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**From:**  
**Sent:** 20 August 2018 09:57  
**To:** PlanningPolicy  
**Subject:** Planning Application number BH2016/01961

Dear Sir or Madam,

I am writing to object to the Planning Application number BH2016/01961

I frequently visit friends in Patcham Village, using the Old London Road which 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 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 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 it's 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 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 will be removed from the list of sites allocated for development in the City Plan part two consultation.

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**From:**  
**Sent:** 20 August 2018 12:22  
**To:** PlanningPolicy  
**Subject:** City Plan Part Two Consultation

Dear Sir or Madam,

I used to live in Patcham Village for many years and still make visits to the bakery and shops and visiting friends.

The Old London Road is a charming road with all the detached houses and gardens, 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.

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The village makes a very charming transition, it gently introduces the countryside to it's 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 upset 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.

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**From:**  
**Sent:** 20 August 2018 15:31  
**To:** PlanningPolicy  
**Subject:** City Plan Part Two Consultation

Land at Ladies Mile / Carden Avenue (the old Patcham Fawcett school playing fields) (35 homes are proposed)  
**I believe out of the three options in Patcham, the land at Ladies Mile / Carden Avenue is the better option. The land is very near the houses that were built in the 90s and the space is adequate for the 35 homes proposed. I cannot believe why this land has not been thought about before as many years have passed since Old Boat Walk and Buttercup Walk were built and still has ample space around these two roads without encroaching on the private houses in Windmill View.**

46 to 54 Old London Road. **This really is on Flood Prone Land and always has been. The water gushes down Church Hill and into Old London Road and pumps have to be used to clear the water from houses in Old London Road. This is because a river runs through it – the underground River Wellsbourne which has been proved to you in the last Planning Inquiry.**

Land beside Horsdean recreation ground in Vale Avenue (25 homes are proposed). **It is a recreation ground that is used by many residents in Patcham, plus very near to the allotments. This will create more traffic going in and out of Vale Avenue which is busy anyway being used as a cut through into Patcham.**  
**I do understand there is a need for more homes but not by taking away recreation grounds.**

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**From:**  
**Sent:** 20 August 2018 19:00  
**To:** PlanningPolicy  
**Subject:** City Plan Part Two Consultation

Hello

I have recently seen media coverage of the city plan part two, specifically relating to the site of 46 to 54 Old London Road and other sites in Patcham ward.

As a resident in Patcham I would like to show my **support** towards the plans for including the Old London Road site and the other sites in Patcham ward [including Horsedean recreation ground and the land at Ladies Mile] in those suitable for development in the city plan.

The city as a whole needs new housing and geographically, Patcham is one of the larger wards in the city, suggesting housing is of a lower density than much of the rest of the city. Patcham must do it's bit towards providing sites for new housing and these sites would be ideal to provide much needing housing. There have also been huge price rises in Patcham ward in the last decade, and building new houses here will surely make the ward more affordable to people living and working in the city [or at least prevent prices rising as fast].

I am aware that the Old London Road site can be at risk of flooding, as can the wider are around Patcham Village. While this would of course be risky for any new housing on the site, it is surely the perfect opportunity to get any developers on the site to invest in flood prevent work, not just for this site, but the whole of Patcham/London Road.

These developments could therefore, be seen as an opportunity to reduce flood risks AND provide much needed new new housing.

**From:**  
**Sent:** 20 August 2018 19:12  
**To:** PlanningPolicy  
**Subject:** City Plan Part Two Consultation

Dear Sir or Madam,

I often walk to the shops in Patcham Village using the Old London Road. The charming row of detached houses going back to the early part of the last century has a very special atmosphere. Patcham Village is part of our heritage and needs to be protected. I strongly object to any new development, which to my mind is over-development. Please re-consider.

Yours faithfully

**From:**  
**Sent:** 21 August 2018 09:41  
**To:** PlanningPolicy  
**Subject:** City Plan Part Two 45-54 Old London Road Patcham

Dear Sir,

We object to the above redevelopment plan as the road is difficult to get through now with just modest housing. The fact that buses use it also causes traffic inconvenience as is the dropping off and collecting from the school opposite.

The density of housing would be intolerable and would also detract from normal village life which we cherish above all.

Yours sincerely,

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**From:**  
**Sent:** > 21 August 2018 19:12  
**To:** PlanningPolicy  
**Subject:** City Plan part two consultation

I am writing to object to the 5 family homes 46 to 54 Old London Road being given the green light for redevelopment.

There is nothing wrong with these houses like any other group of houses in the locality. For example what if 4 houses along Carden Avenue suddenly decided they wanted to be redeveloped would they be included in the plan? So what is the criterion for inclusion in the plan?

It is worrying that the council see nothing wrong in knocking down perfectly good houses in order to cram in more flats simply to meet housing targets.

I strongly object in association with many others.



**From:**  
**Sent:** 21 August 2018 21:53  
**To:** PlanningPolicy  
**Subject:** City plan part two consultation.

To whom it may concern,

I am writing to object to plans for a new housing development in the Old London Road area in Patcham on the grounds that it would ruin the ambience of the area. I hope that it will not be allowed to go ahead.

Sincerely,

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**From:**  
**Sent:** 22 August 2018 14:16  
**To:** PlanningPolicy  
**Subject:** City Plan Part Two Consultation - objection

Dear Sir or Madam

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 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.

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Yours sincerely

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**From:**  
**Sent:** 22 August 2018 14:48 PlanningPolicy  
**To:** City Plan Part Two Consultation  
**Subject:**

**RE: City Plan Part Two Consultation - 46 to 56 Old London Road Patcham**

We believe the above houses should be excluded from the city plan for the same reason the Governments Planning Inspector failed the McCarthy and Stone development i.e: the density of the proposed development would materially detract from the character and appearance of the area.

Also Old London Road is prone to flooding and more housing would create less natural drainage and increase the problem in the future, as seen in other areas. We don't believe the developers or the council could adequately remedy this.

Patcham Village is an area of high density housing and we don't think adding to this will improve the living environment for the people who live here.

Again, please exclude these houses from the the city plan.



Virus-free. [www.avast.com](http://www.avast.com)

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**From:**  
**Sent:** 22 August 2018 15:05  
**To:** PlanningPolicy  
**Subject:** Re: City plan Part 2 conselltation

I object to the London rd and patcham developments

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**From:**  
**Sent:** 23 August 2018 10:38  
**To:** PlanningPolicy  
**Cc:**  
**Subject:** re-development of 46 to 54 Old London Road

I am writing to lodge my objection to the proposed re-development of 46-54 old London road. I recently moved into my new bungalow at 4 Old London Road and my decision to move to this location was based on the quiet peaceful area. I have realised since moving in that the area north of old London road is already congested with traffic and parking and draws to a standstill with the large regular deliveries to the Co-Op store. The trouble exasperated by the regularity of the buses along with the deliveries and the Motor Garage also receiving regular custom. The businesses in the village are already suffering from the problem for their customers to park and the increasing number of vehicles, the impact is felt as far along as us with cars trying to park. I do not think the site can be developed under any circumstances with the current volume of traffic/pedestrians/visitors that exists.

Considering that the previous proposal for a residential home from McCarthy & Stone was declined I cannot see how this new plan can have any justification as the area is in the same position as it was, if anything it is slightly busier.

Kind Regards

**From:**  
**Sent:** 23 August 2018 13:44  
**To:** PlanningPolicy  
**Subject:** Patcham Village

City Plan Part Two Consultation. We still  
object to the site being used to build 30 units to replace 5 familyhomes on the current site,all the objections we put  
forward last time still apply.Patcham village cannot cope with the disruption it will cause. There must be better areas  
suited to this type of development.

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**From:**  
**Sent:** 23 August 2018 13:29 PlanningPolicy  
**To:** City Plan Part Two Consultation  
**Subject:**

Dear Sir/Madam,

I am writing to register my disappointment at the fact that we are once again faced with an application for the site at 46-54 Old London Road, Patcham to be developed.

My reasons being:-

1) From a parking prospective, if new properties are built this will cause an already congested road to be impassable. In particular for the necessary 5A bus which serves the Patcham community and for the large lorries which supply the Co-op Store in the road. They already struggles on occasion. The road is already regularly congested, as for the majority if it, parking is only possible on one side. If I wish to visit the shops in Patcham from my home in Mackie Avenue, I usually walk, because I KNOW I will NOT be able to park!

2) Flooding in this area is historic and still occurs on occasion. If the excessive number of additional new properties are built the necessary drainage installed will add even more stress to the already overloaded elderly drains.

3) I have lived in Patcham for all of my 69 years and naturally want the village of Patcham to remain the quaint unique area it is now and for it to be that way for my grandchildren and their families. Apologies if this is nimbyism but that is how I feel!

I therefore request that 46-54 Old London Road be removed from the list of sites allocated for the development in the City Plan Part Two.

I shall attend the Public Meeting on Tuesday 28th August and listen attentively to the discussion.....

**For Official Use:**

Respondent Number:

Date Received: / / /2018

Entered onto Portal: Yes/No

**Draft City Plan Part Two**  
**Consultation Period: 5th July 2018 until**  
**5pm on 13th September 2018**  
**Word Response Form**

Accessibility Notice: (Ctrl & click to view): <https://www.brighton-hove.gov.uk/content/about-website/help-using-council-website/accessibility>

### **Draft City Plan Part Two – Consultation**

Brighton & Hove City Council has published the draft City Plan Part Two for a 10 week period of consultation starting 5<sup>th</sup> July 2018. This follows on from the scoping consultation undertaken July - September 2016.

The draft City Plan Part Two sets out the preferred approach and includes proposed site allocations for housing and other uses such as employment and community facilities and contains a suite of development management policies which will be used to assess planning applications. The City Plan Part Two will support the implementation and delivery of the City Plan Part One.

The council is seeking your views on the draft Plan and supporting documents. Your comments will help inform the final version of the City Plan Part Two. So if you have any comments about the approaches in the plan then we would urge you to submit those comments during this consultation so that they can be fully taken into account.

The Draft City Plan Part 2 and supporting documents including a quick guide to the City Plan Part Two as well as background evidence documents are available to view and download from the Council's website at: [www.brighton-hove.gov.uk/cityplan-part2](http://www.brighton-hove.gov.uk/cityplan-part2).



**Part A: Contact Details**

**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

No

Privacy Notice: (ctrl & click to view)

<https://www.brighton-hove.gov.uk/content/planning/planning-applications/planning-service-privacy-statement>

*Please note that you must complete Part A as anonymous forms cannot be accepted.*

<b>Organisation Name (If applicable)</b>	Big Yellow Self Storage Company Ltd
<b>Name</b>	
<b>Address</b>	
<b>Email Address</b>	
<b>Agent Name (If applicable)</b>	
<b>Agent Name</b>	
<b>Agent Address</b>	
<b>Agent Email Address</b>	

## Part B: Your Representation relating to Development Management Policies

*Please use a separate sheet for representations against each Development Management policy*

### Employment Tourism & Retail Chapter (policies DM11-DM17)

**Policy Number** - DM11

**Policy Name** - New Business Floorspace

**a) Do you Support or Object to the policy?**

Support      X      **If you support this policy, please go to questions (b) and (c)**  
Object            **If you object to this policy, please go to questions (d) and (e)**

**b) Please explain why you support this policy?**

See Covering Letter submitted on behalf of Big Yellow.

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

No Comment

**d) Please explain why you object to this policy?**

N/ A

**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**

N/ A

## Part C: Your Representation(s) relating to Site Allocations

### Site Allocations - Housing Sites

#### Housing sites and Mixed Use Site allocations: (policies H1-H3)

##### H1 - Housing Sites & Mixed Use Sites

**a) Do you Support or Object to the policy?**

Support  If you support this policy, please go to questions (b) and (c)  
Object X If you object to this policy, please go to questions (d) and (e)

**b) Please explain why you support this policy?**

N/A

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

N/A

**d) Please explain why you object to this policy?**

See Covering Letter submitted on behalf of Big Yellow.

**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**

See Covering Letter submitted on behalf of Big Yellow.

**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**

Table 6 (Mixed Use Site Allocations) - 270 Old Shoreham Road  
See Covering Letter submitted on behalf of Big Yellow.

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

No Comment.

## **Site Allocations - Employment Site**

(Ctrl & click to view): [Opportunity site for business and warehouse uses: \(policy E1\)](#)

**a) Do you Support or Object to the policy?**

Support            If you support this policy, please go to questions (b) and (c)  
Object            If you object to this policy, please go to questions (d) and (e)

**b) Please explain why you support this policy?**

See Covering Letter submitted on behalf of Big Yellow.

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

See Covering Letter submitted on behalf of Big Yellow.

**d) Please explain why you object to this policy?**

**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**

**f) Are there any other sites that could be allocated as employment sites ?**

See Covering Letter submitted on behalf of Big Yellow.

## **Part D: Your Representation(s) relating to Any Other Comments & Equalities**

### **Any other comments**

- [Introduction](#)
- [Appendix 1: Glossary of terms](#)
- [Appendix 2 Parking Standards – Policy DM36 Parking and Servicing \(adopted Parking Standards SPD\)](#)
- [Appendix 3 - Local Wildlife Sites \(Policy DM37 Green Infrastructure and Nature Conservation](#)
- [Appendix 4 - Policy H2 Urban Fringe Housing Site Maps \(see also proposed draft Policies Map\)](#)
- [Appendix 5 - List of Brighton & Hove Local Plan policies that will be superseded on adoption of the City Plan Part 2](#)
- [Appendix 6 Table 1 – Proposed Changes to Policy Map – new additions/ amendments by virtue of policies in Draft City Plan Part 2/ Updates](#)
- [Appendix 6 Table 2 Policies Map – Proposed Changes to the City plan Part 1 Policies Map due to retained Brighton & Hove Local Plan Policies being superseded by City Plan Part 2 policies](#)
- [Supporting documents to the City Plan Part Two](#)
- [Background studies for the City Plan Part Two](#)

**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.**

See Covering Letter submitted on behalf of Big Yellow.

## 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.**

No Comment.
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<b>Signed*:</b>	
<b>Dated*:</b>	24.08.2018

All representations must be received at the email or postal address given on this form by **5.00pm on 13<sup>th</sup> September 2018.**

**Due to the length of the consultation period please kindly note that late representations will not be accepted.**

Completed forms should be sent to:

Email: [planningpolicy@brighton-hove.gov.uk](mailto:planningpolicy@brighton-hove.gov.uk)

Post: Consultation on the Draft City Plan Part Two  
Brighton & Hove City Council  
Planning Policy Team  
1<sup>st</sup> Floor Hove Town Hall  
Norton Road  
Hove BN3 3BQ

If you have any further queries please contact us on 01273 292505 or via email [planningpolicy@brighton-hove.gov.uk](mailto:planningpolicy@brighton-hove.gov.uk)

Date: 24/08/2018

Our Ref: 12751

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

Dear Sir or Madam

**DRAFT BRIGHTON & HOVE CITY PLAN PART TWO – CONSULTATION  
REPRESENTATIONS ON BEHALF OF BIG YELLOW SELF STORAGE COMPANY LTD**

These representations are submitted on behalf of our client, Big Yellow Self Storage Company Ltd ('Big Yellow') in response to the Draft City Plan Part Two which has been published for consultation by Brighton & Hove City Council ('BHCC').

These representations relate to Big Yellow's interests at 270 Old Shoreham Road, Hove, BN3 7EG ('the Site').

Our representations focus on and the following draft policies within the Draft City Plan Part Two:

- 1) DM11 - New Business Floorspace
- 2) H1 - Housing Sites and Mixed Use Sites
- 3) E1 - Opportunity Site for Business and Warehouse Uses

**Site and Surrounding Area**

The Site is located on a prominent corner location and is bound by Old Shoreham Road (A270) to the north and residential properties to the east which are located on Amherst Crescent. Harwoods Lotus Servicing Centre and Sussex House Business Park are located to the south and an access road is located to the west of the Site. Beyond the access road is a retail warehouse unit.

The wider area comprises Hove Cemetery to the west and commercial/warehouse buildings to the east, including Homebase, Carpetright and Goldstone Retail Park.

The Site is currently occupied by a car showroom with workshop, yard and service bays. The current tenant is intending to vacate the site and they have secured planning permission for an alternative facility elsewhere to relocate to.

The Site provides a key opportunity for redevelopment to provide a high quality mixed use scheme providing a modern self-storage warehouse (B8 use class) and flexi offices (B1a use class).



### DM11 - New Business Floorspace

Big Yellow is **supportive** of the emerging policy DM11's aspiration to provide more flexible B Class floorspace that can be adapted to meet the changing needs of businesses and in particular small businesses and start-ups.

Big Yellow is proposing to provide good quality and flexible office accommodation as part of the mixed use development at the Site. The accommodation will be well designed, high quality, have good levels of natural light and will be able to be reconfigured to allow businesses to grow.

The provision of B8 self-storage accommodation at the Site will also support local businesses with changing space requirements through the provision of off-site storage. For example, retail businesses that wish to maximise the sales floorspace in their shop and use Big Yellow self storage to store stock. The increased sales floorspace often helps businesses to grow. Big Yellow also helps businesses who have no fixed place of work and use Big Yellow self storage to store their equipment and materials.

### H1 - Housing Sites and Mixed Use Sites

Big Yellow **does not support** the mix of uses that are proposed for the Site under emerging policy H1. Whilst Big Yellow is supportive of the Council's recognition that the Site provides an opportunity for redevelopment incorporating an element of B1 employment floorspace, the provision of residential units on the Site is not supported.

Table 6 (Mixed Use Site Allocations) of draft policy H1 lists 270 Old Shoreham Road as a site with minimum capacity for:

- Indicative Residential Units (Use Class C3) – 10 Units
- Minimum Requirements for Other Uses – 1,000 sqm B1 employment floorspace

The Site is identified in the Strategic Housing Land Availability Assessment (SHLAA) Update 2017 (February 2018) as an identified site not within a development area and with no planning permission. The table details the potential housing supply for the period 2010- 2032. For 270 Old Shoreham Road the supply figure is zero. The majority of other sites within this list have a potential supply figure for the period 2010- 2032 and are not listed as zero.

The Site is also further assessed in the Housing and Mixed Use Site Allocations Topic Paper (June 2018). This assessment refers to the Site as having capacity for 10 residential units. It is unclear from the information that is publically available how BHCC has reached this conclusion.

The Topic Paper goes on to state that the Site forms *"the entrance to an existing industrial area"* and the *"Site could be considered as having potential as an extension to the existing adjacent industrial alongside residential development, subject to mitigation."*

Whilst the Site is not allocated for employment use, it is a Site that forms the entrance to an existing and allocated industrial area and the Site currently provides employment. Big Yellow proposes to introduce B1(a) office floorspace at the Site to support emerging City Plan Part 2 policy DM11 (New Business Floorspace) which encourages the provision of development proposals which provide new B1a, b and c Use Class business floorspace in well-designed buildings with flexible layouts.



Big Yellow's proposals for the Site also support City Plan Part 1 policy CP3 (Employment Land) which sets the forecast growth requirements for B Class Uses, including B1(a) and B8 Uses, and seeks to protect and safeguard employment sites and premises to meet the city's needs.

Big Yellow has acquired the freehold interest in the Site and the proposed mixed use development will provide a well designed building on a prominent corner site. The proposals will provide employment and supports BHCC's existing and emerging employment policy aspirations. It is not considered that introducing a small element of housing on the Site is appropriate or necessary.

Big Yellow requests that BHCC reconsiders the proposed allocation for the Site and remove the aspiration for an element of residential use to be provided. It is considered that the delivery of a mixed use development comprising of B1(a) and B8 Uses are more appropriate on this Site which provides existing employment and is adjacent to existing commercial uses to the south and south west of the Site.

Due to the constraints of providing a small quantum of housing alongside B Class Uses and due to the Site's proximity to existing industrial uses, it is considered that better quality housing and a higher level of residential amenity could be provided on alternative sites.

### **E1 - Opportunity Site for Business and Warehouse Uses**

Emerging policy E1 recognises the demand for employment floorspace in the city and seeks to safeguard Land at Hangleton Bottom, Hangleton Link Road, North Portslade for new business (Use Class B1) and warehouse (Use Class B8) floorspace over the plan period.

Big Yellow supports the recognition that there is a need for new business and warehouse floorspace over the plan period.

Big Yellow's proposals for the Site provide a further opportunity to deliver B8 floorspace in the city. As explained above the proposed self-storage facility will support local businesses through providing off-site storage accommodation.

### **Notification**

I trust that the information provided clearly sets out Big Yellow's position with regard to the Draft City Plan Part Two. Please do not hesitate to contact me if any further clarification is required on the above.

I would be grateful if you could please confirm receipt of these representations and keep me informed of any further planning consultations moving forward.

Yours sincerely

Date: 24/08/2018

Our Ref: 12751

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

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**Site and Surrounding Area**

The Site is located on a prominent corner location and is bound by Old Shoreham Road (A270) to the north and residential properties to the east which are located on Amherst Crescent. Harwoods Lotus Servicing Centre and Sussex House Business Park are located to the south and an access road is located to the west of the Site. Beyond the access road is a retail warehouse unit.

The wider area comprises Hove Cemetery to the west and commercial/warehouse buildings to the east, including Homebase, Carpetright and Goldstone Retail Park.

The Site is currently occupied by a car showroom with workshop, yard and service bays. The current tenant is intending to vacate the site and they have secured planning permission for an alternative facility elsewhere to relocate to.

The Site provides a key opportunity for redevelopment to provide a high quality mixed use scheme providing a modern self-storage warehouse (B8 use class) and flexi offices (B1a use class).



### DM11 - New Business Floorspace

Big Yellow is **supportive** of the emerging policy DM11's aspiration to provide more flexible B Class floorspace that can be adapted to meet the changing needs of businesses and in particular small businesses and start-ups.

Big Yellow is proposing to provide good quality and flexible office accommodation as part of the mixed use development at the Site. The accommodation will be well designed, high quality, have good levels of natural light and will be able to be reconfigured to allow businesses to grow.

The provision of B8 self-storage accommodation at the Site will also support local businesses with changing space requirements through the provision of off-site storage. For example, retail businesses that wish to maximise the sales floorspace in their shop and use Big Yellow self storage to store stock. The increased sales floorspace often helps businesses to grow. Big Yellow also helps businesses who have no fixed place of work and use Big Yellow self storage to store their equipment and materials.

### H1 - Housing Sites and Mixed Use Sites

Big Yellow **does not support** the mix of uses that are proposed for the Site under emerging policy H1. Whilst Big Yellow is supportive of the Council's recognition that the Site provides an opportunity for redevelopment incorporating an element of B1 employment floorspace, the provision of residential units on the Site is not supported.

Table 6 (Mixed Use Site Allocations) of draft policy H1 lists 270 Old Shoreham Road as a site with minimum capacity for:

- Indicative Residential Units (Use Class C3) – 10 Units
- Minimum Requirements for Other Uses – 1,000 sqm B1 employment floorspace

The Site is identified in the Strategic Housing Land Availability Assessment (SHLAA) Update 2017 (February 2018) as an identified site not within a development area and with no planning permission. The table details the potential housing supply for the period 2010- 2032. For 270 Old Shoreham Road the supply figure is zero. The majority of other sites within this list have a potential supply figure for the period 2010- 2032 and are not listed as zero.

The Site is also further assessed in the Housing and Mixed Use Site Allocations Topic Paper (June 2018). This assessment refers to the Site as having capacity for 10 residential units. It is unclear from the information that is publically available how BHCC has reached this conclusion.

The Topic Paper goes on to state that the Site forms *"the entrance to an existing industrial area"* and the *"Site could be considered as having potential as an extension to the existing adjacent industrial alongside residential development, subject to mitigation."*

Whilst the Site is not allocated for employment use, it is a Site that forms the entrance to an existing and allocated industrial area and the Site currently provides employment. Big Yellow proposes to introduce B1(a) office floorspace at the Site to support emerging City Plan Part 2 policy DM11 (New Business Floorspace) which encourages the provision of development proposals which provide new B1a, b and c Use Class business floorspace in well-designed buildings with flexible layouts.

Big Yellow's proposals for the Site also support City Plan Part 1 policy CP3 (Employment Land) which sets the forecast growth requirements for B Class Uses, including B1(a) and B8 Uses, and seeks to protect and safeguard employment sites and premises to meet the city's needs.

Big Yellow has acquired the freehold interest in the Site and the proposed mixed use development will provide a well designed building on a prominent corner site. The proposals will provide employment and supports BHCC's existing and emerging employment policy aspirations. It is not considered that introducing a small element of housing on the Site is appropriate or necessary.

Big Yellow requests that BHCC reconsiders the proposed allocation for the Site and remove the aspiration for an element of residential use to be provided. It is considered that the delivery of a mixed use development comprising of B1(a) and B8 Uses are more appropriate on this Site which provides existing employment and is adjacent to existing commercial uses to the south and south west of the Site.

Due to the constraints of providing a small quantum of housing alongside B Class Uses and due to the Site's proximity to existing industrial uses, it is considered that better quality housing and a higher level of residential amenity could be provided on alternative sites.

### **E1 - Opportunity Site for Business and Warehouse Uses**

Emerging policy E1 recognises the demand for employment floorspace in the city and seeks to safeguard Land at Hangleton Bottom, Hangleton Link Road, North Portslade for new business (Use Class B1) and warehouse (Use Class B8) floorspace over the plan period.

Big Yellow supports the recognition that there is a need for new business and warehouse floorspace over the plan period.

Big Yellow's proposals for the Site provide a further opportunity to deliver B8 floorspace in the city. As explained above the proposed self-storage facility will support local businesses through providing off-site storage accommodation.

### **Notification**

I trust that the information provided clearly sets out Big Yellow's position with regard to the Draft City Plan Part Two. Please do not hesitate to contact me if any further clarification is required on the above.

I would be grateful if you could please confirm receipt of these representations and keep me informed of any further planning consultations moving forward.

Yours sincerely

Respondent DP066

## Comment

<b>Event Name</b>	Consultation on the Draft City Plan Part 2
<b>Comment ID</b>	67
<b>Response Date</b>	25/08/18 06:01
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	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**

**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?**

In principle I support the need to provide more dwellings within the city as Brighton needs more housing accommodation.

**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?

As with H1 - Housing Sites & Mixed Use Sites, in principle I support the need to provide more dwellings on fringe sites around the city. However, I have reservations about some sites & the impact that increased numbers of people & in particular increased traffic will have on some areas.

## H2 - Urban Fringe Site Allocations

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

The sites I specifically wish to comment on are:

1. 46-54 Old London Road, Patcham (page 52) - I think the replacement of the current 5 houses with more dwellings creating an increase in population & traffic are not consistent with the area of Patcham Village. There seems little capacity in local schools & the Old London Road is not suitable for increased traffic volume. A significant development of dwellings, or as previously proposed, assisted living apartments would be detrimental to the amenity of the area.

2. Site 16 Horsdean Recreation Ground (page 187) - in principle dwellings could be built on the land adjacent to the recreation ground, although providing vehicular access would be potentially difficult. I regularly use Vale Avenue, which is a busy road (at times) & careful consideration would be needed for linking the dwellings to the bend at Value Avenue by the recreation ground to ensure a safe & steady traffic flow at the triangular area of grass.

3. Site 17 Ladies Mile / Carden Avenue (page 191) - in principle dwellings could be built on this site which backs onto existing housing. I think the key issue with this site is providing vehicular access, for both ease of access but without increasing traffic in Ladies Mile Road, which is already congested due to extensive on-street parking. I think the best option would be to provide access via a new access road to Carden Avenue. Ideally this access road should be as far up the hill as possible to be away from the current junctions to retail outlets. This would provide quicker & safer access to the surrounding area, particularly to the Holligbury junction on A27 & Carden Avenue; rather than going via Ladies Mile Road / Portfield Avenue / Carden Crescent.

## H3 - Purpose Built Student Accommodation Sites

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

Support

Respondent DP067

## Comment

**Event Name** Consultation on the Draft City Plan Part 2  
**Comment ID** 68  
**Response Date** 25/08/18 15:03  
**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
- . 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?**

I agree with the policy on minimum sizing.

### **DM2 - Retaining Housing**

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

#### **DM2 Support Reasons**

#### **b) Please explain why you support this policy?**

good mix of types, stricter control of HMO development that is a plague on the city so PBSA is a must have.  
Protection of our Pub heritage. Thanks, long overdue.

### **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

#### **DM7 Support Reasons**

#### **b) Please explain why you support this policy?**

There are too many and they destroy communists for the greed of landlords

### **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?**

The university should provide accommodation for all their students that need it, it should be a huge revenue stream to them.



## **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

### **DM11 Support Reasons**

#### **b) Please explain why you support this policy?**

New quality hotels are good for the city. The council must stop the loss of residential accommodation in the pretence of holiday lets. These are not hotels but stag and hen party houses that cause nothing but problems for those around them.

## **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

## **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

### **DM17 Support Wording Changes**

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

Really looking forward to the new centre and the enlarged Churchill sq, i only worry about transport to and from Black rock

## **DM18 - High Quality Design & Places**

a) Do you support or object to policy DM18?	Support
<b>DM19 - Maximising Development Potential</b>	
a) Do you support or object to policy DM19?	Support
<b>DM20 - Protection of Amenity</b>	
a) Do you support or object to policy DM20?	Support
<b>DM21 - Extensions &amp; Alterations</b>	
a) Do you support or object to policy DM21?	Support
<b>DM22 - Landscape Design &amp; Trees</b>	
a) Do you support or object to policy DM22?	Support
<b>DM23 - Shopfronts</b>	
a) Do you support or object to policy DM23?	Support
<b>DM24 - Advertisements</b>	
a) Do you support or object to policy DM24?	Support
<b>b) Please explain why you support this policy?</b>	
A frame signs should not be allowed on normal sized pavements. There is one in North street outside a coffee shop that forces people in to the road to get around it.	
<b>DM25 - Communications Infrastructure</b>	
a) Do you support or object to policy DM25?	Support
<b>DM26 - Conservation Areas</b>	
a) Do you support or object to policy DM26?	Support
<b>DM27 - Listed Buildings</b>	
a) Do you support or object to policy DM27?	Support
<b>DM28 - Locally Listed Heritage Assets</b>	
a) Do you support or object to policy DM28?	Support
<b>DM29 - The Setting of Heritage Assets</b>	
a) Do you support or object to policy DM29?	Support
<b>DM30 - Registered Parks &amp; Gardens</b>	

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

b) Please explain why you support this policy?

The revamped Valley gardens could do with a cafe in the middle, like Frank in Steyne or the pavilion cafe in the pavilion gardens. This would greatly encourage people to use the new gardens as a leisure destination.

**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

**DM34 - Transport Interchanges**

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

**DM35 - Travel Plans & Transport Assessments**

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

**DM36 - Parking & Servicing**

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

**DM37 - Green Infrastructure & Nature Conservation**

a) Do you support or object to policy DM37? Support

**DM38 - Local Green Spaces**

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

**DM39 - Development on the Seafront**

a) Do you support or object to policy DM39? Support

**DM40 - Protection of Environment and Health - Pollution & Nuisance**

a) Do you support or object to policy DM40? Support

**DM41 - Polluted Sites, Hazardous Substances & Land Stability**

a) Do you support or object to policy DM41? Support

**DM42 - Protecting the Water Environment**

a) Do you support or object to policy DM42? DM43 - Sustainable Urban Drainage	Support
a) Do you support or object to policy DM43? DM44 - Energy Efficiency & Renewables	Support
a) Do you support or object to policy DM44? DM45 - Community Energy	Support
a) Do you support or object to policy DM45? DM46 - Heating & Cooling network infrastructure	Support
a) Do you support or object to policy DM46? SA7 - Benfield Valley	Support
a) Do you support or object to policy SA7? SSA1 - Brighton General Hospital Site	Support
a) Do you support or object to policy SSA1? SSA2 - Combined Engineering Depot, New England Road	Support
a) Do you support or object to policy SSA2? SSA3 - Land at Lyon Close, Hove	Support
a) Do you support or object to policy SSA3? SSA4 - Sackville Trading Estate & Coal Yard, Hove	Support
a) Do you support or object to policy SSA4? SSA5 - Madeira Terrace & Madeira Drive	Support
a) Do you support or object to policy SSA5? SSA6 - Former Peter Pan Leisure Site (adjacent Yellow Wave), Madeira Drive	Support
a) Do you support or object to policy SSA6? SSA7 - Land Adjacent Amex Community Stadium, Falmer Way	Support
a) Do you support or object to policy SSA7? H1 - Housing Sites & Mixed Use Sites	Support
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? Support

## H3 Purpose Built Student Housing Omission Sites

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

More on campus out of town near the Amex/Falmer, plenty of room to build 100s more and free up family housing

## 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.**

Didn't see anywhere to put this-

The council own agricultural land around the city that can't be used for housing. Transfer all the in town allotments to these areas and free up the existing allotments for housing, The developer should cover the cost of setting up the new areas, water, plot layouts, parking and access, new sheds and greenhouses etc. so no cost to the council and we could greatly increase the number of allotments to remove the waiting list thus bringing in more rent money to the council and increasing the council tax income.

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**From:**  
**Sent:** 26 August 2018 21:24  
**To:** PlanningPolicy  
**Cc:**  
**Subject:** City Plan Part Two Consultation

Dear Sirs

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.

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 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 it's 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 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 will be removed from the list of sites allocated for development in the City Plan part two consultation.

Thank you

---

**From:**  
**Sent:** 27 August 2018 09:57 PlanningPolicy  
**To:** City PlanPart 2 Consultation  
**Subject:**

I would like to object to the inclusion of 46-54 Old London Road Patcham in the list of sites allocated for development. Only a year ago this site was deemed unsuitable for a development of similar scale by yourselves and the government, the village setting and character of the area was not considered appropriate for large scale development and such development would detract considerably from the appearance and character of the area. I really can't see why this opinion should have changed in any way in such a short time unless of course the focus of profit and convenience for the council is considered more important than that of McCarthy and Stone Yours

**From:**  
**Sent:** 27 August 2018 13:24 PlanningPolicy  
**To:** City plan part 2 consultation  
**Subject:**

Dear Sir or Madam,

I am writing to express my concern at the planned redevelopment in Patcham.

The row of detached houses on the Old London Road from 40 to 54 which go back to the early part of the last century has a very special atmosphere.

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

Much of Patcham Village is in a conservation area and the houses in question are part of the villages character.

I appreciate that Brighton has limited space for new much needed housing but please let us not ruin this area with huge inappropriate overdevelopment.

I very much hope the planning application committee will take this into account and the views of 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



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**From:**  
**Sent:** 27 August 2018 18:15  
**To:** PlanningPolicy  
**Subject:** Development of 46-54 old London road, Patcham

City Plan Part Two Consultation

I wish to give my objection to the over development in Old London Road, Patcham Village. It is called a village. Old London Road is quite narrow and when attending The Memorial Hall the parking is very difficult. There is also already flats here. Plus buses travel along there which together with the increased parking will make the area very congested and possibly dangerous for people crossing the road.

Sent from my I pad

**From:**  
**Sent:** 28 August 2018 15:41  
**To:** PlanningPolicy  
**Cc:**  
**Subject:** City Plan Part Two Consultation

Dear Sir/ Madam

I hope you are well.

I write to you in connection with allocation of 46-54 Old London Road as a potential development site.

I must state that after a thorough review and subsequent rejection of the plans by McCarthy and Stone to build retirement homes I am surprised that this area has been listed again for potential development.

Living nearby and frequently driving along this section of road I cannot see how any further development can be sustained. The road can be chaotic with buses, children being collected and transported from school and deliveries taking place to the Co-Op by large lorries. The road is very frequently difficult to navigate. It doesn't have the capacity to take any further vehicles safely, it is already over utilised. In addition the previous objections with respect to the area being unable to sustain further occupation (flooding/drainage) and loss of the village atmosphere for residents should also be taken into account.

I would ask you to register my objection to any development of this area.

Thanks you in advance.

**From:**  
**Sent:** 28 August 2018 22:19  
**To:** PlanningPolicy  
**Subject:** City Plan Part Two Consultation

Dear Planning committee

I write to object to the site of 46- 54 Old London Road being recommended as a plot for development as flooding remains an acute risk. This was very obvious earlier this month after torrential rainfall and the drainage system in Old London Road unable to cope, even after flood defenses have been installed in the road.

I was forced to use the electric pump provided by the flood defenses project to prevent water flooding under my house.

Unfortunately the inspector who wrote the report re: McCarthy and Stones last planning application failed to recognise the effect of rising water after rainfall that occurs every year, a truly concerning worry as the Council is the authority with responsibility for Land Drainage management.

In addition I adamantly believe changing the housing structure in Old London Road by building 30 units into the space of 5 houses will have a detrimental effect on the village feel which provides the heart of Patcham and the reason so many of our community choose to live in this area of Brighton.

Whilst I have sympathy and understanding to find spaces to provide more housing I believe this one is inappropriate and will cause irretrievable problems to present and future local residents.

Yours Faithfully

**From:**  
**Sent:** 29 August 2018 15:30  
**To:** PlanningPolicy  
**Subject:** city plan part two consultation.

46-54 old london road should be removed from the list of sites allocated for development in the city plan part two because the extra traffic it would cause would gridlock the...

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**From:**  
**Sent:** 29 August 2018 17:22  
**To:** PlanningPolicy  
**Subject:** City Plan Part Two Consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

We strongly object to the Council's inclusion of the 46-54 Old London Road site into the City Plan Part Two. A development of 30 units there is unsuitable for the site which is far too small to accommodate that number of units. Any such development will change the village setting out of all proportion. It would also encourage a host of developers to submit unsuitable applications for the development.

The potential removal of a substantial number of trees and the concreting over of large areas of green space is not only detrimental to the wildlife in the area, but will also cause issues by removing natural drainage in an area that has a long history of serious groundwater flooding.

We very much hope that the Planning Department will protect the lovely village environment and remove this site from the City Plan Part Two.

Thank you.



**For Official Use:**

Respondent Number:

Date Received: / / /2018

Entered onto Portal: Yes/No

**Draft City Plan Part Two  
Consultation Period: 5th July 2018 until  
 5pm on 13th September 2018  
Word Response Form**

Accessibility Notice: (Ctrl & click to view): <https://www.brighton-hove.gov.uk/content/about-website/help-using-council-website/accessibility>

### **Draft City Plan Part Two - Consultation**

Brighton & Hove City Council has published the draft City Plan Part Two for a 10 week period of consultation starting 5<sup>th</sup> July 2018. This follows on from the scoping consultation undertaken July - September 2016.

The draft City Plan Part Two sets out the preferred approach and includes proposed site allocations for housing and other uses such as employment and community facilities and contains a suite of development management policies which will be used to assess planning applications. The City Plan Part Two will support the implementation and delivery of the City Plan Part One.

The council is seeking your views on the draft Plan and supporting documents. Your comments will help inform the final version of the City Plan Part Two. So if you have any comments about the approaches in the plan then we would urge you to submit those comments during this consultation so that they can be fully taken into account.

The Draft City Plan Part 2 and supporting documents including a quick guide to the City Plan Part Two as well as background evidence documents are available to view and download from the Council's website at: [www.brighton-hove.gov.uk/cityplan-part2](http://www.brighton-hove.gov.uk/cityplan-part2).

## Part A: Contact Details

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

Privacy Notice: (ctrl & click to view)

<https://www.brighton-hove.gov.uk/content/planning/planning-applications/planning-service-privacy-statement>

*Please note that you must complete Part A as anonymous forms cannot be accepted.*

<b>Organisation Name (If applicable)</b>	Round Hill Society
<b>Name</b>	
<b>Address</b>	
<b>Email Address</b>	<hr/>
<b>Agent Name (If applicable)</b>	
<b>Agent Name</b>	
<b>Agent Address</b>	
<b>Agent Email Address</b>	

## Part B: Your Representation relating to Development Management Policies

Please use a separate sheet for representations against each Development Management policy

(ctrl & click to view)

[Housing, Accommodation & Community chapter \(policies DM1-DM10\)](#)

[Employment Tourism & Retail Chapter \(policies DM11-DM17\)](#)

[Design & Heritage Chapter \(policies DM18-DM32\)](#)

[Transport & Travel Chapter \(policies DM32-DM36\)](#)

[Environment & Energy Chapter \(policies DM37-DM46\)](#)

Policy Number DM3

Policy Name Conversions

a) Do you Support or Object to the policy?

Support

If you support this policy, please go to questions (b) and (c)

Object

If you object to this policy, please go to questions (d)

and (e)

b) Please explain why you support this policy?

in areas of existing high density of converted homes, careful control is needed to ensure high quality and low negative impact of new conversions

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

Request that designs for new conversions are required to provide sufficient accommodation for storage of bikes, recycling and rubbish

d) Please explain why you object to this policy?

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



**Policy Number DM7**

**Policy Name HMOs**

**a) Do you Support or Object to the policy?**

Support  
Object  
and (e)

If you support this policy, please go to questions (b) and (c)  
If you object to this policy, please go to questions (d)

**b) Please explain why you support this policy?**

High numbers of HMOs can destroy local communities. They need careful control in location, intensity and design. They also often provide very poor accommodation for those who rent them.

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

Because of the higher levels of refuse and recycling created by HMOs, there should be a requirement to provide adequate storage facilities for these along with better shared facilities such as living rooms and bathrooms. There needs to be a minimum size for bedrooms.

**d) Please explain why you object to this policy?**

**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**

Policy Number DM8

Policy Name PBSA

a) Do you Support or Object to the policy?

Support  
Object  
and (e)

If you support this policy, please go to questions (b) and (c)  
If you object to this policy, please go to questions (d)

b) Please explain why you support this policy?

Broadly support, but concern there is no obvious consideration and therefore requirement to mitigate, the negative impact of the high numbers of these blocks in some areas, eg Lewes Rd. The negative impact on communities is large eg removal of social facilities such as pubs which are either knocked down or changed to provide student entertainment and food shops which lose sufficient local custom are changed into fast food outlets. There is a loss of family homes and therefore children to support local schools.

Also the increase in pressure on public transport along Lewes Rd needs to be helped to flow better and steps taken to address increased air pollution from queuing traffic such as trees and green walls.

We have some concern that the assumption that purpose built student housing might reduce demand for existing HMOs is invalid. They are so much more expensive than HMOs that they only attract wealthy foreign students.

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

New PBSA should be required to contribute to locally identified social needs and also contribute to mitigation of traffic pollution eg new trees, local parks and gardens, green walls and green roofs.

d) Please explain why you object to this policy?

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

Policy Number DM 22

Policy Name Landscape design and Trees

a) Do you Support or Object to the policy?

Support  
Object  
and (e)

If you support this policy, please go to questions (b) and (c)  
If you object to this policy, please go to questions (d)

b) Please explain why you support this policy?

trees are vital to a healthy city

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

with regard to the requirement to retain and protect existing trees during construction, this should be extended to include trees on adjoining properties/land.

d) Please explain why you object to this policy?

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

Policy Number DM28

Policy Name Locally Listed Heritage Assets

a) Do you Support or Object to the policy?

Support  
Object  
and (e)

If you support this policy, please go to questions (b) and (c)  
If you object to this policy, please go to questions (d)

b) Please explain why you support this policy?

Support the idea of protecting heritage assets but think it is too narrow in scope

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

It should include public assets such as cast iron street furniture (eg railings and lampposts) as well as locally special kerbstones (black diorite from Guernsey for example), or pavement material (eg black engineering brick on Mayo Rd) and pavement crossings where special and unusual (eg made from alternate rows of purbeck limestone and thin red bricks on edge) and special walls (eg flint cobble walls at Saunders Park).

d) Please explain why you object to this policy?

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

<b>Signed*:</b>	
<b>Dated*:</b>	24th August

All representations must be received at the email or postal address given on this form by 5.00pm on 13<sup>th</sup> September 2018.

**Due to the length of the consultation period please kindly note that late representations will not be accepted.**

Completed forms should be sent to:

Email: [planningpolicy@brighton-hove.gov.uk](mailto:planningpolicy@brighton-hove.gov.uk)

Post: Consultation on the Draft City Plan Part Two  
Brighton & Hove City Council  
Planning Policy Team  
1<sup>st</sup> Floor Hove Town Hall  
Norton Road  
Hove BN3 3BQ

If you have any further queries please contact us on 01273 292505 or via email [planningpolicy@brighton-hove.gov.uk](mailto:planningpolicy@brighton-hove.gov.uk)

Respondent DP077

## Comment

<b>Event Name</b>	Consultation on the Draft City Plan Part 2
<b>Comment ID</b>	78
<b>Response Date</b>	30/08/18 12:21
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	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)** Private

**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
- . Transport and Travel
- . Environmental and Energy
- . 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

**DM2 Support Reasons**

**b) Please explain why you support this policy?**

No present housing should be removed to build these new homes, this negates the whole process.

**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? Object

**DM6 Object Reasons**

**d) Please explain why you object to this policy?**

The government is make moves to drive landord out of the market, building more buy to lets goes against this.

**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?**

HMO's are historically bad, the use of such creates does not create a good community.

**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?**

Student need good quality accomadation.

**DM9 - Community Facilities**

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

**DM9 Support Reasons**

**b) Please explain why you support this policy?**

Provided these are maintained and populated they provide an important hub for a 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?

Public Houses need saving to provide a social hub for the community

#### **DM33 - Safe, Sustainable & Active Transport**

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

#### **DM34 - Transport Interchanges**

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

#### **DM34 Object Reasons**

d) Please explain why you object to this policy?

There is already a park and ride and this is not well used adding more is a waste of land that could be used for other purposes.

#### **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?

This is vital to any plans, I do not see that this has been looked at prior to the release of the City Plan Part 2 proposal. The city is already struggling with commuter parking and traffic adding more traffic will only make this worse, the use of smaller residential roads needs to be cleverly limited in peak hours as it is becoming dangerous for residents.

#### **DM36 - Parking & Servicing**

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

#### **DM36 Support Reasons**

b) Please explain why you support this policy?

It is vital that any plans look deeply into parking and dedicated spaces are required to avoid overloading the onstreet parking.

#### **DM37 - Green Infrastructure & Nature Conservation**

a) Do you support or object to policy DM37? Support



## DM38 - Local Green Spaces

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

### DM38 Support Reasons

b) Please explain why you support this policy?

Building close to any designated green space need to be deterred, generally this sets a precedent and in a short time the green space will be built on.

## DM39 - Development on the Seafront

a) Do you support or object to policy DM39? Support

## DM42 - Protecting the Water Environment

a) Do you support or object to policy DM42? Support

## DM43 - Sustainable Urban Drainage

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

### DM43 Support Wording Changes

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

London road has a history of flooding due to high water table, it cannot be stressed enough that building larger premises here will increase the flood risk.

## DM44 - Energy Efficiency & Renewables

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

### DM44 Object Reasons

d) Please explain why you object to this policy?

Targets need to be higher for new builds, aiming for EPC B is not good enough.

## DM46 - Heating & Cooling network infrastructure

a) Do you support or object to policy DM46? 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.**

Residential site allocations:

46 - 54 Old London Road any development here will be liable to flooding and will increase the risk, it will also add to already congested roads for traffic and parking.

Land at and adjoining Horsdean Recreation Ground, Patcham & Land at Ladies Mile, Carden Avenue. will add far too much traffic load to the small residential roads in the area.

**From:**  
**Sent:** 30 August 2018 09:10  
**To:** PlanningPolicy  
**Subject:** City Plan Part 2 Consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Sirs,

With reference to the proposal for site 46 to 54 Old London Road I wish to lodge an objection in view of the proposed over intensive development.

The proposal would change the character of the area and involve loss of trees and wildlife habitat which I would suggest is important for us all.

In addition last year we heard evidence from a drainage expert that last year's proposal would have required renewal of the main drainage pipe from the A23 roundabout to the Pier and it was suggested that the present infrastructure for storm water drainage is inadequate for this area.

Thank you for your attention.

Yours faithfully,

---

**From:**  
**Sent:** 30 August 2018 10:10  
**To:** PlanningPolicy  
**Subject:** City plan part two consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I strongly object to the proposal to include site 46-54 Old London Road in a list of sites suitable for development as a block of flats.

It is not suitable as it will cause major traffic problems on a narrow road with a school opposite. Drainage has been a problem in the past with flooding in houses in the road. It will spoil the village aspect of the area. Parking to gain access to the village shops and events at the village hall would be extremely limited. It will be a complete shambles when there are many other opportunities for land development in the area which would cause a lot less problems.

*Yours sincerely*

Landivar Architects Limited

The Workshop,

Unit 3, 29-42

Windsor Street,

Brighton, BN1 1RJ

United Kingdom.

Company number 7194754

1 August 2018

Draft CPP2 Policy Projects & Heritage Team,  
Brighton and Hove City Council,  
First Floor,  
Hove Town Hall,  
BN3 3BQ

**RE: Draft Brighton and Hove City Plan Part Two - Consultation - 'Land at Mile Oak, Portslade'.**

Dear Sir or Madam,

With reference to the above and further to your recent letter dated 06.07.18, addressed to our client,

We have been appointed to act as agents for the land owner and welcome the proposed allocation in Policy H2 of the draft CPP2. We have had involvement with the site for many years and it is very encouraging to see the site being proposed for residential use, to address the long term housing requirements of the city.

As part of an ongoing analysis and feasibility study of the site for our client, we have prepared a draft proposal, as a sketch scheme for a residential development and I attach the following documents, for your reference:

- F.01 1091 Feasibility master plan
- F.02 1091 House types 1 and 2
- F.03 1091 House types 3 and 4

The site area is 2.24 Hectares and our initial studies suggest a suitable density of between **240 - 260 residential units**. As a medium density housing site, we would also wish to propose the following complementary uses within the site:

- Doctors and dentist surgery / community hall (500 m2).
  - Convenience shops (180m2).
-

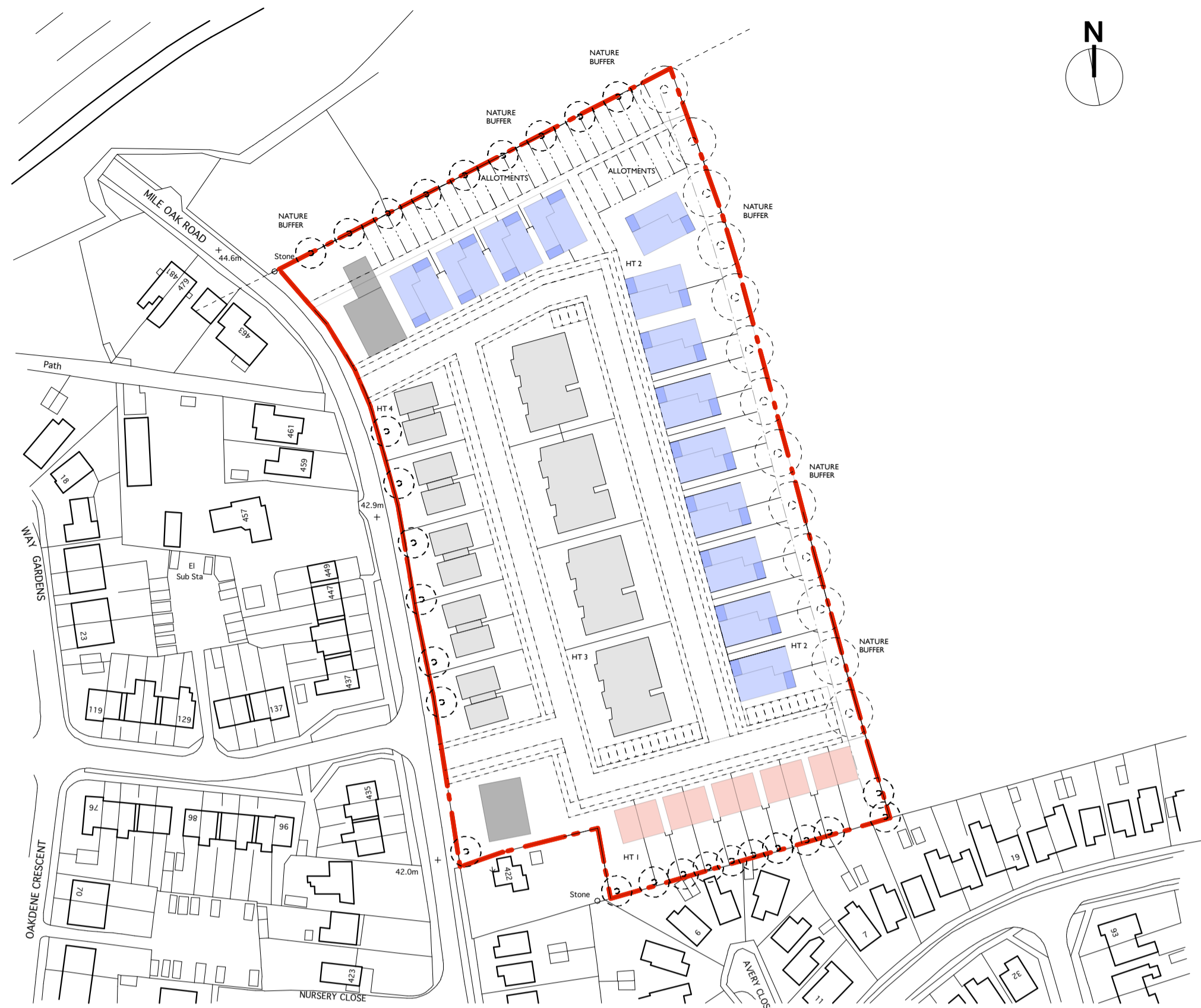
- Nursery / creche.

To Reiterate, we wish to **strongly support the inclusion** of our client's site at 'Land at Mile Oak, Portslade', in the proposed allocation in Policy H2 of the draft CPP2. We propose that the residential units should number 240-260 and should have complementary uses, as listed above.

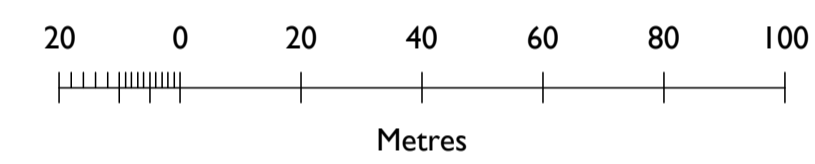
If you have any queries, or require any further information, please do not hesitate to contact me.

Yours faithfully,

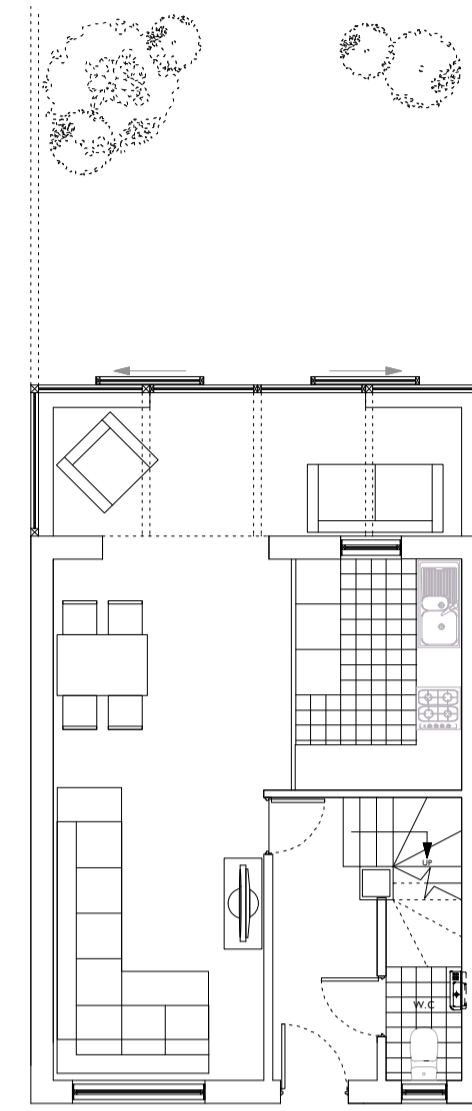
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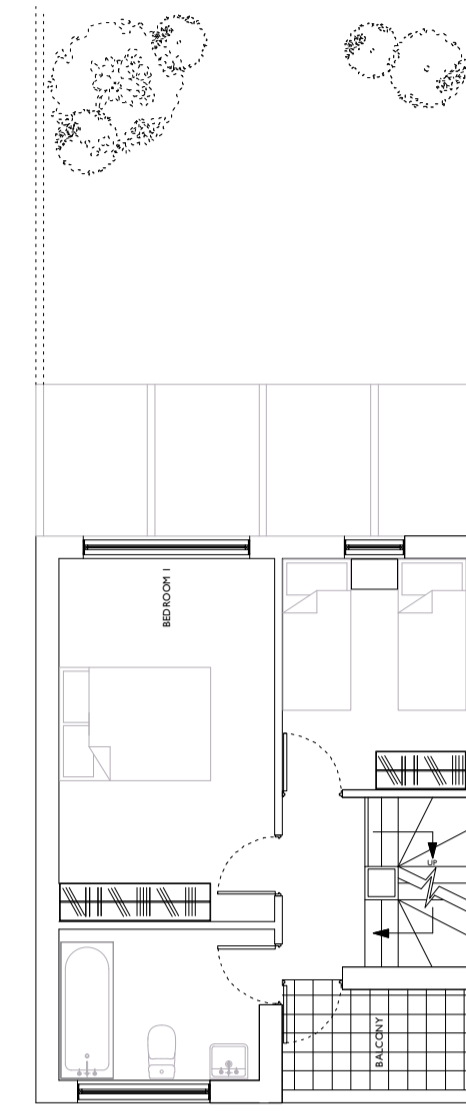
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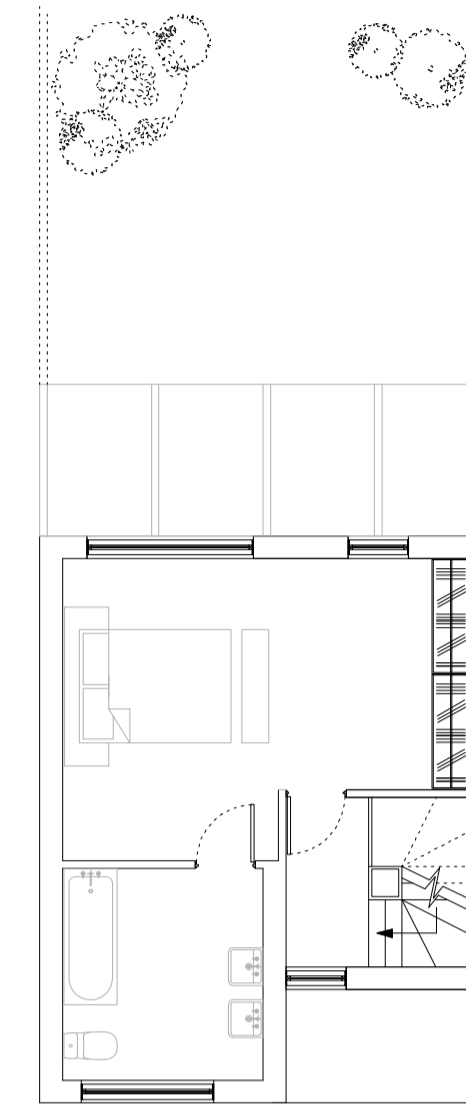
### HOUSE TYPE 1



HOUSE TYPE 1 GROUND FLOOR PLAN SCALE 1: 100



HOUSE TYPE 2 FIRST FLOOR PLAN SCALE 1: 100



HOUSE TYPE 2 SECOND FLOOR PLAN SCALE 1: 100

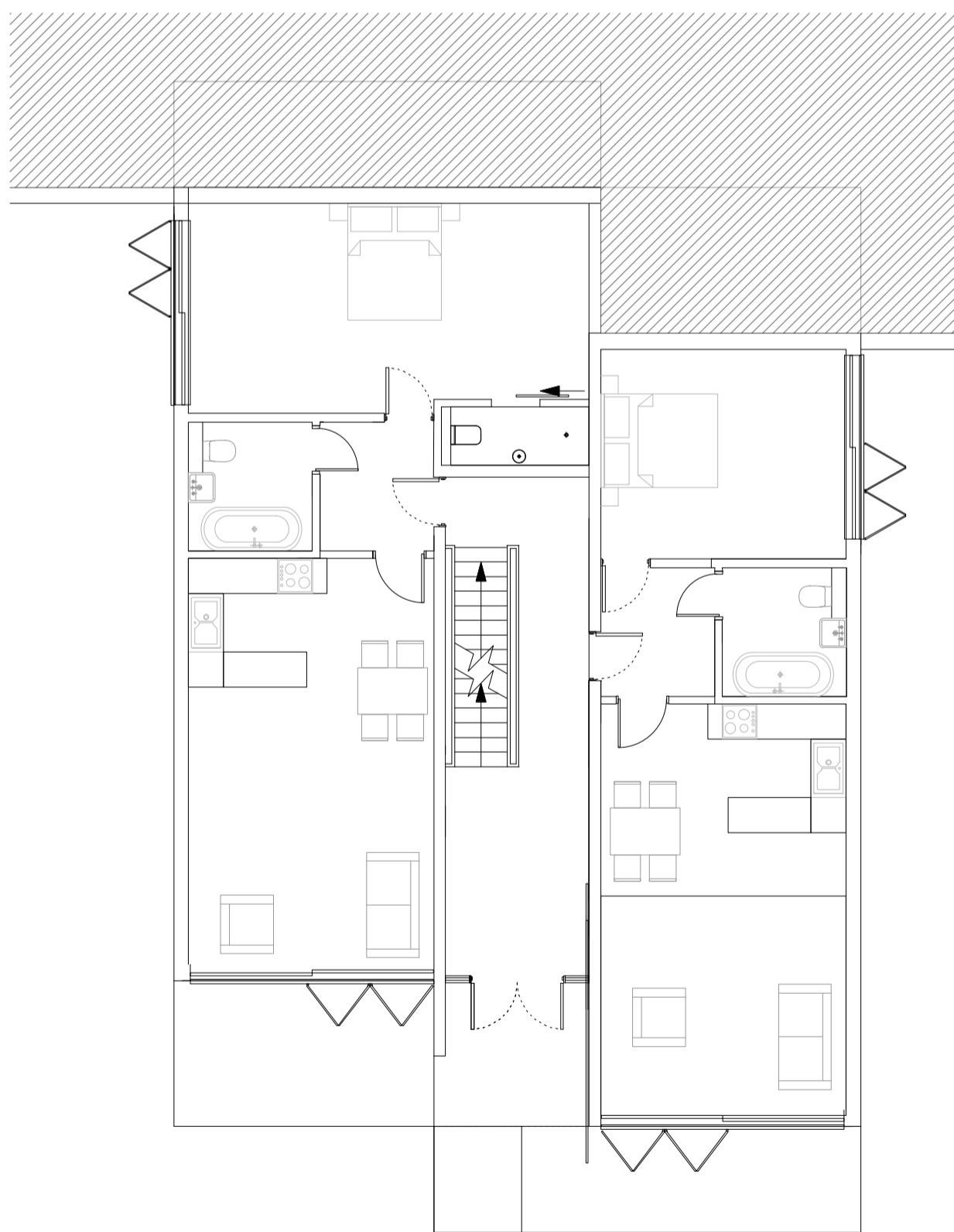
ACCOMMODATION SCHEDULE			
<b>HOUSE TYPE 1</b>			
10	X	3 BEDROOM PER UNIT	
<b>TOTAL NUMBER OF UNITS HT1 10</b>			
<b>HOUSE TYPE 2</b>			
8	X	2 BEDROOM PER BLOCK	
2	X	1 BEDROOM PER BLOCK	
<b>TOTAL NUMBER OF UNITS HT 2 130</b>			
<b>HOUSE TYPE 3</b>			
3	X	2 BEDROOM PER UNIT	
<b>TOTAL NUMBER OF UNITS HT 3 30</b>			
<b>HOUSE TYPE 4</b>			
13	X	1 BEDROOM PER BLOCK	
1	X	2 BEDROOM PER BLOCK	
3	X	3 BEDROOM PER BLOCK	
<b>TOTAL NUMBER OF UNITS HT 4 68</b>			

<b>TOTAL NUMBER OF HOUSING UNITS</b>
238

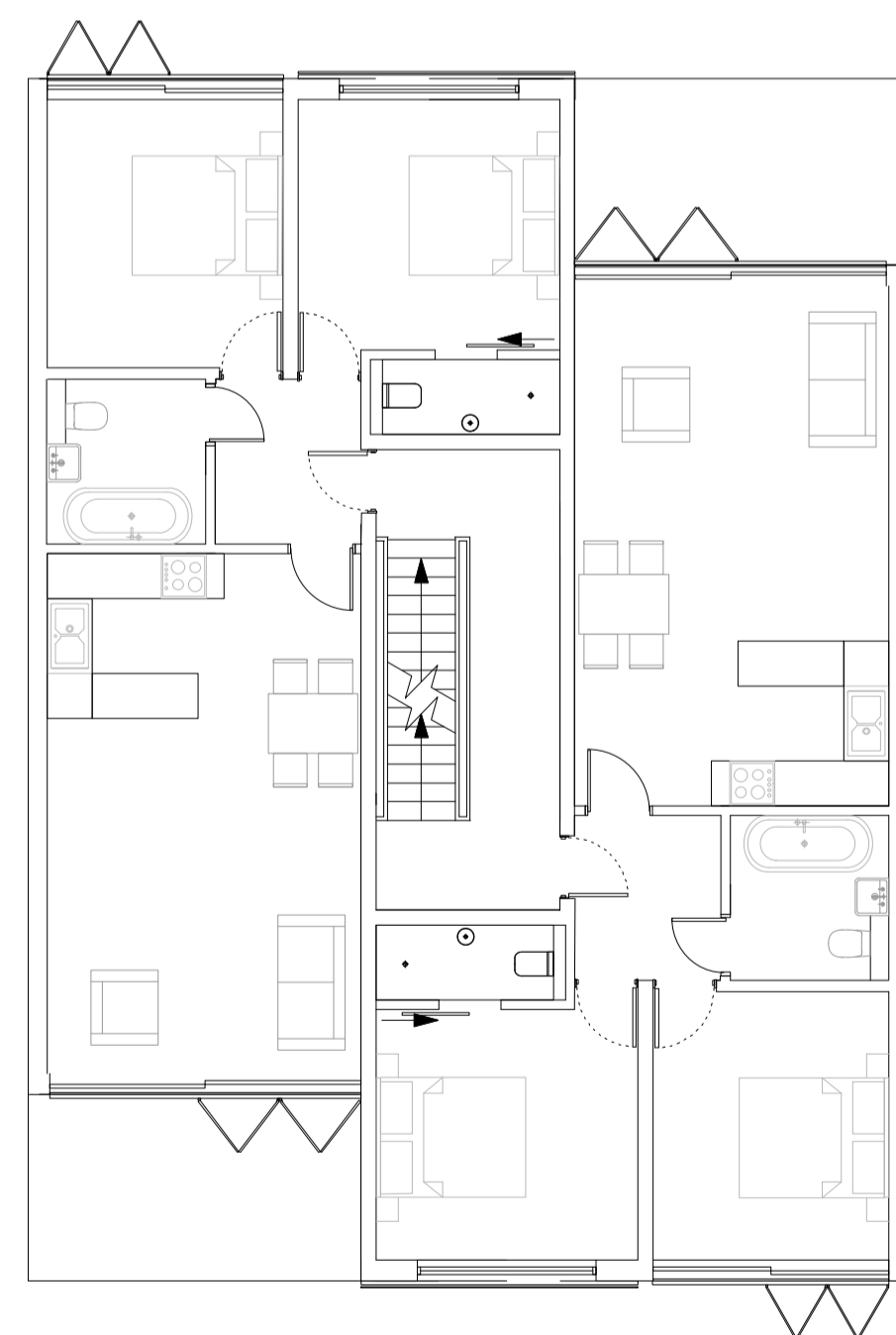
<b>COMMUNITY CENTRE AND DOCTORS SURGERY</b>
500M2

<b>RETAIL / CONVENIENCE SHOP</b>
180M2

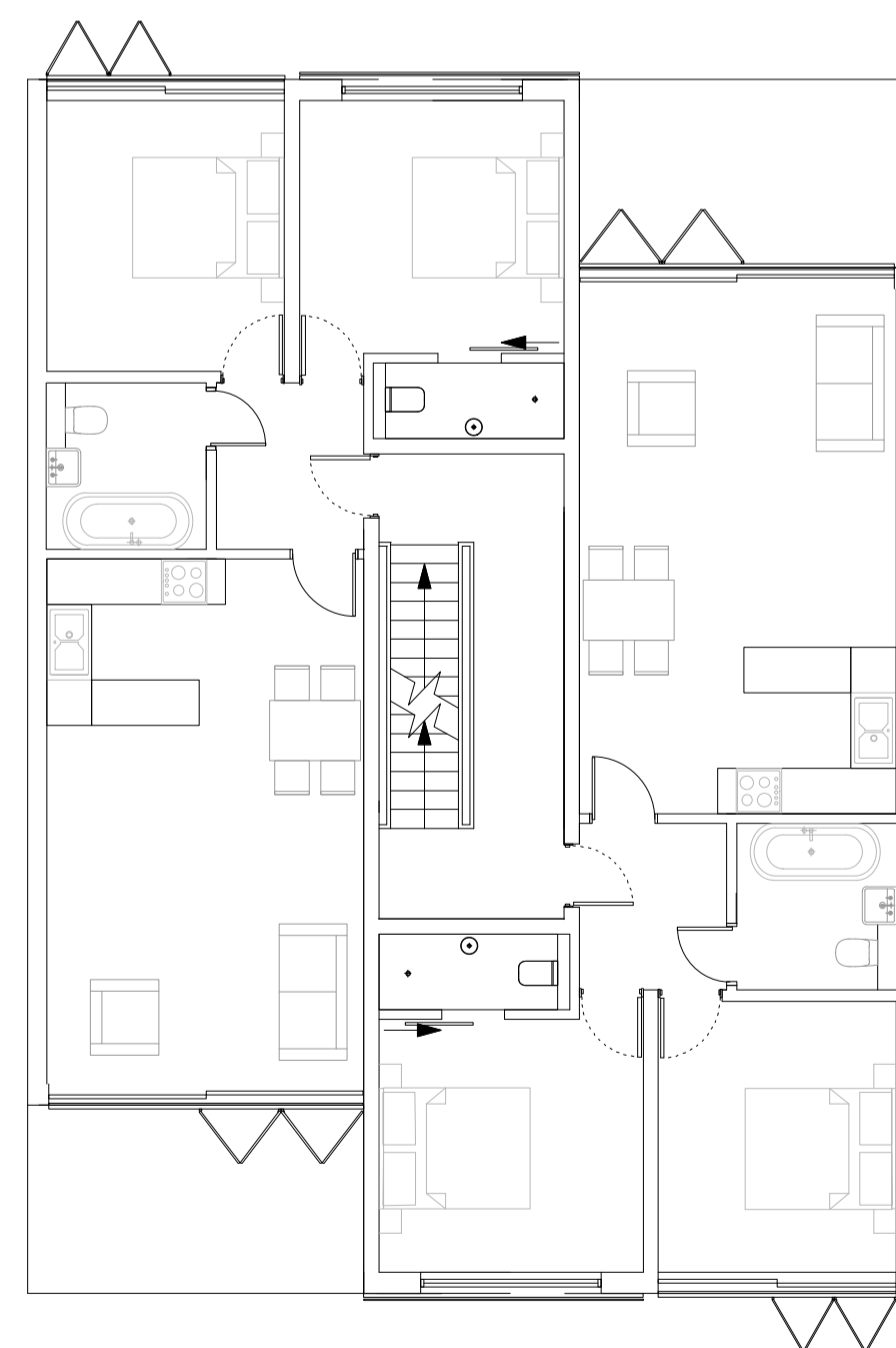
### HOUSE TYPE 2



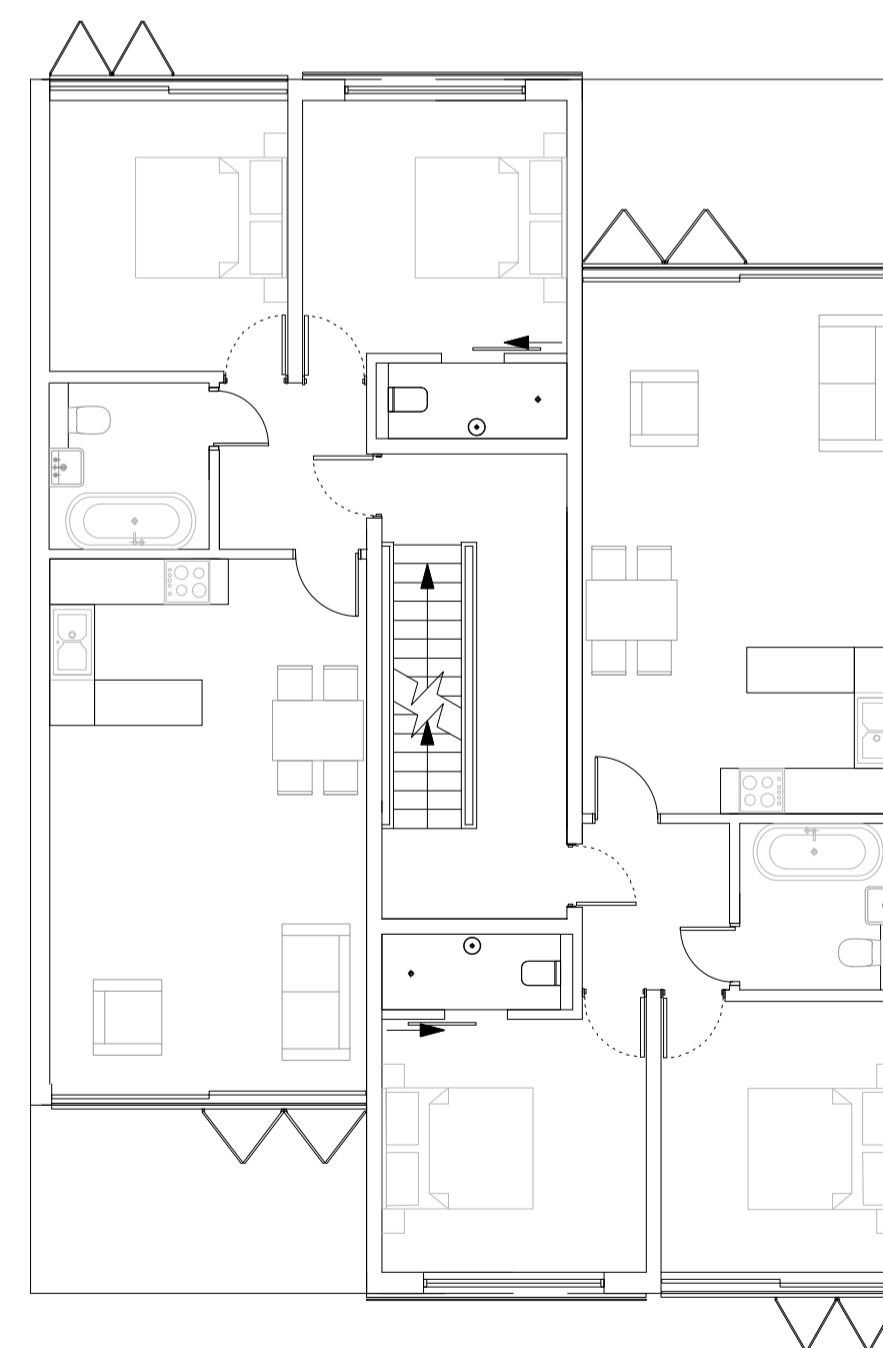
HOUSE TYPE 2 GROUND FLOOR PLAN SCALE 1: 100



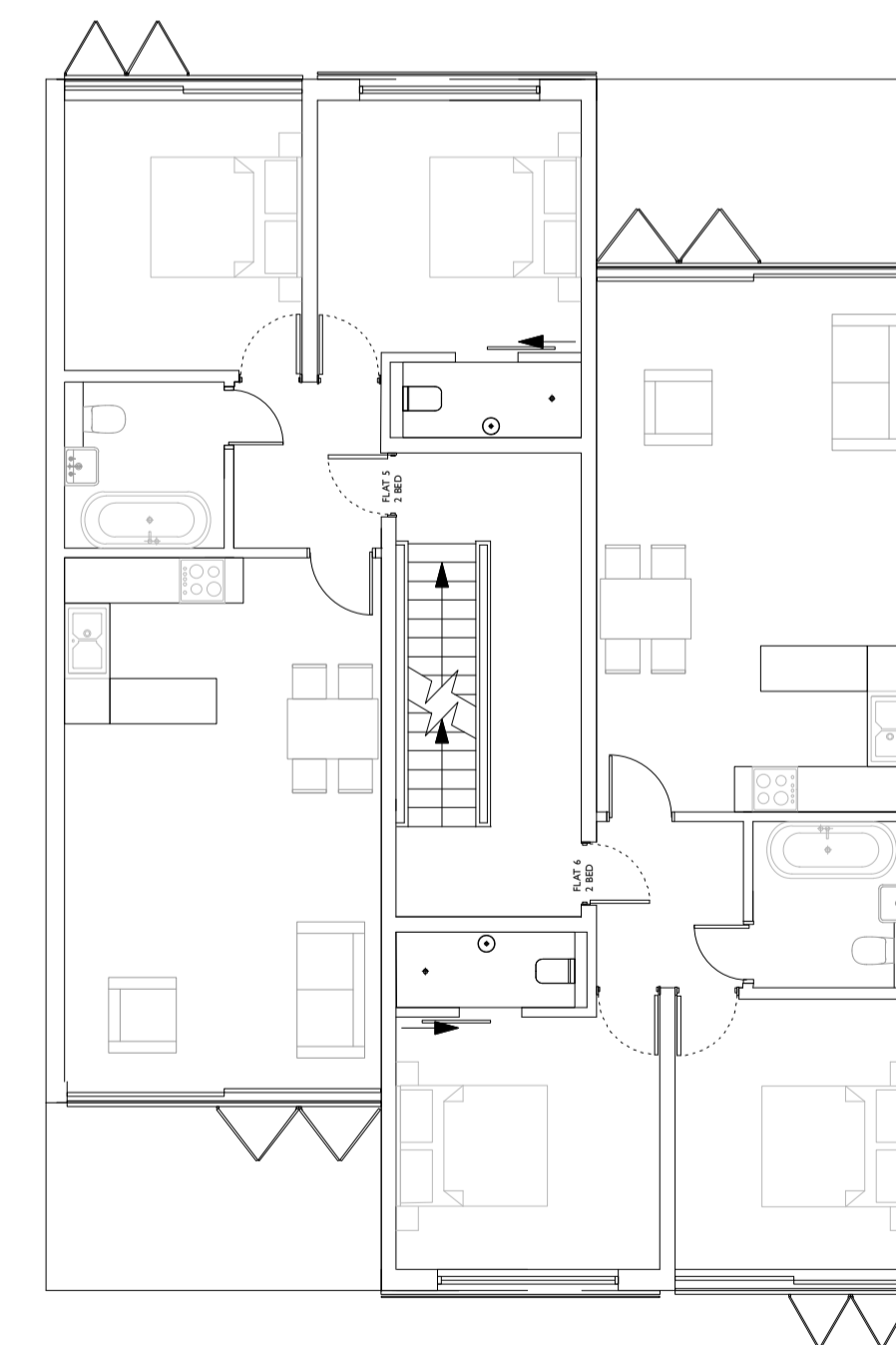
HOUSE TYPE 2 FIRST FLOOR PLAN SCALE 1: 100



HOUSE TYPE 2 SECOND FLOOR PLAN SCALE 1: 100

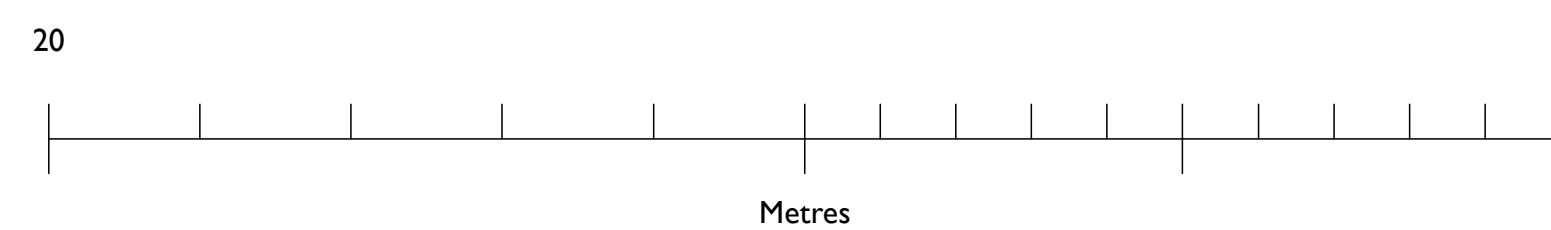


HOUSE TYPE 2 THIRD FLOOR PLAN SCALE 1: 100

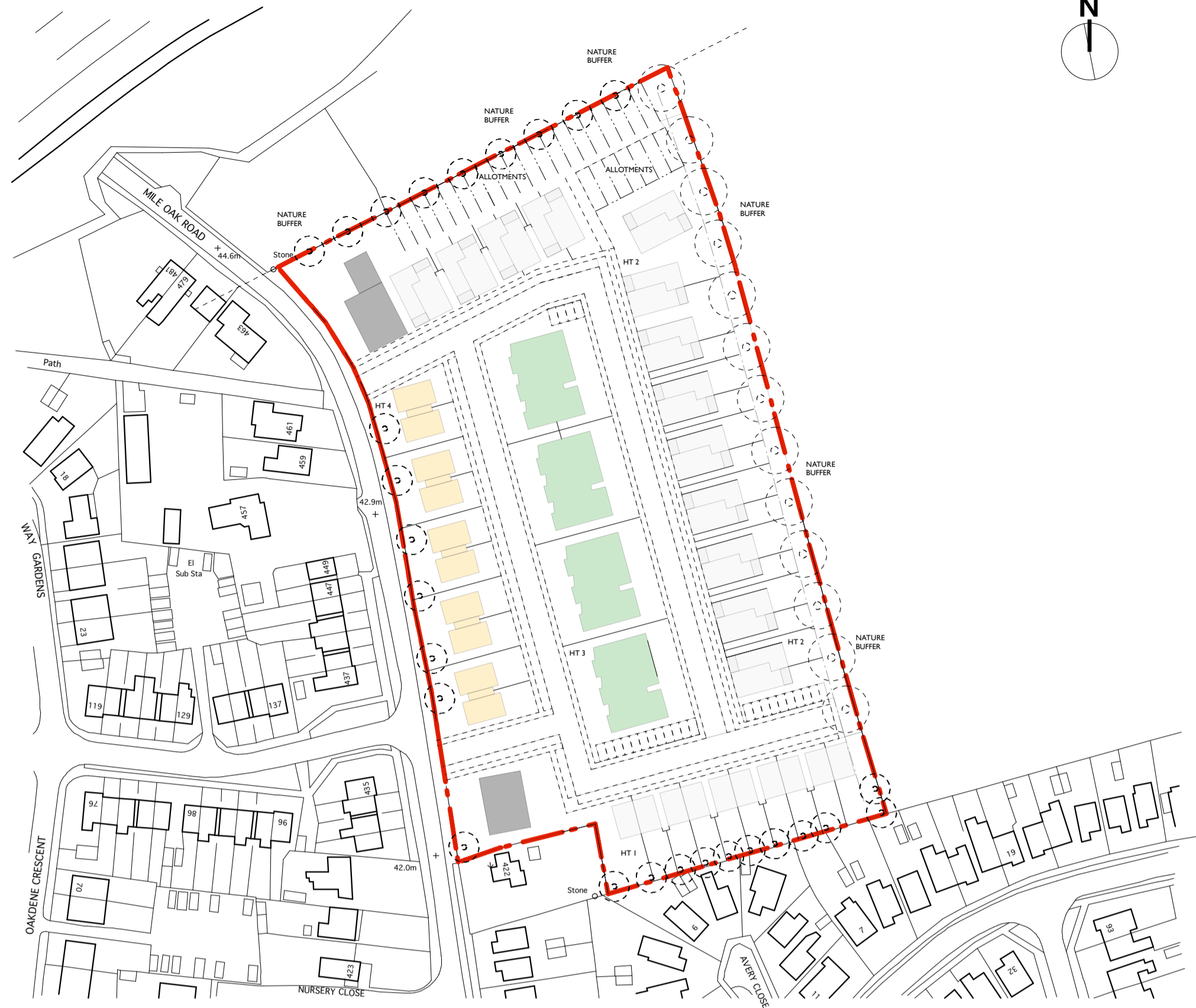


HOUSE TYPE 2 THIRD FLOOR PLAN SCALE 1: 100

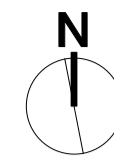
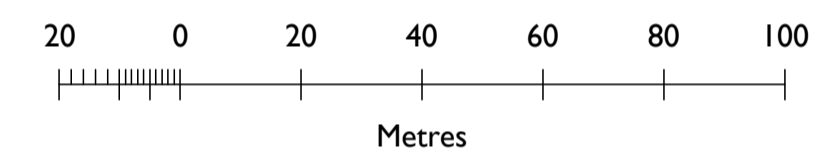
### HOUSE TYPE PLANS 1 & 2 SCALE 1: 100



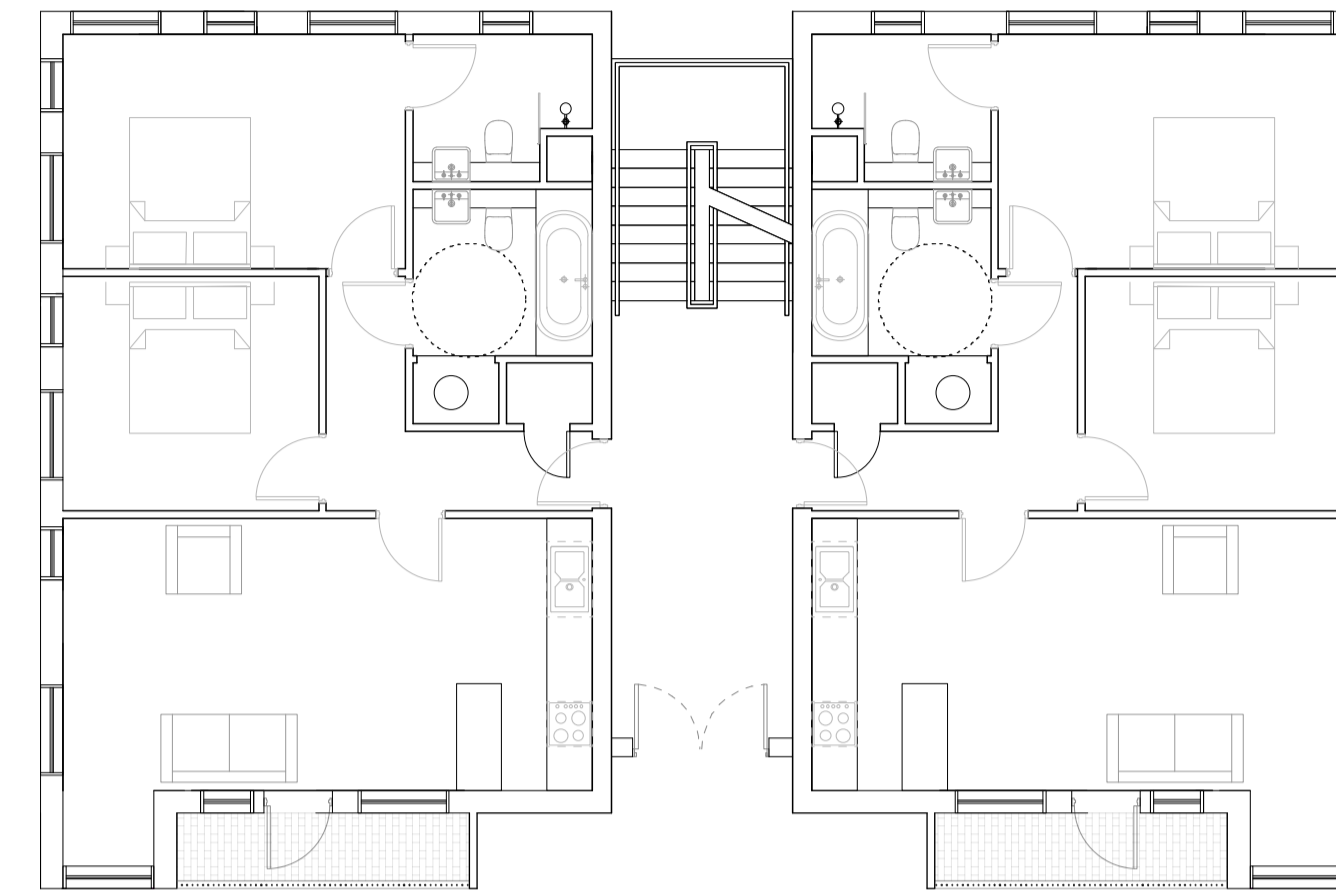




LOCATION PLAN SCALE 1:1250



### HOUSE TYPE 3



HOUSE TYPE 3 TYPICAL FLOOR PLAN SCALE 1:100

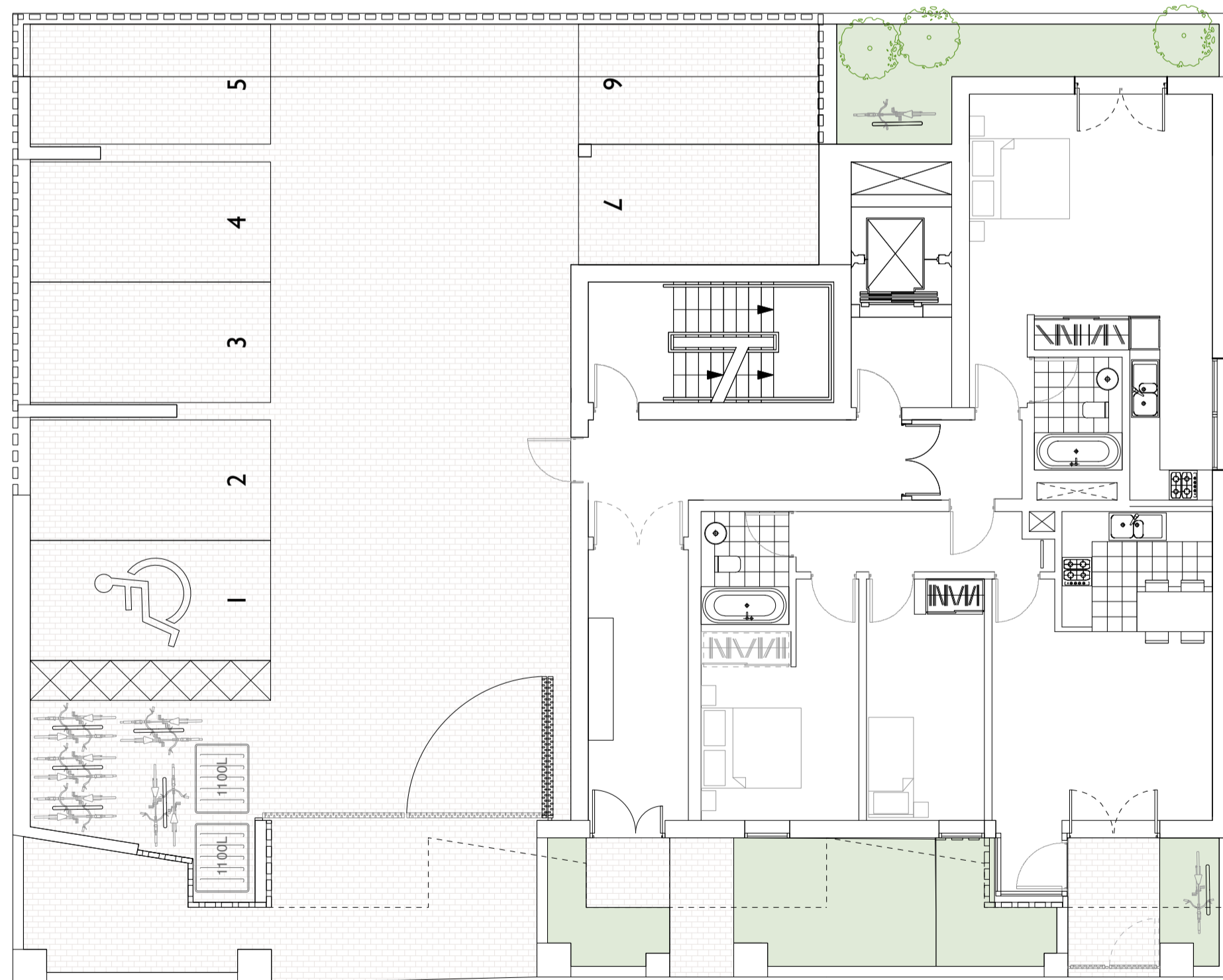
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HOUSE TYPE 1			
10	X	3 BEDROOM PER UNIT	
TOTAL NUMBER OF UNITS HT 1 10			
HOUSE TYPE 2			
8	X	2 BEDROOM PER BLOCK	
2	X	1 BEDROOM PER BLOCK	
TOTAL NUMBER OF UNITS HT 2 130			
HOUSE TYPE 3			
3	X	2 BEDROOM PER UNIT	
TOTAL NUMBER OF UNITS HT 3 30			
HOUSE TYPE 4			
13	X	1 BEDROOM PER BLOCK	
1	X	2 BEDROOM PER BLOCK	
3	X	3 BEDROOM PER BLOCK	
TOTAL NUMBER OF UNITS HT 4 68			

TOTAL NUMBER OF HOUSING UNITS	238
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COMMUNITY CENTRE AND DOCTORS SURGERY	500M2
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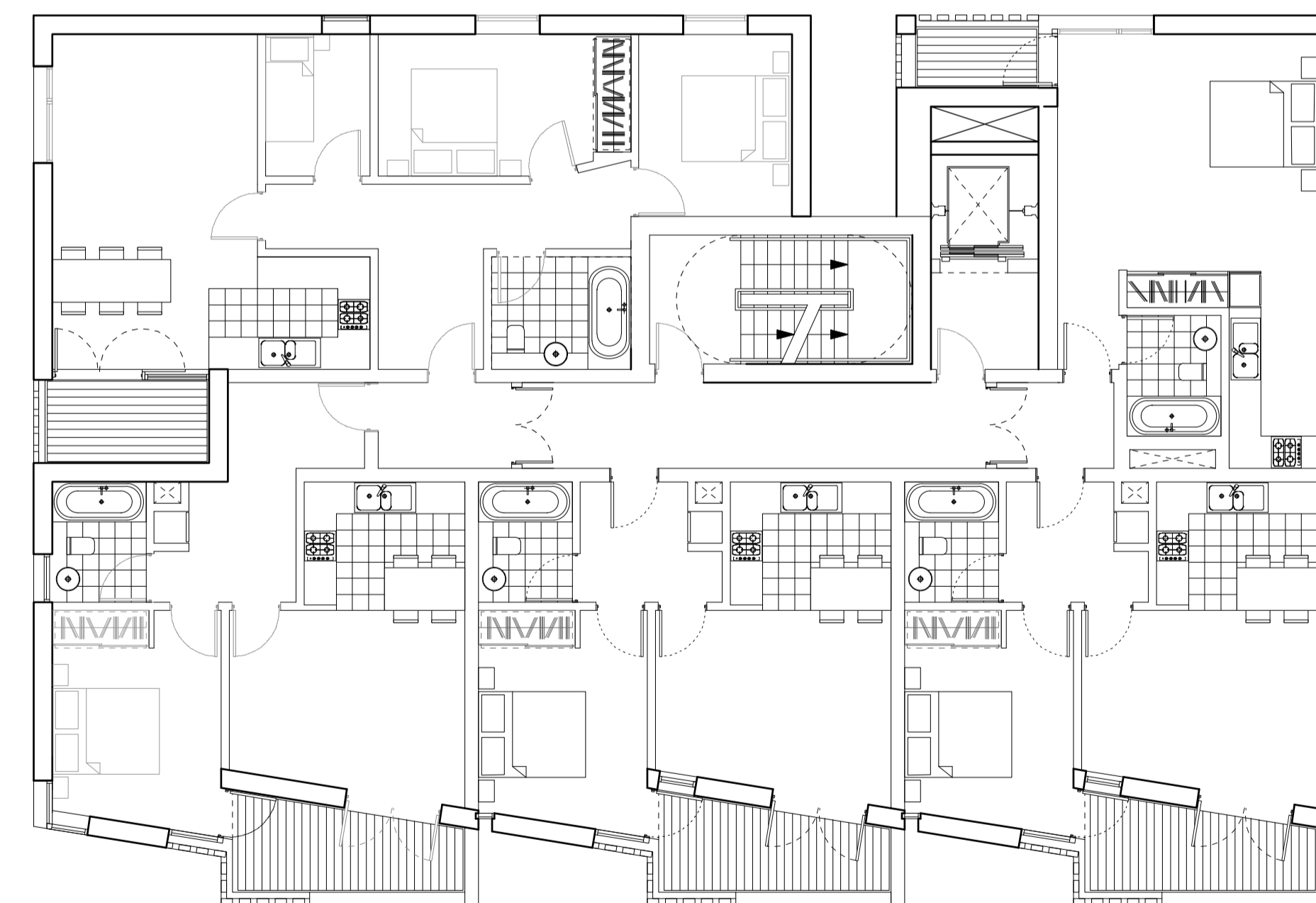
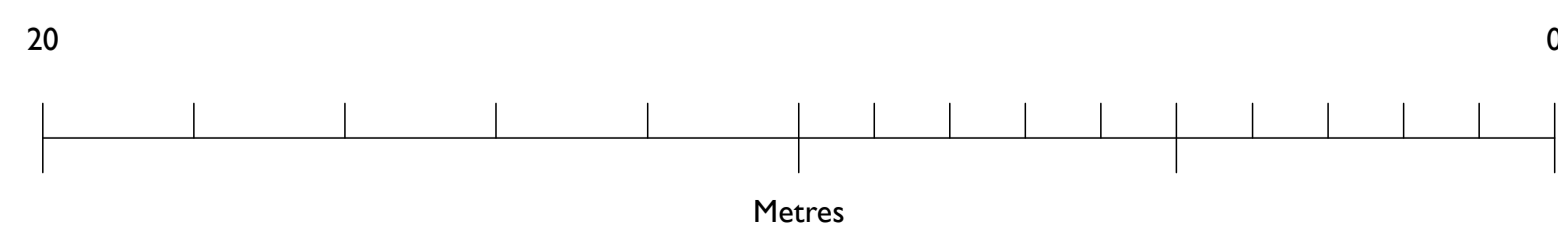
RETAIL / CONVENIENCE SHOP	180M2
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### HOUSE TYPE 4

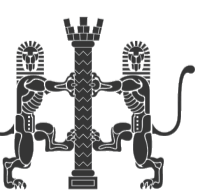


HOUSE TYPE 4 GROUND FLOOR PLAN SCALE 1:100

HOUSE PLANS SCALE 1:100



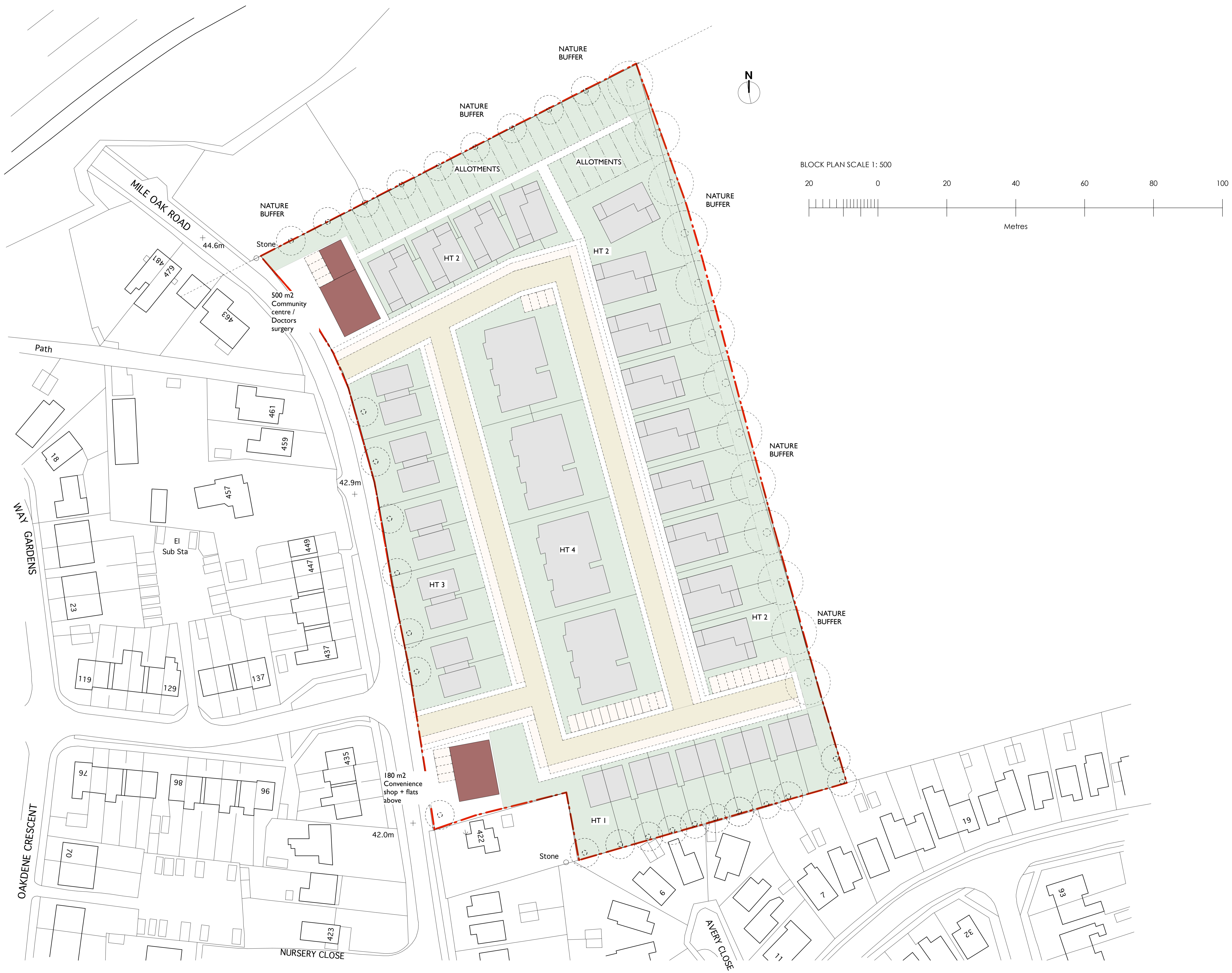
HOUSE TYPE 4 FIRST / THIRD FLOOR PLANS SCALE 1:100





N.B. unless otherwise noted this drawing is not to be used for construction purposes.  
 If indicated as feasibility this drawing is subject to a detailed site investigation, including ground conditions/contaminates, drainage design and planning/density negotiations. The layout may be based upon an enlargement of an OS sheet or other small scale plans and its accuracy needs to be verified by survey. CDM regulations have not been fully considered.

rev.	date	comment	by



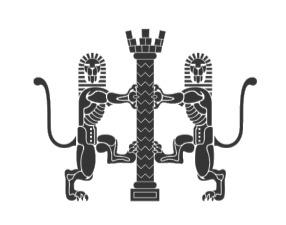
ACCOMMODATION SCHEDULE			
<b>HOUSE TYPE 1</b>			
10	X	3 BEDROOM PER UNIT	
TOTAL NUMBER OF UNITS HT1 10			
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2	X	1 BEDROOM PER BLOCK	
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<b>HOUSE TYPE 3</b>			
3	X	2 BEDROOM PER UNIT	
TOTAL NUMBER OF UNITS HT 3 30			
<b>HOUSE TYPE 4</b>			
13	X	1 BEDROOM PER BLOCK	
1	X	2 BEDROOM PER BLOCK	
3	X	3 BEDROOM PER BLOCK	
TOTAL NUMBER OF UNITS HT 4 68			

TOTAL NUMBER OF HOUSING UNITS	238
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COMMUNITY CENTRE AND DOCTORS SURGERY	500M2
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RETAIL / CONVENIENCE SHOP	180M2
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LANDIVAR ARCHITECTS  
 ARCHITECTS AND DESIGNERS



DRAWING STATUS:	PRE-PLANNING CONSULTATION
CLIENT:	MILE OAK
PROJECT:	BLOCK PLAN / MASTER PLAN
DRAWN:	ML SCALE 1:500@A1
DATE:	APRIL 18 REV. -
JOB NO.	1092 DRG. NO. F.01

Respondent DP081

## Comment

**Event Name** Consultation on the Draft City Plan Part 2  
**Comment ID** 82  
**Response Date** 30/08/18 16:37  
**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 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...**

SITE - 46 to 54 Old London Road, Patcham BN1 8XQ

I strongly object to the Council's decision to include in the City Plan numbers 46 to 54 Old London Road for the potential development of 30 units of residential accommodation. This site currently accommodates 5 family homes and is too small for 30 houses or flats. This density of housing will spoil the look and feel of this part of the village and materially detract from the character and appearance of the area. This was the opinion of the Government Inspector who recently rejected the appeal from the McCarthy & Stone planning application for this site. The Council has already rejected planning applications for this site. How many times does planning applications for this site have to be refused by the council before it is realised that this is just not a suitable site for this scale of development.

Additionally a development of this size will increase parking issues and congestion in the area. Currently during the daytime there is little parking available in Old London Road as people park to catch the bus into town for both shopping and work. The road also acts as a car park for people catching the coach to Gatwick or Heathrow airports and a rat run when the main London road is congested

The area is prone to groundwater flooding so it would not seem sensible to increase the number of people at risk.

I request that the Council remove this site from the list of sites allocated for development in the City Plan.

Respondent DP082

## Comment

<b>Event Name</b>	Consultation on the Draft City Plan Part 2
<b>Comment ID</b>	83
<b>Response Date</b>	30/08/18 16:49
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

<b>I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations</b>	<input checked="" type="checkbox"/> Yes
--	---

**Organisation Name**

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

**Name**

**Name**

**Address**

**Address**

**Email Address**

**Email Address**

<b>Please tick all of the sections you would like to comment on before proceeding</b>	<input checked="" type="checkbox"/> Site Allocations - Housing Sites
---	--

**H1 - Housing Sites & Mixed Use Sites**

<b>a) Do you support or object to policy H1?</b>	Support
--	---------

**H2 - Urban Fringe Housing Sites**

<b>a) Do you support or object to policy H2?</b>	Object
--	--------

**H2 Object Reasons**

**d) Please explain why you object to this policy?**

The inclusion of the site of FORMER PATCHAM FAWCETT SCHOOL LAND to build housing is a catastrophic error of judgement and will have a multitude of lasting negative effects on both the residents immediately local and all around the city, as well as the natural landscape.

**H2 - Urban Fringe Site Allocations**

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

Ladies Mile Road site on the former land of Patcham Fawcett School is a totally unacceptable site for development for housing. The house prices of houses in Windmill View will plummet as will houses at the top of Ladies Mile road and the surrounding area. The green fields are a spot of natural beauty allowing residents from all over Brighton to enjoy the fresh air and tranquillity of the South downs without having to leave the city or go further afar to places such as Devil's Dyke. It is a perfect spot to watch the sunset and is extremely popular walking destination for people of all ages and especially for people with dogs. It would be an absolute waste of a spot of natural beauty if houses were to be built at this site especially when there are so many other brownfield sites around the city just lying in disrepair waiting to be turned into accommodation. I think it would be an absolute waste and shame if any building work whatsoever is to take place in this site. Many residents have small children and or elderly residents who all have moved to Windmill View for the suburban atmosphere and to build houses in this site would turn it into an urban area. The extra noise and traffic and pollution would be destructive to the area. The roads around the top of Ladies Mile Road and Windmill View are always very quiet and many families take advantage of that to allow their children to play on the private residential roads, especially during the summer months. This would be completely wiped out and impossible if extra houses were built on the site and it is an unnecessary sacrifice given the endless other opportunities to build upon in the city. During the winter months snow and ice means Ladies Mile Road is practically impassable and to add extra houses and extra traffic to the top of this road would just be completely illogical as it would mean even more people are unable to leave/return to their houses. In conclusion I think in a city as big as Brighton and Hove, to build housing on what is one of very few truly pure untouched spots of natural beauty, immensely popular with residents both local and all around the city, would be a catastrophic error and would have detrimental effects to residents all over the city.

**H3 - Purpose Built Student Accommodation Sites**

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

Support



Respondent DP083

## Comment

<b>Event Name</b>	Consultation on the Draft City Plan Part 2
<b>Comment ID</b>	84
<b>Response Date</b>	30/08/18 17:16
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

<b>I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations</b>	<input type="checkbox"/> Yes
--	------------------------------

**Organisation Name**

<b>Organisation Name (if not applicable please put n/a)</b>	SAFE
---	------

**Name**

**Name**

**Address**

**Address**

**Email Address**

**Email Address**

**Agent Name**

<b>Agent Name</b>	N/A
-------------------	-----

**Agent Address**

<b>Agent Address</b>	N/A
----------------------	-----

**Agent Email**

<b>Agent Email</b>	N/A
--------------------	-----

<b>Please tick all of the sections you would like to comment on before proceeding</b>	<input type="checkbox"/> 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:

<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.**

There was a full Council recommendation to a sub committee that St Aubyns Field be granted recognition as a Local Green Space as soon as possible . However it doesn't appear in the appropriate section of the Neighbourhood Plan Part 2 ( Tourism Development & Culture Local Green Space DM38) and I would like to know why .

---

**From:**  
**Sent:** 30 August 2018 16:08  
**To:** PlanningPolicy  
**Subject:** Old London Road Redevelopment

My name is XXXXX living at XXXX.

I would like to formally object to the proposed redevelopment in Old London Road Patcham which would demolish houses 46 to 52.

It was rejected by Brighton Council in July 2017 and I see no reason why it should be resurrected again by the very people who rejected it last year!!!

Thanks



respondent DP085

## Comment

<b>Event Name</b>	Consultation on the Draft City Plan Part 2
<b>Comment ID</b>	87
<b>Response Date</b>	30/08/18 18:07
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	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**

**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** . Transport and Travel  
. Environmental and Energy

**DM33 - Safe, Sustainable & Active Transport**

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

**DM34 - Transport Interchanges**

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

**DM35 - Travel Plans & Transport Assessments**

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

**DM36 - Parking & Servicing**

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

**DM37 - Green Infrastructure & Nature Conservation**

a) Do you support or object to policy DM37? Support

**DM38 - Local Green Spaces**

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

**DM39 - Development on the Seafront**

a) Do you support or object to policy DM39? Support

**DM40 - Protection of Environment and Health - Pollution & Nuisance**

a) Do you support or object to policy DM40? Support

**DM41 - Polluted Sites, Hazardous Substances & Land Stability**

a) Do you support or object to policy DM41? Support

**DM42 - Protecting the Water Environment**

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

**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



DP086

**For Official Use:**

Respondent Number:

Date Received: / / 2018

Entered onto Portal: Yes/No

**Draft City Plan Part Two**  
**Consultation Period: 5th July 2018 until**  
**5pm on 13th September 2018**  
**Word Response Form**

Accessibility Notice: (Ctrl & click to view): <https://www.brighton-hove.gov.uk/content/about-website/help-using-council-website/accessibility>

**Draft City Plan Part Two – Consultation**

Brighton & Hove City Council has published the draft City Plan Part Two for a 10 week period of consultation starting 5<sup>th</sup> July 2018. This follows on from the scoping consultation undertaken July - September 2016.

The draft City Plan Part Two sets out the preferred approach and includes proposed site allocations for housing and other uses such as employment and community facilities and contains a suite of development management policies which will be used to assess planning applications. The City Plan Part Two will support the implementation and delivery of the City Plan Part One.

The council is seeking your views on the draft Plan and supporting documents. Your comments will help inform the final version of the City Plan Part Two. So if you have any comments about the approaches in the plan then we would urge you to submit those comments during this consultation so that they can be fully taken into account.

The Draft City Plan Part 2 and supporting documents including a quick guide to the City Plan Part Two as well as background evidence documents are available to view and download from the Council's website at: [www.brighton-hove.gov.uk/cityplan-part2](http://www.brighton-hove.gov.uk/cityplan-part2).

**Part A: Contact Details**

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

No

Privacy Notice: (ctrl & click to view)

<https://www.brighton-hove.gov.uk/content/planning/planning-applications/planning-service-privacy-statement>

*Please note that you must complete Part A as anonymous forms cannot be accepted.*

<b>Organisation Name (If applicable)</b>	
Name	<div style="border: 1px solid red; height: 100px;"></div>
Address	
Email Address	
<b>Agent Name (If applicable)</b>	Collins Planning Services Ltd
Agent Name	<div style="border: 1px solid red; height: 100px;"></div>
Agent Address	
Agent Email Address	



## Part B: Your Representation relating to Development Management Policies

*Please use a separate sheet for representations against each Development Management policy*

(ctrl & click to view)

Housing, Accommodation & Community chapter (policies DM1-DM10)

Employment Tourism & Retail Chapter (policies DM11-DM17)

Design & Heritage Chapter (policies DM18-DM32)

Transport & Travel Chapter (policies DM32-DM36)

Environment & Energy Chapter (policies DM37-DM46)

Policy Number (e.g. DM1)

Policy Name (e.g. Housing Quality, Choice and Mix)

a) Do you Support or Object to the policy?

Support

If you support this policy, please go to questions (b) and (c)

Object

If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

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

d) Please explain why you object to this policy?

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

**Part C: Your Representation(s) relating to Site Allocations**

**Site Allocations - Special Area policies**

(Ctrl & click to view): [SA7 Benfield Valley Policy](#)

a) **Do you Support or Object to the policy?**

Support

If you support this policy, please go to questions (b) and (c)

Object

If you object to this policy, please go to questions (d) and (e)

b) **Please explain why you support this policy?**

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

d) **Please explain why you object to this policy?**

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**

## Site Allocations – Strategic Site Allocations

(Ctrl & click to view): Strategic site allocations: (policies SSA1-SSA7)

*Please use a separate sheet for representations against each Strategic Site Allocation*

- SSA1, Brighton General Hospital Site
- SSA2, Combined Engineering Depot, New England Road
- SSA3, Land at Lyon Close, Hove
- SSA4, Sackville Trading Estate & Coal Yard, Hove
- SSA5, Madeira Terrace & Madeira Drive
- SSA6, Former Peter Pan Leisure Site (adjacent Yellow Wave)
- SSA7, Land Adjacent Amex Community Stadium, Falmer Way

**Policy Number**

**Policy Name**

**a) Do you Support or Object to the policy?**

Support

If you support this policy, please go to questions (b) and (c)

Object

If you object to this policy, please go to questions (d) and (e)

**b) Please explain why you support this policy?**

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

**d) Please explain why you object to this policy?**

**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**

**f) Are there any other sites that could be allocated as strategic sites ?**



[Empty text box]

**Site Allocations - Housing Sites**

(Ctrl & click to view): Housing sites and Mixed Use Site allocations: (policies H1-H3)

**H1 - Housing Sites & Mixed Use Sites**

a) **Do you Support or Object to the policy?**

- Support  If you support this policy, please go to questions (b) and (c)  
Object  If you object to this policy, please go to questions (d) and (e)

b) **Please explain why you support this policy?**

[Empty text box]

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

[Empty text box]

d) **Please explain why you object to this policy?**

[Empty text box]

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**

[Empty text box]

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**

[Empty text box]

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

[Empty text box]

## H2 – Urban Fringe Housing Sites

(Ctrl & click to view): [Housing sites and Mixed Use Site allocations: \(policies H1-H3\)](#)

a) **Do you Support or Object to the policy?**

Support  If you support this policy, please go to questions (b) and (c)  
Object  If you object to this policy, please go to questions (d) and (e)

b) **Please explain why you support this policy?**

My clients own land at Ovingdean Hall Farm and support comprehensive developments.

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

Table 7 sets out potential housing numbers. In view of the recently published NPPF, overall numbers should be increased

d) **Please explain why you object to this policy?**

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**

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**

### H3 - Purpose Built Student Accommodation Sites

(Ctrl & click to view): [Housing sites and Mixed Use Site allocations: \(policies H1-H3\)](#)

a) **Do you Support or Object to the policy?**

Support

If you support this policy, please go to questions (b) and (c)

Object

If you object to this policy, please go to questions (d) and (e)

b) **Please explain why you support this policy?**

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

d) **Please explain why you object to this policy?**

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**

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 and give your reasons**

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



## Site Allocations - Employment Site

(Ctrl & click to view): Opportunity site for business and warehouse uses: (policy E1)

a) Do you Support or Object to the policy?

Support

If you support this policy, please go to questions (b) and (c)

Object

If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

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

d) Please explain why you object to this policy?

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

f) Are there any other sites that could be allocated as employment sites ?

## Part D: Your Representation(s) relating to Any Other Comments & Equalities

### Any other comments

*Please use a separate sheet for each representation*

(Ctrl & click to view):

- [Introduction](#)
- [Appendix 1: Glossary of terms](#)
- [Appendix 2 Parking Standards – Policy DM36 Parking and Servicing \(adopted Parking Standards SPD\)](#)
- [Appendix 3 - Local Wildlife Sites \(Policy DM37 Green Infrastructure and Nature Conservation\)](#)
- [Appendix 4 - Policy H2 Urban Fringe Housing Site Maps \(see also proposed draft Policies Map\)](#)
- [Appendix 5 - List of Brighton & Hove Local Plan policies that will be superseded on adoption of the City Plan Part 2](#)
- [Appendix 6 Table 1 – Proposed Changes to Policy Map – new additions/ amendments by virtue of policies in Draft City Plan Part 2/ Updates](#)
- [Appendix 6 Table 2 Policies Map – Proposed Changes to the City plan Part 1 Policies Map due to retained Brighton & Hove Local Plan Policies being superseded by City Plan Part 2 policies](#)
- [Supporting documents to the City Plan Part Two](#)
- [Background studies for the City Plan Part Two](#)

**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.**

## 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.**

NO
----

Signed*:	
Dated*:	31/8/18

All representations must be received at the email or postal address given on this form by **5.00pm on 13<sup>th</sup> September 2018.**

**Due to the length of the consultation period please kindly note that late representations will not be accepted.**

Completed forms should be sent to:

Email: [planningpolicy@brighton-hove.gov.uk](mailto:planningpolicy@brighton-hove.gov.uk)

Post: Consultation on the Draft City Plan Part Two  
Brighton & Hove City Council  
Planning Policy Team  
1<sup>st</sup> Floor Hove Town Hall  
Norton Road  
Hove BN3 3BQ

If you have any further queries please contact us on 01273 292505 or via email [planningpolicy@brighton-hove.gov.uk](mailto:planningpolicy@brighton-hove.gov.uk)

---

**From:**  
**Sent:** 31 August 2018 11:47  
**To:** PlanningPolicy  
**Subject:** City plan part 2

I strongly object to the houses listed as 46-54 Old London road being in the city plan allocated for development, its already been refused planning for McCarthy stone so why has it been submitted again, once again my objections are it will create to much traffic for a small road and village, flooding is a bigger risk with another 30 houses.

I also object to the plan to allocate a green field site north of the cricket ground in Patcham.

**From:**  
**Sent:** 31 August 2018 15:19  
**To:** PlanningPolicy  
**Subject:** City Plan Part Two Consultation

I am writing to ask you to remove 46 - 54 Old London Rd. Patcham from your list of sites for development. Development here would significantly change the character of Patcham, it would create even more traffic in a busy area, be bad for wild life and increase the flooding risk which is already high.



Respondent DP089

## Comment

**Event Name** Consultation on the Draft City Plan Part 2  
**Comment ID** 92  
**Response Date** 01/09/18 07:43  
**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** . Environmental and Energy  
. Site Allocation - Special Areas policies

**DM37 - Green Infrastructure & Nature Conservation**

**a) Do you support or object to policy DM37?** Object

**DM37 Object Reasons**

**d) Please explain why you object to this policy?**

There are sites missing from the list of Local Wildlife sites

**DM37 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**

Please can you consult with Brighton and Hove's Wildlife forum - I believe they agreed the list with the council a number of years ago

**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?

Not sure of this list is complete either

**DM39 - Development on the Seafront**

a) Do you support or object to policy DM39? Support

**DM40 - Protection of Environment and Health - Pollution & Nuisance**

a) Do you support or object to policy DM40? Support

**DM41 - Polluted Sites, Hazardous Substances & Land Stability**

a) Do you support or object to policy DM41? Support

**DM42 - Protecting the Water Environment**

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

Respondent DP090

## Comment

**Event Name** Consultation on the Draft City Plan Part 2  
**Comment ID** 93  
**Response Date** 01/09/18 14:15  
**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...**

I object to the preposed development of 46 to 54 Old London road, as I believe the planned preposal will adversely effect the surrounding area and community in the following ways:

- Add to the congestion and parking problem in the old village. This is a busy area as it is, with many people using the schools, nursery , shops and local businesses.
- The removal of mature trees and gardens will destroy valuable habitats and disrrupt the 'wildlife corridor' for wildlife travelling through.
- The outlook will be affected for local residents if mature trees are replaced with a large buildings not to mention the loss of privacy from new overlooking buildings
- The scale of the scheme will greatly impact the character, look and feel of the village in a negative way
- There is a historical flood risk - further development will only increase the risk of future flooding as permeable surfaces are replaced with buildings and the greater demands these buildings will place on the existing drainage and sewerage systems

Respondent DP091

## Comment

**Event Name** Consultation on the Draft City Plan Part 2  
**Comment ID** 94  
**Response Date** 01/09/18 22:16  
**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
- . Employment, Tourism and Retail
- . Design & Heritage
- . 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?** Object

## DM1 Object Reasons

### d) Please explain why you object to this policy?

There is no mention of the city's special heritage (Regency and otherwise) and how the new builds are supposed to be sympathetic to the environment around them. There are no aesthetic or streetscape requirements. There is also no detail on how build quality would be achieved/enforced when we know that the majority of new builds are not of high quality and are indeed only built to last 50 years. Posterity needs to be considered, which would also address the issue of buildings outliving their carbon footprint of construction and delivering better VFM through longevity. Change of use should be made easier to accommodate ever changing demand. I would rather see more low density shared housing throughout the city than ugly blocks and 'skyscores' and I am sure I am not alone in this. Most professionals nowadays can only afford shared housing so it is not just students who are affected by anti-HMO sentiment. It is enforcement of good agency and good management which is needed and YEARLY council HMO inspections to ensure that compliance is maintained. Moreover many of the ugly new builds and blocks being built are completely UNAFFORDABLE to the majority of those they should be benefitting and are indeed being sold to overseas investors or developers are allowed to buy their way out of their 40% affordable housing requirement. This must be stopped. Unless new housing can be ringfenced for local need and the quality and look guaranteed, it should be stopped.

## DM1 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

This policy undertakes to maximise accommodation within the city by making it easier for landlords to convert properties into HMO's and former commercial premises into accommodation as it recognises that 70% of under 35s cannot afford to get onto the housing ladder nowadays and this is the lowest impact means of achieving higher density accommodation without ruining the city's historic and special character. It also recognises that university numbers are set to drop over the next five years owing to the shortage of 18 year olds and the construction of new universities in the East meaning that many Chinese students in particular will no longer be sent to UK for their university education. Both universities are simultaneously dropping in the league tables.

## DM2 - Retaining Housing

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

### DM2 Support Reasons

### b) Please explain why you support this policy?

I support all attempts to convert existing buildings to residential accommodation, particularly heritage buildings and vacant commercial premises. This is far cheaper and more sustainable than allowing new builds all over the place. I have no objection to hideous modern buildings being demolished as long as they are replaced with something more attractive. When building new, we need to aim for high density, LOW IMPACT buildings. The Mansion block model has never been bettered in this respect. Handsome, built to last 4-6 storey buildings around a communal greenspace (no need for individual gardens) Safe for children. Safe for pets. Attractive streetscape. Underground garage for cars and access vehicles. We lost half of Hanover to hideous blocks but actually they turn out to house no more people than the houses did and the houses of Hanover, having gone through a slump period) have now become highly fashionable again. Fashions need to be resisted.

## DM2 Support Wording Changes

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

We seek to retain all historic and characterful buildings and will support all sensitive plans to convert them into housing and accommodation where possible, retaining as much historical integrity as possible. Where new builds are permitted/sites are available, we require attractive low impact Mansion Block arrangements providing a secure communal greenspace within and parking underneath. All buildings must be sympathetic to the historic style of Brighton and Hove, though New England style will be considered as it has a narrative to old Sussex style weatherboarding.

Self-builds will need to conform to the same standards as developer builds as these can be of very patchy quality and style.

**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?**

This will enable more choice and options.

**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?**

While many elderly people find the cost of downsizing prohibitive and that it doesn't save them any money, the options should be there as their health needs may dictate their housing choices. However parking for visitors and carers must be incorporated (street parking is ridiculously expensive and electronically discriminatory) and they should be pet-friendly as it is very cruel to separate vulnerable elderly people from their pets, who may be their only companions.

**DM5 -Supported Accommodation**

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

**DM5 Support Reasons**

**b) Please explain why you support this policy?**

This seems very sensible.

**DM6 - Build to Rent Housing**

**a) Do you support or object to policy DM6?** Object

**DM6 Object Reasons**

**d) Please explain why you object to this policy?**

Without protected rents in the UK (and housing trusts to prevent the buildings being sold off), this would be meaningless. Only in the Netherlands could something like this work. We have had build to

rent in the past and it has ended up being sold off - sic King George VI mansions in Court Farm Road, Hove.

#### **DM6 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**

The Council supports Community Land Trusts as an option for genuinely affordable housing by and for the community. Blueprints already exist with successful examples in Bristol and Cheltenham.

#### **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?**

Considering fewer than 70% of under 35s can afford to get onto the housing ladder we need MORE HMO's and FEWER family homes as people cannot afford to start families OR buy family homes these days. Twenty years ago before mass immigration caused our current housing crisis, perhaps, but not now. In addition our housing crisis also demands more HMO's. The key issue is surely whether HMO's pay council tax or not, in which case 25% would be the tipping point for most councils. In a professional HMO they will pay full council tax (or rather the landlord has to on their behalf). In a student HMO the government are supposed to reimburse the council for full-time students, though there is very little information available about how this actually works and whether all councils bother to claim it (and in time before the deadline each year).

Even if both universities closed down tomorrow, very few people could afford a so-called 'family home' in Brighton and Hove these days so that market is very much becoming a thing of the past as trends change and the nuclear family is largely no more anyway.

#### **DM7 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**

The council acknowledges that 70% of the under 35s can afford to get on the housing ladder in the current climate and in this spirit encourages a larger percentage of HMO's as an affordable option.

#### **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?**

Most purpose built student accommodation blocks are completely unaffordable for all but the top 5% of students. Many of these students are set to be lost when the Chinese open their own universities. In cities such as Doncaster and Leeds we are seeing the collapse of some companies providing this overpriced accommodation as there has been an oversupply. In Brighton both universities are dropping in the League tables and Brighton Uni numbers are particularly dropping fast now (sic staff redundancies). Therefore the market for student accommodation is not set to get larger, but smaller. Moreover both Sussex and Brighton are building more of their own on-site accommodation which will lessen the need for private partnership and private developments still further.



## 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**

The council recognises that some cities in the UK have radically overestimated the supply for top-end, top-priced private accommodation for students and are now seeing a drop in student numbers. Moreover many students cannot afford such accommodation. Owing to the national drop in student numbers of 7% in the last two years along with the drop of both universities in the national league table we are not minded to approve any further planning applications for purpose-built student accommodation off campus, unless in exceptional circumstances.

## 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?**

We have plenty of existing buildings suitable for community use and it is much cheaper to utilise empty premises, keep existing premises going or enhance them than build shiny new ones, particularly using PFI money. It is also much greener.

## 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**

The council supports the continuance of all community and Library facilities and the conversion of vacant council and other premises into additional community facilities where indicated. This is a green and cost effective solution enabling the rest of the budget to be spent on overheads, resources and staffing. We will particularly seek to utilise heritage buildings at risk to preserve the special nature of Brighton and Hove. The Bridge has served as a lesson to all who favour shiny new buildings over sustainability, both financial and green. Jubilee Library has also served as a lesson whose PFI payments use up more than half the library budget starving the rest of the Library network of money.

The council acknowledges that whatever the costs of adequate community provision will be re-couped in the longer run by social benefit savings through promoting independent living for as long as possible against social isolation and resulting depression and ill health.

## DM10 - Public Houses

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

### DM10 Support Reasons

**b) Please explain why you support this policy?**

All public houses should automatically be registered as community assets. And potentially converted to community use if no longer viable as pubs. The Bevy is a wonderful example of how this can work.

## DM10 Support Wording Changes

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

The council supports the registering of all pubs as community assets and gives the community first opportunity to form trusts to save and run them.

### **DM11 - New Employment / Business Floorspace**

Click here to read: Employment Tourism & Retail Chapter

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

#### **DM11 Support Reasons**

**b) Please explain why you support this policy?**

Fine as long as all existing business spaces are utilised first and all new ones are required to be architecturally attractive (ie like former Maynards sweet factory).

#### **DM11 Support Wording Changes**

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

The council's policy is to fill all existing commercial space first and foremost. Where purpose-built new business space is needed, the buildings must provide architectural attractiveness outside as well as functionality inside. Adequate parking for business and service vehicles must be provided beneath.

### **DM12 - Primary, Secondary and Local Centre Shopping Frontages**

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

#### **DM12 Support Reasons**

**b) Please explain why you support this policy?**

It seems sensible, except in protected areas which should be the Lanes and North Laine area.

### **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?**

With the proviso that any new development MUST be of Regency style. There are too many architectural abortions on the seafront ruining the view.

#### **DM15 Support Wording Changes**

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

Any new development must be attractive to tourists, worthy of the tour bus and in historic style.

#### **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** Object

#### **DM17 Object Reasons**

**d) Please explain why you object to this policy?**

It is ill-conceived without sufficient thought and research as to the real business and community need for these changes. Nor should these decisions be led or influenced by developers and what they wish to do. It needs to be about what is right for Brighton and Hove every time and looking far into the future - at least ten years. There is far too much short-termism and fashion following.

#### **DM17 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**

While we welcome sensitive changes to Brighton and Hove, we recognise that unregulated growth is both irresponsible and unsustainable as well as environmentally detrimental and would ruin the special nature of Brighton and Hove. Stability is what is needed to survive and thrive into the future rather than endless growth. If the old Conference centre (only 40 years old) needs replacing it will be replaced by a Regency style conference centre in the same location built for posterity, central and convenient and supporting local hotels and businesses. The Hippodrome will also be restored and re-opened as an entertainment centre to enable large shows. There are ample shops, hotels or restaurants. It is about sustaining and polishing what assets the city has, making the most of every square inch of retail, business, accommodation and community space and making it attractive and financially accessible to visit as a city. Facilities should also be more evenly spread between Brighton and Hove. Hove has only one library and one museum yet its citizens pay the same council tax as Brightonians.

The council assures citizens and visitors that the horror of Greater Brighton was put to bed when Daniel Kitson left office. Brighton and Hove will NOT become Luton-on-sea and the mistakes of the past have been learned.

#### **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?**

I totally support this policy and believe it needs to be stricter and state that planning applications will not be passed without these criteria being met. We also need a commitment to full and transparent community consultation. Live planning applications should also be instantly searchable without having to look up specific addresses.

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

The council will decide what style and standard of architecture is acceptable in which area following full and transparent public consultation and will require developer compliance. 106 agreements will be strictly enforced.

#### **DM19 - Maximising Development Potential**

**a) Do you support or object to policy DM19?** Object

**d) Please explain why you object to this policy?**

The heritage and special nature of Brighton and Hove between the Downs and the Sea must be prioritised first. No more skyscres or blots on the landscape. Beauty, stability and sustainability are what will take our city forwards.

**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**

The council does not support the maximising of development at all costs, but the sensitive and sensible best use of sites. Heritage, stability and sustainability come first.

#### **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

#### **DM26 - Conservation Areas**

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

**b) Please explain why you support this policy?**

Conservation areas first. If people choose to live in a conservation area, they need to conform to the area, not expect the area to conform to them. It is the only way to keep areas special.

#### **DM27 - Listed Buildings**

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

b) Please explain why you support this policy?

Our heritage is priceless. Without history there is no context. It is what makes Brighton and Hove special.

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

The council takes listing extremely seriously and will do all in its power to preserve the special nature of Brighton and Hove.

#### **DM28 - Locally Listed Heritage Assets**

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

b) Please explain why you support this policy?

We hear some pathetic excuses from developers that heritage buildings have 'outlived their usefulness' or are 'no longer fit for purpose' There are virtually no heritage buildings or assets which are not fixable. I think the council needs to be 100% robust about anyone wishing to demolish them and insist on a number of independent reports before reaching any final decisions.

Our heritage assets are priceless and once they are gone they are gone.

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

The council takes listing extremely seriously and will do all in its power to preserve the special nature of Brighton and Hove.

#### **DM29 - The Setting of Heritage Assets**

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

b) Please explain why you support this policy?

I have mixed feelings about this. Yes in some ways but not if it enables modern development or 'regeneration' of a heritage asset as this is the slippery slope towards losing first the integrity of the heritage asset and finally the asset itself. As an individual with a heritage background it is very possible to make a heritage building fit for modern use and carbon neutral without ruining it or its setting.

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

The council supports the sensitive restoration of heritage buildings to make them suitable for modern day use with minimal compromise to historic integrity. All developers wishing to convert buildings are required to work closely with the Conservation Officer and English Heritage as appropriate.

#### **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

**SA7 - Benfield Valley**

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

**SA7 Support Reasons**

b) Please explain why you support this policy?

Our green lungs and belts are vital.

**SSA1 - Brighton General Hospital Site**

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

**SSA1 Object Reasons**

d) Please explain why you object to this policy?

We have a high proportion of homeless people in Brighton and Hove. This facility should revert to its original workhouse origins and become a 21st century Emmaus type community to combat homelessness and poverty.

**SSA1 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...

We seek to preserve one of the last workhouses left in Britain and ensure it is used to help the poor and the vulnerable of our society once more as it was originally built to do. All street homeless will be required to reside in this facility and undergo whatever medical, psychiatric or general rehabilitation they require to rejoin society. We can then enforce the Vagrancy Act and rid the city of begging and street homelessness. This will also act as a deterrent to anyone coming to the city believing they can live in the streets and engage in what anti-social or addictive behaviour they wish. The long term social benefits will render this facility cost-neutral.

**SSA2 - Combined Engineering Depot, New England Road**

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

**SSA2 Support Reasons**

b) Please explain why you support this policy?

As long as built in New England style.

**SSA2 Support Wording Changes**

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

An unattractive site will become an attractive one built in New England or traditional Sussex style.

#### **SSA3 - Land at Lyon Close, Hove**

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

#### **SSA3 Support Reasons**

**b) Please explain why you support this policy?**

Must be attractive

#### **SSA3 Support Wording Changes**

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

The council is committed to building in Mansion block formation for attractiveness, longevity and sensitivity to Hove.

#### **SSA4 - Sackville Trading Estate & Coal Yard, Hove**

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

#### **SSA4 Support Reasons**

**b) Please explain why you support this policy?**

Must be attractive

#### **SSA4 Support Wording Changes**

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

The council is committed to building in Mansion block formation for attractiveness, longevity and sensitivity to Hove.

#### **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?**

Madeira Terraces were never intended for this but to be an attractive promenade sheltered from the elements. A few artisan stalls fine, but structure needs proper restoration. It will then form the perfect backdrop once more to the vintage car rallies and other events Madeira Drive is famed for hosting and the income from which should be used to support the Arches.

#### **SSA5 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...**

The council are committed to restoring and preserving the unique character of this Grade II listed asset and refusing any planning application which would compromise it.

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

**a) Do you support or object to policy SSA6?** Object

#### **SSA6 Object Reasons**

**d) Please explain why you object to this policy?**

Obtrusive and intrusive. Inappropriate. It is a public beach. We are supposed to be able to see the sea. No permanent buildings or structures should be permitted. Bring back Peter Pan playground

#### **SSA6 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...**

The Council are committed to preserving the beach as a public facility with good sea views and preserving the special nature of Brighton and Hove. Attractive temporary structures for entertainment will be considered but not permanent structures.

#### **SSA7 - Land Adjacent Amex Community Stadium, Falmer Way**

**a) Do you support or object to policy SSA7?** Object

#### **SSA7 Object Reasons**

**d) Please explain why you object to this policy?**

There is enough development there already. The Amex is extremely ugly and obtrusive.

#### **SSA Omission Sites**

**f) Are there any other sites that could be allocated as strategic sites ?**

No. Brighton and Hove need to focus on utilising and filling all its EMPTY buildings sooner than building more and clamping down on holiday lets and second homes sooner than ruining the city. The Marina in particular is a ghost town for a greater part of the year. In addition it needs to consider that we are vastly oversupplied with shops, restaurants and hotels and many are failing on a continual basis or not paying their business rates (usually a sign of impending failure). The city needs to do an audit of its assets and what is missing and what it can do to rectify before passing another planning application for new premises.

#### **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?**



There is no research to suggest any of this is needed. Or in the case of housing, will address the problem of local affordable need. Developers appear to be leading the agenda and it shouldn't be the council's job to line their pockets, particularly not at the city's expense when overseas developers and second home owners then take advantage. The council should be deciding what is needed and inviting the community's input on what, when and where, not the developer's

## 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...**

While the city needs more housing, this must not be at any cost. The council is committed to working with the community to address housing need and offering fluidity where possible with regard to building conversions within its own stated framework of criteria.

## 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...**

Must not be on greenbelt or heritage sites.

## H1 Housing Site Omissions

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

Council needs to focus on utilising empty buildings and sites first.

## 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?**

Overdevelopment with lack of infrastructure. We have seen the disastrous results of ribbon development in Peacehaven/Telscomb

## 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?**

Too much already. Fewer than 5% of students can afford it. Student numbers dropping. Both universities building their own accommodation on their own sites.

## 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

## **E1 Support Reasons**

### **b) Please explain why you support this policy?**

If it could be built as an attractive, unobtrusive site, ok.

### **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.**

No

**From:**  
**Sent:** 01 September 2018 13:19 PlanningPolicy  
**To:** City Plan Part Two Consultation  
**Subject:**

- . Blocks sunlight from my south facing window.
- . ruins natures creatures : foxes and squirrels.
- . block wonderful views of beautiful trees
- . noise of construction and the sight of ugly flats being built
- . dust coming in from construction, noise of demolition.
- . ruins the village feel of old London road.

**From:**  
**Sent:** 01 September 2018 19:23  
**To:** PlanningPolicy  
**Subject:** city plan part two consultation

With respect to the proposal to develop land beside Horsdean recreation ground in Vale Avenue (25 residential units proposed):

We object to this development as it is unsuitable for residential use.

There is no easy road access to the proposed site, which is currently woodland/scrub land.  
The site is too small for 25 houses.

There is insufficient space for car parking in the proposed plan and therefore, the quality of life for residents of Vale Avenue would be diminished by this development.

Additionally, we should not be building on any green space on the outskirts of the city for the good of the environment.

We need all the green space to be preserved for residents.

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**From:**  
**Sent:** 02 September 2018 08:17  
**To:** PlanningPolicy  
**Subject:** City Plan Part Two Consultation

Dear Sir/Madam

I wish to object to the proposal to include land at 46 to 54 Old London Road, Patcham for possible redevelopment in the City Plan Part Two. Planning permission has been denied on three previous occasions and the reasons for this rejection have not altered.

The road is prone to flooding, partly due to the river beneath it and partly due to the level of current development which prevents proper, natural, drainage. Further development will reduce the amount of open land available to receive rainfall and the drainage system will be more heavily used.

The Old London Road carries a considerable amount of traffic, is frequently densely parked along the entire length, and is also a bus route. Despite the bus service, I would expect most properties to have at least one vehicle leading to increased traffic and need for parking.

There is a fairly narrow pedestrian walkway along one side only of the road, and this walkway is used by pupils at the various Patcham schools, people attending events at the Memorial Hall and shoppers as well as for general foot traffic.

I don't believe that the land is large enough to support up to 30 houses or flats without further reducing the appearance and character of the road.

I can appreciate that more housing is needed but, in my opinion, a development of this density is not appropriate for this site, and it should either be removed from the list of sites included in the development plan or the potential quantity of housing considerably reduced.

Yours faithfully

Respondent DP095

## Comment

**Event Name** Consultation on the Draft City Plan Part 2  
**Comment ID** 98  
**Response Date** 02/09/18 15:08  
**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
- . Environmental and Energy
- . 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?**

A mix of dwellings is a good idea. Design is important.

## **DM2 - Retaining Housing**

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

### **DM2 Support Reasons**

b) Please explain why you support this policy?

It seems sensible

## **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?

It seems sensible

## **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? Object

### **DM6 Object Reasons**

d) Please explain why you object to this policy?

Rented accommodation is too expensive in Brighton and should be better managed. Building more homes specifically for renting will only compound the problem. Also, there should be an extension to the policy to make sure homes are not purchased for renting but then not occupied.

The Universities should be compelled to do more to help with the rental sector in Brighton, they should be providing more accommodation for their students leaving more, cheaper homes for residents of the city.

## **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?

There are too many HMOs in Brighton already

## **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?

I would support this but extra constraints are needed: the sites need to be near transport that goes directly to university sites - otherwise students will add to the parking problems within the city.

Also, extra provision needs to be made for the buses that serve the universities as they are usually full, leading to further problems with parking.

#### 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

#### 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?

I would support but there needs to be acknowledgement within the Council that whatever the policy is, people will still use cars. Provision for more, affordable parking needs to be included in the city centre and at public transport hubs - park and ride, stations.

Also, there needs to be more public transport available over night and in the early morning, otherwise cars will be used when they need not be.

#### DM34 - Transport Interchanges

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

#### DM34 Object Reasons

d) Please explain why you object to this policy?

This needs to be more forceful. There needs to be a specific site for coaches and vans to park, they contribute too much to the parking problems throughout the city.

#### DM35 - Travel Plans & Transport Assessments

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

#### DM35 Object Reasons

d) Please explain why you object to this policy?

In principle this is a good idea. In practice new developments need to allocate space for a sensible number of vehicles. Too many developments allocate too few places leading to pressure in surrounding streets.



The policy of providing 1 and a half spaces per house is woefully inadequate. Nearly all housing outside the city centre has two or more cars, partly because the public transport provision is not good enough. HMOs and student accommodation frequently have even more need for parking. With young people not being able to move from home more houses have 4 or more adults living in them with 4 cars.

### **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?

Most housing on the outside of Brighton does not need provision for cycle parking - the cycle lanes do not extend past the centre and most people do not cycle.

There is a REAL need for ordinary parking let alone cycles and electric cars. There is not much need for car share schemes, they do not operate in the fringe areas.

### **DM37 - Green Infrastructure & Nature Conservation**

a) Do you support or object to policy DM37? Object

#### **DM37 Object Reasons**

d) Please explain why you object to this policy?

I would support this but I think the policy should be changed to ensure the urban fringes are not eroded by development.

### **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 would support this but I think the policy should be changed to ensure the urban fringes are not eroded by development.

### **DM39 - Development on the Seafront**

a) Do you support or object to policy DM39? Support

### **DM40 - Protection of Environment and Health - Pollution & Nuisance**

a) Do you support or object to policy DM40? Object

#### **DM40 Object Reasons**

d) Please explain why you object to this policy?

I would support this but I think the policy should be changed to ensure the urban fringes are not eroded by development.

Due to ignoring the actual level of car usage in the outskirts of the city, any survey as to impact on surrounding areas is flawed. A new way of conducting these surveys needs to found where actual information is used not the supposed use of land.

#### **DM41 - Polluted Sites, Hazardous Substances & Land Stability**

a) Do you support or object to policy DM41? Object

##### **DM41 Object Reasons**

d) Please explain why you object to this policy?

There should be site surveys on all proposed developments. Resource issues for the Council are not a reason to rubber stamp developments.

#### **DM42 - Protecting the Water Environment**

a) Do you support or object to policy DM42? Object

##### **DM42 Object Reasons**

d) Please explain why you object to this policy?

The policy does not go far enough. Issues with flooding and sewage removal are not being acknowledged by 'expert' reports.

In particular, the surface water flooding in Patcham Old Village, the torrents down Carden Avenue and floods in Patchdean, Warmdene, etc. Also, the issue of an overflowing sewers in Patcham that have been ignored in recent reports.

Further building in Patcham must not add to these problems.

#### **DM43 - Sustainable Urban Drainage**

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

##### **DM43 Object Reasons**

d) Please explain why you object to this policy?

I object to this because the Council is already ignoring these standards in Patcham. The expert report ignored the issues that would lead to the London Road development being rejected. I have no confidence that this policy would be upheld, something much stronger is needed, including the process for correcting problems once they have occurred. It should not be down to the Council to fund it.

#### **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? Object

##### **DM45 Object Reasons**

**d) Please explain why you object to this policy?**

The policy needs to look at existing provisions and keep them where it would be more 'green' to do so.

**DM46 - Heating & Cooling network infrastructure**

**a) Do you support or object to policy DM46?** 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?** Object

**H2 Object Reasons**

**d) Please explain why you object to this policy?**

City centre, brownfield sites should be used before any urban fringe sites are contemplated. This is because of the effect on the green fringes of the city.

**H2 - Urban Fringe Site Allocations**

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

I object to the site at the top of Ladies Mile Road,

- 1 Access to the site is extremely difficult: either a rat run on Ladies Mile Road will be created or a dangerous junction to Carden Avenue, with flooding problems caused from either access site.
- 2 Parking - there is not enough space allocated to the scheme. Cars will need to park in Ladies Mile Road or Windmill View where there is already a problem with the number of cars. Dog walkers currently use the open space and would not be able to park.
- 3 Travellers. It has taken a lot of work to discourage travellers from accessing the site and creating a new access road will only encourage the open space to be used by travellers again. Travellers on this site leave rubbish and human waste.
- 4 The density of the development is not in keeping with the surrounding area.
- 5 Creating an access road will take space from the open space and will cause pollution.

**H3 - Purpose Built Student Accommodation Sites**

**a) Do you support or object to policy H3?** 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.**

The amount of jargon in the report makes it difficult to follow for ordinary people.

It was clear from the meeting at Patcham Community Centre in late August that the Council does not have the resources to police the policies in the City Plan properly e.g. proper development reports/schedules for each of the proposed developments. This is worrying because of the damage that can be done to the environment and local communities by mistakes. There is not provision for restitution should something be done incorrectly.

The Council takes an idealistic view of car usage, parking, transport provision, drainage and sewage problems, the plan needs to address the real issues, not ideal situations.

Respondent DP096

## Comment

<b>Event Name</b>	Consultation on the Draft City Plan Part 2
<b>Comment ID</b>	99
<b>Response Date</b>	02/09/18 18:20
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	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  
. Make general comments

**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?**

I specifically object to using greenfield sites where no building has ever been historically. Specifically places that could be included in the Local green space plan but have magically appeared in the Housing site plan instead.

What defines the definition of a local green space and how can somebody just decide that there is now a magic boundary from one piece of land that is greenfield to another piece that becomes Local green space and therefore not open to development.

## 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...**

Specific areas would be Patcham where two areas that are currently "local Green space" in the eyes of the locals. These areas at the end of Ladies Mile road and behind Barrhill Avenue are typical.

## 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?**

Urban Fringe or urban sprawl.

many of us came to buy our properties for the very reason of having green open spaces available to us and I believe that this is an important right. The development of the so called urban fringe ( many of areas marked are in fact local green spaces in the eyes of the locals) would help sort the housing problem out but considerably diminish the quality of lives of local people in these areas.

## H2 - Urban Fringe Site Allocations

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

All

## H3 - Purpose Built Student Accommodation Sites

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

### Any other comments

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

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- . Sustainability Appraisal [PDF, 8MB]
- . Sustainability Appraisal Non-Technical Summary [PDF, 385 KB]
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**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.**

Please be mindful of brown field site development as a first priority.

Be wary of meeting government targets to the detriment of the people who already live in the area and consider it a fantastic place to live with a great balance of green spaces and housing. Please dont continue urban sprawl polices dressed up to look like there was some sense in the choice of sites!

## **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.**

I do believe that the plan does effect peoples lives greatly who already have lived on the area for some years and specifically purchased property of rented there because they loved the mix of green /open space/ closeness to the national park and the positive punctuated landscape with Green highways for animal movement and local use.

The policy although meeting targets which are there can not be seen to be equal to all parties as this effects my families human rights.

Respondent DP097

## Comment

**Event Name** Consultation on the Draft City Plan Part 2  
**Comment ID** 100  
**Response Date** 02/09/18 20:58  
**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** . Environmental and Energy

**DM37 - Green Infrastructure & Nature Conservation**

**a) Do you support or object to policy DM37?** Object

**DM37 Support Wording Changes**

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

Change

Proposals must seek to protect and prevent damaging impacts to the following and, where possible, seek to enhance:

To - Proposals must seek to protect and enhance the following and to prevent damaging impacts:



The South Downs Way Ahead Nature Improvement Area (NIA) does not form the backbone of the Green infrastructure programme as this project finished 2 years ago. It was a finite project with a set of resources which have been spent. The council should have an ecologist to keep up to date on changes within the SDNPA.

2.272 - Add house sparrow to the list of birds. Also add provision to increase the number of swift and bat boxes in new development.

### **DM37 Object Reasons**

#### **d) Please explain why you object to this policy?**

It does not have sufficient protection for biodiversity and does not seek to enhance biodiversity. It refers to obsolete mechanisms, such as the NIA and BAP programmes. It is not ambitious enough.

### **DM37 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**

Change

Proposals must seek to protect and prevent damaging impacts to the following and, where possible, seek to enhance:

To - Proposals must seek to protect and enhance the following and to prevent damaging impacts:

The South Downs Way Ahead Nature Improvement Area (NIA) does not form the backbone of the Green infrastructure programme as this project finished 2 years ago. It was a finite project with a set of resources which have been spent. The council should have an ecologist to keep up to date on changes within the SDNPA.

2.272 - Add house sparrow to the list of birds. Also add provision to increase the number of swift and bat boxes in new development.

### **DM40 - Protection of Environment and Health - Pollution & Nuisance**

a) Do you support or object to policy DM40? Support

#### **DM40 Support Wording Changes**

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

Measures to mitigate air pollution from development likely to increase pollution (ie all housing where people will own cars) should include a financial contribution to the AQMP which fund electric buses, charging places for cars, electric bike hire schemes etc.

### **DM42 - Protecting the Water Environment**

a) Do you support or object to policy DM42? Support

#### **DM42 Support Wording Changes**

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

Should have a paragraph on plastic pollution and the council's aims to reduce single use place in the city.

## **DM45 - Community Energy**

**a) Do you support or object to policy DM45?**                      Object

### **DM45 Object Reasons**

**d) Please explain why you object to this policy?**

This will not achieve the desired effect - just encouraging developers is not sufficient to bring about change.

### **DM45 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**

Change 'Developers of medium scale and major development schemes are encouraged to actively seek'

to 'Developers of medium scale and major development schemes must demonstrate that they have actively sought out community energy developers etc etc...

---

**From:**  
**Sent:** 02 September 2018 18:58  
**To:** PlanningPolicy  
**Subject:** City Plan Part 2 Consultation - proposed inclusion of land adjoining Horsdean Recreation Ground for housing development - 25 units

I would like to submit my objection to the above housing proposal.

As a resident of Vale Avenue I feel it would be a great injustice to use the land beyond the cricket pitch for housing. This area is much loved and used by adults and children alike - a place to enjoy the natural beauty of the countryside on the fringe of the busy roads of the A23 and A27.

Vale Avenue is widely used during the morning and evening rush hours to join the above roads and is therefore full to capacity at these times and is also used as a "rat run" into Brighton in the evening. The increase in traffic as a result of the housing development would be intolerable, as would be the access roads to those houses.

---

**From:**  
**Sent:** 02 September 2018 20:12 PlanningPolicy  
**To:** City Plan Part Two Consultation  
**Subject:**

Re: 46-54 Old London Road

The above named plot should be removed from the list of sites allocated for development in the City Plan Part Two because this area is not suitable for such intensive development - it is too much to replace 5 family homes with 30 units. It will spoil the village feel and character of the area and create a lot more traffic and problems with parking.

## Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	103
Response Date	03/09/18 10:26
Status	Processed
Submission Type	Web
Version	0.7

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

Agent Name

Agent Name n/a

Please tick all of the sections you would like to comment on before proceeding . Transport and Travel  
. Environmental and Energy  
. Make general comments

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?

##### 1 Public Transport

There are congestion hotspots where additional traffic will add substantially to peak time delays, extending commuter bus journey times and impairing bus journey time reliability (JTR), two of the main factors known to mitigate against improved bus patronage.

A development severely impacting the bus services in this way can currently claim to be a sustainable development, by considering just the travel for the occupants, ignoring the wider / cumulative picture.

Our sustainable transport services needs better protection and (3) must be clear and stronger.

##### 1 Safe and Inclusive Travel

Traffic impact (of a new development) can be quite remote from the development itself and can even be in a neighbouring or non-neighbouring highways authority's region (as per the Road Traffic Act).

So for example if Lower Hoddern Farm (in Lewes) or a development in Brighton & Hove adds 100 peak hour vehicles at Saltdean A259 (Brighton) or to the A27 Falmer Interchange (Highways England) **each with a known safety problem identified in the City Plan**, it is important that the road safety implications are properly considered.

A number of recent applications only assessed safety implications very close to the developments, though the bulk of their traffic added to areas with known safety concerns.

Though (4c) is helpful, the wording does not make these responsibilities clear enough.

#### DM33 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...

Suggest enhancing (3) and (4) as follows

3. Public Transport Users In order to promote and provide for greater levels of public transport usage in the city (including bus, coach, taxi and rail travel), new development should: a) be located and designed to provide good access to public transport services and facilities; and b) provide or contribute towards improvements to the public transport network/infrastructure including passenger interchanges and facilities **and must not degrade bus journey times or their reliability**; and c) directly fund or contribute towards improvements and/or extensions to existing bus services and/or the provision of new bus routes; and d) protect and, where appropriate, enhance existing and proposed public transport routes **and must not degrade bus journey times or their reliability**

4. Safe and Inclusive Travel Planning permission will be granted for developments that meet all of the following criteria: a) Do not create road safety problems or dangers for any road user, especially those who are most vulnerable, **including road users remote from the development in places where additional traffic is known to cause problems**; b) Provide inclusive access for disabled people, older people, and other vulnerable road users wherever it can be reasonably achieved having been afforded significant priority; c) Do not prejudice the implementation of proposed road safety improvements set out in the Local Transport Plan (and subsequent revisions/successor documents or programmes) and the council's Road Safety/Safer Roads Strategy, **including at locations remote from the development in places where additional traffic is known to add to the problems**; and d) Create safe and secure layouts which minimise the risk of collision or potential conflict between road users

#### DM34 - Transport Interchanges

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

#### DM35 - Travel Plans & Transport Assessments

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

#### DM35 Object Reasons

#### d) Please explain why you object to this policy?

The protection afforded to our AQMAs to meet the council's legal requirements in respect of meeting UK and EU Air Quality targets is inadequate, being very open to misinterpretation.

A development application refused on the grounds that its traffic will adversely impact an AQMA could be overturned on appeal, if it the developer claims it not "near", "adjacent" or "close", as stipulated in DM35 and DM40 (see below).

For example the 450 homes at Lower Hoddern Farm will put significant extra traffic through the A259 Rottingdean AQMA, though being 5km distant is hardly near, close or adjacent.

Arguably other provisions (e.g. DM34 and DM40 2.297 & 2.298 and its reference to NPPF Para 5) might be interpreted as giving this protection, but with developers ready to appeal interpretations, clarity is essential.

It must be made unambiguously clear that a development which is not adjacent or even near is still subject to these rules if the traffic it generates passes through the AQMA.

*Arguably the criteria for needing an Air Quality Impact Assessment should also be made more explicit in the SSxx sections for the specific sites.*

>>>>

#### DM35 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...

Relevant sections of DM35 and DM40 are copied below, followed by the suggested additional words.

##### **DM35 Travel Plans and Transport Assessments**

- 1 A Transport Assessment should be submitted to support any development located within or **adjacent** to an AQMA.

Suggested addition "or that generates traffic which passes through the AQMA."

##### **DM40 Protection of the Environment and Health – Pollution and Nuisance**

- 1 c) provide, when appropriate, an Air Quality Impact Assessment to consider both the exposure of future and existing occupants to air pollution, and, the effect of the development on air quality. Air quality improvements and/or mitigation must be included wherever possible;

Suggested replacement for "when appropriate" ... "when appropriate, including where the development will add to the traffic in an AQMA in the City or a neighbouring district,"

##### **DM40 Protection of the Environment and Health – Pollution and Nuisance**

2.298 This policy complements the AQAP by ensuring that new development in or **near** AQMAs assists in achieving its aim of improving air quality. New development proposals should take account of their impact on local air quality, be consistent with the latest AQAP and minimise increased exposure to existing poor air quality within an AQMA. Improvements and/or mitigation will be sought wherever possible. It is important that cumulative impacts are taken into account **including impacts from development beyond the boundary** of the City Plan area.

Suggested replacement for "or near" ... "in or near or adding to the traffic in an AQMA"

#### DM40 - Protection of Environment and Health - Pollution & Nuisance

a) Do you support or object to policy DM40?

Object

#### DM40 Object Reasons

#### d) Please explain why you object to this policy?

See comments under DM35 - repeated here for convenience ... this is a linked topic

The protection afforded to our AQMAs to meet the council's legal requirements in respect of meeting UK and EU Air Quality targets is inadequate, being very open to misinterpretation.

A development application refused on the grounds that its traffic will adversely impact an AQMA could be overturned on appeal, if it the developer claims it not "near", "adjacent" or "close", as stipulated in DM35 and DM40 (see below).

For example the 450 homes at Lower Hoddern Farm will put significant extra traffic through the A259 Rottingdean AQMA, though being 5km distant is hardly near, close or adjacent.

Arguably other provisions (e.g. DM34 and DM40 2.297 & 2.298 and its reference to NPPF Para 5) might be interpreted as giving this protection, but with developers ready to appeal interpretations, clarity is essential.

It must be made unambiguously clear that a development which is not adjacent or even near is still subject to these rules if the traffic it generates passes through the AQMA.

*Arguably the criteria for needing an Air Quality Impact Assessment should also be made more explicit in the SSxx sections for the specific sites.*

#### DM40 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

Relevant sections of DM35 and DM40 are copied below, followed by the suggested additional words.

##### **DM35 Travel Plans and Transport Assessments**

- 1 A Transport Assessment should be submitted to support any development located within or **adjacent** to an AQMA.

Suggested addition "or that generates traffic which passes through the AQMA."

##### **DM40 Protection of the Environment and Health – Pollution and Nuisance**

- 1 c) provide, when appropriate, an Air Quality Impact Assessment to consider both the exposure of future and existing occupants to air pollution, and, the effect of the development on air quality. Air quality improvements and/or mitigation must be included wherever possible;

Suggested replacement for "when appropriate" ... "when appropriate, including where the development will add to the traffic in an AQMA in the City or a neighbouring district,"

##### **DM40 Protection of the Environment and Health – Pollution and Nuisance**

2.298 This policy complements the AQAP by ensuring that new development in or **near** AQMAs assists in achieving its aim of improving air quality. New development proposals should take account of their impact on local air quality, be consistent with the latest AQAP and minimise increased exposure to existing poor air quality within an AQMA. Improvements and/or mitigation will be sought wherever possible. It is important that cumulative impacts are taken into account **including impacts from development beyond the boundary** of the City Plan area.

Suggested replacement for "or near" ... "in or near or adding to the traffic in an AQMA"

#### Any other comments

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

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- . [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]
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**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.**

Building new homes as scheduled in the Adopted City Plan would almost certainly be unlawful (at least in the Eastern section of the Urban Fringe), yet City Plan Part 2 proposes no actions to address this obstacle to the successful execution of City Plan Part 1. As was re-stated in July 2018, NPPF (and the derived City Plan) requires the City to comply with EU and UK legal limits and targets on pollution levels (NPPF 2 para 180/1) and to ensure infrastructure (e.g. transport para 20b) is in place to support planned developments. The 2016 Adopted City Plan STA says road congestion (and traffic generated pollution in the AQMAs) will stay within given limits up to 2030 and growth in commuter peak journeys will mostly be absorbed by improved bus services, removing the need to increase road capacities. **However, by 2017 the NO2 level in Rottingdean's AQMA had risen above the legal limit and road congestion (on the B2123 and A259) already exceeded the 2030 upper limit.** Sanctioning extra traffic that aggravates AQMA pollution would certainly be unlawful and may well incur substantial fines. Should the increase be the result of wilfully or negligently ignoring clear evidence, it could result in personal sanctions on the responsible individuals. While there are other issues like the road safety concerns raised in the Strategic Transport Assessment STA and whether the City can meet legally binding obligations under the 2008 Climate Change Act (and subsequent targets), the "lawful" position is the traffic from an extra 1000 homes (even without 1000 more "A259" homes from across the adjacent Lewes District boundary) cannot be sustained without addressing the transport infrastructure. City Plan Part 2 must put in place actions to reduce the current overload on these roads and must identify and address the problems preventing bus services absorbing growth in Urban Fringe (East) commuter journeys, as is required for City Plan Part 1 to succeed. To focus on selecting the sites to house 1000 new homes, when adding even 100 homes is unlawful, will not help the City Plan meet its targets. The council's priorities are wrong and a government inspector may decide that the City Plan failing to meet its targets was avoidable.

Background 1 The City's 2018 Air Quality Annual Status Report ASR reports rising NO2 levels for Rottingdean AQMA over the past 2 years, with 2017 already exceeding the legal limit.<sup>2</sup> The City Plan's STA estimated that in the years up to 2030 the critical local roads would be less than 125% loaded (roughly 8 minutes traffic delays per bottleneck at peak times), but the delays around Woodingdean and Saltdean (Rottingdean) already exceed 20 minutes.<sup>3</sup> The City Plan's STA relied on the bulk of commuter peak journey growth being absorbed by bus services. As peak traffic growth has greatly exceeded the City Plan's prediction, either underlying commuter growth is much higher than the City Plan estimated or, as other evidence suggests, bus services are failing to absorb the peak time commuter growth.<sup>4</sup> The City Plan only identified road safety improvements (on the local highway sections of the A27, B2123 & A259) with no road capacity increases planned before 2030. Note. The A27 Falmer Interchange safety improvement was contingent on addressing the congestion at Woodingdean, without which the Road Safety concerns will continue to grow.

#### **Compliance with Planning Law. NPPF National Planning Policy Framework Mar 2012**

1 To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (**including cumulative effects**) of **pollution on health**, the natural environment or general amenity, and the potential **sensitivity of the area or proposed development to adverse effects from pollution**, should be taken into account ...<sup>2</sup> Planning policies should **sustain compliance with and contribute towards EU limit values or national objectives for pollutants**, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.

#### **2016 Adopted City Plan**

Policy SU9 Pollution and nuisance control **Development that may be liable to cause pollution** and / or nuisance to land, air or water will **only be permitted** where: a. **human health** and safety, amenity, and the ecological well-being of the natural and built environment is not put at risk; b. **it does not reduce the planning authority's**

ability to meet the Government's air quality and other sustainability targets; and c. it does not negatively impact upon the existing pollution and nuisance situation. 2.46 For the purposes of Policy SU9, pollution and nuisance include noise, dust, dirt, PM10, fumes, gases, steam, smell, radiation, vibration, light, smoke, heat and other polluting and nuisance emissions. Policy SU9 ... applies to anything that can be deemed to be pollution and / or a nuisance. This includes **greenhouse gases** and ozone layer damaging gases. 2.48 ... Any additional Air Quality Management Areas (AQMA's) will be identified and declared, if required. Within these areas, the planning authority will expect any **development to help alleviate the air quality problems**, in accordance with the relevant Action Plan and council strategies.

### **2016 Adopted City Plan – Strategic Transport Assessment May 2013 extracts**

9.84 At the Falmer Interchange a more wholesale upgrade of the northern and southern roundabouts to signalised junctions is likely to be required in order to reduce eastbound off slip queuing. This may necessitate departures from standard given the constraints imposed by the width of the A27 overbridge and would need to be considered in conjunction with the Village Way junction to the south and the Falmer Road corridor in general given the often congested conditions approaching the Woodingdean crossroads.

Across Brighton & Hove as a whole the modal share increases from between 25% (morning peak) and 28% (evening peak) in 2010 to 33% in both peaks by 2030.

10.5 Whilst this change in travel patterns is positive towards the use of sustainable transport, the results of the modelling show that a sustained improvement in public transport provision and walking and cycling facilities accompanied by personalised travel planning and behaviour change campaigns **is required** to maintain as a minimum the mode share targets set out above. Further sustainable transport measures **will be required to be** implemented during the plan period, the objectives and themes of which are set out below: • Build on successful behavioural change programmes to reduce background traffic growth

- 1 Increase modal choice to the new strategic development areas by walking, cycling and public transport modes
- 2 Tackle safety issues on the strategic road network where queues block back to mainline carriageways; and
- 3 Address air quality issues in the urban core through increased take up of sustainable transport modes and freight management

10.16 In summary the 2030 City Plan Mitigation strategy would

• Ensure **that growth in public transport trips will outstrip highway trips by ratios of at least 2.5 to 1.**

1 Mode Share will increase across all areas of Brighton & Hove but with the largest increases for trips with an origin or destination in the urban core. **Public Transport Mode Share** will be significantly higher in 2030 compared to 2010 with increases of between **6% and 9%**.

The 125% maximum congestion reference is in the charts that form **Appendix F**

### **NPPF Revised National Planning Policy Framework July 2018**

1 Strategic policies should set out an overall strategy for the pattern, scale and quality of development, **and make sufficient provision** ( *12 In line with the presumption in favour of sustainable development*) for: a) housing (including affordable housing), employment, retail, leisure and other commercial development; b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); c) **community facilities (such as health, education and cultural infrastructure)**; ...

2 Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (**including cumulative effects**) of **pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development**. In doing so they should: ...

3 Planning policies and decisions should sustain and **contribute** towards **compliance** with **relevant limit** values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the **cumulative impacts from individual sites in local areas**. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. ...

RMS V1.1 1 Sep 2018

The City Plan is not just a schedule for developing new homes, it has responsibility to address needs in respect of infrastructure and safeguarding the environment. City Plan Part 2 is not fit for purpose if it does not reflect and respond to the changing infrastructure needs and environmental concerns, having not been kept up to date.

This response to the Consultation should be seen in this context

*National planning policy places Local Plans at the heart of the planning system, **so it is essential that they are in place and kept up to date.** Local Plans set out a vision and a framework for the future development of the area, **addressing needs** and opportunities in relation to housing, the economy, **community facilities and infrastructure** – as well as a basis for **safeguarding the environment, adapting to climate change** and securing good design*

... recent Government Guidance is set out at the end.

With the recent increase in pollution in Rottingdean AQMA and the increase in local peak time road congestion to above that predicted for 2030, it is clear that the 2016 Adopted City Plan Part 1 needs to be brought up to date if the Part 1 plans are to be realised, as sustaining the Outer Fringe schedule requires the infrastructure needs to be addressed and, at least in respect of the environment, it would be unlawful to proceed without addressing these issues.

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<https://www.gov.uk/guidance/local-plans--2>

## **Local Plans: key issues**

### **What is the role of a Local Plan?**

National planning policy places Local Plans at the heart of the planning system, so it is essential that they are in place and kept up to date. Local Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for safeguarding the environment, adapting to climate change and securing good design. They are also a critical tool in guiding decisions about individual development proposals, as Local Plans (together with any neighbourhood plans that have been brought into force) are the starting-point for considering whether applications can be approved. It is important for all areas to put an up to date plan in place to positively guide development decisions.

National planning policy sets clear expectations as to how a Local Plan must be developed in order to be justified, effective, consistent with national policy and positively prepared to deliver sustainable development that meets local needs and national priorities.

Paragraph: 001 Reference ID: 12-001-20170728

Revision date: 28 07 2017 See previous version

### **What should a Local Plan contain?**

The Local Plan should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered. This can be done by setting out broad locations and specific allocations of land for different purposes; through designations showing areas where particular opportunities or considerations apply (such as protected habitats); and through criteria-based policies to be taken into account when considering development. A policies map must illustrate geographically the application of policies in a development plan. The policies map may be supported by such other information as the Local Planning Authority sees fit to best explain the spatial application of development plan policies.

Local Plans should be tailored to the needs of each area in terms of their strategy and the policies required. They should focus on the key issues that need to be addressed and be aspirational but realistic in what they propose. The Local Plan should aim to meet the objectively assessed development and infrastructure needs of the area, including unmet needs of neighbouring areas where this is consistent with policies in the National Planning Policy Framework as a whole. Local Plans should recognise the contribution that Neighbourhood Plans can make in planning to meet development and infrastructure needs.

Paragraph: 002 Reference ID: 12-002-20140306

Revision date: 06 03 2014

### **How often should a Local Plan be reviewed?**

To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every 5 years. Reviews should be proportionate to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within 5 years of the date of adoption.

The National Planning Policy Framework makes clear that relevant policies for the supply of housing should not be considered up-to-date if the authority cannot demonstrate a 5-year supply of deliverable housing sites. Local planning authorities should also consider whether plan making activity by other authorities has an impact on planning and the Local Plan in their area. For example, a revised Strategic Housing Market Assessment will affect all authorities in that housing market area, and potentially beyond, irrespective of the status or stage of development of particular Local Plans.

There are requirements for a local planning authority to support neighbourhood planning. Further detail is provided in the neighbourhood planning guidance.

A local planning authority must set out the timetable for producing or reviewing its Local Plan in its Local Development Scheme.

Paragraph: 008 Reference ID: 12-008-20140306

Revision date: 06 03 2014

<https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

### **Does the local planning authority have to monitor the significant effects of implementing the adopted Local Plan?**

Local planning authorities should monitor the significant environmental effects of implementing the Local Plan (as required by regulation 17 of the Environmental Assessment of Plans and Programmes Regulations 2004). This will enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions.

Details of monitoring arrangements must be included in the sustainability appraisal report, the post-adoption statement or in the Local Plan itself. The monitoring results should be reported in the local planning authority's Monitoring Report.

Paragraph: 025 Reference ID: 11-025-20140306

Revision date: 06 03 2014

<https://www.gov.uk/guidance/air-quality--3#what-is-the-role-of-local-plans-with-regard-to-air-quality>

### **What is the role of Local Plans with regard to air quality?**

Local Plans can affect air quality in a number of ways, including through what development is proposed and where, and the encouragement given to sustainable transport. Therefore in plan making, it is important to take into account air quality management areas and other areas where there could be specific requirements or limitations on new development because of air quality. Air quality is a consideration in Strategic Environmental Assessment and sustainability appraisal can be used to shape an appropriate strategy, including through establishing the 'baseline', appropriate objectives for the assessment of impact and proposed monitoring.

Drawing on the review of air quality carried out for the local air quality management regime, the Local Plan may need to consider:

the potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments; the impact of point sources of air pollution (pollution that originates from one place); and, ways in which new development would be appropriate in locations where air quality is or likely to be a concern and not give rise to unacceptable risks from pollution. This could be through, for example, identifying measures for offsetting the impact on air quality arising from new development including supporting measures in an air quality action plan or low emissions strategy where applicable.

Paragraph: 002 Reference ID: 32-002-20140306

Revision date: 06 03 2014

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 studies show that NO2 pollution has a particularly high impact on young and growing children and on people over retirement age, the lack of progress in meeting UK and EU target suggests these classes of people are not being treated equally by the council.

City Plan Part 1 was claimed to benefit over 90% of local residents (Liz Hobden). Has not addressed the inequalities from City Plan 1. Liz Hobden said over 90% of B&H Residents were better off with the plan than without it.

City Plan Part 2 does not appear to have identified and addressed the needs of those who did not benefit who may therefore be being discriminated against by social group or postcode.

Who was worse off was not stated or whether they form one or more groups being discriminated on the basis of age or sex, or social class or postcode is not known