



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

No

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

Organisation Name (If applicable)	
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) DM42

Policy Name (e.g. Housing Quality, Choice and Mix) Protecting the Water Environment

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?

Southern Water is the statutory water and wastewater provider for Brighton & Hove, which forms part of the wider South East region identified by the Environment Agency as 'seriously water stressed'. Therefore we support the provision within this policy that seeks to prevent development that would have an unacceptable impact on quality and yield of water resources used for public supply.

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

Southern Water supports this policy in principle, and further to our comments relating to water and wastewater infrastructure submitted as part of the 2016 Scoping Consultation, we are pleased to note that our recommendations have been considered.

Since that time however, OFWAT's new approach to water and wastewater connections charging has been implemented (from 1 April 2018). This has changed the way in which developers are charged for new connections, and further details can be found on our website: <https://www.southernwater.co.uk/infrastructure-charges>

As a result, whilst the need remains for recognition that there is limited capacity at some of the sites allocated for housing (as detailed in our representations in Section C) at the "practical point of connection" as defined in the New Connections Services, our recommendations for policy provisions have altered to reflect these changes.

Any reinforcement required as a result of an identified lack of water or wastewater network

capacity will now be provided through the New Infrastructure charge, but Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development.

This is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure, in order to prevent an increased risk of flooding.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure.

Proposed amendments

Accordingly, we propose the following amendments to Policy DM42:

Applicants will be required to demonstrate that capacity exists on and off-site in the sewerage network to serve the development or that ~~it can be provided at the nearest point of adequate capacity ahead of occupation of the development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider, to avoid sewer flooding.~~

Further, amendments to the following paragraph should be made to align with the above:

2.316 Applicants should liaise with Southern Water in order to demonstrate that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development and that it would not lead to problems for existing users. In some circumstances, it may be necessary for applicants to carry out appropriate studies to ascertain whether the proposed development would lead to overloading of existing infrastructure. Where capacity assessments show there is a need, Southern Water will require ~~for~~ occupation of development to be phased to align with the delivery of water or wastewater infrastructure. ~~connect to the sewerage/water network at the nearest point of adequate capacity.~~

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 – 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 Brighton General Hospital Site

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?

In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance, and following our comments relating to Policy DM42, we have undertaken an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that local water and wastewater infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of infrastructure.

Proposals for 200 dwellings at Brighton General Hospital site will generate a need for

reinforcement of the water and wastewater networks in order to provide additional capacity to serve the development. Since OFWAT's new approach to water and wastewater connections charging was implemented from 1 April 2018, this reinforcement will be provided through the New Infrastructure charge, but Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site to the sewer network at the 'practical point of connection' (as defined in the New Connections Services) could lead to an increased risk of flooding unless network reinforcement is undertaken in advance of occupation.

Southern Water has limited powers to prevent connections to its wastewater network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2018). In addition, this approach is consistent with paragraph 28 of the NPPF (2018), which states that policies for specific areas such as site allocations, can include 'the provision of infrastructure... at a local level'.

In addition, our assessment of the site reveals that there is existing Southern Water infrastructure under the site. This infrastructure needs to be taken into account when designing the proposed development. An easement would be required, which may affect the site layout. This easement should be clear of all proposed buildings and substantial tree planting.

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

Having regard to the above, Southern Water proposes the following criteria be added to Policy SSA1:

f. Occupation of development will be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider.

g. Layout is planned to ensure future access to existing infrastructure for maintenance and upsizing purposes

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

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 SSA2

Policy Name Combined Engineering Depot, New England Road

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?

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?

In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance, and with our comments relating to Policy DM42, we have undertaken an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that local wastewater infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of infrastructure.

Proposals for 100 dwellings at the Combined Engineering Depot will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. Since OFWAT's new approach to water and wastewater connections charging

DP201

was implemented from 1 April 2018, this reinforcement will be provided through the New Infrastructure charge, but Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site to the sewer network at the 'practical point of connection' (as defined in the New Connections Services) could lead to an increased risk of flooding unless network reinforcement is undertaken in advance of occupation.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2018). In addition, this approach is consistent with paragraph 28 of the NPPF (2018), which states that policies for specific areas such as site allocations, can include 'the provision of infrastructure... at a local level'.

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

Having regard to the above, Southern Water proposes the following criterion be added to Policy SSA2:

i. Occupation of development will be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider.

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

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 SSA3

Policy Name Land at Lyon Close, Hove

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?

In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance, and with our comments relating to Policy DM42, we have undertaken an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that local water and wastewater infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of infrastructure.

Proposals for 300 dwellings at Lyon Close will generate a need for reinforcement of the water and wastewater networks in order to provide additional capacity to serve the development. Since OFWAT's new approach to water and wastewater connections charging was implemented

from 1 April 2018, this reinforcement will be provided through the New Infrastructure charge, but Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site to the sewer network at the 'practical point of connection' (as defined in the New Connections Services) could lead to an increased risk of flooding unless network reinforcement is undertaken in advance of occupation.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2018). In addition, this approach is consistent with paragraph 28 of the NPPF (2018), which states that policies for specific areas such as site allocations, can include '*the provision of infrastructure... at a local level*'.

In addition, our assessment of the site reveals that there is existing Southern Water infrastructure under the site. This infrastructure needs to be taken into account when designing the proposed development. An easement would be required, which may affect the site layout. This easement should be clear of all proposed buildings and substantial tree planting.

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

Having regard to the above, Southern Water proposes the following criteria be added to Policy SSA3:

h Occupation of development will be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider.

i. Layout is planned to ensure future access to existing infrastructure for maintenance and upsizing purposes

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

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 SSA4

Policy Name Sackville Trading Estate and Coal Yard

g) 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)**

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?

In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance, and with our comments relating to Policy DM42, we have undertaken an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that local wastewater infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of infrastructure.

Proposals for 500 dwellings at Sackville Trading Estate will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. Since OFWAT's new approach to water and wastewater connections charging was implemented

from 1 April 2018, this reinforcement will be provided through the New Infrastructure charge, but Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site to the sewer network at the 'practical point of connection' (as defined in the New Connections Services) could lead to an increased risk of flooding unless network reinforcement is undertaken in advance of occupation.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2018). In addition, this approach is consistent with paragraph 28 of the NPPF (2018), which states that policies for specific areas such as site allocations, can include '*the provision of infrastructure... at a local level*'.

In addition, our assessment of the site reveals that there is existing Southern Water infrastructure under the site. This infrastructure needs to be taken into account when designing the proposed development. An easement would be required, which may affect the site layout. This easement should be clear of all proposed buildings and substantial tree planting.

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

Having regard to the above, Southern Water proposes the following criteria be added to Policy SSA4:

h. Occupation of development will be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider.

i. Layout is planned to ensure future access to existing infrastructure for maintenance and upsizing purposes

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

In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance, and with our comments relating to Policy DM42, we have undertaken an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for each of the sites listed in Tables 5 and 6. The assessment reveals that local wastewater infrastructure in closest proximity to the following sites has limited capacity to accommodate the proposed development;

- 87 Preston Road, Brighton
- 251-253 Preston Road, Brighton
- Preston Park Hotel, 216 Preston Road, Brighton
- Land at and surrounding Downsman Pub, Hangleton Way, Hove
- Victoria Road Former Housing Office, Victoria Road, Portslade

DP201

- Belgrave Centre and ICES, Clarendon Place, Portslade
- Wellington House
- Former Brewery site, South Street, Portslade
- Regency House
- Former Flexer Sacks

Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2018). In addition, this approach is consistent with paragraph 28 of the NPPF (2018), which states that policies for specific areas such as site allocations, can include *'the provision of infrastructure... at a local level'*.

In addition, our assessment of the sites in Tables 5 and 6 reveals that there is existing water and/or wastewater infrastructure under the following sites;

- 76-79 & 80 Buckingham Road, Brighton
- Eastergate Road Garages, Moulsecoomb, Brighton
- Land between Manchester Street/Charles Street, Brighton
- Baptist Tabernacle, Montpelier Place, Brighton
- Old Ship Hotel (garage), 31-38 Kings Road Brighton
- Saunders Glassworks, Sussex Place, Brighton
- Selsfield Drive Housing Office, Selsfield Drive, Brighton
- Tyre Co, 2-16 Coombe Road, Brighton
- Whitehawk Clinic, Whitehawk Road, Brighton
- Buckley Close garages, Hangleton
- 189 Kingsway, Hove
- Kings House, Grand Avenue, Hove
- Land at and surrounding Downsman Pub, Hangleton Way, Hove
- Victoria Road Former Housing Office, Victoria Road, Portslade
- Land at the corner of Fox Way and Foredown Road, Mile Oak
- Land south of Lincoln Street Cottages, 15-26 Lincoln Street, Brighton
- Belgrave Centre and ICES, Clarendon Place, Portslade
- City College, Pelham Tower (and car-park), Pelham Street
- The Astoria, 10-14 Gloucester Place, Brighton
- Post Office site, 62 North Road, Brighton
- Former Brewery site, South Street, Portslade
- 27-31 Church Street
- Former Dairy Crest Site, 35-39 The Droveaway, Hove
- Kingsway/Basin Road North
- Church Road/Wellington Road/ St Peter's Road

DP201

This infrastructure needs to be taken into account when designing the proposed development. An easement would be required, which may affect the site layout. This easement should be clear of all proposed buildings and substantial tree planting.

For the sites in the first list above, where wastewater capacity is limited, we recommend the following criterion be added;

Occupation of development will be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider.

For the sites in the second list above, where there is existing infrastructure under the site, we recommend the following criterion be added;

Layout is planned to ensure future access to existing infrastructure for maintenance and upsizing purposes

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

In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance, and with our comments relating to Policy DM42, we have undertaken an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for each of the sites listed in Table 7. The assessment reveals that local wastewater infrastructure in closest proximity to the following sites has limited capacity to accommodate the proposed development;

- Land at Mile Oak Road, Portslade
- Land at and adjoining Brighton Race Course
- Land at Ovingdean Hall

Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2018). In addition, this approach is consistent with paragraph 28 of the NPPF (2018), which states that policies for specific areas such as site allocations, can include '*the provision of infrastructure... at a local level*'.

In addition, our assessment of the sites in Table 7 reveals that there is existing water and/or wastewater infrastructure under the following sites;

- Land at Mile Oak Road, Portslade
- Benfield Valley
- Land at Ladies Mile, Carden Avenue
- Land at South Downs Riding School & Reservoir Site
- Land north of Warren Road,(Ingleside Stables)
- Land at former nursery, Saltdean
- Cluster at Coombe Farm and Saltdean Boarding

This infrastructure needs to be taken into account when designing the proposed development. An easement would be required, which may affect the site layout. This easement should be clear of all proposed buildings and substantial tree planting.

For the sites in the first list above, where wastewater capacity is limited, we recommend the following criterion be added;

Occupation of development will be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider.

For the sites in the second list above, where there is existing infrastructure under the site, we recommend the following criterion be added;

Layout is planned to ensure future access to existing infrastructure for maintenance and upsizing purposes

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

In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance, and with our comments relating to Policy DM42, we have undertaken an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for each of the sites listed in Table 8. The assessment reveals that local wastewater infrastructure in closest proximity to the following site has limited capacity to accommodate the proposed development;

- Lewes Road Bus Garage

Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure.

Southern Water has limited powers to prevent connections to the sewerage network, even

DP201

when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2018). In addition, this approach is consistent with paragraph 28 of the NPPF (2018), which states that policies for specific areas such as site allocations, can include *'the provision of infrastructure... at a local level'*.

For the Lewes Road Bus Garage site, we recommend the following criterion be added;

Occupation of development will be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider.

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

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.

Southern Water's additional comments relate to Appendix 3 - Local Wildlife Sites. This list includes Local Wildlife Site (LWS) BH71 'Hove Park Reservoir', and Candidate Local Wildlife Sites (cLWS) 'The Engineerium' (38) and 'Beaufort Terrace' (74). All three sites constitute land owned by Southern Water containing operational water supply infrastructure and are managed in accordance with Southern Water's duty to protect drinking water quality. The company operates within the framework of an industry that is regulated and/or monitored through external agencies including the EA, the Drinking Water Inspectorate and OFWAT.

Whilst we recognise that, as a public authority, under Section 40(1) of the Natural Environment and Rural Communities Act 2006, we have a duty to have regard to the purpose of conserving biodiversity, *so far as is consistent with the proper exercise of our functions as a public authority*, Southern Water is primarily a water and sewerage utility with an overriding duty to meet the service standards set by our regulators.

The 'Hove Park Reservoir' site (recognised as Goldstone 2 Water Supply Reservoir (WSR) within the business) is managed to minimise the risk of contamination in accordance with the Royal Society for Public Health, the DWI and Water UK's 'Principles of Water Supply Hygiene' (2015). Regular external and internal inspections of the storage tanks are required, and it may on occasion be necessary to remove the turf layer that conceals the reservoir tank from view.

In addition, some of Southern Water's on-site work may, in the short term, require considerable construction and excavation activity before a site is restored. Having regard to the proper exercise of its functions, Southern Water considers that a LWS designation is not compatible with the site's primary function as a WSR, its associated maintenance routines and any future essential upgrade works that are required.

To enable its effective ongoing commitment to the protection of drinking water quality as an overriding duty, Southern Water considers that an amendment of the boundary of LWS BH71 is required, to exclude the turfed area concealing the WSR. With regard to the remainder of the site, which is largely wooded, Southern Water would support any further independent ecological assessment of its biodiversity interest.

Regarding cLWS (38) The Engineerium, the westernmost end of this site is owned by Southern Water Services Limited and accommodates essential water treatment infrastructure associated with the adjacent Goldstone Water Supply Works (WSW). In line with our comments on site BH71, this site is also managed in accordance with Southern Water's duty to protect drinking water quality. On occasion, some of Southern Water's on-site work may, in the short term, require considerable construction and excavation activity before a site is restored.

Having regard to the proper exercise of its functions, Southern Water considers that a LWS designation is not compatible with the site's primary function as a WSW and its associated maintenance routines and any future essential upgrade works that are required in order to safeguard public drinking water supplies. Southern Water therefore requests the boundary of cLWS site 38 be re-drawn, to exclude in its entirety the area of land owned by Southern Water. A map of this area of land has been supplied separately to the Council.

With regard to cLWS (74), Beaufort Terrace, this site constitutes a portion of Southern Water's larger landholding that is ancillary to its Islingword Road WSR. Whilst this cLWS site is not currently secured against public access, it contains infrastructure essential to the functioning of the WSR, and may be required for any future purposes associated with it.

Some of Southern Water's on-site work may, on occasions such as emergency or routine maintenance works, require considerable excavation activity before a site is restored. To enable the proper exercise of Southern Water's functions, we consider an LWS designation could conflict with its use as operational land in use for public water supply.

However, we also recognise that, as a public authority, Southern Water has a duty to have regard to the purpose of conserving biodiversity. We acknowledge therefore the need for a survey to be carried out on cLWS 74, in order to provide the evidence required as to whether it meets the requisite criteria for a LWS, and welcome any proposals the Council may have in this regard. Until the matter is decided on the basis of such evidence, we understand the site will continue to be listed as a Candidate LWS.

--

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*:	12 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

DP202

Comment

Consultee

Email Address

Consultation on the Draft City Plan Part 2

Address

Event Name

Comment by

Comment ID

214

Response Date

12/09/18 11:14

Status

Submitted

Submission Type

Web

Version

0.1

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

. Yes

Organisation Name

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

n/a

Name

Name

Address

Address

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

- . Housing, Accommodation 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?

I support the principal of retaining housing stock for families and restricting HMO conversion but have little confidence that this will be achieved by the Council. From David Tindell's calculation from the relevant data, only 40% of university students are housed in purpose built accommodation and there are approx 5400 students unaccounted for when taking the numbers of HMOs housing students. I have reason to believe that some of these students are residing in HMOs above the stated minimum because they can find no where else to live. This puts added pressure on those households and the local communities. Some students even resign their courses because they cannot find suitable accommodation. There are not enough checks on HMOs in the city and some landlords are running illegal HMOs. There seems little communication between HMO licensing and Planning. I know of properties that have an HMO licence but do not have planning permission to be an HMO. Why doesn't the HMO licensing department flagged this to Planning?

DM2 - Retaining Housing

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

DM2 Support Reasons

b) Please explain why you support this policy?

Again no confidence as there are many illegal HMOs and no one is checking this.

DM3 - Residential Conversions & Retention of Smaller Dwellings

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

DM4 - Housing & Accommodation for Older Persons

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

DM5 -Supported Accommodation

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

DM6 - Build to Rent Housing

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

DM7 - Homes in Multiple Occupation

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

DM7 Support Reasons

b) Please explain why you support this policy?

Support in principal but there are already too many HMOs in the Lewes Road corridor. As said previously 5400 students unaccounted for in PBA or registered HMOs with students. Where are all these students living? Some (maybe many) are living in HMOs that now housing more students than allowed (no checks by the Council). This puts pressure on local communities and the those living in those HMOs. Some are living in illegal HMOs - again no checks by the Council.

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?

Not enough are being built for the quantities of students and why is Brighton University allowed to expand 700 places until 2020 when there is already not enough housing for those university students we have now?

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

Any other comments

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

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

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

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

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

I do not have a lot of confidence in the Council to manage the number and quality of HMOs or to check on illegal HMOs. There are many permanent residents in the Lewes Road corridor who are unhappy with the level of noise, rubbish and fly tipping that comes with the high levels of student HMOs in this area.

DP203

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	212
Response Date	12/09/18 10:23
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, Accomodation 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?

I would like to ask that we can have Article 4 in the Preston Village and Withdean area to prevent further desecration and disruption to our well loved and cared for communities

From:
Sent: 12 September 2018 12:20
To: PlanningPolicy
Cc:
Subject: " CITY PLAN PART TWO " CONSULTATION re: 46 to 54 OLD LONDON ROAD, PATCHAM, BRIGHTON

To whom it may concern

Re: City Plan Part 2 Consultation- 46 to 54 Old London Road, Patcham , Brighton.

We write to request that the SITE known as 46 to 54 Old London Road, Patcham is removed from the list of sites allocated for proposed over development in their draft "City Development Plan Part 2".

The Council is required to ensure that any site that they are happy to see developed meets the standards set out in their own planning policies and the National Planning Policy Framework. It is our view that the Council should not include 46 to 54 London Road in their list of locations to be developed because by including the SITE for the development of 30+ units - houses / flats - built to replace the 5 current family homes would dramatically over develop the SITE together with contravening some of the Standards of the Council's planning policies and the National Planning Policy Framework .

Linked with our view that the SITE should not be included in the City Development Plan Part 2 as outlined above it is our view that-

- The Patcham Village and surrounding area has high levels of traffic most particularly at peak times from Patcham House School, Patcham Memorial Hall, The Scout Hall, Bus route, local shops including large lorry deliveries to the Coop. It is a thoroughfare also for local schools' traffic. The surrounding roads are very narrow and already struggle to cater for traffic and parking needs. 30 plus individual dwellings would dramatically over develop the SITE and add at least 30 more cars to the present congestion.
- The density of development that the Council would be happy to agree to in any future planning application from developers would spoil the village look and feel and would detract from the character and appearance of the area.
- It remains a well known fact that the area has a history of serious ground water flooding from the underground river below the Old London Road. Raw sewage overflows into surrounding roads, gardens and basements. Over development of the SITE will add to the current volume of run off water and inability of the outdated water drainage system to cope

- Overdevelopment of the SITE will remove many of the 51 established trees together with concreting over the majority of the SITE will add to the existing drainage and flooding problems.

(NB the proposed inclusion in the City Development Plan Part 2 for development of land on the old Patcham Fawcett at Ladiesmile / Carden Avenue on the hill above The Old London Road would impact on all that we have discussed above.)

It is our view that the Council will be negligent if it does not update the present outdated drainage system before including the Old London Road SITE in the City Plan Part 2 and opening the door for over development and creating an increased volume of run off water with nowhere to go. This could result in much of the neighbourhood being seriously affected in the future.

In short we ask the Brighton and Hove Planning department to think beyond the superficial target of building 13,200 new homes in the city by 2030 to the consequences of their actions on local communities.

Yours most sincerely

[Sent from Yahoo Mail for iPad](#)

DP205

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 215
Response Date 12/09/18 12:10
Status Submitted
Submission Type Web
Version 0.1

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

Organisation Name

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

Name

Name

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Environmental and Energy

DM37 - Green Infrastructure & Nature Conservation

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

DM37 Object Reasons

d) Please explain why you object to this policy?

The policy focuses primarily on designated species and habitats outside the city. It isn't strong enough on the Green Network within the city and habitats identified by the council as being part of the green linkages. For example, p. 108;p.109; p.110 footnote 59

I'd also like the council to honour recommendations made by Natural England in the Nature Nearby report when considering planning applications

DM37 Object Wording Changes

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

P. 108 - add the Green Network to the bulleted protected areas

P.109 - add to the list of designated and identified sites. By virtue of having been identified in 2009

P. 110 2.269 - Reference to the Green Network footnote 59. It refers, not to the Green Network in the city, but to the NIA. I suggest reference is made to the council document, 'A green network for Brighton and Hove 2009'.

Personally, I'd like to see the linkages identified protected from development - why identify them otherwise?

P. 111 mention Natural England in the Nature Nearby report as part of the justification

P. 113 mention the Green Network

DM38 - Local Green Spaces

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

DM38 Object Reasons

d) Please explain why you object to this policy?

It focuses mainly on the designated spaces, and could do with more emphasis on the wider Green Network within the city.

DM38 Object Wording Changes

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

I would like to see a map of the Green Network included in the Appendices and the Green Network referred to in 2.2283 and 'A Green Newwork for Brighton and Hove' referenced

From:
Sent: 12 September 2018 13:41
To: PlanningPolicy
Subject: City Plan Part Two Consultation

Dear Sirs

I am writing to object to the inclusion of 46 - 54 Old London Road in the city plan part two.

The re-development of this area has already been rejected by the council, rightly upheld on McCarthy and Stone's appeal by the planning inspector. The majority of the reasons for rejection also apply to the new proposal to build 30 residential units.

The existing 5 family homes are of sound construction and in a good state of repair. Demolition of these houses and replacement by 30 units would result in excessive density of housing, seriously spoil the look and feel of Patcham, and detract from the character and appearance of the area.

Please remove this item from the plan and seek more suitable alternatives e.g. city centre brown field sites/unused offices to meet the residential housing target.

Thank you

Sent from my iPhone

Brighton and Hove City Plan part 2 Comments from the Regency Society

The Regency Society has reviewed the proposed City Plan part 2 and offers the following comments. We have commented on the following sections of the document:

Development Management Policies:

- DM1 Housing Quality, Choice and Mix
- DM2 Retaining Housing and residential accommodation (C3).
- DM8 Purpose Built Student Accommodation
- DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities
- DM18 High quality design and places.
- DM19 Maximising Development Potential
- DM26 Conservation Areas
- DM27 Listed Buildings
- DM29 The Setting of Heritage Assets
- DM30 Registered Parks and Gardens
- DM32 The Royal Pavilion Estate
- DM39 Development on the Seafront

Strategic Site Allocations:

- SSA5 Madeira Terraces and Madeira Drive
- SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive
- H2 Housing Sites – Urban Fringe ...
- H3 Purpose Built Student Accommodation

To query or respond to any of our comments please contact the society's chair,

DM1 Housing Quality, Choice and Mix

The Regency Society welcomes the plan's commitment to national space standards. We note that this is one of the requirements which can be waived in some circumstances and hope that such waivers will only be granted where necessary to enable development of a difficult site which would otherwise be left empty.

We are puzzled by requirement (a) which could be read to imply that any application for residential development should provide a range of dwelling types, tenures and sizes. Clearly this requirement cannot be applied to very small developments, such as a single dwelling on an in-fill site. We suggest that the wording of this section and possibly also section (b) requires clarification.

DM2 Retaining Housing and Residential Accommodation

Note 2.16 says that 'over the Plan period there will be considerable demand for family sized homes (2 and 3+ bedroom properties)'. Note 2.17 says 'intensification of holiday lets... can harm the character of the locality and cause excessive noise and disturbance to resident'. The wording of this policy could include a cross reference to DM7 which seeks to limit the number of HMOs in an area.

DM8 Purpose Built Student Accommodation

The Regency Society welcomes the requirements set out in DM8.

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

This policy seems to be out of date in that it assumes that the new Brighton Centre will be near Churchill Square. The Regency Society would welcome a plan for a new conference centre within an enlarged Churchill Square.

However, the current Council position seems to involve a commitment to sell the existing Brighton Centre site for retail use and to develop a new venue at Black Rock. We do not support this position and regret that the Council has published no explanation of its feasibility in terms of:

- the size of the site
- transport links
- impact on the listed buildings in the Kemp Town conservation area

There is no reference here to the policy of preventing change of use for smaller hotels in central Brighton. Is this covered elsewhere, or has it been dropped?

DM18 High Quality Design and Places

There is much to welcome in this section of the plan. The problem that we have with these good intentions is how they can be made a reality. There may be a case for providing training for Planning Committee members, using a wide range of illustrations and even site visits to draw attention to examples of both good and bad practice.

Perhaps there is also a case for a professionally written and illustrated guidance document to be given to potential developers at the pre-application stage, to illustrate the city planners' commitment to good quality design and materials.

The wording of DM18 needs enlivening and illustrating if it is to influence decision makers.

DM19 Maximising Development Potential

Policy CP14 Housing Density in the City Plan Part One sets general policy parameters for the density of residential development, setting a general expectation for a minimum net density of 50 dwellings per hectare with a minimum of 100 dph within Development Areas DA1-6 and DA8. These are the minimum standards and as such should allow for maximising development potential.

We would suggest that requirement "d" should include 'community facilities', so that it reads "make efficient use of land to provide for effective open space, amenity space, community facilities, access and car parking".

DM26 Conservation Areas

The Council should prioritise the preparation of up-to-date character statements where they do not exist, and not rely on applicants for planning permission to make their own assessments.

The Council should prioritise the preparation of management plans.

Poor condition should not be allowed to justify the demolition of a building which makes a positive contribution to a conservation area where the actions, or inaction of the current or previous owners are a contributory cause.

DM 27 Listed Buildings

It should be made explicit that a less interventive but still economically viable use is preferable to a more commercially profitable but highly interventive use.

As well as the use of the powers under the Planning Acts to secure the repair of listed buildings, the Council should also be prepared to exercise its powers for compulsory purchase.

DM29: Setting of Heritage Assets

Considerations (a) to (g) are listed as those to which for which the Council will have particular regard when considering the setting of a heritage asset. We are pleased to see the inclusion of item (c) (“... historic or cultural associations with its surroundings ...”). Could we suggest that the wording should warn against a narrow approach to the question of the ‘setting’ of the listed building; the focus should not only be on the visual connection between a heritage asset and its setting, but also take account of historic, social and economic connections.

A further consideration could be added to those listed (a) to (g), namely the potentially negative impact of new, tall buildings overshadowing heritage assets.

It will be interesting to see how these factors are interpreted when a planning application is made for the proposed venue at Black Rock. Factors a, c, d, e and f all represent possible considerations when the potential impact on Lewes Crescent and its neighbouring terraces are considered by the Planning Authority.

The Regency Society believes that since the City Council has a specific interest in the development of the Black Rock site, the planning decision should be referred to the Secretary of State.

DM 30 Registered parks and gardens

It would be helpful to the reader if this section identified the registered parks and gardens in the city. We are aware of the Royal Pavilion Garden, Woodvale Cemetery, Queens Park, Stanmer Park, Kemp Town Enclosures, Preston Manor and Preston Park. It would be welcome if the Council were to commit to a review to establish whether any other sites would merit registration for example Brunswick Square or Palmeira Square / Adelaide Crescent.

The Council’s encouragement of management and improvement plans is welcome, but is of little value without a strategy for funding the work required.

DM31 Archaeological Interest

The key point from the Regency Society’s perspective is the recognition of the importance and role of above ground archaeology, which is well covered in the proposed wording for DM31.

DM 32 The Royal Pavilion Estate

This policy seeks to create a sense of coherence for the city's most important heritage asset and to ensure its protection and enhancement by managing the estate as a whole and protecting the Pavilion Gardens. The Regency Society strongly supports these intentions.

The Society is particularly encouraged by the plan to co-ordinate with other adjacent sites including Valley Gardens. The proper development of Valley Gardens as an attractive public space has not been adequately explored in current plans for it and could, if done well, relieve the current pressure on the Pavilion Gardens.

Whilst we support a careful approach to temporary uses of the Gardens, we would not wish to see any restriction of access or charging for entry to them during daylight hours.

We particularly welcome the intention to ensure a wider integrated conservation scheme for the estate as a whole including further development at the Dome after the completion of the current Corn Exchange and Studio Theatre refurbishment.

DM39 Development on the Seafront

The Regency Society recognises that there has been considerable development adjacent to and on the shingle beach between the Peace Statue and the Yellowwave Volley Ball site. These developments play an important role in providing attractions for local residents and for visitors, thus strengthening the city's tourist economy.

The beach-front east of the Yellowwave site is relatively un-developed as far as the Marina, providing a valuable change of character which reveals the natural features of the beach. We believe that the City Plan should protect this stretch of Madeira Drive from further development.

SSA5 Madeira Terrace and Madeira Drive

There should be a commitment that the restoration is functional as well as physical, with full access to the actual terraces. We would also like to see an explicit commitment to a conservation driven approach to the fabric repair; this cannot just be taken as implicit.

Originally the arches provided a covered walkway for use by pedestrians, but recent usage suggests that this is no longer required. However, with the interior of the Terraces occupied, by small businesses, many serving the public, there will need to be a wide footpath in front of the arches, especially if catering outlets have outdoor seating.

Basic visitor amenities such as toilets, shelter and kiosks should preferably be housed within the terraces rather than by increasing development on the actual beach.

No consideration appears to have been given to how the uses within the terraces would be affected by the closing off of the Drive for special events.

Parking on much of Drive is not available during events. The public realm would be much improved if it was reduced at all times. Consideration should be given to restricting parking to low emission vehicles and the provision of charging points.

We would draw attention to the Holmes Report ("Accidents by Design"), which was published by the House of Lords on 1st July. It recommends an immediate moratorium on shared space schemes, which while dominated by parking can never be a fully pedestrian prioritised space. Exhibition Road, South Kensington, which is not a success, is a better comparator for Madeira Drive than New Road, Brighton, which appears to work.

SSA6 Former Peter Pan site, Madeira Drive

The reference to a need for high quality design raises the question of who decides what counts as high quality. For example, does the zip wire near the Palace Pier count as good design? A cross reference to DM18 (High quality design and places) may be useful here.

The suggestion that there should be views of the sea through developed sites is welcome, but some guidance on minimum gap sizes would be useful.

H2 Housing Sites – Urban Fringe

14 urban fringe sites have been identified. Their combined area is in the region of 147 Ha, of which 28 Ha is considered developable. The plan suggests a total of 892 units could be built which equates to 31 units/Ha. (This excludes Site 42 – Land at Ovingdean which was subject to a planning appeal when the draft was written. The appeal has since been allowed).

Because of the sensitivity of the urban fringe sites a broad-brush approach is not appropriate and each site needs to be individually assessed. Planning applications on urban fringe sites should be required to demonstrate that maximum density is being achieved.

H3 Table 8 Purpose Built Student Accommodation Sites

The Regency Society supports the decision not to set a target for the amount of student housing.

We welcome the new on-site student housing being constructed at Moulescomb and hope that similar further on-site development will be possible at Falmer to free up more properties elsewhere for non-student use. There does not seem to be any reference to this in Part 2 of the Plan.

RH 12-9-18

**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)	Brighton & Hove Economic Partnership
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 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?

The BHEP supports this policy. With 14,000 individuals on the city council housing list and vast discrepancy of wages to affordability, given the range of tenures and housing type, the BHEP strongly agrees with the policy objectives.

The BHEP also supports the level of flexibility outlined in the text allowing for movement on the prescribed targets. The BHEP encourages the Council to consider this flexibility further in parts of this policy, as outlined below.

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

The BHEP notes best practice guidance around Build to Rent (purpose built and managed residential rental accommodation) relating to more flexibility being required for space standards given that occupiers utilise more of the building outside of their own 'unit'. If Build to Rent is to be incorporated into Brighton & Hove, the requisite policy has to be welcoming and encouraging of these different forms of housing provision so as to maximise such viability, sustainability and economic benefit for the city.

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) DM2

Policy Name Retaining Housing and residential accommodation (C3)

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)

c) Please explain why you support this policy?

Given the need to provide 13,200 housing units within the plan lifetime, the BHEP strongly supports the policy around retaining currently provision. In addition, the exceptions seem prudent and support accessibility to housing which is mirrored in the new B&H Economic Strategy through Priority Actions 1 + 2 and further supported through additional action GC1 which seeks to continue to innovate in the affordable housing delivery. The new Economic Strategy is also aligned with the city’s Housing Strategy and collaboration framework as well as the new C2C SEP.

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

Notwithstanding the support of this policy, consideration should be given as to whether wording can provide for extraordinary proposals that deliver significant employment benefits and for this to be weighted into a decision.

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 DM3

Policy Name Residential conversions and the retention of smaller dwellings

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?

This is supported in the BH Economic Strategy under chapter 4, 'A Growing City' which aims to unlock sites and provide additional accommodation for the city's residents.

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

Notwithstanding the support of this policy, the BHEP supports the need for a balanced and fair city and accordingly, a mix of housing accommodating families is important. If Build to Rent accommodation delivers increasing numbers of residential accommodation, this policy ought to be weighed appropriately to take account of the fact that purpose built provision is delivering what this policy would otherwise be enabling. As such, justification wording within this policy could stipulate this situation in order to allow for the flexibility in weighing the policy to what the City needs at the time in question within the plan period.

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 DM4 & DM5

Policy Name Housing and Accommodation for Older Persons & Supported Accommodation (Specialist and Vulnerable Needs)

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)

e) Please explain why you support this policy?

Section 2.27.9 of the BH Economic Strategy outlines the need for a resilient society, particularly around older people. The BHEP supports the creation of accommodation for older or vulnerable people to live independently allowing them to enjoy a rich life.

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 DM6

Policy Name Build To Rent Housing

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)

f) Please explain why you support this policy?

In support for the build to rent objective, partnership member Legal and General have supplied direct feedback thus:

From L&G Build to Rent Fund Manager :

“With a policy of 40% affordable housing for build to rent (BTR) the council need to understand that this is likely to be one of the highest policy level across the UK and as such may deter investors from building homes for rent in BHCC. It is unlikely any BTR scheme will be delivered with 40%, indeed I am not aware of any scheme to date across the UK that has delivered 40% affordable housing. Setting the threshold so high will slow the delivery of planning approvals. A simple approach would be to say the affordable housing will be based on an agreed Viability Appraisal and remove any reference to a percentage.”

In addition, we would like to raise feedback from BHEP Vice Chair - quoting the Head of Private Rental Sector at RBS, stipulating the following (when taking 1(f) into consideration):

“Our appetite to fund build to rent schemes favours schemes with unrestricted planning usage given the speculative risk of the asset class. We are seeing more schemes in the UK with some restrictions in the use class but we would normally see an affordable clawback provision that would allow for the scheme to be sold (as per Aug 2017 GLA Planning guidance) within the restricted period. Other conditions that might be able to allow for a sale during the restricted periods are for market failure and/or mortgagee in possession”.

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 DM7 + DM8

Policy Name Houses in Multiple Occupation (HMOs) / Purpose Built Student Accommodation

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)

g) Please explain why you support this policy?

The BHEP broadly agreed with this policy. By freeing up existing HMOs and returning them to family housing, whilst focussing on purpose built accommodation for students will free up much needed housing in the city for families and professionals.

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?

Policy Number DM9 + DM10

Policy Name Community Facilities / Public Houses

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)

h) Please explain why you support this policy?

The BHEP agrees with this policy given the prudent allowances in place.
The policy also links with B&H Econ Strategy theme – A Growing City, which focused on Community Infrastructure. This is further supported via Priority Action 5 /FC1 which supports sustainable neighbourhood planning.

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?

Policy Number DM11

Policy Name New Business Floorspace

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)

i) Please explain why you support this policy?

The BHEP supports the focus in commercial floorspace as it fits neatly with the ‘Growing City’ theme of the Economic Strategy. Paragraphs 1.17 and 2.27.4 deal with the increase of the supply of commercial space in the city and Priority action 2 seeks to accelerate that delivery to support growth.

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?

Policy Number DM12 - DM15

Policy Name Primary, Secondary and Local Centre Shopping Frontages – Special Retail Areas

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)

j) Please explain why you support this policy?

The BHEP supports the policies to protect and enhance the retail offer in the city via theme 5 of the Economic Strategy – An Open City.

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?

Policy Number DM16

Policy Name Markets

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)

k) Please explain why you support this policy?

The BHEP supports this policy given the caveats in place to mitigate undermining any existing retail offer; however it is important that consideration be given to sustainable forms of travel between different retail areas of the City, particularly within the Seafront area in order to protect and enhance business viability.

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?

Policy Number DM17

Policy Name Opportunity Areas for new Hotels and Safeguarding Conference Facilities

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)

l) Please explain why you support this policy?

The BHEP supports this policy primarily through the Strategic theme in the Economic Strategy: An Open City; however concerns have been raised by Members relating to the fluidity of trade between locations cited in this policy – such an issue would need to be adequately accounted for through a credible, sustainable and consulted transport strategy pertaining to 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?

Policy Number DM34 + 35

Policy Name Transport Interchanges / Travel Plans and Transport Assessments

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)

m) Please explain why you support this policy?

The BHEP supports this policy through the Growing City’s theme, principally GC5 which states , “Support investment in transport infrastructure across the City Region and local active travel” & “Continue to work within the city to promote and encourage active travel, improving local connections and delivering health and wellbeing benefits to individuals.” This also aligns with the Coast to Capital SEP Priorities 2 and 8.

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?

Policy Number DM36

Policy Name Parking and Servicing

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)

n) Please explain why you support this policy?

From L&G Build to Rent Fund Manager Dan Batterton:

The CPP2 outlines priorities around safe, sustainable and active travel for pedestrians, cyclists and public transport users. Locally, Legal and General invest £250,000 a year on initiatives and schemes to also promote sustainable travel and encourage their employees to use these sustainable transport methods to get into work. However, with almost 2,000 employees based in Hove City Park, many people do choose to travel by car. L&G only have 400 spaces on site which are prioritised for car sharers and so their employees often have to find places to park in nearby roads as there is no NCP in the areas. This is already a challenge for them in attracting and retaining employees and ensuring that Hove a long term viable location for our business and this will become even more challenging if the proposed parking restrictions for the Hove Park area are introduced. Given this context, BHEP would ask that parking needs of local businesses are taken into consideration when considering any development likely to result in on-street over-spill parking in the city.

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?

Policy Number DM37 + 38

Policy Name DM37 Green Infrastructure and Nature Conservation / Protection of Green Spaces

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)

o) Please explain why you support this policy?

Section 2.28.8 outlines the BHEPs commitment to delivering a robust green infrastructure for the city and wider region, it states: "It is important to protect and grow natural capital/green infrastructure in terms of green spaces, water quality, street trees etc."

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?

Policy Number DM42 - 46

Policy Name DM42 Protecting the Water Environment et al.

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)

p) Please explain why you support this policy?

The Growing City theme of the Economic Strategy supports the development of a city region wide water and energy plan, (Priority GC7, "Continue to work with Greater Brighton on the development of the Greater Brighton Energy Plan and Greater Brighton Water Plan to ensure that we have resilient infrastructure to support economic growth."

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?

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?

Section 2.27.8 of the Economic Strategy states that we will, protect and grow natural capital/green infrastructure in terms of green spaces. It is however arguable that higher proportions of housing density within a site of this size are still achievable. With principles such as those of Policy DM19 in mind; additional flexibility on housing numbers for special areas such as SA7 may bridge gaps in provision if windfall sites do not produce the numbers envisaged.

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 All ff the above

Policy Name All of the above

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?

The BHEP supports the strategic allocations as set out above and at the recent BHEP meeting on 4.9.18 received assurances that any development will be readily accessible and will link with adjacent neighbourhoods (including business and retail areas).

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?

The BHEP supports the allocation of these sites through strategic themes 'A growing city' and 'an open city'.

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?

The BHEP supports the allocation of these sites through strategic themes 'A growing city' and 'an open city'.

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?

BHEP supports the opportunity to free up HMOs with the provision of purpose built student accommodation. In addition, this will also support Brighton University's aspirations to deliver 100% accommodation for first year students.

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?

The recent Industrial Estates research by SHW highlighted the need to save light industrial sites within the city boundary – the BHEP supports the approach as laid out in policy E1

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.

The BHEP would like more business involvement when dealing with the distribution of CIL contributions and would welcome being part of any discussions that may facilitate that. This is particularly around the enhancement of the retail areas in the city and would provide businesses in those areas with more say on how their district develops.

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*:	12.9.18

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: 12 September 2018 14:31
To: PlanningPolicy
Subject: City Plan Part Two Consultation

Dear Sir/Madam

I am writing to object to the inclusion of **46 - 54 Old London Road**, Patcham in the list of sites allocated for development in the City Plan.

I believe the site is too small for thirty homes. The scale of the proposed housing will spoil the character of the area. The inevitable increase in traffic will put further pressure on an already busy environment, especially the parking, which is already hugely problematic along Old London Road.

I am also concerned about the flood risk. There is a history of flooding in Patcham Village. A development on this scale will increase drainage problems in the immediate area.

For these reasons the site should be removed from the list.

Yours,

DP210

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	219
Response Date	12/09/18 14:22
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 . 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 - Strategic Site Allocations

SSA5 - Madeira Terrace & Madeira Drive

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

SSA5 Object Reasons

d) Please explain why you object to this policy?

The hotel and the YHA

DP211

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	221
Response Date	12/09/18 14:51
Status	Submitted
Submission Type	Web
Version	0.1

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

Organisation Name

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

Name

Name

Address

Address

Email Address

Email Address

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

SSA5 - Madeira Terrace & Madeira Drive

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

SSA5 Object Reasons

d) Please explain why you object to this policy?

I object due to the proposal of a hotel being built on the site, blocking the view.

DP212

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 222
Response Date 12/09/18 15:10
Status Submitted
Submission Type Web
Version 0.1

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

Organisation Name

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

Name

Name

Address

Address

Email Address

Email Address

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

SSA1 - Brighton General Hospital Site

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

SSA1 Object Reasons

d) Please explain why you object to this policy?

I would like to see Madeira Terrace used for the good of the community and not the profits of big businesses



Liz Hobden
 Head of Planning
 City Development and Regeneration
 Brighton & Hove City Council

Date: 12th September 2018
 Phone:
 e-mail:

Dear Liz and CPP2 Policy Projects and Heritage Team

CITY PLAN PART 2 – PATCHAM WARD (PATCHAM AND HOLLINGBURY)

In respect to the above consultation we acknowledge the proposals for the various proposed land uses. Our comments relate to three specific locations namely:-

Policy H1 Housing sites and Mixed use Sites (Table 5 – 46-54 Old London Road Patcham BN1 8XQ)
 Policy H2 Housing Sites – Urban Fringe (Table 7 – Land adjoining Horsdean Recreation ground [site 16] and Land at Ladies Mile Road Carden Avenue [site 17])

In respect to Policy H1 – We are deeply concerned at the inclusion of five private detached houses at 46-54 Old London Road. Other than previous attempts by McCarthy and Stone (Mc&S) to acquire and develop the land on which the houses and gardens are located (all of which have been rejected by the Council and/or by the Planning Inspector at appeal) there has been no other development interest in this land; it is the inclusion of this site within these proposed Policies that will create interest. It is incredulous that the Council draws a line around five individually privately owned homes and designates those plots into one site and states in the Policy that this “site” has been identified and should be developed. It is entirely inappropriate for the Local Authority to just designate in Policy private property for development by others without the agreement of the land owners. It was noted at the recent residents’ meeting that officers would seek to establish if the site is available and if not, would have to consider removing the site from the Policy. The Council should have determined this prior to including these houses. We understand that at least one of the property owners has objected to the inclusion of their property in this Policy; that alone should be enough for the site to be removed unless it is the Council’s intention, through Policy, to forcibly compel citizens to sell their property; quasi compulsory purchase scenario.

Irrespective of the above and not least because of reasons such as the detrimental harm that will fall on Patcham Village and the surrounding area due to scale, density, lack of infrastructure, impact on amenity, privacy, character, overlooking, drainage and historical flooding, the proposed Policy opens the site to a vastly different development proposition than that proposed by Mc&S.

In any respect, the proposal by Mc&S was for a number of units dedicated to senior residents that were unlikely to own vehicles. The open proposal in the Policy has no constraints and with the potential for say 30+ 1 bedroom flats equals the potential for 60+ vehicles none of which could be accommodated on the site in an area where the Council could not limit vehicle ownership. The impact of this alone would be devastating.

Further, the sites within H1 and H2 are entirely contradictory. H1 requires intense development with the resultant demolition of five large family homes, whilst H2 requires the developments to have 50% of 3+ bedroom large family homes because of the dire lack of such properties. The

respective sites are within close proximity thus should they be developed they will neutralise some of the key primary objectives behind the Policies.

Addressing Policy H2 - whilst recognising the need for more homes we renew our objection to the proposed developments on urban fringe Sites 16 and 17. Our principal concern being that once the urban fringe is allocated, they will be targeted in preference to brown field sites as an easier option. We would be left with brown field sites at the expense of developing on open green areas. Further, once the urban fringe has become acceptable, it will lead to creep and further proliferation of development.

Acknowledging the consultation is focused on land allocation, there is no detail relating to access, style, density, character, impact on adjacent properties, privacy, overlooking and amenity. There is no detail relating to infrastructure impact such as on roads/ transport, schools, doctors and dentists. There is no detail on the impact on surface and foul water drainage and mitigation and how they will affect already over-capacity drains and sewers. The developments are proposed on locations that are vital water supply collection and extraction zones with the proposal silent on the risks they pose.

The urban fringe sites are popular and well-used environments that provide the community and others with access to open space for recreation, walking, health and wellbeing and “escape” from daily lives and the built urban environment.

Both the urban fringe sites create potential for significant population and vehicle increases. Site 16 appears to have no access connection other than to cross playing fields cutting across three joined areas being Horsdean Recreation ground, “Vale Park” and “Braeside Linear Woods”. Joining traffic onto the heavily congested “rat-run” of Vale Avenue would cause significant detrimental harm.

Further, the wooded area above Horsdean recreation ground provides a buffer to homes following the construction of the dual carriageway A27. Opening the area would impact on noise pollution whilst also setting new homes adjacent to a noisy and busy by-pass that will inevitably have air pollution issues.

Site17 is located on presently designated school playing fields with no obvious traffic connection other than to Ladies Mile Road that is already heavily congested. The proposal identifies the site as “Carden Avenue” yet the site boundary as shown on the map has no connecting boundary with Carden Avenue; this is misleading.

There are no “close-by” public transport connections that will do little to encourage sustainable transport.

Policy H2 relating to Sites 16 and 17 states that opportunities are needed to secure additional and improved publically accessible open space yet both sites are proposed on precisely those areas that will do the exact opposite of removing open space. It states that there must be improved linkage and access to the South Downs National Park yet developing both sites impedes this.

Policy SA4 Urban Fringe promotes the urban fringe as part of the green network with Policy DM37 Green Infrastructure and Nature Conservation being critical to the City. The justification for Sites 16 and 17 have to include provision of public open space. Whereas this is understood to be in the context of the development site itself, the development would contravene Polices SA4 and DM37 by virtue of being sites precisely where those Policies seek to protect green space that should not just include the development sites but also the surrounding areas and population that already enjoys and has access to green space.

In the light of our objections and the overwhelming concerns of the residents we represent (of which many have submitted a petition and many have made representations outlining their concerns) we would request that the three locations subject to this letter are discounted and removed from City Plan Part 2.

Yours faithfully,



DP214

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 - Agent only

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)	Homes for the City of Brighton and Hove Design and Built Company Limited
Name	
Address	c/o Agent
Email Address	
Agent Name (If applicable)	Savills
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) PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON POLICIES

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?

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON POLICIES

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

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON POLICIES

d) Please explain why you object to this policy?

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON POLICIES

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

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON 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?

N/A

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

N/A

d) Please explain why you object to this policy?

N/A

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

N/A

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?

N/A

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

N/A

d) Please explain why you object to this policy?

N/A

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

N/A

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

N/A

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?**

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON PROPOSED HOUSING SITES

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

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON PROPOSED HOUSING SITES

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

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON PROPOSED HOUSING 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**

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON PROPOSED HOUSING SITES

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**

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON PROPOSED HOUSING SITES

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

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON PROPOSED 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?

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON PROPOSED URBAN FRINGE HOUSING SITES

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

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON PROPOSED URBAN FRINGE HOUSING SITES

d) Please explain why you object to this policy?

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON PROPOSED URBAN FRINGE HOUSING 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

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON PROPOSED URBAN FRINGE HOUSING SITES

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

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON PROPOSED URBAN FRINGE HOUSING SITES

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?

N/A

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

N/A

d) Please explain why you object to this policy?

N/A

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

N/A

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

N/A

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

N/A

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?

N/A

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

N/A

d) Please explain why you object to this policy?

N/A

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

N/A

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

N/A

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.

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON THE DRAFT CITY PLAN PART 2.

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.

PLEASE REFER TO REPRESENTATION REPORT FOR FULL COMMENTS ON THE DRAFT CITY PLAN PART 2.

Signed*:	
Dated*:	12 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

Representations to the Draft City Plan Part two

Regulation 18 Consultation

Three sites in Brighton and Hove



Contents

1.	Introduction	1
2.	The Sites	3
3.	Housing Needs and Affordability	5
4.	Representations on The Draft Plan	7
5.	Observations on the Evidence Base	11
6.	Conclusion	18

1. Introduction

- 1.1. On behalf of our client the “Homes for the City of Brighton and Hove Design and Build Company Ltd” (“our client”) we are submitting representations to Brighton and Hove City Council’s (BHCC) current consultation on the Draft City Plan Part 2 (herein referred to as CPP2). The consultation opened on 5 July 2018 and closes on 13 September 2018.
- 1.2. The draft CPP2 sets out BHCC’s preferred approach to delivery of development within the administrative area over the Plan period (up to 2030) and includes proposed allocations for development, notably for housing. The CPP2 forms the second part of the Development Plan and will be read in conjunction with, and supporting, the City Plan Part 1 (CPP1) which was adopted in March 2016. It will also replace the adopted Local Plan 2005.
- 1.3. This current consultation represents the second Regulation 18 consultation on CPP2. BHCC currently propose that a Regulation 19, submission version of the Plan will be published for consultation in autumn 2019, with submission in spring 2020, examination in summer 2020, and adoption in 2021.
- 1.4. The National Planning Policy Framework originally came into force in 2012, replacing a wider range of guidance notes and policy documents produced by National Government. This has since been updated, with the NPPF Revision published on 24 July 2018. CPP1 provided the strategic policies and framework for the city area over the Plan period, and CPP2 is proposed to form the second element of this.
- 1.5. These representations seek to provide observations on the proposed policies and strategy of BHCC as contained in the Draft CPP2 in light of the above tests of soundness and having regard to three sites which are being promoted for development. These sites are all proposed for allocation in the draft CPP2 and are identified by BHCC as follows:
 - **Belgrave Centre and ICES, Clarendon Place, Portslade BN41 1DJ (Site SP2 in Shoreham Harbour Joint Area Action Plan (JAAP) Policy CA3) (Herein referred to as the “Portslade site”)**
 - **Land to north east of Coldean Lane / Land north of Varley Halls / Land south of Varley Halls (Herein referred to as the “Coldean site”)**
 - **Land at and adjoining Brighton Race Course (Herein referred to as the “Whitehawk site”)**
- 1.6. The Coldean site and Whitehawk site are both proposed as urban fringe allocations (policy H2). The Portslade site is proposed for a residential allocation in table 5 accompanying draft policy H1. These policies are explored later in this representation.



- 1.7. With regard to the delivery of much needed homes and the issue of affordability, it is noted that Brighton is one of the least affordable areas in the country, with BHCC's own April to June (Q2) 2018 Housing Market Report, stating that the affordability ratio for a 1 bed flat is 8.76 times the average earnings, increasing to 16.81 for a 3 bed house. In context, the mean average ratio across England is 6.5 times earnings. The report also states that the average house price is over £123,000 higher in Brighton than the average in England and Wales (51.6%).

- 1.8. The issue of affordability is compounded by the lack of homes in the city area and the high demand for homes that arises from the lack of supply. It is therefore essential that BHCC not only looks to address housing needs, but takes a positively approach to higher density development on sites, proposed for allocation, where these can make a valuable contribution to housing delivery over the Plan period.

2. The Sites

Land at the former Belgrave Centre, Clarendon Place, Portslade

- 2.1. The site comprises an area of 0.3 hectares, which was formed by the Belgrave Day Centre, Clarendon Place, Portslade (“Portslade Site”). The Portslade site is within the built up area boundary and lies within the Shoreham Harbour area. It currently contains a vacant building known as the Belgrave Centre which was formerly used as a children’s day centre. This is a relatively large L shaped structure accommodating approximately half of the site. There is also a single storey garage block located in the north western corner. The remainder of the site comprises hard surfacing and parking areas, with a narrow strip of grass and scrub forming the boundary onto Wellington Road.
- 2.2. There is an existing access point into the site from Wellington Road, however the main site entrance is via Clarendon Place to the north, which traverses off the southern side of North Street. North Street itself provides the main entrance to the adjacent commercial area, which is occupied by a range of industrial, light industrial and storage uses.
- 2.3. The area comprises a mix of uses, with a high street located to the north east along Boundary Road, offering a variety of local independent and chain retail uses. Beyond this to the north and east is predominantly residential, with a combination of unit types including, most commonly, flats and terraced dwellings. There is also a 4 storey recently completed flatted block on the corner of Boundary Road with Wellington Road, adjacent to the east of the site.
- 2.4. The scale of development in the locality varies, with a range of 2, 3, 4 and 5 storey structures. Further eastwards, the scale of buildings increases considerably.

Urban Fringe Site North East of Coldean Lane, North of Varley Halls, Coldean

- 2.5. The Coldean site has an area of 3.8 hectares and comprises an open parcel of land to the immediate north west of the Brighton University Varley Park halls of residence. It forms an enclosed parcel of greenfield land, bound on the western boundary by a row of mature trees and planting adjacent to Coldean Lane. The southernmost boundary of the Coldean site is also defined by a mature row of trees, within which is a public footpath. Beyond this is the Brighton University Halls of Residence the Coldean site is enclosed on the northern and eastern boundaries by the A27 bypass. The topography of the site is steep, with an incline of approximately 25m from Coldean Lane to the eastern most part of the site, adjacent A27.

- 2.6. The Coldean site has been recognised in BHCC’s Urban Fringe Assessment 2014 and 2015 (UFA) as being suitable for residential development. It is regarded as falling within area 21 “land north east of Coldean Lane” which has the potential to deliver c.130 dwellings. This is examined further below.
- 2.7. CPP1 also notes that the site is designated as Open Space, a Nature Improvement Area and a Proposed Local Nature Reserve. It lies within flood zone 1, giving it the lowest of fluvial risk of flooding, an Archaeological Notification Area, and is within the edge of Stanmer Park, an Historic Park and Garden of over 485 hectares which predominantly lies the other side of the A27.
- 2.8. The residential area of Coldean lies to the west of Coldean Lane. This has a similar topography with development stepped to follow the land contours. Within this area, there is also a primary school, church, and GP surgery serving the local community. The entire area of Coldean, including the site, lies adjacent to, but outside of the South Downs National Park (SDNP).

Urban Fringe Site adjoining Brighton Race Course and the Whitehawk Estate

- 2.9. The Whitehawk site has an area of 1.4 hectares and is located to the north west of the residential area of Whitehawk. It comprises an open parcel of greenfield land that is in part formed of scrubland.
- 2.10. The Whitehawk site has a steep topography rising from south east to north west with part of Whitehawk falling in the basin of the valley. There are two existing public footpaths through the Whitehawk site, which lead from the adjacent residential area, to the west and via a small tunnel under the Brighton Racecourse Track, to a further built up area north of Brighton. Brighton Racecourse lies at the top of the ridge, where extensive views across the city are available.
- 2.11. To the east are a number of blocks of flats, which extend up to 10 storeys. Development to the immediate west and south of these flats are predominantly 2 storey dwellings.
- 2.12. The site is located outside of the defined settlement boundary of Whitehawk and falls within a Local Nature Reserve (LNR) along with a considerable area of land to the south, north and west.
- 2.13. The Whitehawk site is recognised in BHCC UFA 2014 and 2015 as being suitable for some high density residential development, adjacent to the existing tower blocks at a density of around 75dph. It was identified as part of site 30 and considered to be capable of delivering residential development without significant impacts on landscape and ecology. This is explored further below.
- 2.14. All three of the above sites are proposed to be allocated within CPP2. Comments on the proposed allocators are provided below.

3. Housing Needs and Affordability

- 3.1. The city is one of the least affordable areas in the country, with BHCC's own April to June (Q2) 2018 Housing Market Report, stating that the affordability ratio for a 1 bed flat is 8.76 times the average earnings, increasing to 16.81 for a 3 bed house. In context, the mean average ratio across England is 6.5 times earnings. The report also states that the average house price is over £123,000 higher in Brighton than the average in England and Wales (51.6%).
- 3.2. The issue of affordability is compounded by the lack of homes in the city area and the high demand for homes that arises from the lack of supply. In this regard, BHCC's Objectively Assessed Need (OAN) for housing was stated as being 30,120 homes over the Plan period (Objectively Assessed Need for Housing: Brighton & Hove, June 2015). Due to the constraints in the area, BHCC's adopted CPP1 includes provision for 13,210 homes over the Plan period. Whilst the reasons for this reduced housing target compared to the OAN were accepted at examination, it is evident that the amount of housing that is and can be delivered in the city area is significantly short of the housing needs and this is likely to be having a further impact on affordability in the area. It is therefore essential that BHCC not only looks to address housing needs, but takes a positively approach to the delivery of affordable housing and makes best use of available development sites.
- 3.3. CPP1 allocates a number of sites to help to meet this housing target, and has left some capacity to be addressed in CPP2. The Draft CPP2 therefore includes additional allocations. The Housing Provision Topic Paper (May 2018) identifies that the CPP2 proposes to allocate a minimum of 3,611 dwellings, which includes a combined total of 1,100 dwellings on four strategic sites, 1,609 dwellings on housing and mixed use sites within the existing built-up area and 902 dwellings on 'urban fringe' sites. This represents c.27% of the total housing target over the Plan period.
- 3.4. BHCC suggests that the proposed allocations, in addition to various identified sites in CPP1 will result in the authority exceeding the housing target by circa 200 homes. Whilst this may be the case, the NPPF is clear that housing targets should be seen as a minimum rather than a maximum requirement and it is evident in this instance that the exceeded target remains substantially below actual OAN for housing. BHCC should therefore take every opportunity in CPP2 to deliver higher levels of much needed housing, where this is possible and where evidence is available to support such increases.
- 3.5. In this regard, BHCC needs to ensure that higher density development is supported in the city, including where appropriate, on allocated urban fringe sites. The allocation of such sites demonstrates that these sites can be developed without substantial harm being caused and where development is capable of being entirely commensurate with its setting. This is no more relevant than on our client's two urban fringe sites both of which are adjacent to existing large scale development and, as the site specific studies and surveys have established, can accommodate a much higher quantum of development than BHCC is suggesting. This is explored further below.



- 3.6. In light of the above, and observations in these representations, it is considered that the deliverable quantum from the three sites forming the subject of these representations should be increased, and for those other sites, particularly those in the urban fringe, BHCC should allow some flexibility for an increase in quantum of homes which will ultimately be determined when site specific studies are undertaken.
- 3.7. In order for CPP2 to be positively prepared and justified, BHCC needs to ensure that the absolute maximum development quantum is delivered, supporting the strategic aspirations in the adopted CPP1 and seeking to exceed, as appropriate, housing targets to help address the issue of affordability and lack of supply in the wider city area.

4. Representations on The Draft Plan

Policy H1: Housing Sites and Mixed Use sites

- 4.1. Policy H1 allocates 31 sites for housing, providing a total of 952 new homes. The policy wording states that planning permission will be granted for proposals that *“accord with the development plan and which provide minimum indicative amounts of development shown in the tables”*. The Portslade site is included in table 5 and policy H1 as an allocation and is proposed to deliver 45 new homes.
- 4.2. Our client supports the proposed allocation of the Portslade site in policy H1 subject to the deliverable quantum of development being increased to reflect the proposals now being prepared.
- 4.3. BHCC is aware of the proposals for the site, and its ability to deliver in the region of 120 new homes. The current proposed allocation falls considerably short of the actual quantum that can and should be delivered at this site. The proposals would deliver circa 120 homes in two buildings of staggered heights, ranging between 2 and 6 storeys. Given the character of the area, the details in the Joint Area Action Plan (JAAP) and the high housing need in the city area, BHCC should be looking to substantially increase the delivery of new homes from this urban brownfield site.
- 4.4. In this regard, the NPPF (2012 and Revision) place great emphasis on the need for previously developed land (PDL) / brownfield sites, to be put to the most efficient use, notably when they are located within existing built up areas and settlements. The NPPF Revision increases the importance of this particularly as part of the Plan making processes, identifying that LPAs should look to utilise such land first, before exploring the use of greenfield undeveloped land to meet development needs (see for example paragraphs 117,118 of the NPPF Revision).
- 4.5. Furthermore, the NPPF Revision advises on the need to increase density of urban brownfield sites as a means to maximise delivery of homes and ensure that each local planning authority is able to meet its own OAN. Whilst the importance of higher density development is greater in the NPPF Revision, it is evident that BHCC should be seeking to secure higher density development where it is appropriate in order to address housing needs. In fact, paragraph 3.49 of the draft CPP2 recognises this stating that *“the very significant constraints on the capacity of the city to physically accommodate the required amount of development...means that it is important to maximise the use of brownfield sites.”*
- 4.6. Given such constraints, the CPP1 housing target for housing delivery is much lower than the OAN. Whilst the lower target was accepted at examination of CPP1, BHCC is clearly able to increase the likely delivery of development from this vacant PDL site within the settlement boundary. As a result, if this site, and indeed other PDL sites were maximised, this would help BHCC exceed the minimum housing targets in CPP1, further helping to address housing needs and affordability. In accordance with National Planning Policy BHCC should therefore take every opportunity to do so in order to demonstrate that CPP1 is positively prepared, effective and justified.

- 4.7. **Recommendation:** Update the proposed quantum of development from “Belgrave Centre and ICES, Clarendon Place, Portslade” as shown in table 5 (page 167) to circa 120 homes.

Policy H2: Housing Sites – Urban Fringe

- 4.8. Policy H2 allocates urban fringe sites in table 7 for “some” housing development. it goes on to state that:

Planning permission will be granted for proposals that accord with the Development Plan and which address all of the site considerations and indicative development requirements set out in Table 7 together with all of the following criteria:

- a) Provision is made for 3+ bedroom family-sized dwellings in accordance with provisions set out Table 7*
 - b) Opportunities to secure additional and /or improved publically accessible open space provision are incorporated within the proposed scheme;*
 - c) Green infrastructure and local food growing opportunities are incorporated within the proposed scheme;*
 - d) Improved linkages and access to the South Downs National Park and surrounding areas are secured where feasible; and*
 - e) Appropriate regard is given to the need for local community facilities and renewable energy provision;*
- 4.9. There are a number of matters to address here in relation to the policy text and the proposed delivery from the Whitehawk and Coldean Sites.
- 4.10. In terms of the policy, provision of “some” development is not clear or precise. It does not show that BHCC is seeking to maximise the development potential of the sites that have been identified in the UFA as being suitable for development. This should be amended to remove the word “some” as this is currently considered to contradict the aims of national policy. Evidently, if there are restrictions on the opportunities at a site to deliver housing, this will become evident from site specific assessment and surveys.
- 4.11. In terms of the criteria listed, the ability of the sites to deliver a specific quantum of family homes will be entirely dependent upon site survey results and characteristics, which BHCC has not yet assessed. In this regard the UFA is a high level assessment only and does not explore fully the opportunities of any urban fringe site for development. As such, BHCC should seek to ensure that a range of housing sizes, types and tenures are delivered on the urban fringe sites to meet local needs. In some locations, it is possible that a higher demand may exist for smaller homes. The policy should therefore allow some flexibility.
- 4.12. In this regard, BHCC suggest that 35% of new homes on the Whitehawk and Coldean sites should be 3 or more bedroom properties. Given the site specific characteristics, topography and housing needs in these areas, 3 or more bedroom homes are not considered appropriate. This is especially relevant bearing in mind the focus which our client has on maximising the delivery of affordable housing units from these sites and the corresponding lack of requirement for 3+ bed flatted units in the local affordable market.

- 4.13. Furthermore, Draft policy DM1 states that proposals for development should include a range of dwelling types, sizes and tenures that reflect and respond to the city's needs, and that is subject to the character, location and context of the site. Providing a set requirement for housing types on these urban fringe sites does not allow this flexibility, and is considered to contradict the aims of policy DM1.
- 4.14. Notably, in both instances, blocks of flats are proposed to maximise development opportunity and utilise land in the most efficient way. Such development would also reflect the character of their immediate settings. Flats containing 3 or more bedrooms may not necessarily be required by the community, yet the current draft policy and associated table, does not provide the required flexibility to allow site specific considerations, or area specific considerations, to be taken into account in determining unit sizes.
- 4.15. All criterion above, and as listed in policy H2 do not allow for site specific evidence to inform proposals or for viability to be considered. As such, in order to ensure that the Plan is effective, and that housing can be delivered on these sites, flexibility must be incorporated into this policy. BHCC may otherwise risk under delivery from these identified urban fringe sites.
- 4.16. With regard to the two sites at Whitehawk and Coldean, both of which are proposed to be allocated in this policy, BHCC again suggests a quantum of development for each which is considerably below that which can be achieved. For Whitehawk, it is anticipated that up to 220 homes can be delivered. This will be in the form of flatted blocks, reflecting those immediately adjacent to the site. Table 7 supporting policy H2 suggests that only 150 homes can be delivered.
- 4.17. The Coldean site is suggested to have capacity for 100 homes. However, the UFA suggested that 130 homes could be achieved. There is a clear inconsistency here. Further, the proposals currently being explored suggest up to 250 homes can be delivered on site and this quantum has been determined as a result of site specific surveys and assessments being undertaken, which go above and beyond those undertaken to inform the UFA and Draft CPP2. Such evidence can be made available to BHCC if required at this stage and will be submitted with the impending planning applications.
- 4.18. The above identifies the severe need for housing and the associated demand and lack of affordability that has resulted. Recognition that these urban fringe sites can deliver a high quantity of new homes, over and above that suggested by the high level UFA, will demonstrate compliance of the Plan with national policy and ensure that the Plan is effective in meeting housing needs in the city area. Importantly it will be making best use of the land resources available.
- 4.19. In the event that BHCC does not change the table, it is recommended that the policy is amended to state the housing numbers suggested as a minimum requirement. Again, this will ensure that the most efficient use of suitable, available, and deliverable housing sites, identified by BHCC, is made by CPP2. BHCC would otherwise miss the opportunity to meet and exceed its housing targets and identified needs, contrary to Government Guidance and Policy.
- 4.20. Recommendations:**
- i. Remove “some” from the policy text.**

- ii. Include a sentence to allow site specific considerations and local housing needs evidence, to be taken into account in determining whether the stated criteria and requirements should be applied.
- iii. Update table 7 to correctly identify the opportunities at “*Land at and adjoining Brighton Race Course*” to deliver circa 220 homes, and “*Land to north east of Coldean Lane / Land north of Varley Halls / Land south of Varley Halls*” to deliver circa 250 homes.

Policy DM1: Housing Quality, Choice and Mix

- 4.21. BHCC require that all residential units meet the nationally described space standards, should as a minimum be accessible and adaptable in accordance with Building Regulation M4(2) and for proposals providing 10 or more dwellings, 10% of the affordable residential units and 5% of all the residential units should be suitable for occupation by a wheelchair user in accordance with Building Regulation M4(3). If this cannot be met a financial contribution may be required.
- 4.22. The Draft CPP2 does not appear to provide evidence to support the requirement for these building targets and whilst it does allow for flexibility if sufficient evidence is produced, the policy does not state the level or type of evidence expected to justify a deviation from the policy requirements. BHCC also needs to fully justify any proposed requirements of this nature, in a local context. This needs to be updated for the Plan to be justified and effective. Further comments on this will be provided as part of future representations on the CPP2 and on the basis of the evidence that BHCC produces.
- 4.23. Whilst the Draft CCP2 does include a number of other policies that would be applicable to these sites, should the Plan be adopted before planning applications are submitted, it is considered that the above changes are most relevant in seeking to deliver much need housing in the city area.

5. Observations on the Evidence Base

Urban Fringe Assessments 2014 and 2015 (UFA)

- 5.1. No comments are provided in respect of the two UFAs prepared by BHCC. This is due to the age of the documents, prepared to support the CPP1 rather than the policies and proposals in CPP2. It is however considered that the UFA should be updated to ensure that the most relevant, accurate and up to date information is utilised by BHCC to support the progression of the CPP2.

Strategic Housing Land Availability Assessment 2017 – February 2018 update (SHLAA)

- 5.2. The SHLAA update advises at paragraph 4.1 that sites, sufficient to deliver 13,670 homes up to 2030 have been identified. Up to 2032, this increases to 15,046 homes with a further 1,082 homes beyond the 15 year period. The report advises that it has taken into account information including inclusion of urban fringe sites having potential for development.
- 5.3. Within this report, BHCC identified the Belgrave Centre, Portslade as having SHLAA reference 6077 and Development Area (DA) reference DA8. It suggests that 45 homes can be delivered on the site and this has evidently been pulled through to the draft policy H1. The commentary states that the capacity of the site has increased from 25 to 45 homes as a result of the JAAP. However, as outlined above, the site has a much greater capacity (120 units) and this should therefore be reflected in the SHLAA.
- 5.4. Equally, the Urban Fringe Site at Coldean is referred to, and given reference 169 albeit as a “cluster of sites” with an anticipated delivery of 100 homes, and later delivery of 12 homes, also reiterated in draft policy H2 (actual capacity of Coldean is 250 units). The Urban Fringe Site at Whitehawk is given reference 712 and stated to have capacity to supply 150 homes (actual capacity of Whitehawk is circa 220 units)
- 5.5. Whilst this is only an update document, there is no assessment of the sites to show how BHCC has concluded the deliverability and capacity of these sites. It is appreciated that some high level work was prepared and presented as the Urban Fringe Assessment, but this did not explore all planning matters affecting the development opportunities at the sites in Whitehawk and Coldean. It is therefore reiterated that all three sites which are the subject of these representations are suitable, available, achievable and ultimately deliverable over the Plan period. Subject to planning permission being granted, it is considered that the sites could be delivered within a 0-10 year period, and a timetable for delivery can be provided to BHCC going forward.
- 5.6. **Recommendation: Update the SHLAA to review the opportunity to deliver a higher quantum of development at the three sites.**

Site Allocations Topic Paper June 2018

- 5.7. This report outlines BHCC's approach to housing delivery up to 2030. It includes extracts of the Sustainability Appraisal specifically applicable to all of the proposed allocations and housing policies H1 and H2 of the Draft CCP2. Appendix 3 contains site profiles for all sites assessed. The Portslade site is assessed at page 98. The following comments are made in relation to these assessments.

Portslade

- 5.8. Firstly, the quantum of development should be increased as per the above recommendations. This is particularly relevant given the status of the site as vacant previously developed land within the defined settlement, in addition to the accessibility of the area, which BHCC has noted in the "overall summary" (reference to "good access to" local services and public transport facilities). Furthermore, reference is made to the submitted JAAP and ability of the site to deliver a development of 6 storeys. Given the accessibility of this location and the Government's emphasis on optimising the use of PDL to deliver homes and other development needs, a 6 or more storey development on the site can accommodate much more than 45 homes.
- 5.9. Evidently the site has capacity to accommodate a considerably greater number of new homes than BHCC suggests. These are required to meet housing needs, and to assist in addressing the issue of affordability. Furthermore, redevelopment of the site will improve the overall appearance of the site which is suggested to be "run down" in BHCC's assessment. Irrespective of whether the site will be used for market or affordable homes, the site should be put to the most efficient use possible, in line with the NPPF and objective of optimising vacant PDL.

Coldean

- 5.10. The assessment of this site refers to the site constraints including landscape, heritage and biodiversity. As outlined above, extensive survey work of the site has been undertaken and this has identified that when such considerations are taken into account, a scheme of circa 300 homes can be delivered. This would include appropriate mitigation of ecology and landscape in particular. Such evidence needs to be taken into consideration.

Whitehawk

- 5.11. This assessment shows the site area in the same form as that detailed in the UFA. This area for potential development was determined based on the high level UFA. Further site investigations, surveys and assessments have determined that this is not the most suitable area of land within the Whitehawk Urban Fringe site area to accommodate development. Some of this land is subject to ecological and habitat constraints. In addition there are landscape and visual considerations that are ultimately informing the layout of the scheme and the amount of development that can be achieved.

- 5.12. As a result of these surveys, it has been determined that land to the south, slightly outside of BHCC's assessed area for potential development is much more appropriate for use than land to the north. This is because land to the south is further down the ridge and therefore lower. This would mean that its development would have less visual impact on the surrounding area, and allow a taller structure, taking up a potentially smaller footprint that would otherwise be required to accommodate the level of development proposed. As such, key views, that BHCC is keen to preserve, can be retained, and a larger area of land at the site can be utilised for provision of green space, and landscaping and biodiversity enhancements.
- 5.13. In light of this, it is recommended that the Plan showing the potential development area at Coldean, is amended to reflect that outlined in **Appendix A**. The red line shows the current potential development area, and the blue line is that now proposed. It is emphasised that this proposed change would result in a reduced site area compared to that identified by BHCC, yet overall a large amount of development can be achieved, the design of which will reflect the neighbouring blocks of flats. Evidence of this can be provided to BHCC to support the suggested change if this is required.
- 5.14. Notwithstanding this, the report also refers to the site as having "*high value as designated open space with public access and public footpaths...*" It is correct that footpaths do cross the site. However, the area of land is, in part, overgrown, and therefore offers no amenity or physical recreational value to the local community. This statement should be amended.
- 5.15. It is noted as part of the redevelopment of the site, there may be an opportunity to provide improvements to amenity and recreation for the local community on this site. This could include upgrades to existing footpath links through the site.

All sites

- 5.16. In all instances the site summaries states that "*The site is owned by BHCC and has been identified as a one of the priority sites within a Joint Venture Initiative (BHCC working with Hyde New Homes) to deliver 1,000 affordable homes across the city which shows willingness to develop the site.*" Whilst this does show "willingness" to develop the sites, it is not in any way reflected in the draft CPP2. It is also, more importantly, not the reason why any of the sites have been proposed for allocation by BHCC and therefore whether it is proposed to deliver market or affordable housing, BHCC should be seeking to maximise the housing delivery opportunity from these sites which have been assessed as suitable for development.
- 5.17. Overall, the assessments contained in this Topic Paper have clearly informed the draft policies. However, the UFA, which ultimately underpins the proposed urban fringe allocations was carried out on a high level basis, and does not include site specific assessments. These assessments have been carried out by our client and their appointed consultants. These have demonstrated that a higher capacity of development can be accommodated on the urban fringe sites without harm being caused. Furthermore given the sustainability and accessibility of the Portslade site, in addition to its status as vacant PDL, BHCC should be seeking to maximise delivery from the site in order to help address the shortfall against identified housing needs compared to the adopted target.



- 5.18. **Recommendation:** Reassess the sites within the Topic Paper and refer to the higher quantum of homes that can be delivered having regard to the site specific surveys and assessments undertaken by our client. This is required to ensure that the sites themselves can be delivered over the Plan period, and therefore to ensure that the CPP2 is effective and positively prepared.

Housing Provision Topic Paper 2018

- 5.19. This report advises that BHCC expect to deliver 13,440 homes by 2030, resulting in 230 more homes than required by the CPP1 target. Although BHCC state that this is a “conservative assessment of potential housing supply”, it is highlighted that if sites such as those referred to in these representations were optimised, the delivery against the CPP1 target would be considerably greater, going some way to address the shortfall against OAN which was ultimately accepted at examination.
- 5.20. In particular, table 3 of the topic paper advises that against policy CP1 provision of 5,190 homes in “the rest of the city” (note that this excludes the Portslade site which is in DA8, and includes the two Urban Fringe sites). Against this requirement, the “total potential supply” is only 4,916, a shortfall against CP1 of 274 homes. The two urban fringe sites at Whitehawk and Coldean could readily assist in making up this shortfall for the reasons outlined in this representation. Subsequently, if the draft CPP2 and associated evidence base are updated as proposed above, this too should be updated to provide a better reflection of the opportunities in the city area to meet and exceed housing requirements.

Sustainability Appraisal June 2018 (SA)

- 5.21. The SA provides an assessment of each of the three sites. the following table shows a summary of these assessments and commentary is provided below:

SA Objective / Site	Portslade	Coldean	Whitehawk
1. To protect, conserve and achieve a net gain in biodiversity.	++	-	-
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	-	--
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	-	-
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	--	--
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	-	-/+
6. To reduce air and noise pollution	--	--	--/+
7. To improve water quality(ecological, chemical and quantity status)	++	--	++
8. To reduce the risk from all sources of flooding to and from	-	+	+



development			
9. To reduce emissions of greenhouse gases that cause climate change	++	-	+?
10. To increase the city’s resilience and ability to adapt to climate change.	+	-	-
11. To improve soil quality	0	0	0
12. To minimise and sustainably manage waste	--	0	0
13. To make the best use of land available.	++	+	++
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	++	++
15. To improve the range, quality and accessibility to services and facilities.	++	+	+
16. To improve health and well-being, and reduce inequalities in health.	+	+	+
17. To improve community safety, and reduce crime and fear of crime	+	++	--
18. To increase equality and social inclusion	++	++	++
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	-	0	0
Overall Summary and Policy Considerations	Largely positive	Mixed	Mixed

Portslade

5.22. Broadly the conclusions of the SA are considered correct. Those given a negative score appear to relate to the site’s location and former business uses. Technical matters such as noise and flood risk can be addressed as the scheme for the site is progressed and appropriate mitigation included. This would ensure that the development is acceptable in planning terms. The status of the site as vacant PDL within a settlement boundary should however be fully recognised within the SA and scores increased accordingly to reflect the need for such land to be put to the most efficient use possible.

Coldean

5.23. In relation to objective 1, ecological surveys of the site have been undertaken. These have identified instances where net gains in biodiversity at the site can be provided including through mitigation and new areas of habitat. The development of the site will therefore provide the opportunity to improve biodiversity. As such it is considered that at the very least the site should be scored a “0” if not a “+” in relation to objective 1.

- 5.24. Objective 2 refers to the site as providing informal recreation. However, this is only considered to be provided through the footpaths that are within the site. The proposals for the site allow for the retention and improvement of footpath links, improving their value from a recreation and accessibility point of view. Again the score for this site should be reassessed as “+” at least. This equally applies to the ability to provide access to the South Downs National Park. BHCC advises that the landscape is affected by the *“urbanising influencing, such as the A27 and presence of existing housing across Coldean Lane”*. The site assessment should not be negative because of this existing transport infrastructure. Any development on the site would be seen against this existing backdrop and would not negatively affect the National Park to any greater degree than existing.
- 5.25. In respect of objective 4 archaeological assessments of the site are being undertaken. Simply because the site is within the ANA, does not mean that its development will have a negative effect. Until such time as the assessments are available, this should be reassessed as “0”. This also applies to transport, water quality and air quality. Furthermore, in respect of climate change (objective 10) the sites’ ability to secure greenfield run off rates for a development will be explored as the scheme is progressed. An extensive area of the site will also be retained as green space and this will further serve the function of objective 10.
- 5.26. In respect of objective 13, the score should be changed to “++” on the basis that a higher quantum of development can be achieved and therefore, the scheme will make the most efficient use of land available. It is highlighted that a higher density of development on this site would not deter any urban regeneration or higher density development elsewhere, particularly given BHCC’s considerable housing needs.

Whitehawk

- 5.27. In relation to objective 1, ecological surveys of the site have also been undertaken. These have identified instances where net gains in biodiversity at the site can be provided including through mitigation and new areas of habitat. In addition, areas of higher ecological value are not proposed to be developed. The development of the site will therefore provide the opportunity to improve and secure the long term management of land for biodiversity purposes. As such the site should be scored a “+” in relation to objective 1.
- 5.28. In respect of objective 2, the site provided very limited recreation value due to the overgrown nature of a large part of it. The footpaths through the site will be retained and improved as part of the redevelopment of the site. This will provide amenity enhancements and therefore the site should be scored a “0” at the very least in respect of objective 2.
- 5.29. A score of “- -” is stated for objective 3 due to the proximity of the Whitehawk Camp Ancient Monument. This is not however considered to impact upon the site or its ability to be developed. Furthermore a development of the site is not considered likely to have any negative impact on the ancient monument. A heritage assessment is being undertaken and pending the results of this, it is fair and reasonable for the score against objective 3 to be changed to “0” as there is currently no evidence of an impact resulting.
- 5.30. Similarly, the assessment in respect of transport and noise should be a score of “0” until such time as a full assessment of these matters has been undertaken.

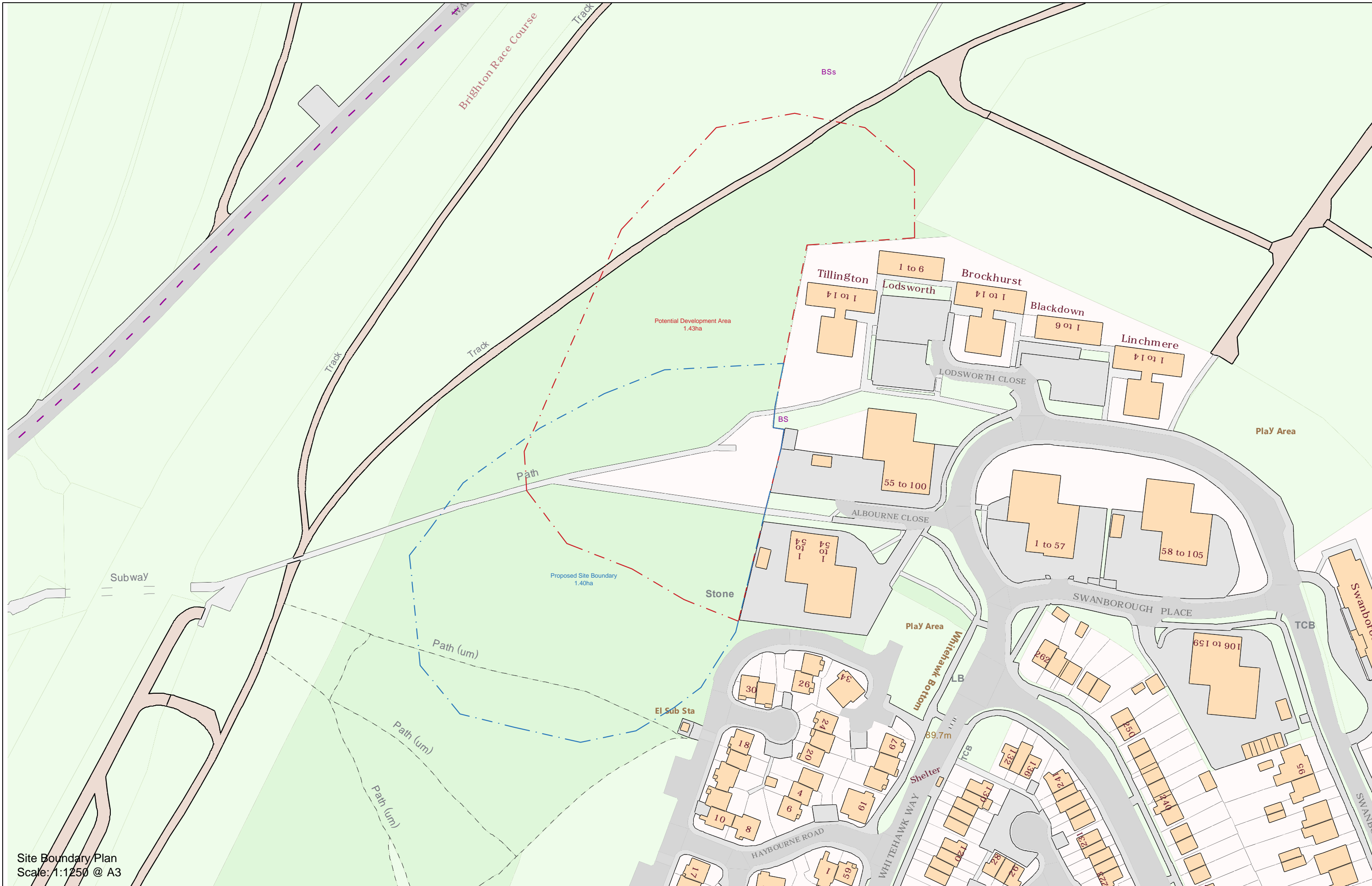
- 5.31. In respect of objective 17, the scheme for the site can be designed to ensure as far as possible, community safety and to design out crime. Whilst BHCC may consider that the area more generally warrants a “-” score against this objective, it is evident that a high quality scheme on the site does provide the opportunity to address this objective in a positive way. Therefore, the score should in fact be “++” or at least “+” to reflect this.
- 5.32. **Recommendations:** The SA for the three sites should be updated to show the positive impact that development will have against the SA objectives. The conclusions should also be “largely positive” to reflect this.

6. Conclusion

- 6.1. This representation is submitted on behalf of our client Homes for the City of Brighton and Hove Design and Build Company Ltd (“our client”) to The BHCC consultation on the Draft City Plan Part 2.
- 6.2. The draft CPP2 sets out BHCC’s preferred approach to delivery of development and should be read alongside the adopted CPP1.
- 6.3. This current consultation represents the second Regulation 18 consultation on CPP2. BHCC currently propose that a Regulation 19, submission version of the Plan will be published for consultation in autumn 2019, with submission in spring 2020, examination in summer 2020, and adoption in 2021.
- 6.4. Representations have been submitted on those policies directly applicable to three sites which our client is promoting, namely:
- Belgrave Centre and ICES, Clarendon Place, Portslade BN41 1DJ (Site SP2 in Shoreham Harbour Joint Area Action Plan (JAAP) Policy CA3) (Herein referred to as the “Portslade site”)
 - Land to north east of Coldean Lane / Land north of Varley Halls / Land south of Varley Halls (Herein referred to as the “Coldean site”)
 - Land at and adjoining Brighton Race Course (Herein referred to as the “Whitehawk site”)
- 6.5. In all cases, BHCC is proposing to allocate the sites for residential development. The proposed allocation of the sites, and recognition of their opportunity to deliver much needed housing in the city is supported. However, as outlined above, the proposed allocations significantly underestimate the likely delivery of new homes from these sites.
- 6.6. In terms of the urban fringe sites in Whitehawk and Coldean, BHCC’ allocations are based on Urban Fringe Assessments which are high level only. Detailed site specific surveys and assessments have been undertaken, and these have identified that the sites are capable of delivering a much higher quantum of development, and as a result, substantially contribute towards meeting housing needs over and above the adopted housing target in CPP1. Whilst the target in CPP1 takes into account the various constraints of the district, including the surrounding National Park, National Policy both in the 2012 NPPF and 2018 NPPF is clear that housing targets are a minimum and should be exceeded. Maximising development opportunity on these urban fringe sites and allowing flexibility for this within the policy (Draft H2) is essential to this being achieved.
- 6.7. In terms of the urban site at Portslade, this is also proposed for allocation in policy H1, but again the quantum proposed is considerably less than which can be achieved. Government policy provides a very clear indication that underused, vacant PDL should be a priority for meeting development needs, and this is none the more obvious than in a local authority area such as Brighton and Hove, where considerable constraints are otherwise preventing objectively assessed needs for housing and other development from being achieved. It is subsequently recommended that this policy is also updated.

- 6.8. In relation to housing needs, BHCC's own evidence document show that affordability is a significant issued, with the affordability ratio for a 1 bed flat being 8.76 times the average earnings. This increases to 16.81 for a 3 bed house and both are well above the 6.5 times mean average ratio across England. By maximising the opportunities at these three sites to deliver homes and meet housing needs, BHCC could go some way to addressing these evident affordability issues.
- 6.9. Where applicable, observations have been provided on the evidence base documents that support the proposed allocations. In all instances, it is clear that the assessments of the sites must be updated.
- 6.10. Further observation and recommendations will be provided to BHCC as part of future consultations on the emerging CPP2 in light of the promotion of these three sites.





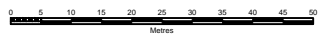
Site Boundary Plan
Scale: 1:1250 @ A3

Rev	Date	Drawn	Description
-	12.09.18	ACR	For Information

Notes:
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Legend	
[Red dashed line]	Potential Development Area 1.43ha
[Blue dashed line]	Proposed Site Boundary 1.40ha
[Blue dashed line]	Path (um)
[Grey area]	Stone
[Green area]	Play Area
[Orange area]	Residential Plots
[Grey area]	Subway
[Grey area]	El Sub Sta
[Grey area]	Shelter

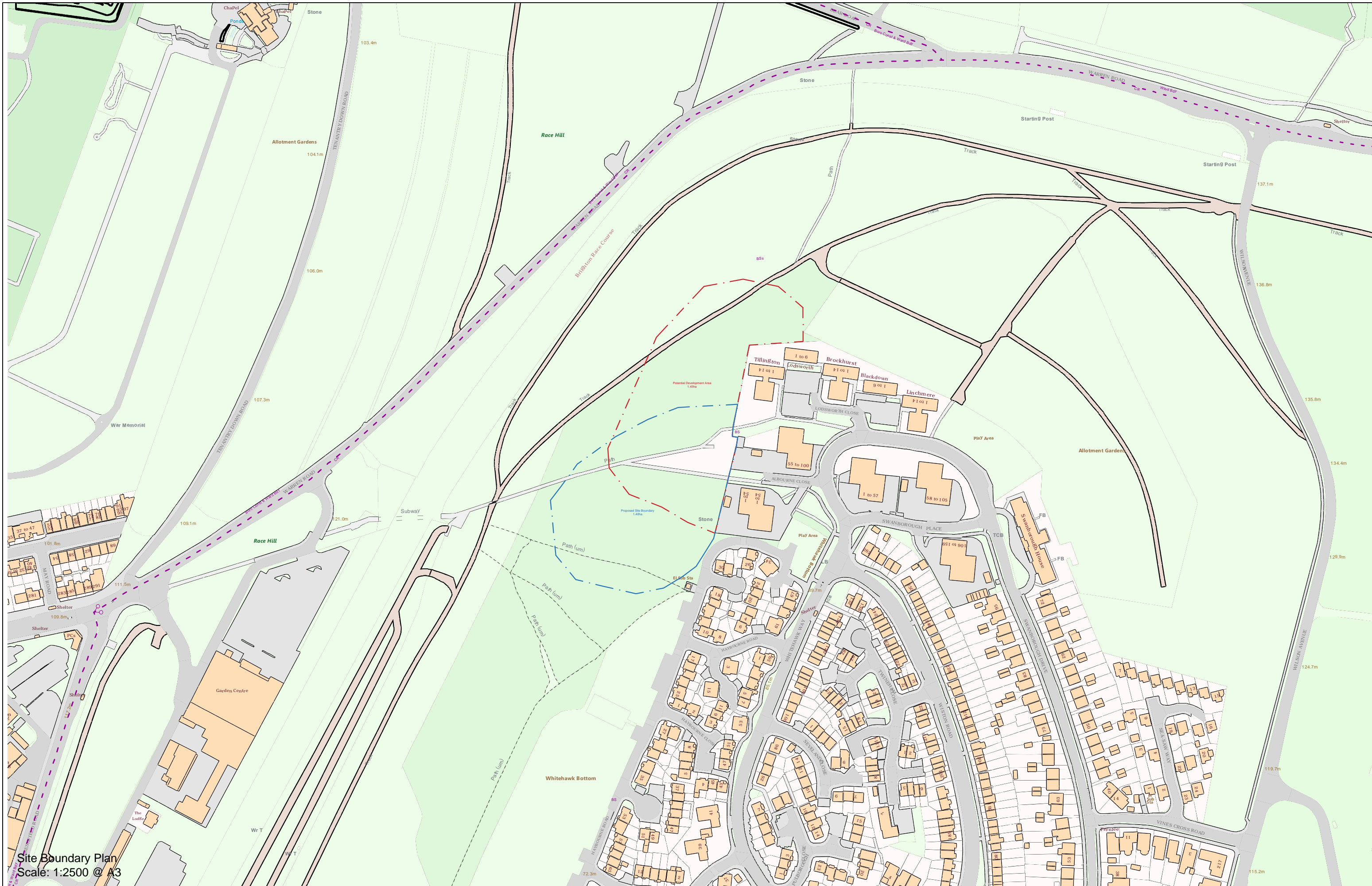


WORK IN PROGRESS

Client Hyde and Brighton & Hove City Council
Project HBH-BRI_Homes for Brighton

HTA Design LLP
www.hta.co.uk
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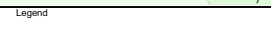


Site Boundary Plan
Scale: 1:2500 @ A3

Rev	Date	Drawn	Description
-	12.09.18	ACR	For Information

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WORK IN PROGRESS

Client Hyde and Brighton & Hove City Council
Project HBH-BRI_Homes for Brighton

HTA Design LLP
www.hta.co.uk
London | Edinburgh | Manchester | Bristol



From:
Sent: 12 September 2018 15:31
To: PlanningPolicy
Subject: City Plan Part Two Consultation

Dear Sir/Madam,

I wish to register my strong objection to the proposal that 46 - 54 Old London Road in Patcham be added to the council's list of sites for possible development.

The potential for flooding is of course of serious concern for Patcham residents, however I especially wish to draw the council's attention to the current over-population of cars and parking in this narrow village thoroughfare. Cars regularly park on the double yellows outside the nursery school, large Co-op lorries regularly block the road, buses get stuck and Old London Road is used as a short cut for those avoiding main road traffic at peak times. It is hard to see how the addition of thirty or so family homes, many of which will undoubtedly have more than one car would not have a devastating impact on the village. If a parking lot is also to be added then the space required to accommodate all makes this site an unreasonable option. If a parking lot is not to be added, where will the new residents leave their vehicles? Patcham Village has heritage and a unique charm which should be protected by our council. The proposed site is simply too small and Patcham Village already fit to burst.

Thank you

Regards,

From:
Sent: 12 September 2018 15:52
To: PlanningPolicy
Subject: City Plan Part Two Consultation.

From:

***City Plan Part Two Consultation.
Re-development of 46 to 54 Old London Road.***

We understand that in July of this year, Brighton and Hove Council commenced consultations on a draft development plan for Brighton, called the 'City Plan Part Two', within which it is intended that the council will build 13,200 homes over the next two decades.

We would like to place on record our vigorous resistance to the proposed development at 46 to 54 Old London Road, Patcham. As over 350 fellow local residents objected during 2017 to McCarthy and Stone's planning application to build a block of retirement flats on this site, an application which was subsequently rejected by both Brighton and Hove Council and the Planning Inspector, we fail to understand how such a Council development can now take place.

This site has been determined by the Council as an area large enough on which to build 30 homes, and more if detailed site inspection allows. The site currently accommodates only five family homes and consequently a proposal of this scale and density of housing will spoil the village look and feel, and significantly damage in appearance and quality Patcham as a village. We fail to see that for whatever reasons the Planning Inspector rejected last year's application on this site, do not also apply for the erection of 30 Council homes.

I would also like to add the already well-known facts that such a development will intensify already existent parking problems in the area, increase congestion on what is already a bottlenecked road system, will exacerbate local flooding problems, reduce the privacy of neighbours and introduce an entirely out of character construction, without any regard to the sensitivity of surroundings, trees and visual appearance etc.

We would therefore ask that the planning department reconsiders its proposals for this development.

Yours faithfully

.

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 223
Response Date 12/09/18 15:47
Status Processed
Submission Type Web
Version 0.2

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

Organisation Name

Organisation Name (if not applicable please put n/a) Brighton and Hove Community Land Trust

Name

Name

Address

Address

Email Address

Email Address

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

- . Housing, Accommodation and Community
- . Site Allocation - Special Areas policies
- . Site Allocations - Strategic Site Allocations
- . Site Allocations - Housing Sites
- . Make general comments

DM1 - Housing Quality, Choice and Mix

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

DM1 Support Wording Changes

c) If you support this policy but have some suggested wording changes please outline these clearly below
DM1 – Housing Quality, Choice and Mix

*“b) make provision for a range and mix of housing /accommodation formats subject to the character, location and context of the site, for example, **self and custom build housing**, build for rent, **community led housing**, starter homes and other types of provision supported by national and local policy.”*

COMMENT - This is positive for Community Led Housing, although the wording ‘make provision’ is perhaps a little weak. Perhaps it should read “must include...”

“c) all residential units should meet the nationally described space standards”

COMMENT - The introduction of space standards for residential accommodation is positive and makes designing units easier and clearer. However, these space standards do not allow for the innovative ‘tiny home’ type of housing. It is a response to mass low quality developer type housing and therefore maybe too prescriptive.

2.9 National planning policy makes clear planning authorities should plan positively to meet a full range of housing needs. Self or custom build housing is housing built or commissioned by individuals (or groups of individuals) for their own occupation.

The council is required to keep a register of individuals and groups of individuals who are seeking to acquire serviced plots of land in their area in order to build homes for those individuals to occupy. This provides information regarding the demand for custom/ self-build plots in Brighton & Hove.

The council is keen to support and encourage individuals and communities who want to build their own homes.

Note - The Community Infrastructure Levy Regulations include a definition of “self-build housing” as a dwelling built by (or commissioned by) someone to be occupied by them as their sole or main residence for at least three years.

2.10 The ability to make provision for serviced plots of land specifically for custom/self-build housing in the city is constrained by a number of factors. A key factor is the nature of development sites in the city and the constrained land supply generally. A large proportion of sites in the city are small scale and are brownfield sites required for flatted development in order to make effective use the land. Sites within the city’s urban fringe may provide an opportunity for custom and self-build and this is encouraged. Proposals involving sites within the urban fringe will be encouraged to make provision for this type of housing.

COMMENT - The Council seems to be acknowledging the requirement for self build plots but also resisting it except in the Urban Fringes (where as we know the Council own a large proportion of the land themselves.) This is disappointing.

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?

DM6 Build To Rent Housing

1 *e) the affordable homes to be secured in perpetuity - the council will seek inclusion within the S106 agreement of a ‘clawback’ arrangement in the event of affordable units being sold or taken out of the build to rent sector.*

COMMENT - This policy could be an opportunity for Brighton and Hove CLT to work with developers or the Council to help secure the homes being affordable in perpetuity..? CLTs have experience to offer in this type of housing.

DM7 - Homes in Multiple Occupation

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

DM7 Object Reasons

d) Please explain why you object to this policy?

1 Policy DM7 - Residential Accommodation (C3) and HMOs: these policies have the effect of supporting changes of use from C4 to C3 but preventing changes of use from C3 to C4. This will have the effect, over

time, of reducing the range of housing available to residents and would disproportionately affect specific groups of residents. No justification or evidence has been provided for this and could result in a shortage of housing for sharers (in particular non-student sharers) and worsening affordability.

As the Council's current policy approach (Under CP21 of the City Plan – Part One) is to refuse applications in areas with over 10% concentration of HMOs this planning policy approach will restrict the provision of newer HMO units within the city. Combined with a chronic under supply of housing (and a housing requirement significantly below the identified need for the city), we believe this policy approach will significantly constrain the provision of new shared housing across the city and could force young professionals out of the city.

DM37 - Green Infrastructure & Nature Conservation

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

DM37 Object Reasons

d) Please explain why you object to this policy?

The policy focuses primarily on designated species and habitats outside the city. It isn't strong enough on the Green Network within the city and habitats identified by the Council as being part of the green linkages. For example, p108, p109, p110 footnote 59. We would also like the Council to honour recommendations made by Natural England in the Nature Nearby report when considering planning applications.

DM37 Object Wording Changes

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

p108 - add the Green Network to the bulleted protected areas. p109 - add to the list of designated and identified sites. By virtue of having been identified in 2009 p110 2.269 - reference to the Green Network footnote 59. It refers, not to the Green Network in the city, but to the NIA. We suggest reference is made to the Council document 'A Green Network for Brighton and Hove 2009'. We would like to see the linkages identified protected from development. Why identify them otherwise. p111 - mention Natural England in the Nature Nearby report as part of the justification. p113 - mention the Green Network

DM38 - Local Green Spaces

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

DM38 Object Reasons

d) Please explain why you object to this policy?

It focuses mainly on the designated spaces and could do with more emphasis on the wider Green Network within the city.

DM38 Object Wording Changes

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

We would like to see a map of the Green Network included in the appendices and the Green Network referred to in 2.2283 and a 'Green Network for Brighton and Hove' referenced.

SSA1 - Brighton General Hospital Site

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

SSA1 Support Wording Changes

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

SSA1 Brighton General Hospital Site

The policy wording relating to the BGH site does not include the Council's request for the land at BGH to be developed for "truly affordable housing, including options for development by the Joint Venture, **B&H Community Land Trust**, directly by the Council, or a combination." which was passed unanimously at the Council's Committee meeting on 19th July 2018.

COMMENT - This policy needs to be updated with this requirement.

SSA4 - Sackville Trading Estate & Coal Yard, Hove

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

SSA4 Support Reasons

b) Please explain why you support this policy?

SSA4 Sackville Trading Estate and Coal Yard

COMMENT - Recognition that the development must meet the requirements of a future Hove Station Neighbourhood Plan is positive.

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...

H1 Housing Sites and Mixed Use Sites

Sites that have been identified in the SHLAA (Strategic Housing Land Availability Assessment) and Brownfield Register which will bring forward 10 or more residential units are allocated in this policy.

COMMENT – This is a useful distillation of sites that are already in the SHLAA and Brownfield Register. However, there doesn't seem to be anything new here and a number of these sites are either not available (yet) or are owned by the Council and will probably be developed by them or are already being developed.

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?

H2 – Housing Sites – Urban Fringe

Some of the previous sites identified in the 2015 UF study have been removed.

COMMENT - The density identified in the UF sites is well below that of the rest of the document and is contradictory to policy DM19 above and the new NPPF. The suggested densities should be increased to match the surrounding grain of development in the areas where the sites are situated. The low densities mentioned in the policy are not reasoned and do not recognise the desperate lack of affordable housing in these areas. By persisting with low densities on these sites, they will attract the volume house builders who will build large 4/5 bed 'executive homes' which will be unattainable for most of the residents of the city.

Para 3.55 - The site allocations on the urban fringe are suitable locations to deliver a significant amount of family-sized housing and affordable housing. Proposals should accommodate at least 50% family sized housing

(unless otherwise indicated in the table above) and the provision of self-build and custom build serviced plots is encouraged (see Policy DM1 Housing Quality, Choice and Mix). They also offer opportunities for community-led housing development.

COMMENT – The wording could be stronger here – ie “Community-led Housing will be encouraged on these sites”

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.

In general we feel that the timing of the draft and consultation thereon is unfortunate for two reasons; one that this is happening during the summer holiday period so may reduce the meaningful response from stakeholders and secondly that the draft is out of date since the new NPPF has now been published. I feel that the consultation should have been delayed until Sept / October when the re-draft taking into account the NPPF update has taken place.

Vision -Regretfully this document appears to be a missed opportunity to positively and creatively shape the future of the city; and, albeit in a simpler format, seems to be a re-write of many of the former policies from the 2005 Local Plan without seriously grappling with the major challenges and issues the city faces over coming years to 2030 and beyond.

Brighton and Hove is a truly unique City for reasons well known to us all. It also has an objectively assessed need of 30 000 dwellings by 2030 and the horizontal expansion to accommodate it constrained on all sides. However, the challenges and pressures on land experienced here are shared by most Cities, but the sort of creativity and boldness in tackling these challenges evident in London and other great cities in the UK, Europe and elsewhere, in particular the willingness to accept greater density and greater contrasts in mass, scale and use between existing and proposed, old and new, small and large, is not encouraged in CPP2.

Fundamentally if the housing crisis in the city is to be meaningfully addressed, and the city is to be able to evolve, change and grow into the great city it has the potential to be, greater densities and contrasts which are accepted elsewhere, will need to be accepted here too. As an example, the recently published NPPF specifically mentions upward extensions as a way of providing much needed housing, see paragraph 118e of the NPPF.

This opportunity and other innovative solutions should be encouraged and included in the City Plan Part 2 for Brighton and Hove.

General - On a more prosaic note, we welcome how the document is easy to navigate and how it is divided in simple topics. We also welcome the shortening, from the previous plan, of many of the policies but we question the need for such long “reasoned justification” which seems to make the document, overall, seem unnecessarily repetitive and lengthy. Text that does not provide useful detail to the actual policy requirements should be removed in the interest of delivering the stated aim to “ensure there is a more streamlined and straightforward set of development management policies”.

We seek clarification on the status of “reasoned justification” and question whether it should reflect City Plan Part 1 with “supporting text”. Also, there appears to be aspects of Policy appearing under “reasoned justification” e.g. Under Special Area SA7, the numbers of dwellings are in paragraph 3.5 of the justification.

Despite the title “reasoned justification” label, many of the policies are not supported by evidence and we believe the Plan will not meet not the tests of soundness in some instances.



DP218

For Official Use:

Respondent Number:

Date Received: / / /2018

Entered onto Portal: Yes/No

Draft City Plan Part Two
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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) DM12

Policy Name (e.g. Housing Quality, Choice and Mix) Primary, Secondary and Local Shopping Frontages

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?

Please see enclosed representations.

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

Please see enclosed representations.

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)

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Policy Number

Policy Name

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

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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)

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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)

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

Site Allocations - Employment Site

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a) Do you Support or Object to the policy?

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

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- [Appendix 1: Glossary of terms](#)
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- [Appendix 3 - Local Wildlife Sites \(Policy DM37 Green Infrastructure and Nature Conservation](#)
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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*:	12 th September 2018

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

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

Policy Number (e.g. DM1) DM14

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

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?**

Please see enclosed representations.

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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

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Site Allocations - Housing Sites

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H1 - Housing Sites & Mixed Use Sites

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H2 – Urban Fringe Housing Sites

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

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

Policy Number (e.g. DM1) DM17

Policy Name (e.g. Housing Quality, Choice and Mix) Opportunity Areas for new Hotels and Safeguarding Conference Facilities

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

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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

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)
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b) Please explain why you support this policy?

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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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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?

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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

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Draft City Plan Part Two
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Word Response Form

For Official Use:

Respondent Number:

Date Received: / / /2018

Entered onto Portal: Yes/No

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Yes

No

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Organisation Name (If applicable)	JTC Fund Solutions (Jersey) Limited ("JTC")
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) DM28

Policy Name (e.g. Housing Quality, Choice and Mix) Locally Listed Heritage Assets

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?

Please see enclosed representations.

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

Please see enclosed representations.

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?

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Policy Number

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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

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)
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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

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

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H3 - Purpose Built Student Accommodation Sites

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

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AO2 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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Part A: Contact Details

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Yes

No

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Name	
Address	
Email Address	
Agent Name (If applicable)	
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Part B: Your Representation relating to Development Management Policies

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

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

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

Policy Number (e.g. DM1) DM29

Policy Name (e.g. Housing Quality, Choice and Mix) The Setting of Heritage Assets

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?**

Please see enclosed representations.

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

Please see enclosed representations.

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

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H2 – Urban Fringe Housing Sites

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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) DM37

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

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?**

Please see enclosed representations.

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

Please see enclosed representations.

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)

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Site Allocations – Strategic Site Allocations

(Ctrl & click to view): [Strategic site allocations: \(policies SSA1-SSA7\)](#)

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- SSA3, Land at Lyon Close, Hove
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- 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

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

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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

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?**

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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)
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Site Allocations - Employment Site

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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](#)
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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*:	12 th 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

**For Official Use:**

Respondent Number:

Date Received: / / /2018

Entered onto Portal: Yes/No

Draft City Plan Part Two
Consultation Period: 5th July 2018 until
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Accessibility Notice: (Ctrl & click to view): <https://www.brighton-hove.gov.uk/content/about-website/help-using-council-website/accessibility>

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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)	JTC Fund Solutions (Jersey) Limited ("JTC")
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 \(policies DM1-DM10\)](#)

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

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

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

Policy Number (e.g. DM1) DM39

Policy Name (e.g. Housing Quality, Choice and Mix) Development on the Seafront

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?**

Please see enclosed representations.

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

Please see enclosed representations.

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

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Site Allocations - Housing Sites

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H1 - Housing Sites & Mixed Use Sites

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H2 – Urban Fringe Housing Sites

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

Any other comments

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

Organisation Name (If applicable)	The RSPB
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)

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Environment & Energy Chapter (policies DM37-DM46)

Policy Number (e.g. DM1) DM37

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

a) Do you Support or Object to the policy?

Support

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

Object

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

b) Please explain why you support this policy?

In response to the City Plan 2, the RSPB have several comments to make with specific relevance to the conservation of swifts within the City Plan area.

The RSPB would like to support City Plan 2 and welcomes its recognition of “...*species that are vulnerable but are not currently protected by law and have specialised habitat requirements*” (policy point number 2.270). This particular policy point captures current and future challenges conservation of species like Swift (*Apus apus*) in Brighton and Hove have been and will be faced with without local government support. Since 1995, the UK Swift population has declined by 51 per cent and as a result is now on the on the Amber-list of Birds of Conservation Concern and have since been placed on the RSPBs priority species list. Swifts are almost exclusively associated with buildings in the UK. Swifts tend to nest inside the roof space of older houses, searching out gaps in brickwork or soffit boards to gain access.

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

The RSPB would like to bring local authority attention to another policy point, number 2.272 which states: “...regards will be given to the achievements of local BAP Targets” and reading further on “...that enhancement opportunities should focus on Brighton & Hove’s local BAP habitats (e.g chalk grassland) and species (e.g. swifts, peregrines, starlings, white-letter hairstreaks, hornet robberfly etc.)”.

This policy point of City Plan 2, although it acknowledges Swift as one of the species to be considered for enhancement opportunities, does not stress enough the urgent need for action to conserve this species and therefore may miss the opportunity to include those enhancements in upcoming developments.

Rationale behind our concerns and short explanation:

To support our view point on this matter, the Brighton and Hove local Biodiversity Action Plan (BAP), also clearly address the problems this iconic bird has been experiencing in finding the nest sites. This plan, since its adoption on 6th of February 2012 states: “...the main cause of the decline in Swift populations in the UK appears to be a reduced availability of nest sites. Many older buildings have been refurbished and no longer offer access into the roof space. Most new buildings do not provide opportunities for Swifts to nest”.

Swifts were once a common breeding bird in Brighton and Hove but anecdotally have suffered a noticeable decline. Without a specific policy that addresses enhancement for species like swift, current nesting sites of swift in Brighton and Hove will at some point become irreplaceable, especially, if there is no provision of nesting sites in every new planned development. The reason the RSPB is using the word irreplaceable is due to the fact that once the development is completed there is no way of incorporating the nests into the structure of the building, the opportunity to have permanent solution is simply lost.

Furthermore, swifts are being very loyal to their nests, which means they come back to the exact same nest during their entire life. When residential dwellings are being sold and new homeowners carry out necessary improvements, throughout the year, these nests are not only left unprotected by law but could be potentially lost at any time. The

RSPB and its volunteers have been carrying swift survey in Brighton and Hove for the past three years and have identified 76 nests in the past two years. Some of the nests found in 2016 were unfortunately not confirmed in 2017 and we are yet to discover this year's results. Creating new nesting spaces that would last the life of the buildings would mean swifts would be safe to nest in our City for a very long time to come. This would also align with this governments vision of "**Green Future: Our 25 Year Plan to improve the Environment**" that states it is our ambition to leave our environment in a better state than we found it".

The RSPB suggests some change in wording to policy point 2.272:

"Consideration should also be given to the protection of native species, and provision of roosting/nesting boxes for bat/birds (including swifts, house martins and swallows), gaps/holes at ground level in boundaries for hedgehogs, biodiverse roofs and walls, and, appropriate innovative and creative measures".

Instead:

Strong consideration should also be given to the protection of native species, and provision of roosting/nesting boxes for bat/birds (including swifts, house martins and swallows), gaps/holes at ground level in boundaries for hedgehogs, biodiverse roofs and walls, and, appropriate innovative and creative measures should be implemented in all major developments.

All new builds, refurbishments, and renovations to benefit swifts. The installation of swift boxes should become a standard procedure in urban development.

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
Object

If you support this policy, please go to questions (b) and (c)
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Site Allocations – Strategic Site Allocations

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

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- 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 BRIGHTON GENERAL HOSPITAL SITE

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?

Under Strategic Site Allocation, City Plan 2 informs about redevelopment of Brighton General Hospital site and the RSPB understands necessity for it. However, this site holds around 15 nests and is considered to be the oldest breeding colony in Brighton and Hove. The RSPB would like to stress the importance of replacing these nesting sites as a planning condition that would be implemented in City Plan 2 as one of the site specific requirement.

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

We suggest an additional point (f) that states:
f) The developer will replace existing swift nests and protect the existing nests by carrying its initial demolition activities outside of Swift breeding session, that is May to August.

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)
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H2 – Urban Fringe Housing Sites

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H3 - Purpose Built Student Accommodation Sites

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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?

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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.

In reference to our previous comments made by Chloe Rose, Conservation Officer back in 15th September 2016, the RSPB strongly believes a specific policy should be included in City Plan 2 that would include:

- *The installation of swift boxes as a standard procedure in urban development.*
- *All new builds, refurbishments, and renovations to benefit swifts.*

An update of Supplementary Planning Document, specifically-SPD 11 (Nature Conservation and Developments) and the SPD 11 Annexes are urgently needed.

The current version of SPD11 and the SPD 11 Annexes does not inform the applicants and developers well enough about the swift brick and the rationale behind including it.

The RSPB is committed to providing advice to developers with regards to swift conservation, for example, guidance when installing nest boxes for new and restored buildings and consideration during the demolition of buildings of the needs of swifts.

This policy, if implemented, will help to deliver a net gain in biodiversity as is consistent with the guidance in the NPPF:

Paragraph 117 - Protecting and recovery of priority species populations, linked to local and national targets.

Paragraph 118 - Opportunities to incorporate biodiversity in and around developments should be encouraged.

Thank you for taking our comments into consideration.

Yours sincerely,

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*:	12 th 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

From:
Sent: 12 September 2018 17:23
To: PlanningPolicy
Subject: Fwd: comments for city plan

Hi there

It has been suggested to me that I send these comments in as part of the City Plan consultation part 2. I am currently away and have been unsuccessful in downloading the form, so hope you are able to accept this format.

Many thanks

----- Forwarded message -----

From:
Date: Thu, 26 Jul 2018, 14:16
Subject:
To: <planning.applications@brighton-hove.gov.uk>

Hi there

I have long meant to email you as I grow in concern at the number of houses being demolished in Brighton & Hove and replaced with expensive, new property. My issue with this is two-fold....

- 1) Beautiful homes (generally I am estimating c1930s) are being demolished. Without wishing to state the obvious, once this architecture is gone, it is gone forever (I am in Patcham, so the houses at the end of Carden Avenue to make way for Maycroft Manor, but likewise properties on the Drive, Dyke Road, Withdean Road).
- 2) The inflated prices that are then being fetched by the new properties built on the sites. Property which is definitely out of reach for most people and can do nothing but make the housing issues in Brighton & Hove worse as a result.

An illustration of my concern is shown in the link below. You will see that plans already appear to have been agreed to demolish a further bungalow on Carden Avenue and build a property the same as two already built in that row. It also shows one of those already built - I am stunned that a house on Carden Avenue has been able to reach a selling price of £925,000?!

<https://www.spencerandleigh.co.uk/properties/sales/page-13#grid>

Finally, my impetus for emailing you comes from seeing that three beautiful cottages, on the link below, on Vale Avenue have been sold for development. This is an appalling thought! The description on the agent's website itself states that they date back to the early 1900s. It seems counterintuitive to me to highlight such things and then proceed to explain how they can be pulled down to make way for development. Further, I sincerely hope that part of this development does not then include a move towards building on the allotments (something that had been mooted many years ago).

<https://www.spencerandleigh.co.uk/properties/sales/page-14#grid>

I know of people who have had to or are considering moving away because they know they will never be able to afford to buy even a small flat here. The link below is an example of a property a friend of mine recently looked at, on the market for £180,000 - the 'bedroom area' is apparently some slats between two pieces of

plasterboard. The overall dimensions are smaller than a hotel room I have recently booked! He was also contacted a while ago about the new development opposite St Peters Church. Unfortunately at £300,000 for the studio flat, even on a pretty decent joint income, it was out of reach. As he said, £300,000 doesn't even buy you a bedroom anymore!

https://www.zoopla.co.uk/for-sale/details/47975632?search_identifier=a4f7bb1a16ed8e43c8007f95d4b94186#6t2wfdITJwvKLH4.97

Whilst writing, I would also add my concern about the loss of community within Brighton & Hove as the houses of multiple occupancy appear to continue to spread - I understand from a friend of mine that this is now showing in Poets Corner - even at that distance from the universities landlords know they can fill houses with students rather than families. The fact that I understand that one of either Coldean, Moulsecoomb or Bevendean primary schools will close at some point is such a sad situation to have reached. I do understand that this is something you have been seeking to address, but unfortunately my friend saying about the house on her street in Hove concerns me that the issue is moving rather than changing.

I fully appreciate this is a far from easy situation to resolve and is a national as well as local issue. However I feel that Brighton & Hove is disproportionately affected. So I wanted to register my concerns in the hope that it might be possible for something to be done to stop these developments that further put homes out of reach of all but a very small number of people (in fact, I am at loss to understand who can buy them, certainly not people that work in the area because the wages are not reflective of the level of income needed) - not to mention rob us of some beautiful architecture.

Thank you for your time.

Yours sincerely

12 September 2018

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

Dear Sir / Madam

Subject: SDNPA response to Brighton & Hove Draft City Plan Part Two consultation (Regulation 18)

Thank you for consulting the South Downs National Park Authority (SDNPA) on your emerging Local Plan. We have a number of comments we would like to make that follow on from the response sent on the City Plan Part 2: Scoping Document 2016.

The SDNPA and all relevant authorities are required to have regard to the purposes of the South Downs National Park (SDNP) as set out in Section 62 of the Environment Act 1995. The purposes are 'to conserve and enhance the natural beauty, wildlife and cultural heritage of the area' and 'to promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.'

Duty to Cooperate

As set out in our previous response, the SDNPA has a set of six strategic cross-boundary priorities. I would like to take the opportunity to again highlight these which provide a framework for ongoing Duty to Cooperate discussions:

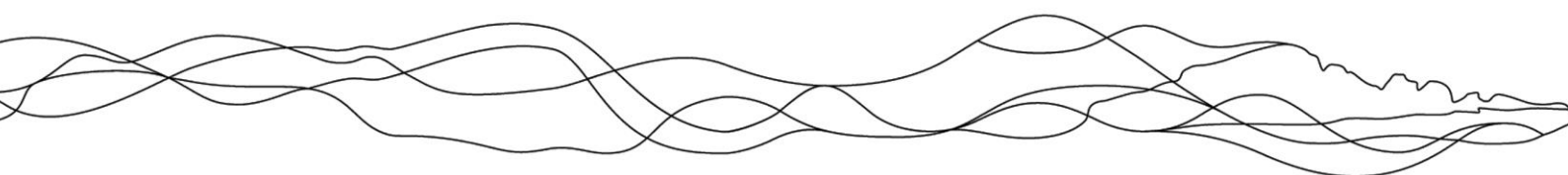
- Conserving and enhancing the natural beauty of the area.
- Conserving and enhancing the region's biodiversity (including green infrastructure issues).
- The delivery of new homes, including affordable homes and pitches for Gypsies, Travellers and Travelling Showpeople.
- The promotion of sustainable tourism.
- Development of the local economy.
- Improving the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel.

We have the following comments on **Section 2: Development Management Policies:**

Policy DMI9 Maximising Development Potential

It would be helpful to include a cross-reference in the supporting text to City Plan Part 1 Policy SA5 – The Setting of the South Downs National Park.

Policy DM25 Communications Infrastructure



The reference to there being no adverse/unacceptable effect on the setting of the SDNP (criterion c) is welcomed.

Policy DM34 Transport Interchanges

It would be helpful to include a criterion in the policy equivalent to criterion c in Policy DM25 i.e. to be clear in the policy that there should be no adverse/unacceptable effect on the setting of the SDNP. This could include impacts on the Dark Night Skies reserve as well as the setting of the downland landscape.

We have the following comments on **Section 3: Special Area Policy, Strategic Site Allocations, Housing and Mixed Use Sites and other Site Allocations:**

Policy SSA7 Land Adjacent to American Express Community Stadium, Village Way

Welcome the wording in b) and c) regarding respecting and enhancing downland character and preserving and enhancing the setting of the SDNP respectively. Strongly support the justification of the policy in para 3.45 referencing key views and the requirement to conserve and enhance the setting of the SDNP.

Suggest making the reference to Policy DM40 a separate paragraph as this is a different issue to the landscape setting of the SDNP.

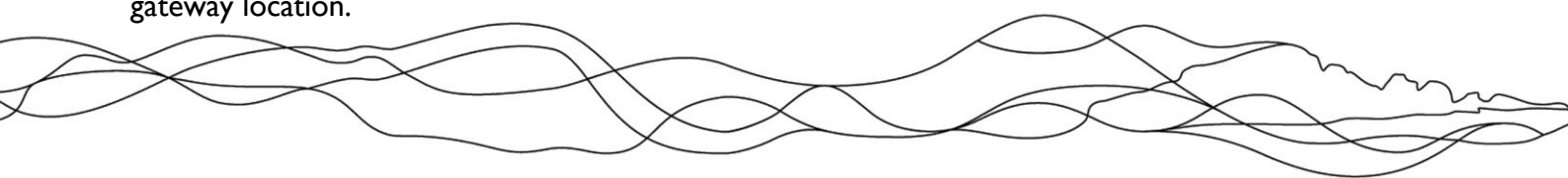
The justification talks about the Stadium being a gateway to the City from the East. The gateway nature of the site is also into the SDNP from the City. Suggest adding to the policy the need to provide visual connectivity to the SDNP, and therefore consideration of the setting in proximity to the SDNP, in terms of the design of any proposed development. In the justification suggest adding wording referencing the proposal site as a gateway to the SDNP when exiting the City along a key transport route. Also suggest adding the need to use materials and design reflecting the setting of the SDNP and referencing the South Downs Integrated Landscape Character Assessment (SDILCA), specifically the Landscape Management and Development Considerations described in Appendix A, Landscape Type A: Open Downland and A2: Adur to Ouse Open Downs area
<http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-A-Open-Downland.pdf>

Policy SA7 Special Area Benfield Valley

Welcome wording in policy bullet points 1 and 3 regarding connectivity through the site from urban area to SDNP and creation of gateway facilities respectively.

Strongly support the requirement in the policy justification for detailed proposals to provide Landscape and Visual Character Assessment. Suggest adding the need to use materials and design reflecting the setting of the SDNP and referencing the SDILCA specifically the Landscape Management and Development Considerations in Appendix A, Landscape Type A: Open Downland and A2: Adur to Ouse Open Downs area
<http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-A-Open-Downland.pdf>

Support the wording regarding pedestrian and cycling links, the need to deliver an effective and visually attractive gateway to the SDNP and the creation of a visitor centre as part of the gateway location.



Policy H2 Housing Sites – Urban Fringe

Support wording in d) improving linkages and access to the SDNP. Note that Policy SA5 in Local Plan Part I is referenced in the justification. However, suggest adding to the policy wording a cross-reference to Policy SA5, and the setting of each site in relation to the SDNP. It is important to strongly reiterate the policy context for any development on these sites as they will have an impact on the setting of the SDNP.

Suggest adding to the policy the need to provide visual connectivity to the SDNP, and therefore consideration of the setting in proximity to the SDNP, in terms of the design of any proposed development.

In the justification suggest adding the need to use materials and design reflecting the setting of the SDNP and referencing the South Downs Integrated Landscape Character Assessment (SDILCA), specifically the Landscape Management and Development Considerations described in Appendix A, Landscape Type A: Open Downland and A2: Adur to Ouse Open Downs area <http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-A-Open-Downland.pdf>

This is to help ensure the setting of the SDNP is respected, brought into the design and result in a development that visually reflects the setting and natural beauty of the SDNP.

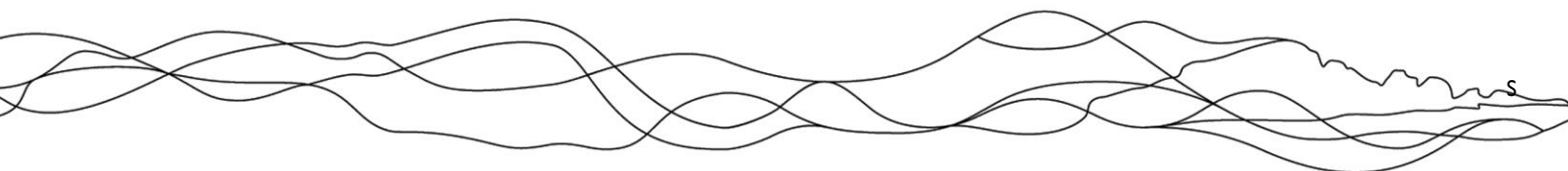
In the justification, para 3.58, there is reference to developers may include Landscape Visual Impact Assessment in submitting detailed assessment at application stage. Suggest adding the wording making it a requirement rather than an option because of the proximity to the SDNP.

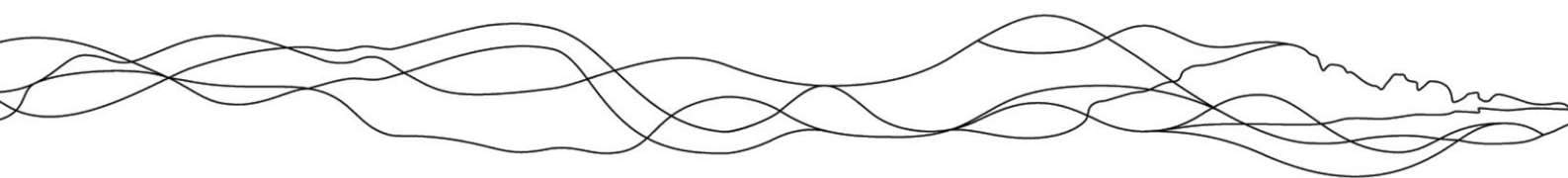
West and East Proposals Maps

The proposals maps do not show the boundary of the South Downs National Park. Request that the SDNP boundary is shown on the proposals maps. The SDNP is the visual backdrop to the City and it is crucial that the proximity of the boundary is clearly marked, particularly in relation to proposed allocations of urban fringe sites.

Notwithstanding the above comments, we would like to wish you well in the progression of your Local Plan. If you have any questions on the content of this letter, please do not hesitate to contact me.

Yours faithfully





**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>

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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 ✓

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)	
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)

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

a) Do you Support or Object to the policy?

Support

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

Object

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

b) Please explain why you support this policy?

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

d) Please explain why you object to this policy?

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

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

Site Allocations - Special Area policies

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

a) Do you Support or Object to the policy?

Support
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 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 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?

It proposed residential development of Saltdean Nursery

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

Please see covering letter. The proposed density and overall number of dwellings provided on this site should be significantly higher than that stated in the draft policy.

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

Please see covering letter from Lewis & Co Planning

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?

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

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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?**

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

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

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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):

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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.

N/A

Equalities

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

N/A

Signed*:	
Dated*:	12.09.2018

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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

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

12 September 2018

Dear Sirs,

Brighton and Hove Draft City Plan – Part Two

Land at Church Street and Spring Gardens, Brighton

We write on behalf of XXXX the landowner of the site above to promote the site for development through the City Plan – Part Two. We believe the site provides an appropriate location for new development and should be included as a site allocation within Policy H1 of the City Plan – Part Two accordingly.

Site Description

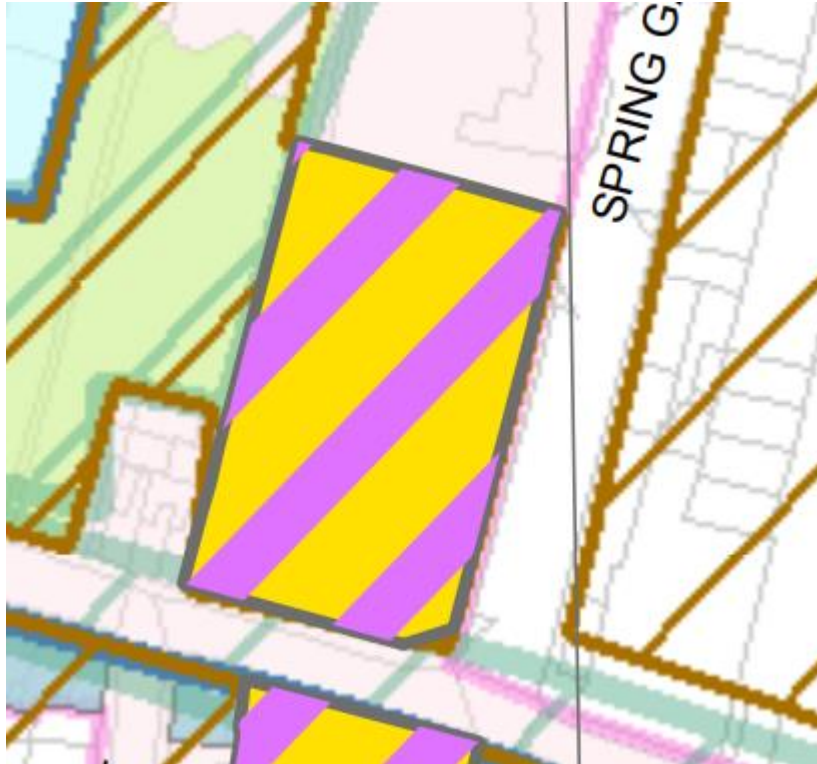
The site is currently in use as an antiques dealer's offices and storage. The south part of the site is a Listed Building – being the former Sussex Regiment headquarters. Behind this is a large former drill hall and external car park fronting on to Spring Gardens.



Aerial view of the site edged red (for indicative purposes only)

Policy H1

Draft Policy H1 proposes an allocation on the site for 50 new residential units, With B1 employment space on the ground floor as a “permitted additional uses”.



Extract of Draft City Plan Part 2 Central Area Proposals Map

Proposed Development

Our client is the freeholder of the site to which this allocation relates.

While the allocation for 50 dwellings in the draft city plan part two is welcomed, the freeholders do not wish for the potential future uses of the plot to be restricted or limited to such low density residential led development in this highly sustainable location.

Given the site’s location in the city centre between the main rail and public transport links, the regional shopping centre and the Development Areas in the City Plan Part 1, it is our representation that a denser form of development than that proposed in the draft allocation is appropriate for this site.

As a minimum, the site should be developed to provide around 60-80 units (anticipated to be apartments) as well as the supporting employment generating uses on the ground floor and lower ground floor.

Of these 60-80 dwellings it is anticipated that the full policy requirement of affordable housing and mix of unit type/size would be achievable, subject to the usual viability tests.

Developing the site at a higher density would be in keeping with the National Policy Aims to make efficient use of brownfield land and to seek to maximise the provision of housing on identified sites.

For the reasons set out above, we would therefore welcome an amendment to the draft Policy H1 to require this site to be developed to provide a minimum of 60-80 dwellings plus employment space.

Lewis & Co Planning have some indicative capacity studies that have been prepared by a consultant architect which demonstrate how this number of units might be achieved in a development that retains the Listed Building on the site and is no taller than the buildings adjacent on North Road. We would welcome the opportunity to meet and discuss the potential of this site to provide a greater proportion of the identified housing need for the city.

Lewis & Co Planning would welcome the opportunity to discuss the merits of the site in further detail with the Council.

Yours faithfully,

Lewis & Co Planning

**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
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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.

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 ✓

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)	
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)

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

a) Do you Support or Object to the policy?

Support

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

Object

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

b) Please explain why you support this policy?

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

d) Please explain why you object to this policy?

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

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

Site Allocations - Special Area policies

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

a) Do you Support or Object to the policy?

Support
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 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?

The site is available for development

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

Please see covering 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

Please see covering letter from Lewis & Co Planning. The proposed density and overall number of dwellings provided on this site should be significantly higher than that stated in the draft policy.

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?

It proposed residential development of Saltdean Nursery

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

Please see covering letter. The proposed density and overall number of dwellings provided on this site should be significantly higher than that stated in the draft policy.

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)
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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](#)
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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.

N/A

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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.

N/A

Signed*:	
Dated*:	12.09.2018

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.

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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

**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.

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

a) Do you Support or Object to the policy?

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Site Allocations - Special Area policies

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

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Support
Object

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Site Allocations - Housing Sites

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H1 - Housing Sites & Mixed Use Sites

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b) Please explain why you support this policy?

The site is available for development

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

Please see covering 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

While the allocation for 24 dwellings in the draft city plan part two is welcomed, the freeholders do not wish for the potential future uses of the plot to be restricted or limited to residential led development. Given the site's location immediately behind the seafront in the city centre, within the hotel core area (Policy CP6 CPP1) and close to the Prime Retail Frontage area of St James Street (Policies CP4 CPP1 & DM12 CPP2); and the Special Retail Area of the Seafront (Policy DM15 CPP2) it is our representation that a more flexible allocation is appropriate for this site.

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

Please see covering letter from Lewis & Co Planning.

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

H2 – Urban Fringe Housing Sites

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Object

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N/A

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

N/A

Signed*:	
Dated*:	12.09.2018

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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: 12 September 2018 19:21
To: PlanningPolicy
Subject: Re 46 - 54 Old London Road

Dear Sirs,

I strongly object to the proposal of 30 homes on this site. The reasons for this are as follows:

Flooding, having lived in the Old London Road for 35 years I know first hand the detestation flooding causes. Parking. Already a problem, even if residents have off road parking, visitors etc will add to the problem. Character. This would damage the friendly, village atmosphere, also loss of trees etc.

[Sent from Yahoo Mail for iPad](#)

From:
Sent: 12 September 2018 19:42
To: PlanningPolicy
Subject: Patcham development

Dear Sirs,

I strongly object to the proposal of 30 homes on this site. The reasons for this are as follows:

Flooding, having lived in the Old London Road for 35 years I know first hand the detestation flooding causes.

Parking. Already a problem, even if residents have off road parking, visitors etc will add to the problem.

Character. This would damage the friendly, village atmosphere, also loss of trees etc.

Sent from my iPhone

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

We live at 44 Old London Road, Patcham, next door to the proposed development site at 46 to 54 Old London Road. The southern border of the site runs the length of the northern border of our property. We request that 46-54 Old London Road is removed as a development site from the Draft City Plan Part Two for the reasons noted below.

1. The last planning application on this site (BH2016/01961) was unanimously turned down by the Council's planning committee. On appeal it was turned down by the Planning Inspector (<https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3163517>) because the scale of the building 'would cause significant harm by virtue of its impact on the character and appearance of the area.'
2. When considering any future planning application on the site, the Council would need to take into account the reasoning behind the Planning Inspector's decision. This would mean that any application for 30 residential units on a site of this limited size in this location would have to be turned down by the Council. To provide this number of units whilst at the same time meeting minimum planning standards for internal room size and amenity space would mean that the development would have to be of such scale and dominance that it would cause unacceptable harm to the surrounding area.
3. Leaving this site in the Plan gives false hope to developers that a development of 30 residential units is practical in this location. It is wasting the time, money and resources of developers which would be better directed to sites which have a realistic expectation of receiving planning consent.
4. Allocating this site would also lead to a waste of the Council's time and resources in opposing any planning applications. It will distract the Council from approving other valid planning applications elsewhere which can deliver the additional housing much needed throughout the city.
5. This site is prone to flooding from 3 sources – ground water, surface water and sewers overflowing. The Council has funded flood protection measures for properties in this part of the Old London Road. The Council argued at the Planning Inquiry that McCarthy and Stone's extensive flood risk mitigations, including a large underground attenuation tank, did not sufficiently address the increased risk of flooding from the large scale development. The Planning Inspector decided on balance that McCarthy and Stone's flood risk measures were adequate. Any future large scale development would require comparable flood risk mitigations. These add to the cost of the development which means that the site is unlikely is to make financial sense for any developer, especially after taking into account the need to also provide an element of affordable housing.
6. We are aware that you have written to all the owners of the 5 properties at 46 to 54 Old London Road to establish that the land is likely to be available to a developer. It is very important to get a positive response from each owner as we understand that the legal interest of McCarthy and Stone in the site expired in October 2017, and it needs to be verified that all 5 owners are prepared to go through a similar process again.

In summary, it is unrealistic to imagine that a developer can squeeze in 30 residential units without falling foul of the concerns raised by the Planning Inspector. In addition the need to fund expensive flood risk mitigations and provide affordable housing means that this site is not economically viable with 30 residential units. The inclusion of this site in the Plan would only result in a waste of money and resource for both Council and

developers and mean that both parties are distracted from progressing good quality planning applications elsewhere.

Last year 350 people objected to the planning application by McCarthy and Stone citing many other reasons to those mentioned above: for example, traffic congestion, inadequate parking space, loss of trees, green space and biodiversity. Old London Road is a popular hub and much-loved by people throughout Patcham and Hollingbury. There was a collective sigh of relief last year when the Planning Inspector turned down McCarthy and Stone's plans, but now the appearance of the site in the City Plan has provoked anger, surprise, disappointment, frustration and fear, as well as renewed stress and uncertainty for those in neighbouring properties. Please listen to the message from the people of Patcham - we do not want this part of Patcham intensively developed. Please remove 46-54 Old London Road as a development plan from the Draft City Plan Part Two.

If you would like any further information, please get in touch.

From:
Sent: 12 September 2018 20:43
To: PlanningPolicy
Subject: Old London Road, Patcham

Last year I wrote in great detail my objections to building residential accommodation on the above site in Old London Road, Patcham.

The objections that were raised then still apply: namely that this very busy part of Patcham does not need further development as it is already overcrowded with cars and 30 new houses will be out of character with the area. There are very few detached houses in Patcham, which is mostly made up of semi detached houses and bungalows and it's important to keep the mix of housing rather than add 30 more units on the site.

Whilst understanding that the council has a target to meet, it seems entirely wrong to choose an area which will lose part of its charm and neighbourliness in order to satisfy quotas and targets.

I hope that the same reasoning which saw the application last year being turned down, will apply to this new application,

Sent from my iPad

From:
Sent: 12 September 2018 20:58
To: PlanningPolicy
Subject: City Plan Part Two Consultation

Dear Sirs,

With reference to The City Plan Part Two Consultation, I am writing to you with my objections to three particular proposed development plans for the Patcham area.

First- 46-54 Old London Road Patcham BN1 8XQ.

I object to this proposed development and request that it is removed from the Council's list of residential sites allocated for development.

The proposal for an indicative number of 30 residential units would be very overbearing for this site, as the site is too small for this scale of development.

I believe it would spoil and damage the village environment and detract from the character and appearance of the area. There have extremely serious issues with flooding in the past, and any development of this nature will, in my opinion, exacerbate the flooding problem.

Therefore based on previous events , and with personal experience of some of the residents not being able to use their bathroom facilities, there is a high risk of surface water flooding and not low-medium risk.

Second-land next to Horsdean Recreation Ground

I object to any proposed development in this location and request that it is removed from the Council's list.

I believe it is important to retain the existing publicly accessible green open space between existing housing and the recreation ground area especially in view of the nearby South Downs National Park.

Although there is no indication of where road access would be located, I believe whatever access road is proposed it would be inappropriate and would have a detrimental effect to the environment of this particular area with additional pollution and noise.

There is a green space and children's play area nearby, the Horsdean recreation ground itself used by adults and children, and the current green space where the proposed development is situated. With all the usage by adults and especially children there would be considerable safety implications.

There would be irreparable damage to the wildlife and the environment with this proposed development.

Additionally, I understand that there is a possibility of interference and contamination of the water supply in that area and its distribution.

Third-Land at Ladies Mile, Carden Avenue

I object to any proposed development in this location and request that it is removed for the Council's list.

I understood that the intention of the original developer of the Ladies Mile Estate was to keep the land at the end of Ladies Mile Road as a publicly accessible open space.

The proposed development is too near to the Ladies Mile Nature Reserve and will impact this area. Development would damage the habitats of various species and generally cause harm.

As this is part of a designated open space (amenity grassland), it should therefore be protected from any development.

It also would seem likely that road access would encroach on this designated green space which I do not find acceptable. This appears to be in contradiction of your policy DM38 which provides special protection for green areas that are considered of particular importance to local communities.

In general, and in relation to these three particular objections, I believe there should be much more impetus to develop numerous brown field sites in the city. There are a number that have been derelict for several decades, which are not only wasted opportunities for additional housing units but are visually awful. These should be developed first before considering the encroachment on to green spaces which are still needed by residents of the city.

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.

DP230

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 226
Response Date 12/09/18 16:21
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) Madeira Terraces & Black Rock Past Present & Future

Name

Name

Address

Address

Email Address

Email Address

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

SSA5 - Madeira Terrace & Madeira Drive

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

SSA5 Object Reasons

d) Please explain why you object to this policy?

I generally like this proposed scheme BUT:I object to the proposed Hotel or Youth Hostel or any accomodation whatsoever on Madeira Terrace. I would like to see the Terraces maintained in their

present form and location retaining the very important green wall. I would like to see the middle terrace used for spectators, relaxing, maybe some small beach-hut type structures, not for living in nor buying, but for renting. I have seen this work very well in other seaside towns. I agree to having retail units as separate structures within the Terraces led by small local businesses. An art gallery (desperately needed for Brighton, a la Hastings one), running track & sports facilities plus beach huts/chalets for day use would also be a good idea. Any changes or additions should not affect any of the annual events that take place on Madeira Drive such as the Speed trials, etc. I believe this project should be council led in conjunction with the people of Brighton and Hove - it is the first occasion that I know of when the local people have been allowed to have a say & a part - I think that this should be expanded upon!

SSA5 Object Wording Changes

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

Yes, I would like to see any reference to living accommodation, temporary or permanent, erased from this City Plan. It has always been agreed that we do not want any residential properties along here.

DP231

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	227
Response Date	12/09/18 16:44
Status	Submitted
Submission Type	Web
Version	0.1

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

Organisation Name

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

Name

Name

Address

Address

Email Address

Email Address

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

SSA1 - Brighton General Hospital Site

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

SSA1 Support Reasons

b) Please explain why you support this policy?

Did not mean to answer

SSA5 - Madeira Terrace & Madeira Drive

a) Do you support or object to policy SSA5?

Object

SSA5 Object Reasons

d) Please explain why you object to this policy?

I don't think there should be a hotel here

From:
Sent: 12 September 2018 21:54
To: PlanningPolicy
Subject: Objection to City Plan Part 2 Vale Avenue.

12th September 2018

To Liz Hobden Head of Planning City Development and Regeneration Brighton & Hove City Council

City Plan Part 2 Patcham & Hollingbury

Objection to the housing planned on site 16 adjacent to Vale Avenue. Patcham

Vale Avenue is a 'rat run'. Traffic comes along at speed, cars are parked either side of the road.

To add an access road to this proposed development, presumably going from the bend on Vale Avenue is ill conceived and dangerous. Houses in this area need the hillside shrubs and trees as a buffer from the bye pass noise.

Why would you want destroy this area that is used for recreation and pleasure?

Once again you are trying to over develop this area of Patcham. There is insufficient infrastructure, drainage and services.

An influx of extra people will put further pressure on schools, Drs, dentists and cause even more parking and traffic chaos.

You will have already added to traffic chaos in the future by allowing the overdevelopment of Patcham High School Field despite objections.

Regards

From:
Sent: 12 September 2018 21:56
To: PlanningPolicy
Subject: Objection to City Plan Part 2 Top of Ladies Mile Road

12th September 2018

To Liz Hobden Head of Planning City Development and Regeneration Brighton & Hove City Council

City Plan Part 2

Objection to the development of site 17 top of Ladies Mile Road.

This is a further proposed development without appropriate infrastructure roads, drainage etc.

There have been recent issues with inadequate drainage.

Patcham cannot cope with a further population increase that will have a significant impact on traffic, schools, Drs and dentists and services.

This area has a nature reserve that must be protected a building site adjacent is not palatable.

Regards

Sent from [Mail](#) for Windows 10

From:
Sent: 12 September 2018 21:59
To: PlanningPolicy
Subject: City Plan Part 2 Objection Old London Road

12th September 2018

To Liz Hobden Head of Planning City Development and Regeneration Brighton & Hove City Council

City Plan Part 2 Patcham & Hollingbury

Objection to plans regarding The Old London Road. Patcham

Plans by McCarthy and Stone to build in this area have already been refused in well documented detail. It is disgraceful that the council have even considered including these houses. My understanding is not all owners are prepared to sell.

Flooding is a problem in this area, something the council seems to play down as an occasional problem. It most certainly is not.

This issue is also well documented.

An influx of extra people will put further pressure on schools, Drs, dentists and cause even more parking and traffic chaos.

The Old London Road resembles a car park most days restricting traffic flow and mayhem by local shops. Trying to add more units into this mix is ridiculous.

I do wonder how much research went into this City Plan Document and the impact on Patcham Village.

Regards

DP233

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 229
Response Date 12/09/18 16:56
Status Submitted
Submission Type Web
Version 0.1

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

Organisation Name

Organisation Name (if not applicable please put n/a) Brighton & hove Food 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
- . Employment, Tourism and Retail
- . Design & Heritage
- . Transport and Travel
- . Environmental and Energy
- . Site Allocation - Special Areas policies
- . Site Allocations - Strategic Site Allocations
- . Site Allocations - Housing Sites
- . Site Allocations - Employment Site
- . Make general comments

DM1 - Housing Quality, Choice and Mix

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

DM1 Support Reasons

b) Please explain why you support this policy?

2.2 Support need for affordable housing as housing costs are a key reason for food poverty in the city

2.9 / 2.10 Support reference to self-build as part of a sustainable housing mix - any development on the urban fringe including self build to include food growing space

2.11 / 2.13 Particularly support requirements for usable outdoor space either private or shared - benefits for health and wellbeing - important to ensure that this is not cut at build stage and opportunities for multi-functional landscaping eg fruit trees / pollinator friendly planting schemes are used in shared areas

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?

B&H also has a higher % of older people living alone than other parts of the UK and this proposal should take into account design to encourage older people that live alone to access shared community facilities / spaces to help prevent isolation. We welcome the inclusion of food growing and community spaces in the list of criteria for building older people's housing. This could be strengthened to reference community spaces for shared eating in line with the city's food poverty action plan / food strategy (adopted by Neighbourhood, Communities and Equalities Committee and the Health and Wellbeing Board) ambition to be a city that 'cooks and eats together' to prevent food poverty. The city lacks community facilities with suitable kitchen space available at low cost to groups

DM10 - Public Houses

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

DM10 Support Reasons

b) Please explain why you support this policy?

Support efforts to keep local pubs as community assets

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

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

DM13 Support Reasons

b) Please explain why you support this policy?

2.119 Brighton and Hove has numerous small local shopping parades and individual shops located in local residential communities. It is important that these shopping facilities remain vibrant, attractive and accessible. Providing local shopping and related facilities within walking distance enables the less mobile, including the elderly and low-income groups, access to food and services close to where they live, and is important in achieving equality of opportunity and sustainable neighbourhoods.

Support the inclusion of access to food within walking distance in this policy and new developments should include reference to this too

Support the inclusion of 'meanwhile use' for shops / cafes - this can also be extended to include open space as demonstrated at Preston Barracks

DM13 Support Wording Changes

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

2.115 The function of parades has gradually changed over time, and in addition to shops that perform a local shopping function, many parades now provide more specialist retailers (for example, bridal wear or musical instruments) together with a range of non-retail uses such as takeaways. Whilst non-retail uses can provide an important local function, there is risk that the presence of too many can undermine the ability of the parade to meet local shopping needs and are still anchored by at least one convenience retailer. It is vital, therefore, that each neighbourhood parade continues to offer a good balance of shops and services to support residents' day-to-day needs, whilst providing flexibility to allow for other appropriate uses.

Elsewhere in the country there have been reviews of the number of hot food take aways in an area - whilst there has been work on this issue in the past it would be good to review this to ensure that convenience retailers and hot food take aways offer healthy options as these are often the only option for people on low incomes / without transport to buy food

DM16 - Markets

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

DM16 Support Reasons

b) Please explain why you support this policy?

Support reference to improvement to the Open Market's management and environment - this is an amazing city asset that would benefit from a more dynamic approach to marketing and promotion

Temp and permanent markets including 'street diner' style hot food markets support food entrepreneurs often serving local and sustainable food as well as providing an attractive offer to visitors and residents

This section could include more information about 'box park' style market spaces (shipping containers) in areas of the city waiting for development eg Black Rock / Marina or North of St Peters church

The new National Planning Policy Framework (NPPF) for England references the expectation that councils will enhance existing, and create new, markets in town centres in an effort to improve access to healthier food and we would welcome more detailed guidance about markets temp and permanent and how and where they are permitted would be beneficial to support this activity

DM18 - High Quality Design & Places

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

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

We know from evaluating Harvest Brighton & Hove that community gardens address the issues listed in the new NPPF such as "social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other", reducing the fear of crime, enhancing community cohesion and producing "high quality public space which encourages the active and continual use of public areas".

As the new NPPF confirms the creation of high quality buildings and places is fundamental to what the planning and development process should achieve and for the first time it recognises the importance of food within planning we would like to see reference to this strengthened in this section. In response to the drive to create high quality buildings and places we would like to ensure new housing has sufficient space for families to cook and store fresh food and to eat together in homes on streets with edible planting and communal gardens.

This could be further expanded in this section and/or via an SPD on food

DM22 - Landscape Design & Trees

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

b) Please explain why you support this policy?

Support the inclusion of food growing, tree planting and pollinator friendly planting schemes in the criteria

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

An SPD on food could expand guidance on 'edible landscapes' which have the potential to increase social cohesion more than open spaces which invite people to 'stay and use' but not to become actively involved on-site, in an ongoing fashion. Initiatives based on edible urban green space directly and lastingly involve residents in social processes, ranging from co-design to co-implementation and long-term co-management of spaces in sustainable, livable and healthy cities.

DM24 - Advertisements

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

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

Consent will be granted for advertisements and/or signs where they are sensitively designed and located so that they do not harm the visual amenity of the site or wider area and do not adversely affect public safety. Consideration will be given to: a. The character of the area b. The siting of advertisements c. Size and proportion d. Design e. Materials f. Lettering and colour g. Means of fixture h. Method and extent of illumination i. Cumulative impacts

Brighton & Hove City Council has pledged to be a Veg City as part of the national campaign Peas Please and as part of this we want to take action on local advertising of food and drink – restricting the worse and encouraging the best i.e. restricting junk food advertising and promoting advertising of healthy alternatives such as the Veg Power advert. We appreciate that changes on advertising are not something that can be done overnight (and is not just about planning) a handful of cities are looking at what can be done within existing powers and to identify what powers they need to go further. It would be good to explore if this planning policy could be used in any way - for example only granted permission for advertising space that offers lower cost space for every 10 unhealthy products advertised.

Restricting junk food advertising is one of the headline measures of the Government's Childhood Obesity Plan (chapter two) Alongside this it pledges to support local trailblazers taking action to improve children's health:

Government is also committing to setting up a three-year trailblazer programme with local authority partners to help close the deprivation gap, looking at what can be achieved within existing powers and better understand what could be fuelling obesity in specific communities.

We would like to build on recent local examples such as proposed restrictions to junk food advertising on London's Transport for London network and the 5,000 Veg Power adverts run across the UK last year following the Peas Please summit

DM33 - Safe, Sustainable & Active Transport

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

DM33 Support Reasons

b) Please explain why you support this policy?

Work to achieving healthy weight for the population of Brighton & Hove is supported by active transport

DM33 Support Wording Changes

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

Greater emphasis on supporting active transport to food shopping

DM37 - Green Infrastructure & Nature Conservation

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

DM37 Support Wording Changes

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

Inclusion of allotments, orchards and community food spaces as part of green infrastructure as habitats for wildlife, green corridors and providing shade / ground cover / flood prevention

DM38 - Local Green Spaces

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

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?

Access to safe, clean drinking water is a priority for the city

DM43 - Sustainable Urban Drainage

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

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...

For all urban fringe sites important that in line with the new NPPF's support for the development and diversification of agricultural and other land-based rural businesses that as well as prioritising new housing that the value of the role of undeveloped land in food production is also considered by local authorities. Given that previous work has been done to assess urban fringe sites for food production this work could be revisited to assess if any of the urban fringe sites should specifically have a small farm / horticulture element included.

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.

We welcome that food growing / access to shops selling food and the role of food growing in place making is included in City Plan Part 2 but would like to see reference to the production of a Food Supplementary Planning Document

We welcome that the new planning policy framework for England for the first time confirms that food is a planning issue and would welcome the opportunity to work with BHCC on an SPD for food that continues the city's trailblazing work on food and the planning system. As a city we have provided national and international inspiration around food and planning and it would bring huge wins for the city in terms of health and sustainability outcomes if this work is continued

Since the production of City Plan Part One and many of the background papers food security post Brexit and longer term food security as an issue related to climate change are becoming a concern for the city. Although much of the agricultural area surrounding the city is in the SDNP it is owned by the Council and inclusion of policies that recognise the value of this land to the city for food production as well as water supply could be strengthened.

In line with BHFPs concerns about the viability of farms, the need for better quality, locally produced food and the ability of food producers to develop successful businesses, we welcomes the new NPPF's support for the development and diversification of agricultural and other land-based rural businesses and would like to recommend working closely with the SDNP on this issue

BHFP welcomes the specific recognition in planning policy of the role of food in creating healthy communities. The new Framework states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, local shops, access to healthier food, and allotments.

We know from evaluating Harvest Brighton & Hove that community gardens address the issues listed in the new NPPF such as “social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other”, reducing the fear of crime, enhancing community cohesion and producing “high quality public space which encourages the active and continual use of public areas”.

The new NPPF confirms the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. In light of the expectation that councils will enhance existing, and create new, markets in town centres in an effort to improve access to healthier food we would like stronger guidance on this. And in response to the drive to create high quality buildings and places we would like more guidance for developers to ensure new housing has sufficient space for families to cook and store fresh food and to eat together in homes on streets with edible planting and communal gardens.

An SPD on access to healthy food and prevention of an obesiogenic enviroment could draw together in one easily accessible policy the elements of food and planning spread across this document and our main recommendation is that BHFP and BHCC work together to scope the idea of a 'food SPD' and if viable commit to having this adopted by 2020

DP234

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	230
Response Date	12/09/18 16:59
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 . Yes

Organisation Name

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

Name

Name

Address

Address

Email Address

Email Address

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

SSA5 - Madeira Terrace & Madeira Drive

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

SSA5 Object Reasons

d) Please explain why you object to this policy?

I'm very disappointed that a hotel was mentioned! We have raised a lot of money with the crowdfunding with the thought that it was going to be Independent shops and gallery's not a hotel.

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

a) Do you support or object to policy SSA6?

Object

DP235

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 231
Response Date 12/09/18 17:21
Status Submitted
Submission Type Web
Version 0.1

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

Organisation Name

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

Name

Name

Email Address

Email Address

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

SSA5 - Madeira Terrace & Madeira Drive

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

SSA5 Object Reasons

d) Please explain why you object to this policy?

It is all Aunt Mary and apple pie, aspirations and promises. Last time the council did over the area was at the Terraces and we ended up with Burger King, an amusement arcade and a Harvester in total disregard of all the council promises. Now all but Harvester, boarded up and derelict.

The council promises were given to justify allowing the developers to build above the level of the road on the seafront for the first time thus obscuring the sea view for the rest of us. And who can remember that the terraces originally provided a valuable communal facility before being "given" to the speculators.

Now we we have the same thing all over again and the council says at 3.34 "The renovation of Madeira Terrace will need to becommercially viable in order to pay for its long term maintenance".

Hey ho, here we go again with the speculators being invited to work against the community interest. And at Peter Pan playground the council will allow "development at beach level, primarily single storey and should not exceed the height of middle promenade". And what about the promised boutique hotels?

SSA5 Object Wording Changes

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

Commercial development only permmitted where supplies public amenity. No residential, hotel or permanent event venues. No commercial development to impede public amenity in any way and any development to be within footprint of existing arches and of sympathetic character.

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

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

SSA6 Object Reasons

d) Please explain why you object to this policy?

It is all Aunt Mary and apple pie, aspirations and promises. Last time the council did over the area was at the Terraces and we ended up with Burger King, an amusement arcade and a Harvester in total disregard of all the council promises. Now all but Harvester, boarded up and derelict.

The council promises were given to justify allowing the developers to build above the level of the road on the seafront for the first time thus obscuring the sea view for the rest of us. And who can remember that the terraces originally provided a valuable communal facility before being "given " to the speculators.

Now we we have the same thing all over again with the speculators being invited to work against the community interest. And at Peter Pan playground the council will allow "development at beach level, primarily single storey and should not exceed the height of middle promenade". And what about the promised boutique hotels?

SSA6 Object Wording Changes

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

Commercial development only permmitted where supplies public amenity. No residential, hotel or permanent event venues. No commercial development to impede public amenity in any way and any development to be small footprint, less than 10 foot high, not impeding seaviews and of sympathetic character

DP236

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	232
Response Date	12/09/18 17:22
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 . 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 - Strategic Site Allocations

local small businesses. An art gallery, running track, sports facilities plus beach huts/chalets for day use would also be a good idea. Any changes or additions should NOT affect any of the annual events that take place on Madeira Drive such as speed trials. I believe the project should be council led in conjunction with the people of Brighton and Hove

DP237

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 233
Response Date 12/09/18 17:32
Status Submitted
Submission Type Web
Version 0.1

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

Organisation Name

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

Name

Name

Address

Address

Email Address

Email Address

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

SSA5 - Madeira Terrace & Madeira Drive

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

SSA5 Object Reasons

d) Please explain why you object to this policy?

The policy mentions the possibility of a Hotel or YHA and I object to this part.

DP238

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	234
Response Date	12/09/18 17:32
Status	Submitted
Submission Type	Web
Version	0.1

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

Organisation Name

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

Name

Name

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Environmental and Energy

DM37 - Green Infrastructure & Nature Conservation

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

DM38 - Local Green Spaces

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

DM39 - Development on the Seafront

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

DM39 Support Reasons

b) Please explain why you support this policy?

It aims to protect and enhance public access to the sea and builds in climate change adaptation.

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?

It is strong on air quality - but I want to see the Council actively monitoring impacts of development and refusing permission for developments that will worsen AQ.

DM42 - Protecting the Water Environment

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

DM43 - Sustainable Urban Drainage

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

DM43 Support Reasons

b) Please explain why you support this policy?

Its stronger than national policy.

DP239

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	235
Response Date	12/09/18 17:49
Status	Submitted
Submission Type	Web
Version	0.1

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

Organisation Name

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

Name

Name

Email Address

Email Address

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

SSA5 - Madeira Terrace & Madeira Drive

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

SSA5 Object Reasons

d) Please explain why you object to this policy?

I object to any accommodation on Madeira Terraces. I would like to see the Terraces maintained as the historic structure that it is (longest cast iron structure in the UK, if not the world!!) I feel that units within the ground floor level of the terraces would be acceptable, as long as the main road way area will be kept for the regular events that are held there each year, speed trials, children's parade, motorbike ACE club etc etc.

From:

Sent: Sunday, September 9, 2018 4:27 pm

Subject: Objection to proposed development

As the residents of 11 Belle Vue Cottages, we are very concerned to hear about the proposed building development of the 15 houses on the reservoir and South Downs Riding School land.

We put to you our reasoning behind our objections and please can you forward on to the relevant department:

Currently there is no street lighting nearby which enables an abundance of wildlife, including a high proportion of bats which we see regularly most nights.

Also adjoining us and next to the proposed development site is the Jewish cemetery which is a nature reserve, providing habitation for a variety of wildlife including foxes, badgers and many different butterflies, some of which are rare.

The South Downs Riding School provides an invaluable service to the community, enabling young people and children work experience, keeping them off of the streets. In addition, they provide riding opportunities to disabled children. Why would anyone want to take this away and deprive these children of such important and life-enriching activities?

Bats have also been seen flying in the vicinity of the large barn within the riding stable grounds.

With the proposed building site so close to the reservoir, it is a great concern that it will result in damage to the reservoir tanks and present a flood risk to our own properties.

As the reservoir site is a great deal higher than our level, we would be totally overlooked by the new houses. Our privacy would be lost. We are also very concerned about the noise generated by all these houses would affect the wildlife.

We also feel that parking would be a major issue, as most of the houses will be 3 bedroom which will be for families with typically 2-3 cars. We are extremely concerned about the over spill from this parking where cars would be dispersed onto nearby Bear road where the only parking available is on the grass verges. Yet again this would dramatically affect the look of the rural area and no doubt encourage more cars to park there. More over, this will likely cause issues within our private road. As it is we already get people wandering down our road looking for access and parking, this will get a lot worse if these houses get built, leading to a major security risk and noise pollution on our quiet neighbourhood.

With the South Downs National Park boundary adjoining this proposed development, has it even been taken into consideration the abhorrent eyesore this will be on the landscape? No to mention spoiling the beauty of a National Park.

They are protected for a reason or does that no longer matter?

There is no gas available up here which hardly makes for an appropriate site for homes.

In addition, there are no shops within a suitable walking distance, meaning yet more unnecessary car journeys would have to be made on already heavily congested roads. Doesn't really fit in with the idea of a greener environment does it?

We hope you will consider the above points raised when making this permanently landscape changing, and life changing, decision.

Kind regards

DP241

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 236
Response Date 12/09/18 18:24
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) Na

Name

Name

Email Address

Email Address

Agent Email

Agent Email

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

SSA5 - Madeira Terrace & Madeira Drive

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

SSA5 Object Reasons

d) Please explain why you object to this policy?

I object to a hotel or YHA accommodation being added to the site. Would like to see the green wall retained / maintained with local businesses - arts and retail being included in the terraces plans changes should not affect the events that are held on Madeira drive

This project should be council led alongside representatives of the people of Brighton and Hove

DP242

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 237
Response Date 12/09/18 20:50
Status Submitted
Submission Type Web
Version 0.1

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

Organisation Name

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

I object to the proposed hostel (ymca) or hotel at Madeira Terraces. The arches must be preserved with a viewing walkway and the underneath only used for artists, and non chain cafes. The area must be improved with the full support of the Victorian Society and the arches fully reinstated.

SA7 Object Wording Changes

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

remove references to hostel and hotels in this location.

DP243

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 238
Response Date 12/09/18 21:59
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 . Yes

Organisation Name

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

Name

Name

Address

Address

Email Address

Email Address

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

H1 - Housing Sites & Mixed Use Sites

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

H1 Object Reasons

d) Please explain why you object to this policy?

The greatest protection should be given to existing green spaces particularly those creating a link with the countryside which encourages healthier lifestyles e.g. physical exercise & enjoyment of the area and promotes and maintains wildlife of flora and fauna.

H1 Housing Site Allocations

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

46-54 Old London Road, Patcham BN1 8XQ - I object to this area being developed more extensively than current use. There are many mature gardens on site the retention of which is in keeping with the neighbourhood, encourages healthy wildlife. The area is prone to flooding due to the subterranean waterway so more intensive housing would add to the existing flood risk. The road is already extremely limited for resident, school, community hall & retail parking. Increased traffic on the road will put the safety of local residents at risk.

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?

The urban fringe land is a significant factor for a pleasant environment for the local residents and visitors enjoying the area. The Council's area is known for its Downs land beauty. The fringe borders the Downs and provides a natural buffer both to the wildlife (plants & animals) and as a way of reducing noise and fuel emissions pollution given the presence of the A27 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...

Land adjoining Horsdean recreation ground - The site is part of a key corridor linking wildlife across the Council area along the A27 and feeding into the parks within Patcham & Hollingbury. The position encourages healthy leisure activities across the area and acts as a natural and attractive buffer to the pollution from the A27. The existing underground waterway and sewage system is unlikely to cope with additional pressures from the proposed development.

If any development goes ahead the existing vegetation & links to the rest of Patcham valley through green public walkways should be protected and enhanced with further planting to boost the buffer between the A27 and residential dwellings in Patcham.

The empty green space between Vale Avenue and Barrhill Avenue (adjoining the Horsdean recreation grounds on the south side) would be a better site to develop as there is less vegetation & wildlife and it does not act as a direct buffer from pollution from the A27.

DP244

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	239
Response Date	12/09/18 22:20
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) Na

Name

Name

Email Address

Email Address

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

SSA5 - Madeira Terrace & Madeira Drive

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

SSA5 Object Reasons

d) Please explain why you object to this policy?

I object to the policy as it mentions a YHA and a hotel.

DP245

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 240
Response Date 12/09/18 22:47
Status Submitted
Submission Type Web
Version 0.1

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

Organisation Name

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

Name

Name

Address

Address

Email Address

Email Address

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

H1 - Housing Sites & Mixed Use Sites

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

H1 Housing Site Allocations

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

46-54 Old London Road, Patcham BN1 8XQ

I object to this site being part of the development plan, a scheme to develop this area was rejected by the planning committee recently and the reasons for the rejection are and will be valid for any new proposals, namely, site is too small for the number of houses or flats proposed, the density will spoil the look and feel of Patcham village, likelihood of increased surface water flooding, increased traffic movements, flats would be out of keeping with the area.

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 241
Response Date 12/09/18 22:47
Status Submitted
Submission Type Web
Version 0.1

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

Organisation Name

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

Name

Name

Address

Address

Email Address

Email Address

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

SSA5 - Madeira Terrace & Madeira Drive

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

SSA5 Object Reasons

d) Please explain why you object to this policy?

I object to the use being hotels and/or residential. Any development should respect and retain the original ironwork. Commercial development should be on the lower level only to enable the upper and middle levels to be retained as viewing areas for the events held at ground level.

From:
Sent: 12 September 2018 22:23
To: PlanningPolicy
Subject: 100% Objection

Planning Policy Part Two Consultation.

My husband and I wish to strongly object to any and all of the local councils proposals to developing the site at present occupied by 46-54 Old London Road for the following reasons.

1. The site is completely inappropriate for the amount of flats and houses the council wish to erect there.
2. The site would have to be stripped of all trees and flora and fauna to build on this land, destroying much of nature's habitat.
3. The property we live in was flooded in 1999/ 2000 and although no more flooding has occurred since then the proposed properties will place great strain on the present water table and sewerage system.
4. The Old London Road is a rat run at peak times already and the parking is completely inadequate for any more vehicles.

We have cars and vans parking half on the pavement 18 inches from our front door on double yellow lines to use the local shops already.

5. We objected strongly to McCarthy and Stones proposal to develop this site recently, and won our fight with the self same reasons stated above backed by the head of the town's planning committee and now you wish to leave this site again on a list in danger of being developed with all the same negative reasons.

These are our objections to this planning application.

From:
Sent: 12 September 2018 23:24
To: PlanningPolicy
Subject: City Plan Part 2 Consultation

Ref: City Plan Part 2 Consultation

This letter is to **OBJECT** to the inclusion of 40-54 Old London Road on the list of sites for development in the City Plan and ask it to be removed from this list.

It should be removed from the list for the following reasons:

- Flood risk, well documented in the past years.
- Parking in the area already oversubscribed increasing congestion.
- Over capacity of drainage and sewage.
- The amount of units suggested would mean design would be completely out of character for this area of Patcham and its history.
- A massive overdevelopment and destruction of 5 large homes out of character.
- The 350 + objections to a recent application proved the strength of opposition to any development to the area. These objections were supported by this council and enabled the turning down of the plan.

As a resident living close to this plan it would be completely out of keeping with the area of Patcham Village that I have enjoyed for many years.

I would again ask for it to be removed from this plan.

Yours Sincerely

DP249

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 242
Response Date 12/09/18 22:56
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) QED Sustainable Urban Developments

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
. Site Allocations - Strategic Site Allocations
. Make general comments

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

I suggest that the wording from the draft London Plan regarding meanwhile housing be included in the City Plan Part II as an additional policy to in line with best practice guidance being produced in London.

Policy H4 Meanwhile use Toggle plan navigation H4

1 Boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development.

4.4.1

Meanwhile uses are a range of temporary uses on land and property awaiting longer-term development. Some vacant land is suitable for meanwhile use as housing. To make efficient use of land that would otherwise be left vacant, boroughs are encouraged to identify sites that are suitable for residential occupation to be used for **meanwhile housing** including land in both public and private ownership. Opportunities for the meanwhile use of land for housing on large-scale phased developments should be identified during the planning process. The meanwhile use of a site must not result in an unacceptable impact on residential amenity or prevent development sites from being brought forward for development in a timely fashion. Parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties.

4.4.2

Meanwhile housing can be provided in the form of **precision-manufactured homes**. This can reduce construction time and the units can potentially be reused at a later date on another site.

4.2.3

The **time period** for meanwhile uses will vary with site circumstances. Boroughs should consider starting the time period for the meanwhile use from the date of occupation rather than the date of planning permission, in order to support the viability and delivery of meanwhile housing developments.

SSA5 - Madeira Terrace & Madeira Drive

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

SSA5 Support Wording Changes

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

I support policy SSA5 and suggest that similar wording being included as outlined in SSA6. I suggest that the following wording be included;

Compliment the regeneration of the Former Peter Pan leisure site (SSA6) and contribute to a coordinated approach to enhance the public realm;

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

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

SSA6 Support Wording Changes

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

I would like to see the range of uses for this site broadened to include:

Retail uses (Use Classes A1, A3, A4 & A5)

Commercial space (Use Class B1)

Hotel (Use Class C1)

Galleries/museum(s) (Use Class D1) and or

Leisure uses (Use Class D2) appropriate to the character of the seafront to provide a year round leisure attraction such as an open air swimming pool

This is to ensure the site provides the necessary flexibility for Madeira Drive to adapt and complement emerging plans for the development of the Council's ambition for a new conference centre at Black Rock

I suggest an additional item be added to the site specific requirements:

g) Encourage a variety of temporary / pop up uses consistent with the area's role as a centre for cultural, sports and family based activities - so as for the site to provide a flexible built environment as required.

i suggest that in paragraph 3.40 in supporting evidence that the words such as an open air swimming pool be included

i suggest that in paragraph 3.41 in supporting evidence that more evidence be provided to support the open character of this area - historically this site has always supported a dense built environment as evidenced by images of the previous playground and should indeed do so in the future. It would be my suggestion that the words "open character" be removed

Any other comments

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

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

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

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

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

I am interested to understand how the Council intend to deal with the new National Planning Policy Framework released (28th July) after this document was issued for consultation 5th July, particularly in light of changes to presumption in favour of sustainable development and housing allocations and Brighton's context in light of our city's chronic shortage of housing and particularly affordable housing.

DP250

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 243
Response Date 12/09/18 23:53
Status Submitted
Submission Type Web
Version 0.1

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

Organisation Name

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

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
. Site Allocations - Strategic Site Allocations
. Make general comments

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

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

SSA6 Support Reasons

b) Please explain why you support this policy?

I support the principle of regeneration of this long neglected site subject to the proposed uses being broadened

SSA6 Support Wording Changes

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

I feel that its really important that the range of uses for this site are broadened to include:

Retail uses (Use Classes A1, A3, A4 & A5)

Commercial space (Use Class B1)

Hotel (Use Class C1)

Galleries/museum(s) (Use Class D1) and or

Leisure uses (Use Class D2) appropriate to the character of the seafront to provide a year round leisure attraction such as an outdoor swimming pool

I suggest the following be added to the site specific requirements:

g) Encourage a variety of temporary / pop up uses consistent with the area's role as a centre for cultural, sports and family based activities - so as for the site to provide a flexible built environment as required.

I suggest that in paragraph 3.40 in supporting evidence that the words such as an open air swimming pool be included

I suggest that in paragraph 3.41 in supporting evidence that the statement regarding the open character of this area be removed as it doesn't reflect the past uses of the site - historically this site has always supported a dense built environment as evidenced by images of the previous playground and should indeed do so in the future. It would be my suggestion that the words "open character" be removed as this will prevent any form of development on the site that blocks views of the sea even single storey development .