



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

For Official Use:

Respondent Number:

Date Received: / / /2018

Entered onto Portal: Yes/No

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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 5th 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.

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 Y

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.

Organisation Name (If applicable)	Brighton and Hove Clinical Commissioning Group
Name	
Address	
Email Address	
Agent Name (If applicable)	
Agent Name	
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) DM9

Policy Name (e.g. Housing Quality, Choice and Mix) HO19

a) Do you Support or Object to the policy?

Support Y **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?

The CCG is working more and more closely with the Council to integrate the commissioning and provision of health and social care. A key component of this is the provision of community based hubs that will support the delivery of multi-agency working across health and care and also integrate other Council services, such as Housing.

This work is being pursued through the Shadow Integration Board and Part 2 of the Greater Brighton Operational Public Sector Working Group.

Our ambition is that these groups are used to develop a strategic approach to estates that helps to improve patient/user experience through co-location and integration (including record keeping) and improve value for money from our current Estate. We also aim to develop a joint approach to planning any future premises developments, working with health and social care providers, the council and other public bodies where relevant, to ensure that they support integration in line with our joint vision and become as self-funding as possible, by being designed to improve health and social functioning, allowing the local NHS to treat people with increasingly complex needs in the community, thus reducing avoidable use of other facilities (crisis intervention, A&E etc).

We trust that, as the Council continues to develop its policies for Section 106 and Community Infrastructure Levy, the CCG will have a voice in the process and these enabling instruments will support strategic sites and enable the joint working and integration summarised above.

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 Y 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

We would hope that the impact of this scheme on the NHS locally (especially on General Practice) will be reflected in the allocation of Section 106 and/or Community Infrastructure Levy funding

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 SSA1

Policy Name

a) Do you Support or Object to the policy?

Support Y **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?

The BGH development is supported in principle by the CCG and, as planning on the scheme develops, our intention is for this support to be full and unqualified, subject to the provision of certain assurances in the Full Business Case that SCFT are working on. We see an opportunity for the provision of an integrated care hub on this site and hope to work jointly with the Council and SCFT on this.

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

We would wish to consider the number of housing units proposed. The 200 housing units suggested previously related to a time when the Brighton General site was being considered for a new secondary school. This project is no longer going ahead and we believe that a far greater use of housing could be provided from the part of the site surplus to healthcare use. This would support SCFT to secure investment on a self-funding basis and deliver more units. The percentage of housing deemed to be ‘affordable’ would need to be subject to a separate viability assessment, but Brighton and Hove CCG would actively support the provision of keyworker housing, particularly to help in the recruitment of health and social care staff in a high cost of living city, in lieu of provision that is strictly defined as ‘affordable’ in planning policy terms.

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 ?

The city wide health estates strategy continues to evolve, to support new models of care wrapped around place based communities of practice. We envisage three main hub locations for community based health services (incorporating primary care, community services, mental health and social care). There are six communities of practice and expect these to be supported through three hub communities. There are two established major community health sites in the city, and we have already referred to the Brighton General Hospital site, as a new health hub site, above.

In addition, the community health infrastructure within central and north Brighton would need to be enhanced. We do not envisage a unified hub site for this sector of the city, partly because of the lack of sites and the very different requirements for specific areas within the central area. In the city centre where the priorities are to provide homelessness services, drug and alcohol and sexual health services, and it should be noted that the assessed deficit in total primary care capacity is greatest overall (cluster one). The northern suburbs (Preston Park and Patcham) might only require minor investment, with potential development of the 175 and 177 Preston Road sites and minor expansion of primary care in Patcham and a potential neighbourhood centre in Westdene (an affluent suburb that does not have any primary care provision within). There are specific needs within the Lewes Road corridor related to the larger student population and particularly Moulsecoomb. .

We are engaged with the council on plans for the Moulsecoomb neighbourhood hub and see the opportunity to consolidate and develop primary care and community health infrastructure. We would be supportive of extending the SSA7 (land adjacent to the Amex stadium) to effectively become a strategic site zone that incorporates the existing leisure centre, community centre, children’s services and miscellaneous other sites in order to facilitate a multi-sector community infrastructure proposal that is developed in the most coherent way possible.

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 Y **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?

Key worker housing is vital to the success of the local health and care economy. We would like to see the provision of key worker housing continue in the city as part of an overall, strategic approach to recruiting and retaining staff.

For any significant new housing schemes being brought forward, we expect to be consulted on the impact of this on NHS services, particularly primary care. Plans should take account of this in any allocation of S106/CIL.

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 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 housing sites ?

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
Object

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

b) Please explain why you support this policy?

For any significant new housing schemes being brought forward, we expect to be consulted on the impact of this on NHS services, particularly primary care. Plans should take account of this in any allocation of S106/CIL.

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 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
Object

Y

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

b) Please explain why you support this policy?

We support the expansion of the universities and accommodation to go with them. However, we expect to be consulted on the impact of this on NHS services, particularly primary care, and would see the new developments as a further opportunity for integration across health, social care and education. Plans should take account of this in any allocation of S106/CIL.

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?

We support policies that enhance employment opportunities and wider economic regeneration as a whole. Whilst public health responsibilities rest with the local authority, the CCG is supportive of policies that have a benefit in terms of the wider determinants of health.

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

[Empty text box for suggested wording changes]

d) Please explain why you object to this policy?

[Empty text box for explanation of objections]

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 for alternative wording]

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

[Empty text box for other 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.

DM36. We note that the provision of Parking is under consideration in this second iteration of the City Plan. We hope that adequate parking facilities for patients (especially those with disability or frailty challenges) and staff are reflected in the plans and would be pleased to contribute to the development of policy in this area.

H10. We are pleased to see that the Council’s policy for Housing for homeless people is under review and would like to be part of the revision of the policy, along with the specialist homeless service providers across the city.

We welcome the commitment to developing approaches to Environment, Health (DM40) and Active Travel (DM33) and, again, would be pleased to contribute further to this work as it progresses.

City Plan Part Two Consultation.

9.9.18.

We are surprised that the application by McCarthy and Stone to build a block of 44 retirement flats at 46-54 Old London Road has reappeared having been rejected by both Brighton & Hove Council and the Government Planning Inspector.

What has changed? We walked this semi-rural road to-day and cannot understand how the site, which currently has 5 family homes, can accommodate 30 houses or flats. It would materially detract from the character of the area.

The council is surely hanging on straws to include this location in its city plan after its earlier rejection. We would certainly be against it.

From:
Sent: 03 September 2018 14:09
To: PlanningPolicy
Subject: City Plan Part Two Consultation

Dear Sirs,

Re: 46-54 Old London Road, Patcham.

We strongly object to the above location being considered for development on the following grounds:

1; Overdevelopment

It is likely to represent an overdevelopment and would almost certainly be completely out of scale with the current balance of building types. It is therefore likely to create an ugly, overbearing structure or structures in an important location close to the heart of the village and the adjacent conservation area. With FIVE other developments within ONE mile of this site, any further developments would overwhelm the area and is likely to spoil the carefully balanced mix of housing, shops and businesses.

Furthermore, the existing properties at 46-54 London Road form an integral part of the village setting and its rare charm; in fact, we feel that these properties should be protected rather than threatened.

2; Traffic, parking and pedestrians

The village is already straining to accommodate the number of vehicles - parked and passing-through - and further development would, in turn, create more problems for pedestrians. These include a high proportion of young children and older, often frail, people. Development would inevitably increase traffic congestion and associated dangers including pollution and noise - as well as spoiling the pace and character of the village.

3; Flooding

Patcham experiences ongoing problems with flooding and this has always been difficult to predict and manage. Changes to weather patterns are widely forecast to lead to more such incidents, and further development would only make matters worse.

4; Destruction of wildlife

Development of the site is likely to threaten around 50 trees, along with the ecosystems they support and the greenery around them. This is far too much to lose in our attractive village, which currently serves many residents and visitors so well. Its well-balanced environment would be ruined by reducing trees and green space - and adding more buildings.

My family has lived in Patcham for more than sixty years, and whilst development has generally been sympathetic to the area, any more is completely inappropriate and could damage the fabric of the village irreparably.

In short, to proceed with development of the above site would be nothing short of planned vandalism on an overwhelming scale and must be avoided at all costs.

Yours faithfully,

.

From:
Sent: > 03 September 2018 15:27
To: PlanningPolicy
Subject: City Plan Part Two Consultation

Sirs,

I should like to register my objection to the proposed demolition of 5 family homes to make way for 30 houses or flats.

This would conflict completely with the houses on Old London Road and the village atmosphere of the area, which has already been blighted by the flat that were allowed in 1960's.

Old London Road is a very narrow busy road, with busses sometimes having difficulty in turning right to go up Ladies Mile Road, the increased traffic from 30 dwellings would be dangerous and unacceptable.

Yours

From:
Sent: 03 September 2018 17:18
To: PlanningPolicy
Subject: City plan part2 consultation

I am writing to object to the proposed planning of 30units on 46-54 Old London Road. The area is not suitable for such a large new development. Patcham is a Village and this proposed housing development would destroy the feel and history of this area. The amount of extra traffic and parking is unacceptable to this area. If it was not suitable for the McCarthy and Stone development what are you thinking with this proposal, this is in many ways even worse and I strongly object.

From:
Sent: 03 September 2018 18:56
To: PlanningPolicy
Subject: City Plan Part Two Consultation

City Plan Part Two Consultation

46-54 Old London Road, Patcham should be removed from the list of sites allocated for development, for the following reasons.

The McCarthy and Stone planning application for abolition of five family homes and subsequent development of the same site was turned down by the Council in January last year. Two of the reasons given were:

1. The development has not adequately taken the flood risk into account in an area with a significant history of groundwater flooding.
2. The development is considered to detract from the character and appearance Old London Road of mainly detached properties with London Road.

The current proposal for 30 plus dwellings on the same site would exacerbate both these objections which were made by the Council itself. The second objection was endorsed by the inspector at the appeal.

Construction of 30 dwellings (or more) would require demolition of mature trees and a substantial increase in hard infill, both of which would increase the risk of flooding and further tax the sewage system. Living in Old London Road and being flooded to the extent of being out of our house for eight months in 2000/20001 means we monitor the water table levels every winter and we are very disturbed by the council's proposals.

How is provision for parking to be made? Underground parking is out of the question because of the water table.

DP107

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 110
Response Date 04/09/18 10:24
Status Submitted
Submission Type Web
Version 0.1

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

Organisation Name

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

Name

Name

Address

Address

Email Address

Email Address

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

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?

The City Plan for Old London Road Patcham is totally unsuitable. The locals already do not have enough room to park in Old London Road and shops, therefore, are not being fully used as, already, if it difficult to find a place to park. Any new properties will increase parking, extra traffic along Old

London Road which is used as a cut through and, as such, the cars are going fast along it. A lot of the character of the village will be lost with any new development. We already have problems with drainage in Patcham.

We do not have enough services doctors, dentists in the area to support any of the developments planned for Patcham/Hollingbury. Any new builds will cause extra traffic in the areas and will cause even further problems. Ladies Mile road and Mackie Avenue already have problems especially with fast traffic which is unsuitable for these roads.

CP 12 PROVIDED + HERI HGT TEAM
 BRIGHTON + HOVE CITY COUNCIL
 FIRST FLOOR HOVE TOWN HALL
 NORTON ROAD BN33BQ

Entered
 on Portal
 4/7/18

CITY PLAN PART TWO CONSULTATION

WHY 46-54 OLD LONDON ROAD SHOULD BE REMOVED
 FROM THE LIST OF SITES ALLOCATED FOR DEVELOPMENT
 IN THE CITY PLAN PART TWO.

Portal
 ID

111

My parents, and I moved into no 1
 Highways Avenue North, in October 1954, a new
 house built for us by H.J. Paris. I went to school
 in Patcham Old School, Old London Road. The
 playground is still there (later became Patcham House
 School) and I pass by on the narrow pavement,
 every time I go to Patcham Memorial Hall, and I
 enjoy the Peace Park further along and then see
 the Drinking Trough used by the horses who
 stopped on the way to and from London. I would
 hate to spoil the charming entrance to the
 city, only 3 miles away from Brightonstone
 by replacing five family homes, mature gardens,
 trees, and wildlife nos 46-54 Old London Road
 with 30 residential units, with an indication of
 more if justified, through detailed examination
 of site specific considerations.

HOW CAN THIS BE, that the Council indicates
 IN CITY PLAN PART 2 it is happy in principle to
 see land INTENSELY DEVELOPED when only last
 year it was vigorously opposed. THEREFORE

1. I believe that the site is too small for the 30 homes
 houses or flats, creating a problem with lots of extra
 vehicles entering and leaving the site, before, &
 after building and creating havoc for traffic, and
 the two important buses that use the 5A & 56
 from the city along Old London Road to the Co-op
 and Shops and then over to the other side of Patcham
2. Parking at 30 new homes for residents, visitors
 deliveries, health visitors etc will intensify problem
 and cause an increase in congestion of traffic, along
 the Old London Road.
3. In the 1960's, a heavy snow storm started during
 lunch time, so later I walked from the Borough
 Treasurer Office, home. Leaving the main road
 and taking a 'fork' along Old London Road, I
 struggled as there were deep drifts - then the
 snow melts leading to risk of floods and

4. A strain on the sewage system as in 2000. I took a photo of my future son in law walking along Old London Road, after getting shopping locally, and another of a very elderly neighbour with her dog.
I hope to return this by 13th September 2018 and go to a public meeting of the Next Local Action Team at 7 PM on Tuesday 28th August 2018.
5. Patcham Village held a duck Fayre for many years, and when our Elm Trees had to be felled, Villagers turned out with band, service and speeches and then later watched the felling and replacement of new Elms opposite the Co-op.
6. It is a 100 years nearly since the armistice and in 1917 The Patcham WI was formed so that in 2017 we celebrated and I helped to get the Archive - scrapbooks together. Sadly the Afternoon WI was unable to start another century but we have joined with the Patcham Morning WI so we continue. There are several Churches and the Community Hall and Patcham School that have had big anniversaries to celebrate, and visitors often call in the village cafes and restaurants after they have walked round the quaint streets of old cottages in old Patcham, or walked over to the Windmill and Chattri.
7. On the first Saturday in the Month we have a local history group meet in the Library of Patcham Community Centre and we try to keep up to date with the old and the new events in Patcham.

**For Official Use:**

Respondent Number:

Date Received: /4/9/2018

Entered onto Portal Yes No

Portal ID 113

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Consultation Period: 5th July 2018 until
5pm on 13th September 2018
Word Response Form

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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

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

Organisation Name (if applicable)	N/A
Name	
Address	
Email Address	
Agent Name (if applicable)	n/a
Agent Name	n/a
Agent Address	n/a
Agent Email Address	n/a

I wish to comment and make observations on the Draft City Plan, part two as it impacts on St James's Street and the area south from Edward Street and the sea front, and propose that it should be designated as- “SPECIAL RETAIL AREA”

- Much of the Shopping Frontage on St James' Street is designated as “ PRIME RETAIL FRONTAGE”.
- This area is included in the hotel “CORE ZONE”.
- This area is within the alcohol “ACCUMULATIVE IMPACT ZONE”.
- Although this area has a high density of residential housing it is also this a commercial district mainly but not exclusively tourism forecast , providing considerable employment.
- The development on the Edward Street, old Amex site will bring about significant changes to the foot fall of St James's Street and the area, as will revamping, Grand Parade and the Old Steine. (Valley Gardens project phase 2)
- Developments proposed in the Draft City Plan for the sea front and Madeira Place including new hotel beds will have an impact on the St James's Street area.
- St James' Street is designated as an “Air Quality management Area” in the City's Air quality action plan (2015), which highlights that more than 180 homes in an area of 1.5 hector have high nitrous oxide levels, above permitted levels.
- There is ongoing residential development, with over 60 social housing flats as well as numerous commercial developments in resent years and a site between Manchester street and Charles street has been identified for 24 homes in the draft plan.

Although this is a significant commercial and residential district it has not had any significant attention from the city planers in regard to improving the shopping environment.

I would like to see the City's VISION for St James's Street and the area set out in the City Plan and I think that the most appropriate way to do that would be to make it a “SPECIAL RETAIL AREA”

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.

NEUTRAL

Signed*:	
Dated*:	2 September 2018.

All representations must be received at the email or postal address given on this form by 5.00pm on 13th 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

Post: Consultation on the Draft City Plan Part Two
Brighton & Hove City Council
Planning Policy Team
1st 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

DP110

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 114
Response Date 04/09/18 13:27
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) St. John's School and College

Name

Name

Address

Address

Email Address

Email Address

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

Equalities

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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.

St. John's School and College would like the plans to consider :

- 1 Traffic management issues in the Walpole Road area
- 2 The issues of rough sleepers on Whitehawk Hill
- 3 The promotion of greater employment opportunities for young adults with learning difficulties across the City especially Supported Internships
- 4 Supporting charities like St. John's to convert from petrol and diesel mini-buses to electric powered people carriers to reduce carbon emissions in our short journeys through charging points on site and other measures
- 5 Supporting our social enterprise (Inklusion) to provide further opportunities for young adults with autism and other learning difficulties to engage in employment in the printing and associated industries

Protecting theatres for **everyone**



Ref.: TC/8212

03 September 2018

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

By e-mail: planningpolicy@brighton-hove.gov.uk

Draft City Plan Part 2

Thank you for consulting the Theatres Trust on the above document. Our comments are set out below.

Remit:

The Theatres Trust is the national advisory public body for theatres. We were established through the Theatres Trust Act 1976 'to promote the better protection of theatres' and provide statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2015, requiring the Trust to be consulted by local authorities on planning applications which include 'development involving any land on which there is a theatre'.

Comments:

The Trust's interest in the City Plan arises from the area being an important centre for culture and the arts. There are a number of theatres and theatre buildings within the Council's boundary of different sizes and scales. There are also several other facilities such as music venues and pubs that host live performance alongside temporary and 'pop-up' venues.

Within Brighton, a site of great concern to us is the Grade II* listed Brighton Hippodrome. The Hippodrome is number one on the Trust's Theatres at Risk register and is also on Historic England's Heritage at Risk register. It is considered the UK's most architecturally significant circus theatre and the finest surviving example. We believe the Hippodrome can be brought back to active use as a large-scale performance venue, which would fill a gap in provision within the local area and provide Brighton with a 'number one' touring venue. We strongly believe that restoration is achievable and that realistic options exist for delivering the outcome we suggest. As well as further improving the cultural well-being of local people, by broadening the range of performances Brighton can handle and introducing even greater flexibility into the city's cultural offer the city's economy would be boosted. Theatres can help draw people into an area, and in

coastal areas inbound tourism linked to theatre can help balance out the impact of seasonality.

Paragraph 92 of the NPPF (2018) requires authorities to plan positively for the provision of community facilities including cultural buildings, to improve social and cultural well-being for all sections of the community and to guard against the unnecessary loss of valued facilities. To that end, the City Plan has a role to play in objectively supporting a positive future for the Hippodrome and in turn enhance the local economy and stimulate improvement within its surrounding area. The Plan is also vital for supporting and promoting the valued cultural offer across Brighton and Hove, protecting all venues that meet a need and are valued by local people. Please find our specific comments set out below.

DM9 Community Facilities

Alongside Policy CP5 of City Plan Part 1 (2016), this policy sets a positive framework for promoting and protecting community facilities of different types across Brighton and Hove. We welcome that the definition of community facility within the context of this policy has been applied broadly, and has been well described and defined within the supporting text. We also support the flexible approach where new uses are proposed; in the case of cultural facilities this can help facilitate community-scale proposals outside of designated town centres, and also allow for temporary and 'meanwhile' uses in such locations for example where they activate vacant sites.

In terms of protecting facilities from loss (part 2), we support the intent behind the policy but consider that it should be strengthened by deleting the need to meet just one of the criteria. We would contend that marketing evidence should underpin demonstration that the building or land is no longer required or no longer suitable. The only exception would be where replacement of equal or greater standard is being provided. We would suggest the policy to be amended as follows:

2. Development that would lead to the loss of community facilities will only be permitted where it has been demonstrated that replacement facilities of an appropriate quality and size will be provided as part of new development proposals or in an alternative suitable location that meets the criteria in part 1 of this policy, or if ~~at least one of~~ the following circumstances applies:

~~a) replacement facilities of an appropriate quality and size will be provided as part of new development proposals or in an alternative suitable location that meets the criteria in part 1 of this policy; or~~

a) b) the facility is no longer needed and suitable alternative provision with sufficient capacity is available in a location easily accessible to users of the facility; or

b) ~~e~~) the building or land is no longer suitable to accommodate the current use or any alternative suitable community use and cannot be reasonably adapted to do so; ~~or~~ and

c) ~~d~~) it has been demonstrated that there is no current or future need or demand for the space, either in its current use or any alternative community use and evidence of active, flexible and appropriate marketing of the site for community use has been provided.

We **object** to the current wording giving support for partial loss of floorspace through change of use where the use requires less floorspace or to sustain the existing use through cross-subsidy. While we appreciate and support the principle behind the policy, as currently drafted it is far too permissive and would be very easy to manipulate. Loss of space currently reads as a favoured option rather than a 'last resort'. This applies equally to supporting paragraph 2.78. Community and cultural facilities will almost always be at a disadvantage in terms of land value to more lucrative residential, short-stay and commercial uses. There will also be many that aren't viable on purely commercial terms. Without amendment, potentially all community and cultural facilities across the city could be at risk from inappropriate development that undermines their function and longer-term sustainability. We would strongly recommend an amendment as set out below which requires evidence to justify and support that existing provision cannot be maintained.

Partial loss of floorspace through change of use will **only be supported when the operational need of the community use requires less floorspace or in order to sustain the viability of the existing use by cross-subsidy, and robust evidence including marketing information and other information such as structural reports are provided to demonstrate that existing floorspace cannot be maintained.**

DM10 Public houses

Pubs provide valued facilities for communities to meet and come together. They also provide important performance spaces at an amateur, community and 'grass-roots' level, helping to develop and nurture talent and broadening access to arts and cultural entertainment. This policy is very strong, and includes thorough and robust marketing information and justification to support any proposals for loss which we **support**. Pubs face unique challenges compared to other commercial, community and cultural uses and this has been understood well and is reflected within the supporting justification, for example requiring evidence that the pub has been offered free of tie and restrictive covenant.

We would question though why other community uses cannot also be subject to a 24-month marketing period. We in no way suggest that the marketing period for pubs should be decreased, but it is certainly the case that theatres and other such cultural venues can also be

subject to complex challenges which would justify requirement for a longer marketing period to give decision-makers confidence they cannot reasonably be maintained.

DM32 The Royal Pavilion Estate

We **support** this policy, which seeks to reunify the estate and improve the visitor experience and setting of this historic asset which includes the Corn Exchange and Studio Theatres.

In conclusion, we would recommend that the amendments we have set out are incorporated into the next draft of the City Plan Part 2 to help ensure that Brighton and Hove's valued community facilities including its theatres are adequately protected from unnecessary loss, and that key opportunities such as restoration of the Hippodrome as a large-scale performance venue can be realised.

Please do not hesitate to contact the Trust should you wish to discuss this representation in greater detail. We have expertise in policy-drafting related to community and cultural uses and would be willing to assist the Council should it be required.

From:
Sent: 04 September 2018 12:27
To: PlanningPolicy
Cc:
Subject: FAO Draft CPP2 Policy Projects & Heritage Team: Highways England response - Draft Brighton & Hove City Plan Part Two Consultation

For the attention of: Draft CPP2 Policy Projects & Heritage Team

Consultation: Draft Brighton & Hove City Plan Part Two Consultation

Highways England reference: 5439

Dear Draft CPP2 Policy Projects & Heritage Team,

Thank you for your email of 5th July 2017 regarding the above consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN.

Having examined the above consultation documentation, we have the following comments:

- **DM24 Advertisements (page 78)** – it is requested that the text in red is added as follows:
“Advertisements viewable from the Strategic Road Network (SRN) must not distract road users, and accordingly, any such proposals will require consultation with Highways England, who may require their own conditions to ensure the continued safe and efficient operation of the SRN.”
- **DM34 Transport Interchanges (page 100)** – it is requested that the text in red is added as follows: *“d) there is no unacceptable impact on local and strategic road networks and its capacity to safely and efficiently accommodate the movement generated or attracted by the development (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32)”*.
- **DM35 Travel Plans and Transport Assessments (page 102)** – it is requested that the text in red is added as follows: *“Any development that is likely to impact on the safe and efficient operation of the SRN or requires direct connection to the SRN will require consultation with Highways England, who may have their own requirements for a Transport Assessment/Statement”*.
- **Special Area SA7 Benfield Valley (page 144)** – confirmation is requested that the Special Area does not encroach upon the highway boundary as this could impede essential highway works including safety maintenance works.
- **SSA7 Land Adjacent to American Express Community Stadium, Village Way (page 162)** – please note that proposals that could impact on the SRN will need consideration by Highways England, and in any event, due to the close proximity of the site to the SRN, Highways England will need to be consulted on any applications submitted.

- **Table 5 - Residential Site Allocations, Table 6 - Mixed Use Site Allocations and Table 7 – Urban Fringe Allocations (pages 165-174)** – Highways England requires confirmation that the cumulative impact of the development sites has been included within the strategic modelling and therefore included within the agreed junction mitigations. If not, further consideration of appropriate mitigation may be required.

Should you have any queries regarding this response, please contact us at:

Regards,

Highways England |

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Consider the environment. Please don't print this e-mail unless you really need to.

From:
Sent: 04 September 2018 12:58 PlanningPolicy
To:
Cc: Land at Horsdean
Subject:

Dear Sirs

We as a family are very fortunate in that we have a lovely home in Patcham which is a beautiful part of Brighton & Hove. We live very close to Horsdean field where construction is suggested. On a daily basis we walk locally and the field is part of it. Our garden backs on the public footpath which leads directly to the field. We put fresh water out every day for dogs/wild creatures passing by. (Until recently, we also sited a bench on the footpath but, sadly, it was vandalised).

So, I think you will see that we appreciate our local amenities which include the field.

However; as I say we are fortunate that we have a home. As a family we appreciate that many families do not, and a home to call your own is NOT a luxury so we will not object to the development of the field as sad as we would be should it be designated for housing.

However; and this paragraph is written in the **strongest possible terms**. We would strongly resist the above development in favour of new homes being built on "brown field sites" within our City. There are numerous areas ripe for development. The eyesore on the A23 at Stanford Avenue for example. This site has been derelict for years and we are fobbed off with "ownership" issues. There was an area in Church Street - is that still available? Also, land at Black Rock which looks like a traveller site at the moment. Yes, we appreciate we are being naive - like most people we see issues in black and white.

Also, is the Council considering "affordable" housing? Would the 25 units at Horsdean be allocated to, say, our lower earners, i.e. emergency services staff? NHS staff? Would the homes be offered on a part rental/part mortgage basis? Would it be the Council providing the housing or a private landlord?

So, whilst we are all in favour of new homes being constructed within our City and as quickly as possible, we ask that both the "green field" sites in Patcham are developed only once **all other available "brown field" options within the City are utilised.**

Thank you for reading and digesting our comments.

Yours faithfully

DP114

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	120
Response Date	04/09/18 20:02
Status	Submitted
Submission Type	Web
Version	0.1

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

Organisation Name

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

Name

Name

Address

Address

Email Address

Email Address

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

DM1 - Housing Quality, Choice and Mix

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

DM2 - Retaining Housing

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

DM3 - Residential Conversions & Retention of Smaller Dwellings

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

DM4 - Housing & Accommodation for Older Persons

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

DM5 -Supported Accommodation

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

DM6 - Build to Rent Housing

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

DM7 - Homes in Multiple Occupation

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

DM8 - Purpose Built Student Accommodation

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

DM9 - Community Facilities

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

DM10 - Public Houses

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

From:
Sent: 04 September 2018 16:39 PlanningPolicy
To: City plan part two
Subject:

Hi I've lived in patcham for 20yrs and it's one of the best places to live I think the houses in old London road 46-54 should be removed from the list of sites allocated for development in the city plan part two as I used to take my children for walks in old pat ham village and putting up new flats would change the peace and quiet that the village has and wouldn't fit in as it would mean more cars and noise keep patcham as it is no new. developments please

Sent from my iPad

**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 5th 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.

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.

Organisation Name (If applicable)	lot 88
Name	
Address	
Email Address	
Agent Name (If applicable)	
Agent Name	
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) site 17.

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?

Too much traffic, access critical across open spaces.
Density of population not taken into account, schools, parking etc.

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

na.

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 ?**

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?

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 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 housing sites ?

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
Object

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

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 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
Object

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

--

Signed*:	
Dated*:	4/9/2018.

All representations must be received at the email or postal address given on this form by **5.00pm on 13th 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

Post: Consultation on the Draft City Plan Part Two
Brighton & Hove City Council
Planning Policy Team
1st 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

From:
Sent: 04 September 2018 22:26
To: PlanningPolicy
Subject: 46-54 Old London Road - possible redevelopment

Hi

I'd like to comment about the possible redevelopment of 46-54 Old London Road into flats.

As redevelopment was refused recently when McCarthy & Stone were seeking to build retirement flats, it is a surprise that the Council is effectively going against its own decision (and that of the Environment Agency Inspector).

The current family houses are in scale with others in the area and blocks of flats will change the character of the village.

The site is relatively small and backed by very mature trees which I imagine would need to be preserved, thus making the site even more limited.

Parking around Patcham is already at capacity, with vehicles being parked on streets other than where residents live, and some being left for long periods, and some using the area for commuter parking. There is so little space that people visiting the local shops park (illegally) in the bus stop causing more problems. I suspect that there will be insufficient space for parking for 30 flats so more congestion will occur.

It may be that its the wrong time anyway to be carrying out new building as the market is flat (even standard flats are not selling), and its clear there is a lot of building going on elsewhere in Brighton, so demand is actually weak.

From:
Sent: 05 September 2018 09:31
To: PlanningPolicy
Subject: Re: City Plan Part two Consultation

>
>
> I'm writing in objection to the proposed City Plan Part Two Consultation for 46-54 Old London Road, Patcham proposal for 30 houses and flats to replace 5 family homes.
>
> Firstly, it was good to see that the McCarthy & Stone's proposals for 44 retirement flats for this area was rejected by both the Brighton and Hove council and the Government's Planning Inspector. Common sense prevailed.
>
> However, it is now disappointing to see that Brighton City Council is now proposing another development only slightly smaller at two thirds of the original proposed development. As a resident of Patcham for over 30 years, I speak for many people living here that do not want to see our area get any larger in population. The density of housing will detract from the character and appearance of the area the very reason that the government's Planning Inspector rejected the original planning application. So what has changed the Council's mind?
>
> It should also be noted that this is in an area that does not need to see an increase in traffic which it will ultimately will do. Especially as this is right opposite an existing school and local shops. The increase housing will almost certainly increase car use to and from these homes by at least 6 fold and the same goes for the on line shopping vehicles serving these homes. We need to wake up and understand that the infra structure of the area cannot accommodate this increase in housing.
>
> So please listen to the residents and again use some common sense and reject this housing proposal and remove it from the City Plan Part Two list. We do not need this development.
> Regards
>

DP119

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	125
Response Date	05/09/18 14:25
Status	Submitted
Submission Type	Web
Version	0.1

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

Organisation Name (if not applicable please put n/a)	Stonegate Pub Company Ltd
---	---------------------------

Name

Name

Email Address

Email Address

Agent Name

Agent Name

Agent Address

Agent Address

Agent Email

Agent Email

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

We write on behalf of Stonegate Pub Company Ltd, the operators of Charles Street Tap, which occupies a large unit adjacent the proposed site allocation. We write to provide representations to the Draft City Plan Part Two. Policy H1 allocates the '**Land between Manchester Street/Charles Street, Brighton, BN2 1TF**' for 24 Residential Units. Our client's premises at 8 Marine Parade are situated directly adjacent the southern edge of the proposed site allocation.

The establishment is a very successful LGBTQ bar and nightclub, that also serves food during the day. It opens from 10:00am until 01:00am Monday to Wednesday, 10:00am until 03:00am Thursday to Saturday and 11:00am until 01:00am on Sundays. Historic England have launched Pride of Place to engage community members and increase awareness of the significance of LGBTQ histories in relation to England's buildings and landscapes. This is as a result of the LGBTQ community often having their histories hidden, marginalised or suppressed. Venues such as the Charles Street Tap are vitally important for this community and must be appropriately protected.

Our client is not principally against the allocation of this site for residential use. However, particular concern does relate to potential complaints from future residential occupiers regarding noise and general on-street activity from their existing lawful late-night premises. Complaints alleged to be caused by our client's night club and/or its customers, could lead to possible constraints on our client's existing authorised late-night use and opening hours through restrictions imposed on its Premises Licence. This in turn would reduce the profitability and viability of its business.

The 'Agent of Change Principle' confirms that developers are responsible for ensuring new developments provide mitigation against existing late-night businesses. This is now an accepted planning consideration, following its inclusion in national planning policy. Paragraph 182 of the revised National Planning Policy Framework (NPPF) which states:

"Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."

Whilst it is accepted that existing national and local development plan policies support mixed use developments in central locations, due consideration has to be given to existing businesses in line with the above.

In addition to the NPPF, Paragraph 6 of the Planning Practice Guidance on Noise highlights that proposals for conflicting uses which need to exist cheek by jowl on the same street will require appropriate consideration:

"The potential effect of a new residential development being located close to an existing business that gives rise to noise should be carefully considered. This is because existing noise levels from the business, even if intermittent (for example, a live music venue), may be regarded as unacceptable by the new residents and subject to enforcement action. To help avoid such instances, appropriate mitigation should be considered including optimising the sound insulation provided by the new development's building envelope."

Paragraph 7 continues on the same theme, recognising that noise may already exist in the area and therefore that this noise will contribute to the established character of the locality:

"When assessing whether a statutory nuisance exists, local authorities will consider a number of relevant factors, including the noise level, its duration, how often it occurs, the time of day or night that it occurs and the 'character of the locality'. The factors influencing the "character of the locality" may include long-established sources of noise in the vicinity – for example, church bells, industrial premises, music venues or public houses."

While it is recognised that the Draft Plan is at an early stage, it is requested that the Council monitor any applications that may come forward at this proposed site allocation and ensure that appropriate notice is provided to our client so that they may pass appropriate representation should development be proposed. It is vitally important that the requisite noise attenuation condition(s) are imposed upon any decision, so as to protect the longstanding establishment as well as the amenity of future residential occupiers.

DP120



Liz Hobden, Head of Planning
City Development and Regeneration
Hove Town Hall
Norton Road
Hove BN3 3BQ

5 September 2018

Dear Madam

Objection to City Plan Part 2 Sites 32 and 32a

Belle Vue Cottages, an unadopted Victorian lane, represents an historical area of old Brighton, areas that are rapidly and irreplaceably disappearing. Therefore, I am writing to object to the proposed planning application to build 15 dwellings on the sites behind Belle Vue Cottages. My reasons are enclosed.

Yours sincerely



Enc: Objections to City Plan 2



OBJECTIONS TO CITY PLAN PART 2 – SITES 32 AND 32A

**LAND AT SOUTH DOWNS RIDING SCHOOL AND RESERVOIR BEAR ROAD,
BRIGHTON**

Sites 32 and 32a are behind a row eleven 19th-century cottages in a cul-de-sac surrounded by ancient flint walls. The owners of the cottages have specifically bought their homes in order to live in this rural and tranquil setting, in spite of its exposure to the extreme weather conditions during winter. The proposed modern development would not be in keeping with the existing Victorian architecture. It would create an unacceptable suburban feel to this rural area, which is on the very edge of the South Downs National Park and in a prominent, elevated, exposed and steeply sloping position. The noise impact of a modern estate would be devastating to the existing ambience. The development would be an unsightly and unsuitable suburban addition to an ancient area. The flint walls were in existence before the cottages were built and to consider removing them for modern building is vandalism. The site is on the top of a ridge and slopes steeply downwards. in a southerly direction.

Building work, particularly on the reservoir site within the ancient flint walls, would cause serious loss of amenity to the existing cottages. These cottages have no foundations and any building work nearby could cause severe material damage to the existing dwellings. They would be overlooked and overshadowed, with loss of visual privacy, sunlight and daylight. The outlook of the existing cottages would be irreparably damaged. Overlooking the South Downs and a riding stable is very different from overlooking a modern estate with all that this would entail. The creation of a modern estate would cause unacceptable harm to quality of life and affect the sensitive biodiversity.

The existing reservoir may be a cause of flooding and attempts to build beside it could cause severe flooding problems to the existing cottages as the water would pour into the houses. In view of the extreme weather conditions being experienced in England currently, the ground containing the reservoir must be stressed by drought and torrential winter rains and could be dangerous if disturbed. There is high risk of ground water flooding.

Transport facilities. The site is currently served by an irregular and erratic bus service with buses 2 and 22 often arriving at the same time, thus leaving large gaps in the timetable. Traffic jams in Woodingdean cause frequent hold-ups which affect transport services. The existing bus stop consists of three paving slabs without a shelter. Requests to improve it have been rejected by the bus company. Moulsecoomb rail station is over 3000m distant and not on the Southern main line. Broadband access is not satisfactory and there are frequently difficulties and disruptions, even if a fibre optic service is additionally paid for.

Local services. Shops, primary schools, secondary schools, health facilities and a local park are all a considerable distance away - between 1310m and 4520m. The nearest secondary school, Varndean (3370m), is not in the catchment area. The nearest secondary school within the catchment area is Longhill in Rottingdean (4520m). Access to the site is via single rough rural farm track on the edge of a steeply sloping site. The adjoining road to Woodingdean suffers regular traffic jams as drivers negotiate their way towards the A27, the nearest strategic road network (5200m distant). This regular traffic congestion also affects the bus services, particularly during summer months.

South Downs Riding School is an important asset to the local community and of recreational value. It acts as the local city farm. Many disabled children enjoy riding there. Many local youngsters come to the stables to help with the horses. Thus South Downs Riding School is providing a youth amenity which helps youngsters to be occupied in a meaningful way at no cost to local government - an important point in these straitened times. Removal of South Downs Riding Stables would be a considerable loss to the local community, to local youngsters and to the disabled children who enjoy learning to ride. This riding amenity would be destroyed by a housing development.

The site has policy restraints relating to landscape, archaeology, ecology/biodiversity.

Ecology/biodiversity. The area is a wild life sanctuary with flocks of sparrows, starlings, magpies, swifts, swallows, house martens and crows, as well as kestrels, bats, badgers and foxes visible daily in the vicinity. The bats roost in the South Downs Riding Stables barns. Two dewponds in the adjoining Jewish Cemetery are home to endangered invertebrates such as newts and frogs. Bees and butterflies thrive in this rural/semi-rural environment, encouraged by the gardens of the cottagers and abundant native wild flowers and trees. Brighton and Hove Biodiversity Action Plan sets out in detail the importance of protecting the local ecology.

The South Downs National Park International Sky Reserve would be affected by artificial lighting.

Archaeology. The site is within the Race Hill Mill ANA. UFA 2015 (Archaeology) considered that the site has high archaeological potential, particularly as the site contains significant amounts of open space.

From:
Sent: 05 September 2018 14:49
To: PlanningPolicy
Subject: City Plan Part Two Consultation

I would like to see 46 to 54 Old London Road, Patcham removed from development under the above proposal.

I live very close to it and believe it would be a detriment to the relatively peaceful area. More traffic, more noise, loss of family homes etc.

DP122

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	128
Response Date	05/09/18 18:59
Status	Submitted
Submission Type	Web
Version	0.1

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

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

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 - 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...

Regarding 'Land North of Warren Road (Ingleside Stables)'. I don't think this is a suitable site for any housing development. The site entrance sits on a blind corner of a very busy road that is highly susceptible to low cloud and fog. I have witnessed plenty of crashes in the area due to the combination of poor visibility and motorists driving too fast (the speed limit is 40 mph), often without their lights on. The site entrance of any housing development would also be shared with horses, walkers and cyclists who use Drove Road to access the South Downs and the cycle trail to Lewes.

H3 - Purpose Built Student Accommodation Sites

a) Do you support or object to policy H3?

Support

Carly Dockerill

From:
Sent:
To: PlanningPolicy
Subject: Housing Development

Dear Sirs

I am writing to strongly object to the planned proposal of a housing development on the land adjoining Horsdean Recreation ground.

Although I recognise the need for homes, I can see the effects of urbanisation in the centre of Brighton and the 'creeping' of this urbanisation into the fringes of Brighton.

Vale Avenue and the surrounding roads provide much needed family homes and subsequently there are many families with children who have moved into the area. The recreation ground is used daily by dog walkers, children after school and in the holidays, but especially at weekends for the local football clubs and cricket teams both adult and children alike.

The Horsdean ground joins onto the field behind the East facing side of Vale Avenue, if the houses were built on the proposed site the natural access would be between these two parks, causing them to be separated. This would cause a danger to the children using the parks.

Vale Avenue is used as a 'rat run' at the best of times. The increased population of the area would only increased the amount of cars and therefore traffic on Vale Avenue as it would be used for access and exit, again causing a huge danger for children crossing the road.

Finally the area proposed may only be classed as a copse, but it is a wild piece of land that I'm sure has benefits to attracting wildlife and with the busy A27 generating huge amounts of pollution, it is even more important not only to help neutralise the amount of CO2 emitted but as an important green space used by many people throughout all the seasons.

I urge you to consider these points I have raised.

As an additional comment, if the council stopped allocating such large areas of land to the University for financial gain, allowing them to build student accommodation instead of homes for residents of Brighton and Hove, I'm sure there would not be such a housing crisis.

Kind regards

From:
Sent: 06 September 2018 13:30
To: PlanningPolicy
Cc:
Subject: City Plan Part Two Consultation

My name is and I live at . I am contacting to raise objections to the proposals to develop land at Old London Road and Horsdean.

Patcham village had a very rustic feel to it when I moved to Patcham in 1990 (pre by-pass construction) which has been steadily eroded over the years due to the number of people cutting through our streets to reach the by-pass and the ever increasing number of residential vehicles in use by residents which have been steadily destroying our verges.

This will be in danger further if the extra housing units are built on these two locations. The inevitable result of further vehicles on our Patcham roads will be greater detracting of the character and appearance of the area. We currently put up with higher noise, pollution and congestion levels as a direct result of the by-pass and further development would increase this unnecessarily.

What irritates me particularly is the councils willingness to permit the construction of larger numbers of student accommodation in the city without adequate provision for residents waiting for affordable housing which could have been constructed on some of these sites.

Please remove Old London Road and Horsdean from the proposals.

Regards

From:
Sent: 06 September 2018 16:23
To: PlanningPolicy
Subject: City Plan Part Two Consultation

46/54 Old London Road, Patcham

I would like to object to the inclusion of the above properties for redevelopment in your latest City Plan Part Two.

Losing five perfectly habitable family houses in the village and replacing them with 30 flats would be a total overdevelopment of the site. Such a development would impact on the dynamic of the village; the ambience; increased traffic; parking as well as adding to the flood risk that already exists.

I hope you will reconsider and remove these five houses from your Plan.

Many thanks

From:
Sent: 06 September 2018 16:57 PlanningPolicy
To: City Plan Part 2 Consultation
Subject:

To whom it may concern

City Plan Part 2 Consultation

I wish to object very strongly to the proposal of knocking down 5 perfectly sound family homes in Old London Road and replacing with 30 new dwellings.

I have lived in Overhill Way, Patcham for 43 years. The main reason for staying in the same house for all these years is the enjoyment of living in the village of Patcham. Throughout this time the village has maintained it's village kudos , supporting myself and family as they grew up here.

The local Infant, Junior and Secondary schools are at maximum capacity and should the plans go ahead to replace 5 family homes with 30 new residencies these schools would not be in a position to accommodate the potential additional children.

As the council is aware there is the problem of water flooding along Old London Road. This flooding has occurred on several occasions in the last 10 years . By adding another 25/30 dwellings would inevitably lead to more widespread flooding impacting on the current residents of Patcham.

At present there is already a shortage of parking in Old London Road exacerbated by the controlled parking moving ever closer and what spaces there are being taken by commuters. Unless adequate parking is included in the plans then this problem will ultimately impact on residents and tradespersons alike. To do this would necessitate building higher.

In order to build 30 residencies on this small site would inevitably mean high rise flats which would be totally out of keeping with the village. My garden backs on to the proposed development which will inevitably mean that the outlook from my house will be destroyed if flats are built on the proposed site together with added noise and pollution of cars.

Whereas I am sympathetic to the target of building 13,200 new homes by 2030, I feel very strongly that 46 to 54 Old London Road is not the place to build 30 or even more by your own admission, new homes, inevitably in the form of flats as the area is not large enough to build low level dwellings. This density of building would destroy the 'village' look and feel and detract from the character and appearance of the area. Such a development would also put tremendous strain on resources. i.e. Schools, environment, health services.

DP128

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 132
Response Date 06/09/18 16:39
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 Allocation - Special Areas policies

SA7 - Benfield Valley

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

SA7 Object Reasons

d) Please explain why you object to this policy?

My objections are as follow:

When we brought out property in 2009 we had woods at the back of our garden which was why we purchased , since then some of the trees have been cut down due to dutch elm disease which we understand was a necessity.

We are very upset to learn that you now have plans to ruin our outlook further by building 100 houses close to our back garden.

Another deep concern is the amount of extra traffic this will put on surrounding roads which are already extremely busy especially at peak times of the day. From your illustrated plan this looks to be extremely close to the busy roundabout which often has queues of traffic from Fox Way and Hangleton Lane going right back to Towns Corner.

Surely this will also put tremendous pressure on local schools, doctors surgeries and dentists.

DP129

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	133
Response Date	06/09/18 20:22
Status	Submitted
Submission Type	Web
Version	0.1

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

Organisation Name

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

Name

Name

Address

Address

Email Address

Email Address

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

Any other comments

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

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

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

<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.

housing.

i resent the amount of house building and general developement going on in Brighton, it is becoming uncomfortably overcrowded for residents

From:
Sent: 07 September 2018 07:45
To: PlanningPolicy
Cc:
Subject: deveopment proposal city plan site number 13

Dear Sir Madam,

I am writing to express my wife's and my concern over the councils, plans to develop, under the councils' city plan, site number 13 (46-54 old London road Brighton.

This site has been refused planning permission three times over the last few years, the last time as recently as 2017.

The reasons for objection remain the same. The prospect of destroying the villages' ambience and looks by replacing 5 well presented and set back properties with a foreboding and dense overdevelopment. the increased risk of flooding (given the village's history and inadequate drainage infrastructure), the destruction of trees and the consequential effect on wildlife and added risk to flooding that the removal of trees will result in, the increased traffic congestion and parking issues resulting from additional vehicles accessing the village, including any additional residents' their visitors and support staff. emergency vehicle access and finally, the depth of public feeling all ready demonstrated regarding the villages' protection.

It is also somewhat disturbing, that the council, who can count themselves amongst those that participated in the fight against the last attempt at developing site number 13 for many of the above reasons, have now seemingly about faced and now support development, and development on a grand overbearing scale.

Yours faithfully,

Your Ref:

Date: 7th September
2018

Our Ref: Brighton Local Plan Part 2

By e-mail only

Dear Sir/Madam,

Brighton Draft City Plan Part Two Consultation

Mid Sussex District Council welcomes the opportunity to comment on the Regulation 18 consultation of the Brighton Draft City Plan Part Two ('the Plan').

The allocation of further sites for housing in the Plan is acknowledged, but it is disappointing that sufficient sites to meet the residual housing requirement identified in the City Plan Part One (CPP1) have not been identified.

Brighton has an objectively assessed need of 30,120 units, but the requirement for housing set out in CPP1 Policy CP1 (Housing Delivery) makes provision for 13,200 new homes to be built over the plan period 2010-2030.

Paragraph 23 of the NPPF states that:

'Strategic policies should provide a clear strategy for bringing sufficient land forward.... This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.'

This Council therefore considers it is important that the City Council is able to demonstrate that it has explored all opportunities to allocate housing sites to maximise certainty of delivery of the 13,200 homes, to minimise the Council's unmet housing need, and that it continues to do so through Plan allocations.

The Plan should therefore make provision to meet the residual need for homes identified in CPP1 Paragraph 4.12, for 4,585 dwellings. The Plan only allocates sites to provide 3,611 dwellings, leaving a significant shortfall of dwellings.

The Council's Housing Provision paper (May 2018) notes that the shortfall will be made up from a number of sources, including a windfall allowance, prior approvals consents and an Estates Regeneration programme. We contend that the reliance on these sources provides significant uncertainty relating to the deliverability of the Plan numbers.

CPP1 makes provision for a windfall allowance of 1,250 units, which represents almost 10% of the total supply. It is questionable that it is appropriate that windfall sites should form such a

Working together for a better Mid Sussex



significant component of the housing land supply over the entire Plan period, when there can only be a finite supply of such sites.

It is recommended that in order to improve certainty of delivery, sites identified through the Estates Regeneration programme, which are not currently formally allocated, should be assessed through the SHLAA process, and suitable sites allocated for inclusion in this programme.

An additional source of housing sites identified in the Council's Housing Provision paper is Council owned land; the paper notes that as these sites come forward, they will be identified in the annual SHLAA updates. We would strongly encourage the Council to review the availability of these sites now, and assess them through the SHLAA process so that they can be allocated, if found to be suitable, in the Regulation 19 consultation document, to provide a source of more certain source of supply on which delivery of the Plan can rely.

It is noted that CPP1 Policy CP14 (Density) states that new residential development in Brighton and Hove will be expected to achieve a minimum net density of 50 dph, with new residential development in the areas covered by Policies DA1 to DA6 and DA8 achieving a minimum density of 100 dph. The use of these minimum standards is supported.

However, the policy also states that where a proposed development is below 50 dph, a lower density will be accepted where this approach can be justified by a number of criteria such as the development would reflect the neighbourhood's positive characteristics, would meet the housing needs of a particular group or groups within the community and would better contribute towards creating a sustainable neighbourhood.

We do not believe that these criteria constitute strong reasons for delivering lower densities, nor that the approach complies with paragraph 123 of the NPPF (July 2018), which states that:

'Plans should contain policies to optimise the use of the land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate.'

The preparation of the Part 2 Plan provides an opportunity for the policy on density to be strengthened in accordance with the recent guidance published in the NPPF, by identifying minimum densities on sites allocated through this Plan, and by seeking an uplift in densities on other new development.

The Council should also explore the opportunity to optimise development within its boundaries by reviewing its approach to the development of tall buildings. The Tall Buildings Supplementary Planning Guidance (SPG) was published in 2004. In light of significant changes to national planning policy which have taken place since that time, as well as revised published guidance from organisations such as Historic England on tall buildings, and the Government's commitment to delivering a significant number of new homes, we recommend that the SPG should be revised.

Updated Tall Buildings Guidance should provide a more flexible framework which encourages the development of higher buildings within the City, where appropriate, to deliver more homes in sustainable, accessible locations.

Working together for a better Mid Sussex



INVESTOR IN PEOPLE

**Planning Policy and Economic Development
Business Unit**



We note the recent proposal to develop the area around Hove railway station which includes fifteen storey apartment blocks as an example of a mixed use scheme which is optimising the use of land in this area.

As well as encouraging new, tall buildings, Paragraph 118e of the NPPF also notes that:

'Planning policies should allow upward extensions, where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards) and can maintain safe access and egress for occupiers.'

The Plan should make provision for such extensions, to increase capacity, where appropriate.

In summary, Mid Sussex District Council encourages Brighton City Council to:

- Identify further sites suitable for allocation, including Council owned land and Estate Regeneration sites, to maximise the number of units which are planned for on allocated sites;
- Optimise use of land by seeking to uplift residential densities;
- Review the Council's guidance on development of tall buildings.

The Council is then encouraged to use all these sources of information to plan for the 4,585 units which CPP1 identified would be delivered through the Part 2 Plan, so that the Council is planning properly to meet its own housing requirements, and minimises unmet housing need.

Yours sincerely,

Working together for a better Mid Sussex



INVESTOR IN PEOPLE

**Planning Policy and Economic Development
Business Unit**



From: @westsussex.gov.uk>
Sent: 07 September 2018 14:50
To: PlanningPolicy
Subject: Brighton and Hove City Plan Part 2

Thank you for the opportunity to consider and comment on the City Plan Part 2.

Considering the draft Plan and the available background documents, it is not clear if there would be any impacts on West Sussex from the proposed additional allocations. We would welcome a discussion, if through continued work to support the preparation of the plan, any cross boundary mitigation is required.

Kind regards

This email and any attachments are confidential and intended solely for the persons addressed. If it has come to you in error please reply to advise us but you should not read it, copy it, show it to anyone else nor make any other use of its content. West Sussex County Council takes steps to ensure emails and attachments are virus-free but you should carry out your own checks before opening any attachment.

From:
Sent: 07 September 2018 14:14
To: PlanningPolicy
Subject: Re: City Plan Part Two Consultation

apologies - the developments in Patcham village - Re-development of 46 to 54 Old London Road

From: PlanningPolicy <PlanningPolicy@brighton-hove.gov.uk>
Sent: 07 September 2018 08:27
To: Richard Baker
Subject: RE: City Plan Part Two Consultation

Dear Mr Baker,

Please could you clarify which site your comment refers to?

Regards

From:
Sent: 06 September 2018 5:26 PM
To: PlanningPolicy
Subject: City Plan Part Two Consultation

Please don't allow the flats to be built which will ruin the village I have lived in for years

Richard

Notice to recipient:
The information contained in this electronic mail message is intended only for the use of the individual to

DP134

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 141
Response Date 09/09/18 11:05
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
. Make general comments

DM37 - Green Infrastructure & Nature Conservation

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

DM37 Support Reasons

b) Please explain why you support this policy?

It is, without doubt, a serious issue within any senior town/city whereby we need to support wholeheartedly any project that can and does give aid to conservation and promotes a green infrastructure. Where are the solar panels? where is the green energy from wind power? Where are

the no zones for motor vehicles? Where are you not supporting hydroelectricity, biofuels, and the use of geothermal energy?

DM38 - Local Green Spaces

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

DM40 - Protection of Environment and Health - Pollution & Nuisance

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

DM40 Support Reasons

b) Please explain why you support this policy?

Common sense should tell us that there are far too many cars in Brighton and that the future should be a move towards green energy. Where is the electric tram service for getting around the city? Why are diesel buses still pumping their carbon into our lungs? Think of the future for once and clean up the beaches and the town.

DM42 - Protecting the Water Environment

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

DM42 Support Reasons

b) Please explain why you support this policy?

The collection points for beach rubbish should be well signposted and have much larger bins and get collected on a much more regular basis! What is wrong with having a beach patrol to ensure that people take home their rubbish or put it in the relevant place? Goodness me you've got the idiot brigade 'Environment Officers' going around fining mainly young women around Brighton Station for dropping a cigarette butt while on the beach there's bloody carnage and rubbish everywhere! Ban chewing gum, clean up the pavements and give people back some civic pride.

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 142
Response Date 09/09/18 11:12
Status Submitted
Submission Type Web
Version 0.1

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

Organisation Name

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

Name

Name

Address

Address

Email Address

Email Address

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

More diversity and range of housing accomodation needed to provide for family living

DM2 - Retaining Housing

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

DM2 Support Reasons

b) Please explain why you support this policy?

Brighton is making student accommodation more of a priority and family accommodation is being eroded

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?

Will give families more choice of living possibilities

DM4 - Housing & Accommodation for Older Persons

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

DM4 Support Reasons

b) Please explain why you support this policy?

Older people need to feel part of the community

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 is important again so that the vulnerable feel part of the community

DM6 - Build to Rent Housing

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

DM6 Support Reasons

b) Please explain why you support this policy?

This will make renting more affordable with more choice

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?

Robertson Road already has several HMO's in a small area. A lovely family home is being changed beyond recognition to potentially accommodate students and or shared living and if it goes ahead the family next door will be sandwiched between 2 HMO's as well as having 3 HMO's opposite. Robertson road is largely family homes with great access to schools and a great community spirit However if more HMO's are allowed in the road that will disappear and parking already at saturation point. This is a very worrying and upsetting situation. Anything implemented must cover Withdean Ward with Article 4 protection

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?

Students need accommodation in an area where there is space and they can feel part of university life

DM9 - Community Facilities

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

DM9 Support Reasons

b) Please explain why you support this policy?

Anything that supports community is welcome. Brighton has so many people just passing through either as tourists or students. The heart and soul is slowly being eroded

DM10 - Public Houses

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

DM10 Support Reasons

b) Please explain why you support this policy?

We are in danger of losing a pub in Dyke Road. Public houses are an important part of the local community providing a meeting and social place for local residents. This would be so wrong to lose it.

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.

Withdean Ward to be included in Article 4 protection

DP136

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	143
Response Date	09/09/18 12:30
Status	Submitted
Submission Type	Web
Version	0.1

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

Organisation Name

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

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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.

CPP2, Strong objections to these areas-Old London Road, Patcham & Land adjoining Horsdean Recreation ground.

So the planners turned down a private project ref 46-54 Old London Road, then decided to build on it themselves, taking no notice of flooding, traffic, pollution or access on such a narrow road.

Addressing impact on building at Horsdean Rec, Light pollution, the risk of flooding, already floods without further drainage in place, traffic already the by-pass, Vale Avenue and slip road is at a stand still at peak times, how could you possibly add to the pollution already at high levels! I would assume Low cost housing will be included, so Bus links? Schools? Shops? accessibility?! This needs addressing. Use of all brownfield sites within the city should be a priority, so as to avoid more pollution and encroaching on green spaces.

DP137

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	144
Response Date	09/09/18 20:40
Status	Submitted
Submission Type	Web
Version	0.1

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

Organisation Name

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

- . Housing, Accommodation and Community
- . Make general comments

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?

We currently have 4 HMO in the lower section of Robertson Rd. At present, a very large development is taking place, effectively sandwiching one of the terraces. It was originally a Victorian house quite in keeping with its original terrace and the triangle of streets around it. It has gone from 3 bedrooms to 7 and dominates the rear gardens and houses of its neighbours. It is an aggressive development with no thought for the long established community which surrounds it. The builders have been dirty, noisy and disrespectful, and daily urinate and defecate in the back garden. This is a development that needs to be stopped in its tracks before we become overwhelmed, and lose our close knit and very supportive community. Most of us in this area have lived here for over 35 years, and we treasure and value everything we have achieved here. It is criminal to watch it being destroyed so casually.

From:
Sent: 07 September 2018 16:18
To: PlanningPolicy
Subject: City Plan Part Two Consultation

From:

I think 46-54 Old London Road Patcham should be removed from the list of sites allocated for development in the City Plan Part Two for the following reasons:

It would create a greater volume of traffic and parked cars in what is already an overcrowded area of the village. It would put further strain on the sewers and no doubt contribute to the reoccurrence of flooding from the underground stream which runs along that road.

Our village would be eroded by any further development in the Old London Road area.

I strongly oppose this plan.

From:
Sent: 07 September 2018 18:18
To: PlanningPolicy
Subject: City Plan Part Two Consultation

I am writing to object to the inclusion of 46 to 54 Old London Road on the list of sites for potential development.

I believe that the site which currently accommodates 5 family homes is too small for 30 houses or flats. It is too many homes on too small a piece of land. In particular this scale and density of housing will spoil the Village look & feel, and materially detract from the character and appearance of the area.

In particular I would highlight:

Flood risk - the site is prone to flooding from 3 sources – ground water, surface water and sewers overflowing

Parking - 30 new homes will intensify parking problems in road

Traffic - increase in congestion
volume

Trees, mature gardens & wildlife - replaced by intensive building and parking

Privacy - loss of privacy to surrounding neighbours, plus unsightly outlook

Any proposals need to be proportionate, appropriate and sensitive to the surroundings. Putting 30 homes on a site this size in this location is none of those things.

Regards



Liz Hobden, Head of Planning
City Development and Regeneration
Hove Town Hall
Norton Road
Hove BN3 3BQ

5 September 2018

Dear Madam

Objection to City Plan Part 2 Sites 32 and 32a

Belle Vue Cottages, an unadopted Victorian lane, represents an historical area of old Brighton, areas that are rapidly and irreplaceably disappearing. Therefore, I am writing to object to the proposed planning application to build 15 dwellings on the sites behind Belle Vue Cottages. My reasons are enclosed.

Yours sincerely





OBJECTIONS TO CITY PLAN PART 2 – SITES 32 AND 32A

**LAND AT SOUTH DOWNS RIDING SCHOOL AND RESERVOIR BEAR ROAD,
BRIGHTON**

Sites 32 and 32a are behind a row eleven 19th-century cottages in a cul-de-sac surrounded by ancient flint walls. The owners of the cottages have specifically bought their homes in order to live in this rural and tranquil setting, in spite of its exposure to the extreme weather conditions during winter. The proposed modern development would not be in keeping with the existing Victorian architecture. It would create an unacceptable suburban feel to this rural area, which is on the very edge of the South Downs National Park and in a prominent, elevated, exposed and steeply sloping position. The noise impact of a modern estate would be devastating to the existing ambience. The development would be an unsightly and unsuitable suburban addition to an ancient area. The flint walls were in existence before the cottages were built and to consider removing them for modern building is vandalism. The site is on the top of a ridge and slopes steeply downwards, in a southerly direction.

Building work, particularly on the reservoir site within the ancient flint walls, would cause serious loss of amenity to the existing cottages. These cottages have no foundations and any building work nearby could cause severe material damage to the existing dwellings. They would be overlooked and overshadowed, with loss of visual privacy, sunlight and daylight. The outlook of the existing cottages would be irreparably damaged. Overlooking the South Downs and a riding stable is very different from overlooking a modern estate with all that this would entail. The creation of a modern estate would cause unacceptable harm to quality of life and affect the sensitive biodiversity.

The existing reservoir may be a cause of flooding and attempts to build beside it could cause severe flooding problems to the existing cottages as the water would pour into the houses. In view of the extreme weather conditions being experienced in England currently, the ground containing the reservoir must be stressed by drought and torrential winter rains and could be dangerous if disturbed. There is high risk of ground water flooding.

Transport facilities. The site is currently served by an irregular and erratic bus service with buses 2 and 22 often arriving at the same time, thus leaving large gaps in the timetable. Traffic jams in Woodingdean cause frequent hold-ups which affect transport services. The existing bus stop consists of three paving slabs without a shelter. Requests to improve it have been rejected by the bus company. Moulsecoomb rail station is over 3000m distant and not on the Southern main line. Broadband access is not satisfactory and there are frequently difficulties and disruptions, even if a fibre optic service is additionally paid for.

Local services. Shops, primary schools, secondary schools, health facilities and a local park are all a considerable distance away - between 1310m and 4520m. The nearest secondary school, Varndean (3370m), is not in the catchment area. The nearest secondary school within the catchment area is Longhill in Rottingdean (4520m). Access to the site is via single rough rural farm track on the edge of a steeply sloping site. The adjoining road to Woodingdean suffers regular traffic jams as drivers negotiate their way towards the A27, the nearest strategic road network (5200m distant). This regular traffic congestion also affects the bus services, particularly during summer months.

South Downs Riding School is an important asset to the local community and of recreational value. It acts as the local city farm. Many disabled children enjoy riding there. Many local youngsters come to the stables to help with the horses. Thus South Downs Riding School is providing a youth amenity which helps youngsters to be occupied in a meaningful way at no cost to local government - an important point in these straitened times. Removal of South Downs Riding Stables would be a considerable loss to the local community, to local youngsters and to the disabled children who enjoy learning to ride. This riding amenity would be destroyed by a housing development.

The site has policy restraints relating to landscape, archaeology, ecology/biodiversity.

Ecology/biodiversity. The area is a wild life sanctuary with flocks of sparrows, starlings, magpies, swifts, swallows, house martens and crows, as well as kestrels, bats, badgers and foxes visible daily in the vicinity. The bats roost in the South Downs Riding Stables barns. Two dewponds in the adjoining Jewish Cemetery are home to endangered invertebrates such as newts and frogs. Bees and butterflies thrive in this rural/semi-rural environment, encouraged by the gardens of the cottagers and abundant native wild flowers and trees. Brighton and Hove Biodiversity Action Plan sets out in detail the importance of protecting the local ecology.

The South Downs National Park International Sky Reserve would be affected by artificial lighting.

Archaeology. The site is within the Race Hill Mill ANA. UFA 2015 (Archaeology) considered that the site has high archaeological potential, particularly as the site **contains** significant amounts of open space.

From:
Sent: 08 September 2018 01:35
To: PlanningPolicy
Subject: City Plan Part Two Consultation

Dear Sir,

We wish to object to the inclusion of the development envisaged for 46 to 54 Old London Road, Brighton in the City Plan Part Two.

> We were astonished to hear of this possible development bearing in mind that the Council and the Inspector had so very recently thrown out for very cogent reasons an application by McCarthy and Stone to develop the self same land.

Has the Council not heeded its own advice and that of the inspector? The development of this site in such a way would clearly be extremely detrimental in every way to the special area of Patcham village. It would be a case of extreme overdevelopment and would materially destroy the character and appearance of the area. The inspector gave many reasons why such a development should not take place and we trust that the Council will reconsider this idea and discard it.

Yours sincerely,

Sent from my iPad

From:
Sent: 08 September 2018 08:00
To: PlanningPolicy
Subject: City Plan Part Two Consultation

I would like to strongly object to the building of 30 new homes in Patcham Old Village (46 to 54 Old London Road) and this should be removed from the list of sites allocated for development in the City Plan.

This is a small quiet village and should be preserved as such. Proposals need to be proportionate, appropriate and sensitive to the surroundings. Putting 30 homes on a site this size in this location is none of those things, and will ruin the village atmosphere, and drive in extra traffic.

From:
Sent: 08 September 2018 16:12
To: PlanningPolicy
Subject: City Plan Part Two Consultation - 46-54 Old London Road

Dear Sirs

I understand that the City Plan allocates the above site as suitable for the development of 30 or more houses or flats. I object to any development of this scale being considered as I believe it would be an over development for a site of this size and in relation to its specific location. I acknowledge that development somewhat in excess of the current level of five units could be considered but I strongly believe 30+ to be excessive.

Yours faithfully

From:
Sent: > 08 September 2018 19:45
To: PlanningPolicy
Subject: City Plan part 2 consultation

I cannot believe that having opposed the development on Old London Road by Mccarthy Stone, you are proposing another development on the site. Surely this is double standards. If the infra structure, parking problems and the potential for flooding were reasons for opposing the last plans, what has changed? The retirement property would in all probability not have had a car " attached " to each property. 30 plus dwellings on the open market will almost certainly have at least one car per property. Many of the retirement flats would have been single occupancy the proposed dwellings will have a mix of singles, couples and families needing more resources and producing more waste. Please think carefully about spoiling the village feel of Patcham, all the wildlife which inhabits the long gardens and adding pressure on the local services

Sent from Samsung tablet

From:
Sent: 08 September 2018 19:57
To: PlanningPolicy
Subject: City Plan Part Two Consultation

Dear Sir or Madam

We wish to object strongly to the inclusion of 46 to 54 Old London Road, Patcham for development of 30 units.

Our reasons are that this same site was rejected last year for development by both the Council and the Government Planning Inspector for the very reasons that this density of housing will spoil the Village look and feel, and materially detract from the character and appearance of the area. This is an historically important area of our City and should remain free from further development. There are other sites on the edge of the city that would be much better suited for housing development.

We therefore consider that this site should be removed from the City Plan Part Two.

Sent from [Mail](#) for Windows 10

From:
Sent: 08 September 2018 19:57
To: PlanningPolicy
Subject: City Plan Part Two Consultation

Dear Sir or Madam

We wish to object strongly to the inclusion of 46 to 54 Old London Road, Patcham for development of 30 units.

Our reasons are that this same site was rejected last year for development by both the Council and the Government Planning Inspector for the very reasons that this density of housing will spoil the Village look and feel, and materially detract from the character and appearance of the area. This is an historically important area of our City and should remain free from further development. There are other sites on the edge of the city that would be much better suited for housing development.

We therefore consider that this site should be removed from the City Plan Part Two.

Sent from [Mail](#) for Windows 10

From:
Sent: 09 September 2018 13:43 PlanningPolicy
To: City Plan Part Two Consultation
Subject:

Apologies for my earlier e-mail, which was sent without content.

I am writing to express my objection to the proposal to replace the five family homes located at 46 to 54 Old London Road, with a development of 30 residential units.

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

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

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

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

I believe that the site which currently accommodates 5 family homes is too small for 30 houses or flats. It is too many homes on too small a piece of land. In particular, this scale and density of housing will spoil the village look & feel, and materially detract from the character and appearance of the area. This was the reason that the Planning Inspector rejected last year’s planning application on the site.

Many of the other reasons which led 350 people to object to McCarthy and Stone's last application continue to apply. For example:

Flood risk - the site is prone to flooding from 3 sources – ground water, surface water and sewers overflowing

Parking - 30 new homes will intensify parking problems in road

Traffic - increase in congestion
volume

Trees, mature gardens & wildlife - replaced by intensive building and parking

Privacy - loss of privacy to surrounding neighbours, plus unsightly outlook

Any proposals need to be proportionate, appropriate and sensitive to the surroundings. Putting 30 homes on a site this size in this location is none of those things.

From:
Sent: 09 September 2018 12:28
To: PlanningPolicy
Subject: City Plan Part Two Consultation

To whom it may concern,

We write to register our objection to the proposa[relating to the site currently occupied by No's 46 to 54 Old London Road, Patcham.

'Our reasons for doing so are as follows:-

1. The planning inspector has already thrown out one proposal on the grounds that it would spoil the appearance and character of the village. It seems hardly credible, therefore, to suggest that replacing the same five houses, as before, with a much more concentrated development could, in any way, be seen as an improvement.
2. The site as proposed would pose a marked increase in the amount of foul water to be disposed of exacerbating problems within an already stretched infrastructure.
3. Whilst the amount of surface water experienced, at any given time, would not be modified by the proposal, the time to concentration could be substantially reduced, adding to potential surface flooding. New developments may not always make provision and, particularly as the area concerned suffers from groundwater problems ruling out soakaways as a solution, pass such water directly to the sewer where its effect on flow will be additive not probabalistic as in 2 above.
- and 4. The area, as mentioned above, is prone to groundwater rise which has, from time to time, created serious problems which could become potentially much worse if coincident with a surface water generated event. Newly acquired data for 2000, not to hand during the inspector's deliberations, shows, at least one incident, in which the water table rose sufficiently long enough to reach ground level at both the northern and southern ends of the site simultaneously demonstrating a risk to the whole. Something similar occured in 2014 showing this to be not an isolated or infrequent event. Whilst it might be argued, with respect to the site itself, that mitigation measures could be taken these, together with any further confinement of the aquifer, may well have unforeseen consequences for properties outside.



Virus-free. www.avg.com

From:
Sent: 09 September 2018 20:09
To: PlanningPolicy
Subject: 46-54 Old London Road

City Plan Part Two Consultation

You seem to be intent on spoiling Patcham. 30 or more flats or houses on this site is totally unsuitable. It would completely change the look and feel of this ancient village (older than Brighton). Parking is already a problem in this area. Just because the government tells you to provide more homes doesn't mean you should spoil existing communities. I would have thought flats would be more appropriately situated in Brighton.

From:
Sent: 06 September 2018 09:15 PlanningPolicy
To: Housing Development
Subject:

Dear Sirs

I am writing to strongly object to the planned proposal of a housing development on the land adjoining Horsdean Recreation ground.

Although I recognise the need for homes, I can see the effects of urbanisation in the centre of Brighton and the 'creeping' of this urbanisation into the fringes of Brighton.

Vale Avenue and the surrounding roads provide much needed family homes and subsequently there are many families with children who have moved into the area. The recreation ground is used daily by dog walkers, children after school and in the holidays, but especially at weekends for the local football clubs and cricket teams both adult and children alike.

The Horsdean ground joins onto the field behind the East facing side of Vale Avenue, if the houses were built on the proposed site the natural access would be between these two parks, causing them to be separated. This would cause a danger to the children using the parks.

Vale Avenue is used as a 'rat run' at the best of times. The increased population of the area would only increased the amount of cars and therefore traffic on Vale Avenue as it would be used for access and exit, again causing a huge danger for children crossing the road.

Finally the area proposed may only be classed as a copse, but it is a wild piece of land that I'm sure has benefits to attracting wildlife and with the busy A27 generating huge amounts of pollution, it is even more important not only to help neutralise the amount of CO2 emitted but as an important green space used by many people throughout all the seasons.

I urge you to consider these points I have raised.

As an additional comment, if the council stopped allocating such large areas of land to the University for financial gain, allowing them to build student accommodation instead of homes for residents of Brighton and Hove, I'm sure there would not be such a housing crisis.

Kind regards

Sent from my iPad