consider that the proposed building would, by virtue of a combination of its scale, density, massing and width, be a dominant and over-bearing feature that would detract from the attractive suburban character of this part of Old London Road.... I consider that the proposed development would cause significant harm to the character and appearance of the area."

In addition, 30 houses or flats would also mean a very large increase in the use of cars on the small road which could not be accommodated for parking.

Yours faithfully

Sent from [Mail](#) for Windows 10

From:
Sent: 18 August 2018 17:30
To: PlanningPolicy
Subject: City Plan Part Two Consultation

46 - 54 Old London Rd should be moved from the list of sites allocated .Changing family homes into 30 houses or flats will greatly increase the density and spoil the village look and feel of what used to be the last mail coach carriage stop before Brighton.Congestion and parking issues will greatly increase, more pressure on an already over stretched Doctors surgery and school places will also be a problem

From:
Sent: 18 August 2018 23:21
To: PlanningPolicy
Subject: City Plan Part Two Consultation

Re: 46-54 Old London Road, Patcham

I strongly believe that the above referenced address (in bold) should **not** be included in the LA's list of potential developments.

The old village of Patcham is busy enough as as it is....

Please address the dangerous problem of cars accessing the London Road from the old village junction by the Well as is currently provided.

Thank you.

From:
Sent: > 19 August 2018 12:52
To: PlanningPolicy
Subject: Planning

I make visits to the bakery and shops in Patcham Village, when visiting friends, using the Old London Road which, as driving through, gives me so much pleasure, particularly the unique ambience of No's 40-54. This charming row of detached houses going back to the early part of the last century has a very special atmosphere. The properties are will set back from the road and generally quite low creating a lovely feel of openness. The beautiful little well established front gardens and picturesque verges are generously planted with an array of some very mature flora that changes with beauty through the seasons. The rear gardens contain a number of mature trees that also contribute to the general suburban village atmosphere. It was this that charmed and allured me to move here.

I appreciate that there is pressure to create new housing for the city though feel that we as residents and the council as our representatives also want to protect areas of neighbourhoods that contribute unique character and charm to our environment and city as a whole.

Much of Patcham Village is in a conservation area and relates the evolution of the village, through earlier periods to the post first world war era, of which these houses are prime contributors to the village's character. The developers' proposal last time stated that these houses are of no particular architectural value. I could not disagree more. I feel they are a charming and complementary combination of homes.

The drainage in the area is already insufficient and has caused huge problems and although the developers state they are making changes to this large development this will potentially exasperate the problems with a huge potential adverse effect.

Generally parking is very difficult in the village and regularly the Old London Road is totally full with visitors having to park far out and walk back in. The traffic is also heavy for an area like this it is sometimes very difficult for the residents to move their cars off the drives waiting for a gap in congestion or trying to manoeuvre around badly parked cars across drives and on yellow lines.

The village makes a very charming transition, it gently introduces the countryside to its north, through the old village and then on to this beautiful row of houses with their pictures gardens and verges, in this small suburban area, and on to the City of Brighton. Please let us not ruin this area with huge inappropriate overdevelopment.

I am depressed about the thought of the ruination of this beautiful area and the village ambiance.

I very much hope the planning application committee will take these views into account and the views of the very many other distressed and troubled residents of the neighbourhood and surrounding district and that this area will be removed from the list of sites allocated for development in the City Plan part two consultation.

Thank you

From:
Sent: 19 August 2018 13:39
To: PlanningPolicy
Subject: I City Plan Part Two Consultation

Dear Sir or Madam,

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I very much hope the planning application committee will take these views into account and the views of the very many other distressed and troubled residents of the neighbourhood and surrounding district and that this area will be removed from the list of sites allocated for development in the City Plan part two consultation.

Thank you

From:
Sent: 19 August 2018 21:30
To: PlanningPolicy
Subject: City Plan Part Two Consultation

I am told by a relative, who lives in the Old London Road, Patcham that there is a plan to redevelop a large area in Patcham Village. I use the village frequently on the way to visiting relatives in the area and nearby. Parking to shop at the village is virtually impossible at the best of times. The local trade will not benefit as it will drive away the passing trade as parking there will be hopeless. Why accommodate more people in an area that is already overcrowded and spoil the very attractive vicinity with modern buildings.

Why is it necessary to redevelop this area when it is already so crowded?