

DP277

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	203
Response Date	11/09/18 21:52
Status	Processed
Submission Type	Web
Version	0.1

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

Organisation Name

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

Name

Name

Address

Address

Email Address

Email Address

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

H1 - Housing Sites & Mixed Use Sites

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

H1 Support Reasons

b) Please explain why you support this policy?

These are not in my area.

H1 Support Wording Changes

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

N/A

H1 Object Wording Changes

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

N/A

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...

N/A

H1 Housing Site Omissions

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

N/A

H2 - Urban Fringe Housing Sites

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

H2 Object Reasons

d) Please explain why you object to this policy?

For both areas of land identified in the urban fringes of Patcham (off Vale Avenue and the end of Ladies Mile), neither have any means of access.

Particularly with the site at the end of Ladies Mile, this is land-locked. If access were to be made via Ladies Mile, this would either go over public green space, or private land.

Access via Ladies Mile would also be exceptionally disruptive during construction due to the very long and narrow Ladies Mile road or very congested Carden Crescent.

H2 Object Wording Changes

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

With regard to the end of Ladies Mile site, access should be clearly identified as coming from Carden Avenue, possibly combined with a new roundabout joining Crowhurst Road, to also help temper traffic on this busy road.

H2 - Urban Fringe Site Allocations

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

The site at the end of Ladies Mile which is currently a disused playing pitch is not a problem if it is confined to this. If all this land was repurposed, the remaining reserved green space would be too small for the number of residents in the area who use the space.

The site off Vale Avenue I object to because of poor access and because it cuts the green space into two. It would look messy, squashed and awkward, and would not be in keeping with the area or surroundings.

The suggestion of both of these small sites appear to more testing the water and opening the door to much greater development on both site shortly after, which would negatively affect the community, due to not only lack of green space but public services such as schools.

H3 - Purpose Built Student Accommodation Sites

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

H3 Support Reasons

b) Please explain why you support this policy?

These are not in my area.

H3 Support Wording Changes

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

N/A

H3 Student Housing Site Allocations

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

N/A

H3 Purpose Built Student Housing Omission Sites

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

N/A



DP278

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

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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)	Outer Harbour Development Company Partnership LLP
Name	
Address	
Email Address	
Agent Name (If applicable)	
Agent Name	
Agent Address	
Agent Email Address	

Part B: Your Representation relating to Development Management Policies

Employment Tourism & Retail Chapter (policies DM11-DM17)

Policy Number DM14

Policy Name Special Retail Area – Brighton Marina

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 the aim of this proposed policy which seeks to support and complement the existing convenience goods and leisure offer by supporting change of use to service based retail operators and community uses. The policy does not hinder future retail and leisure floorspace being delivered within Brighton Marina, instead it provides additional flexibility to promote alternative town centre uses through change of use.

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?

The last part of this policy seeks to restrict residential development at ground floor level frontages through change of use. Residential uses at ground floor level can provide active frontages and improve the vitality and viability of retail centres. The diversification of retail centres to include a mix of uses (including housing) is advocated in the NPPF, and this restriction may prevent occupation of retail/leisure units in the future, should there be a requirement for additional flexibility of use.

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 B: Your Representation relating to Development Management Policies

Transport & Travel Chapter (policies DM32-DM36)

Policy Number DM35

Policy Name Travel Plans and Transport Assessments

c) 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)**

d) Please explain why you support this policy?

We do not object to the content of the proposed policy wording, however we consider that this could be expanded to promote sustainable travel measures at Brighton Marina.

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

At present Brighton Marina is classified in the Parking Standards SPD14 as ‘Key Public Transport Corridors’, however we consider that CPP2 provides an opportunity for key strategic sites, in particular Brighton Marina, to be treated as a ‘Central Area’, like the rest of the town centre. There is an opportunity for Brighton Marina to be subject to lower maximum car parking requirements, and this should be encouraged through draft policy DM35. Car free development should also be supported in this draft policy as a key means of achieving the design and place-making objectives of CPP1 Policy DA2 and sustainable travel objectives of CPP1 Policy CP9.

The marina is very well served by public transport. The number 7 bus operates every 6-8minutes from the Marina with a 10-15min journey time to the centre of Brighton (15min journey time to Brighton station). Further, less frequent services operate along the south-coast and to the University of Sussex and University of Brighton.

With improved connectivity for cyclists and walkers, there is an opportunity to reduce the dominance of private motor vehicles within the marina and reduce reliance on private cars. This should be promoted in draft Policy DM35.

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 B: Your Representation relating to Development Management Policies

Environment & Energy Chapter (policies DM37-DM46)

Policy Number DM46

Policy Name Heating and Cooling Network Infrastructure

e) 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)

f) 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

The draft policy requires that the requirements in CPP1 Policy CP8 are met.

Section 2.9 Energy and Sustainability refers to Adopted Policy CP8 of CPP1 requiring all developments to achieve the minimum standards of BREEAM Excellent for Major and Greenfield Sites.

BREEAM 2018 is the latest version of the assessment methodology, and therefore BREEAM criteria has therefore been amended since the policy was adopted. Under the latest BREEAM 2018 requirements it is not achievable for BREEAM Excellent to be achieved for non-residential elements which are being delivered to shell and core standard. This is due to how BREEAM calculates the mandatory Energy credits based purely on the performance of the envelope.

Accordingly we request that reference is made in CPP2 to BREEAM 2018, and an acknowledgement included that achieving 'Excellent' for shell and core non-residential units is not feasible under BREEAM 2018, and therefore 'Very Good' will be acceptable in these instances.

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

Any other comments

- 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

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.

We support the amendment to the draft Policies Map which now illustrates that the Outer Harbour Site would fall within the defined 'built up area', including Phases 2 and 3 of the consented Brighton Marina Outer Harbour planning permission (BH2006/01124).

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*:	13 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

Our Ref: 02B809043

13 September 2018

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

[VIA EMAIL]

Dear Sir / Madam

SUBMISSION OF REPRESENTATIONS TO THE BRIGHTON AND HOVE DRAFT CITY PLAN PART TWO (PUBLISHED JULY 2018) ON BEHALF OF THE OUTER HARBOUR DEVELOPMENT COMPANY PARTNERSHIP LLP

On behalf of our client the Outer Harbour Development Company Partnership LLP, we write to submit representations to the Brighton & Hove City Council draft City Plan Part 2 (CPP2), which was published for consultation in July 2018.

The Outer Harbour Development Company Partnership LLP has an interest in the Brighton Marina Outer Harbour site, and are currently in the process of reviewing development options for the site. The publication of the CPP2 is of particular interest to our client, given the potential implications it may have on future development coming forward on the site and the surrounding area, therefore we welcome the opportunity to provide representations.

We have completed the consultation response template in relation to Part B (Development Management Policies) and Part D (Any Other Comments), which we have enclosed. We summarise our representations below:

Draft Policy DM14 – Special Retail Area Brighton Marina

We support the proposed flexibility for change of use of retail uses to support more service based retail and community spaces to complement the existing retail provision at Brighton Marina.

We are however concerned that the proposed restriction on change of use to residential at ground floor is inconsistent with the NPPF which advocates diversification of retail centres, which should include a mix of uses, including residential.

Draft Policy DM35 – Travel Plans and Transport Assessments

We consider that the proposed policy should be expanded to promote lower car parking provision and car free development at Brighton Marina. Brighton Marina is very well served by public transport and should be treated the same as the town centre for the purpose of applying car parking standards. Advocating car free development at the Marina should

be included within Draft Policy DM35 as a key means of achieving the design/place-making objectives of CPP1 Policy DA2 and sustainable transport objectives of CPP1 Policy CP9.

Draft Policy DM46 – Heating and Cooling Network Infrastructure

We recommend that a clarification is added to this policy to take account of the latest BREEAM 2018 requirements. The draft policy supports the requirements of CPP1 Policy CP8, however there is a conflict between Policy CP8 (which requires Major and Greenfield sites to achieve a minimum of BREEAM 'Excellent') and the new standards whereby it is not achievable to reach BREEAM 'Excellent' for non-residential units which are completed to shell and core. Further details are provided in the policy response.

Conclusion

Overall we consider that CPP2 is broadly consistent with national planning policy.

Our representations highlight a couple of areas where the draft CPP2 could be amended or expanded in respect of retail and car parking to provide a more positive framework for contributing to the achievement of sustainable development.

In addition we request that in order to ensure that energy policy requirements are justified we request that wording is added to draft Policy DM46 to reflect latest technical requirements associated with BREEAM 2018 to enable that the relevant targets can be achieved.

We look forward to receiving confirmation of receipt of our comments and request that we are updated with any future changes to the CPP2 and duly notified about the future consultations.

Yours sincerely



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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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.

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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

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)	Fairfax Acquisitions Ltd
Name	
Address	
Email Address	
Agent Name (If applicable)	
Agent Address	
Agent Email Address	

Part B: Your Representation relating to Development Management Policies

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

(ctrl & click to view)

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

Employment Tourism & Retail Chapter (policies DM11-DM17)

Design & Heritage Chapter (policies DM18-DM32)

Transport & Travel Chapter (policies DM32-DM36)

Environment & Energy Chapter (policies DM37-DM46)

Policy Number (e.g. DM1)

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

a) Do you Support or Object to the policy?

Support
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

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?

See attached letter

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

See attached letter

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

b) Please explain why you support this policy?

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

d) Please explain why you object to this policy?

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

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

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

Site Allocations - Employment Site

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

a) Do you Support or Object to the policy?

Support

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

Object

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

b) Please explain why you support this policy?

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

d) Please explain why you object to this policy?

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

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

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

Any other comments

Please use a separate sheet for each representation

(Ctrl & click to view):

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

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

Equalities

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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.

--

Signed*:	
Dated*:	13 September 2018

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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

13 September 2018
Our Ref: 17.4007/08.01

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

Dear Sir/Madam

**City Plan Part 2 – Policy H1: Housing Sites and Mixed Use Sites
Former St Aubyns School, Rottingdean – Proposed Site Allocation**

I am writing on behalf of our clients, Fairfax Acquisitions Ltd, in respect of the above site which is identified within Policy H1 (Table 5) of the City Plan Part 2 (and allocated on the accompanying Proposals Map) as a residential site allocation for an indicative total of 40 new homes.

As the Council will be aware, my clients have submitted a planning and listed building consent applications for the redevelopment of the site to provide 93 new homes (refs: BH2017/02680 & 02681) which are expected to be determined at the Council's Planning Committee shortly. Prior to the current applications, planning and listed building consent was refused by the Council in 2016 for the site's redevelopment to provide 48 new homes and a 62 bed care home (refs: BH2015/03108, 03110 & 03112).

We support the site's proposed housing allocation and the fact that the extent of the allocation includes not only the former school buildings but also the former playing fields. As referred to in a footnote to Table 5, a Planning Brief (2015) has been prepared for the site which reiterates the fact that the former school has long been considered an appropriate development site by the City Council.

The site is subject to a number of heritage constraints with part of the site containing the former school buildings, a number of which are statutory listed, falling within the Rottingdean Conservation Area. As a consequence one of the key aims of the Planning Brief is to ensure the conservation and long term protection of these important heritage assets. As a result the proposals have had to be sensitively designed in order to achieve this aim. Associated with this and a key plank of both national and local policy is to achieve a viable and deliverable development that not only conserves and protects the historic environment but also meets with the other relevant policy objectives (e.g. delivery of affordable housing and maximising public access to the retained open space).



In order to achieve the above benefits and to deliver a viable scheme it is necessary to develop on part of the former playing field. To demonstrate this a supporting viability assessment was submitted with the planning application which was subsequently independently assessed by the District Valuer. This followed a similar approach to that taken in respect of the previous proposals where it was common ground that a development on just the previously developed part of the site was not viable. As a result, the previous proposals, which likewise involved development on the playing field were not refused on the principle of developing on the playing field. In this case, it is accepted by the District Valuer that a policy compliant affordable housing scheme is not viable on just the previously developed part of the site and as such the benefits of development would not be realised.

The conclusions of the above are considered to strongly support the rationale for the allocation to cover both the former school buildings and former playing field in order to provide the necessary flexibility to secure a viable and deliverable development.

We note that the indicative capacity of the site is identified as 40 dwellings. Policy H1 refers to this figure as a 'minimum indicative amount' meaning that this does not prevent a higher number of new homes to be delivered. Notwithstanding this, given that the Council's housing requirement is only approximately 50% of the need, as identified by the Council's latest SHMA (2015), means that we consider that the Council should be more ambitious in terms of optimising development potential of this and other similar sites. On this basis, we consider the housing number of the site should be increased to be consistent with the amount proposed as part of the current planning application.

In summary, we support the sites proposed allocation but consider that the indicative capacity be increased to 93 new homes. I trust that these representations will be taken into account by the Council when progressing with the next stage of the City Plan Part 2. In the meantime, should you have any queries then please do not hesitate to contact me.

Yours faithfully

DP280

Comment

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Comment ID 270
Response Date 13/09/18 14:35
Status Submitted
Submission Type Web
Version 0.1

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

Organisation Name

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

Name

Name

Address

Address

Email Address

Email Address

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

DM1 - Housing Quality, Choice and Mix

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

DM1 Support Wording Changes

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

All new residential development will be required to provide useable **public** outdoor amenity space appropriate to the scale and character of the development

Reason: this massive overdevelopment in BH needs to give back to the host communities, therefore any space/ amenities should be for all, not just people living in the developments

DM9 - Community Facilities

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

DM9 Object Reasons

d) Please explain why you object to this policy?

BHCC should be replacing (and prioritising) community facilities that are being sacrificed to developments- you are not (e.g Westows, YMCA, Hove)

This part of the CPP2 should adhere to the latest govt National Planning Policy Framework (Jul 2018)

Section 8: Promoting healthy & safe communities

1 *Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; orb) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; orc) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use*

DM9 Object Wording Changes

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

See above

DM10 - Public Houses

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

DM18 - High Quality Design & Places

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

DM18 Support Reasons

b) Please explain why you support this policy?

A good start, but why not use design to maximise space (e.g football pitches/ sports facilities/ urban gardens on roofs,etc)? Think long-term and take inspiration from other cities (e.g Portsmouth, Swedish cities)

Developers should be assessing the host community's needs before hand and intergrating into their proposals

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

Proposals for development will be expected to consider the following key design aspects:

a. innovative use of design (e.g roof space) to create more space for the residents/ community (*think football pitches on roofs, urban gardens, etc*)

a. the local context; including responding positively to the urban grain; b. the scale and shape of buildings; c. the building materials and architectural detailing; and d. the spaces between and around buildings taking into account: (i) purpose and function; (ii) access and linkages; (iii) uses and activities; and (iv) comfort, image and sociability

DM20 - Protection of Amenity

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

b) Please explain why you support this policy?

I'd like to see BHCC start officially protecting communtiy amenities before it is too late, you've already gone far enough with ones going and not being replaced (e.g YMCA, Westows)

DM36 - Parking & Servicing

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

DM36 Object Reasons

d) Please explain why you object to this policy?

Developments are draining the host community, with parking being just one element.

Any new development should provide parking provision for all likely flats/ owenrs/ tenants/ businesses rather than a token few, then overflowing into already congested street parking. It is not fair to current residents. A Permit-free approacj is totally unfeasible (and unlikely in the long term) as people just won't want to buy the properties. Be realistic with developments and make sure they are as self-sufficient in parking and all other aspects that will worsen the lives of the others who live around them. Stop letting developers get their own way for the sake of achieving goct housing targets.

DM36 Object Wording Changes

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

Any development proposed must show self-sufficiency in parking to cover all dwellings, owners, tenants, businesses correlating exactly with number required, in the form of underground parking. There should be no overspill car parking onstreet.

**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 x

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)	Enplan
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) **DM1**

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

We note that this policy reiterates much of the existing approach set out in City Plan Part One. We are generally supportive of the aims of the policy and the strategy for seeking to deliver a balance to the housing stock, ensuring that the right houses are delivered to meet the needs of the community.

However, we question whether the level of provision for 10% of all affordable units and 5% of all market units to be wheelchair accessible is in line with actual need. This policy and the evidence base appear to lack sufficient evidence to support this requirement. As such, we **do not support** clause (e) of draft policy DM1. Supporting text to draft policy DM1 states:

'Since 2005 [The Council] has applied lifetime home standards to all new dwellings and required the provision of a proportion of wheelchair accessible

units, within schemes of 10 or more units.'

Indeed, this proposed figure 10% of all affordable units and 5% of all market units to be fully wheelchair accessible is directly transferred from the Adopted Local Plan 2005 (policy HO13), despite the fact that in 2005 the Local Plan stated that actual need for wheelchair accessibility ought to be regularly reassessed and no reassessment of this need appears to have taken place since 2005. The supporting text to the 2005 policy stated:

*'up to date monitoring suggests that the percentage of homes to be built to a wheelchair accessible standard on larger (10+) housing sites should be approximately 5% overall. This is based on the numbers of people in Brighton & Hove holding a disabled persons 'Blue Badge'. It should be noted that in affordable housing schemes, 10% wheelchair accessible housing is sought which reflects registered needs. **Regular assessment** of the housing needs of disabled people over the plan period may lead to a higher/lower percentage of wheelchair accessible housing being required.'* Para. 4.68 adopted Local Plan 2005.

We note that the OAN Report 2015 does not include an up-to-date assessment of actual need for wheelchair accessibility, despite the fact that in 2005 the Local Plan anticipated that this would be necessary. Moreover, we question whether the 2005 methodology remains appropriate for measuring the *actual* need for wheelchair accessible homes: Blue badges can be issued for a range of disabilities (physical and mental) which do not necessarily require wheelchair use at home. As such, it may not be accurate as the blue badge scheme as a direct measure for the need for permanent wheelchair accessible homes. Rather, we consider that a reassessment of **actual dependence on wheelchair use at home** ought to be carried out in order to provide a more accurate and up to date assessment of the need for wheelchair accessible homes. When such an assessment has been carried out, BHCC will be in a position to redraft this policy such that it reflects actual proven needs for wheelchair accessible dwellings.

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

See above.

Policy Number (e.g. DM1) **DM4**

Policy Name (e.g. Housing Quality, Choice and Mix) **Housing and Accommodation for Older People**

c) 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)

d) 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?

Having reviewed this policy, we are generally supportive of an approach which seeks to 'ensure there is a sufficient supply and range of residential accommodation suitable for older people'. However, to this end, we are **not in support** of the policy stating:

'In accordance with City Plan Part One Policy CP20 Affordable Housing, the Council will seek an element of affordable housing provision for older persons as part of market-led developments for older people.'

We do not consider that the OAN Report 2015 provides sufficient evidence to justify affordable housing provision at a rate of 40% for older persons housing, particularly as the OAN found that there is a current surplus of affordable housing for older persons. Whilst it may be the case that some Affordable Housing for older persons is not fit for purpose (and thus requires replacement), it is not clear from the OAN how much of the existing stock requires replacement. Indeed, we agree with the Brighton and Hove OAN 2015 advice which states that 'decisions about mix should be taken at a local level taking account of specific needs and the current supply of different types of units available'. As such, we consider a more robust assessment is required to determine actual needs for affordable housing for older persons based on actual local need and requirements. It is likely to be most effective if this is undertaken on a site by site basis, rather than applying an inappropriate blanket 40% requirement for all sites.

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

See above.

Policy Number (e.g. DM1) **DM31**

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

Do you Support or Object to the policy?

Support

x

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

Object

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

e) Please explain why you support this policy?

We **support this policy**, which offers a pragmatic solution to complicated sites, such as THV, where it is not always possible to carry out a full program of archaeological investigation prior to the grant of planning consent. At THV, ecological sensitivities prevent a full on-site archaeological investigation in advance of submitting a planning application. However, other sites may be unable to carry out archaeological investigations for reasons relating to the existing built form on the site or the viability of carrying out such extensive work in advance of planning.

We welcome the LPA taking a pragmatic approach and making full use of the opportunity to use planning conditions for such investigations.

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

Policy Number (e.g. DM1) **DM33**Policy Name (e.g. Housing Quality, Choice and Mix) **Safe, Sustainable and Active Travel****Do you Support or Object to the policy?**

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

f) 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 **support** the general approach of this policy, however, we consider that the **policy requires amendments**. Amendments should provide clarity that contributions towards transport and network improvements will only be sought where negative impacts can be demonstrated and in such circumstances, improvements will only be sought which are fair and proportional. We suggest the following amendments:

1. *'Pedestrians (including wheelchair users)*

In order to encourage walking, new development should: ... b) Where negative impacts are identified, contribute towards fair and proportional improvements to the wider pedestrian environment, providing for a safe and attractive public realm, including signage, seating, shade/shelter and planting, including consideration of assigning some parts of streets and spaces for shared use by pedestrians and small numbers of vehicles;

2. *'Cyclists*

In order to ensure a safe and accessible environment for cyclists, new development should: ... b) provide proportionate and fair contribute towards, the city's network of high quality, convenient and safe cycle routes only where development proposals identify negative impacts as a result of proposals.

3. *Public Transport Users*

In order to promote and provide for greater levels of public transport usage in the city ... new development should: b) provide or contribute towards fair and proportional improvements to the public transport network/infrastructure including passenger interchanges and facilities

only where negative impacts identify a need for such'

4. *Safe and Inclusive Travel*

Planning permission will be granted for developments that meet all of the following criteria ...

b) Provide fair and proportional improvements to inclusive access for disabled people, older people, and other vulnerable road users wherever it can be reasonably achieved having been afforded significant priority where the development identifies a need for such improvements as a direct result of the proposals'.

d) Please explain why you object to this policy?

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

Policy Number (e.g. DM1) **DM35**

Policy Name (e.g. Housing Quality, Choice and Mix) **Travel Plans and Transport Assessments**

Do you Support or Object to the policy?

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

g) 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 are generally **supportive** of the need to include Transport Statements, Transport Assessments and Construction Environmental Management Plans on schemes where there are likely to be significant impacts. However, we consider that the wording of this **policy should be amended**.

In particular, it is noted that when considering which schemes should be included in 'cumulative impact assessments', the inclusion of 'or planned developments' is too ambiguous even with the example in the brackets. Only 'committed developments' should be included in cumulative impact assessments. Further it is not for a current development proposal to consider aspirational development such, we consider that the wording should be amended to remove reference to 'or planned developments'.

The supporting text to this policy ought to be amended also as follows:

'Matters to be considered, amongst others, will include ~~accordance with~~ SPD14 parking standards, likelihood and impact of potential overspill parking onto nearby streets, trip generation, and arrangements for servicing and deliveries'.

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

DP281

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Policy Number (e.g. DM1) **DM36**

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

Do you Support or Object to the policy?

Support
Object

x

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)

h) 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

As set out above, we have not seen any up to date information on data relating to blue badge holders in Brighton or Hove. Nor has any other data regarding up to date parking needs in Brighton and Hove been set out. In the absence of this, we **do not support policy DM36 without amendments**. We suggest the following alterations to the first line of proposed policy DM36 to accommodate a different approach on a site by site basis (or a city wide basis), where up to date information justifies this:

‘In the absence of further evidence or mitigating circumstances provision of parking, including’

Additionally, at paragraph 2.258, we consider that the supporting text should be amended to recognise that around the periphery of Brighton and Hove closer to the main road network there may be a need for additional parking, especially for the larger family properties. Where justification can be provided (or a need is demonstrated) the council should allow parking provision in excess of the standards.

Policy Number (e.g. DM1) **DM37**

Policy Name (e.g. Housing Quality, Choice and Mix) **Green Infrastructure and Nature Conservation**

Do you Support or Object to the policy?

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

i) 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 have reviewed this policy and confirm that we support the general approach it sets out. However, we consider that the proposed policy could be improved by adding examples or caveats where a scheme might be allowed, even where some harm to green infrastructure and/or nature conservation interests may be caused. It should be made clear that mitigation and/or ecological compensation measures can assist in making a scheme acceptable. We **would support this policy with the following amendment:**

'Proposals liable to cause demonstrable harm to such sites and/or features will not be permitted, unless adequate mitigation and/or compensation measures are included in the proposals'

d) Please explain why you object to this policy?

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

Policy Number (e.g. DM1) **DM38**

Policy Name (e.g. Housing Quality, Choice and Mix) **Local Green Spaces**

Do you Support or Object to the policy?

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

j) Please explain why you support this policy?

We have reviewed this policy and confirm that we **support** the general approach set out in 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

Policy Number (e.g. DM1) **DM40**

Policy Name (e.g. Housing Quality, Choice and Mix) **Protection of Environment and Health**

Do you Support or Object to the policy?

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

k) Please explain why you support this policy?

We have reviewed this policy and confirm that we **support** the general approach set out in 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

Policy Number (e.g. DM1) **DM44**Policy Name (e.g. Housing Quality, Choice and Mix) **Energy Efficiency and Renewables****Do you Support or Object to the policy?**

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

l) Please explain why you support this policy?**c) If you support this policy but have some suggested wording changes please outline these clearly below**

Having reviewed this policy, we **support the general approach, but suggest amendments**, as set out below.

The opening sentence allows for arguments of technical feasibility and financial viability to be made, which is welcomed.

We note the aim for all development to achieve a 19% carbon reduction target. Whilst this may be possible for new build proposals, we consider that this will have a variable impact on development and it may not be possible for conversions and changes of use. As such, we consider that this policy should be amended as follows:

- '1. All new build development ~~including conversions and change of uses of existing buildings~~ to achieve at least 19% improvement on the carbon emissions target set by Part L.'*

Presumably the basis for the 19% target is equivalence to the former Code for Sustainable Homes Level 4 target. Broadening this target to all development types understandably provides a consistent reference point; however, for reasons discussed above, this will be easier for certain development types. As such, we consider that the council should ensure that sufficient flexibility is applied to the target to avoid unintended consequences (e.g. the use of potentially inappropriate technologies).

In addition, we object to the use of 'Energy Performance Certificates' (EPC) ratings as a basis for the planning targets proposed by this policy. This approach is potentially problematic. This is because an EPC can only be completed using the software applicable at the point of lodgement (i.e. at the end of the project). However, this version of the software may not be the same as that applicable during the design stages. Given that the software is updated on a regular basis (and not just for the Building Regulations updates), it is entirely feasible for the project to

satisfy the EPC target at design stage; be built exactly as designed but fail the final EPC just because the software has been updated. This problem has already been observed in the industry but can be circumnavigated if targets are based around the design stage EPC, with development implemented as designed.

In any case, it is questionable why an EPC target is required in addition to the 19% carbon reduction target. Both targets are seeking to reduce carbon emissions and the use of parallel targets may introduce confusion. It might also be worth examining the legitimacy of an EPC on domestic new build development in light of the 2015 Ministerial Statement by Eric Pickles.

As such, referencing 'Energy Performance Certificates' in this policy is likely to lead to legal challenges and undermines the soundness of the plan. We suggest the removal of any reference to EPCs as a planning target in this policy and recommend the complete removal of clause 2.

- ~~'2. All development to achieve a minimum Energy Performance Certificate (EPC) rating of: i) EPC 'C' for conversions and changes of use of existing buildings to residential and non residential use
ii) EPC 'B' for new build residential and non residential development.'~~

We note that this policy also seeks opportunities to achieve greater reductions in key development areas and this may be possible in some situations. However, we would only support this clause if it is clear that greater reductions will only be sought subject to clearly demonstrable viability and feasibility considerations:

- ~~'3. *Only where clearly viable and feasible will opportunities for new development be sought to achieve greater reductions in CO₂ emissions through the use of passive design, fabric standards, energy efficiency measures and low and zero carbon technologies will be encouraged in the following areas...*~~

When demonstrating that the minimum CO₂ reduction targets cannot be met, the use of mitigating measures seems appropriate in some circumstances. Certain development proposals (e.g. change of use) may have a limited budget. We therefore support an inclusion of flexibility in relation to requirements for offsite mitigation measures, since such a requirement would need to be considerate of viability. The inclusion of the word "may" in the policy is therefore important and supported.

Finally, whilst the requirement for energy statement seems sensible, it may not be necessary for all developments and therefore consider that the final paragraph could amended be as follows:

- ~~'All development ~~will~~ may be expected to submit an energy statement to provide details of the low and zero carbon energy technologies used including the size/capacity of the systems and the estimated CO₂ savings that will be achieved.'~~

d) Please explain why you object to this policy?

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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

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Policy Number (e.g. DM1) **DM45**

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

Do you Support or Object to the policy?

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

m) 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?

Whilst we appreciate the aims of this policy, it appears to be a rather aspirational hope, rather than a measurable, effective and deliverable planning policy. In our experience, this energy supply model may play an increased role in the future, but for the foreseeable future, take up in the near term is likely to be modest and probably restricted to owner-occupiers (or projects which are seeking a point of differentiation). This is because perception matters and purchasers often value (a) independence; (b) full access to the energy market to ensure competition; (c) security of supply. Deviation can affect onward sale price (or rate of sales), which has an impact on viability. As such, we **do not support this policy.**

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

Policy Number (e.g. DM1) **DM46**

Policy Name (e.g. Housing Quality, Choice and Mix) **Heating and Cooling Network Infrastructure**

Do you Support or Object to the policy?

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

n) 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?

We recognise that B&HCC has an interest in District Heating networks as a possible tool for reducing carbon emissions. However, we consider that it is important for the Council to recognise that the objective (i.e. to reduce carbon emissions associated with development) is not overshadowed by the **means** of achieving the objective, purely for ideological reasons. It is entirely possible that *alternative means* of achieving this same objective are actually more effective than District Heating. As such, the policy should not be restricted to one means of meeting the objective.

Whilst it is an interesting possible solution to the objective of reducing carbon emissions, District Heating is not without its drawbacks:

- Infrastructure can be very expensive (£1,000 to £2,000 per metre) limiting the distance for which connection costs are viable;
- Distribution losses can be significant (potentially 15% - 25% even on new networks; and more on older networks) meaning that on-site systems can be lower carbon;
- The national grid for electricity is decarbonising as the UK increases its use of renewable technologies. If the council is to encourage significant investment into District Heating, it should be considering how such networks will decarbonise over time;
- District Heating is best applied in high density development, it would therefore not be appropriate in more suburban locations;
- District Heating typically requires wet distribution within the buildings. Given that the design of the building envelope is continuing to focus on very high efficiency fabric, the introduction of an uncontrolled heat source into the building may increase the overheating risks.

Given these draw-backs, we are not persuaded of the necessity of favouring District Heating, above other methods of achieving carbon reduction. In view of this, we **do not**

support policy DM46 as currently worded. We consider that draft policy DM46 does not offer anything in addition to policy DM44, and consider that it should be removed. Alternatively, the scope of this policy should be broadened to offer equal support to other options within the energy mix, encouraging alternative options where its environmental and economic advantages are clear.

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

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Number (e.g. DM1) **H1 and H2**

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

Do you Support or Object to the policy?

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

o) 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

. Over the plan period, Policy CP1 Housing Delivery Strategy (City Plan Part 1) sets out that there is a target for the delivery of 13,200 new homes to 2030, stating that City Plan Part 2 will allocate some of these sites. Accordingly, policy **H1** allocates land for 1,609 new homes (on either 100% housing sites or mixed use sites). In addition, 'Urban Fringe' sites are allocated in policy **H2** for approximately 857 new homes, plus additional capacity on 7.47 ha at 'land adjacent to Ovingdean' (possibly 45 dwellings). Together, these allocations are likely to provide land for in excess of 2,500 new homes.

We note that policy **CP1 Housing Delivery** of the City Plan Part One anticipates that allocations across the rest of the city (allocated in Part Two of the development plan) will include:

- Development Across the Rest of the City:
 - Within the Built Up Area 4130
 - Development Within Urban Fringe 1060

Based on the proposed allocations put forward in these Draft City Plan H1 and H2 it is not clear whether the OAN has been provided for as anticipate by Part 1 of the development plan. As such, we question policies H1 and H2 and consider that more information is required to demonstrate how the OAN is met. To ensure the soundness of

the plan, we consider that further evidence is required to demonstrate exactly how the OAN is met. Without further clarification we **do not support** the policies.

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
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

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
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) 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 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

H3 - Purpose Built Student Accommodation Sites

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

a) Do you Support or Object to the policy?

Support

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

Object

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

b) Please explain why you support this policy?

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

d) Please explain why you object to this policy?

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

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

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

Site Allocations - Employment Site

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

a) Do you Support or Object to the policy?

Support

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

Object

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

b) Please explain why you support this policy?

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

d) Please explain why you object to this policy?

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

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

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

Any other comments

Please use a separate sheet for each representation

(Ctrl & click to view):

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

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

Equalities

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

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

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

--

Signed*:	
Dated*:	

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

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 DM1

Policy Name 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?

See Accompanying Documents

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

See Accompanying Documents

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

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Transport & Travel Chapter (policies DM32-DM36)

Environment & Energy Chapter (policies DM37-DM46)

Policy Number DM19

Policy Name Maximising Development Potential

c) 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)

d) Please explain why you support this policy?

See Accompanying Documents

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

See Accompanying Documents

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 - 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?

Support subject to retention of 62 North Road Brighton and addition of 88 Denmark Villas, Hove. See Accompanying Documents

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 ?

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

Any other comments

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A02 Do you consider the City Plan Part Two to have any equalities implications, positive or negative? If so, please provide further details.

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Signed*:	
Dated*:	13 September 2018

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