

**For Official Use:**

Respondent Number:

Date Received: / / /2018

Entered onto Portal: Yes/No

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

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

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

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

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

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

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

**Part A: Contact Details**

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

Yes

No

Privacy Notice: (ctrl & click to view)

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

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

<b>Organisation Name (If applicable)</b>	Mid Group
<b>Name</b>	
<b>Address</b>	
<b>Email Address</b>	
<b>Agent Name (If applicable)</b>	
<b>Agent Name</b>	
<b>Agent Address</b>	
<b>Agent Email Address</b>	

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

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

(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** DM20

**Policy Name** Protection of Amenity

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

Support

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

Object

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

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

We have no objection to the principles sought in this policy. However the wording should be amended to ensure that otherwise acceptable proposals are not inadvertently caught by this policy – see below.

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

The policy currently states that planning permission will be granted where it would not cause “a loss of amenity”. There may be instances where a slight loss of amenity is unavoidable, but where the resulting level of amenity remains within acceptable standards. We therefore suggest that the wording should be amended to refer to “an unacceptable loss of amenity”.

**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**

*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** DM33

**Policy Name** Safe, Sustainable and Active Travel

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

Support

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

Object

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

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

We do not object to the aims and objectives of this policy but require some changes to the wording.

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

The wording should be amended to make clear that any requirements of development should be reasonable and proportionate in line with NPPG requirements. At present, the policy could be read as requiring a variety of public transport improvements irrespective of the impact of the development upon existing provision.

**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**

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** DM35

**Policy Name** Travel Plans and Transport Assessments

**e) 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?**

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

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

Whilst we do not object to the aims and objectives of this policy, a change is required to the wording of criterion 2 to make it acceptable. Criterion 2 currently requires a Transport Assessment (as opposed to a Transport Statement) for all development, irrespective of size or impacts, within or adjacent to an AQMA. This is a disproportionate approach for smaller developments.

**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**

Criterion 2 should state that "A Transport Assessment or a Transport Statement should be submitted..."

**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  
Object

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

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

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

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

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

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

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

Whilst we have no objection to this policy, we consider that our client's site should also be included in the list of Housing Sites at Policy H1. See covering letter for further details of our reasoning. The Outpatients Department at Royal Sussex County Hospital should be allocated for residential development under policy H1 for an indicative 80 residential units. It is possible through further design work that the number of units could be increased further.

## **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.**

See covering letter

## 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.**

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<b>Signed*:</b>	
<b>Dated*:</b>	11.09.18

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

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

Completed forms should be sent to:

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

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

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



Brighton & Hove City Council  
Hove Town Hall  
Norton Road  
Hove  
BN3 3BQ

Our ref: JB/JW/13223

13 September 2018

Dear Sir/Madam,

**BRIGHTON AND HOVE LOCAL PLAN CONSULTATION 2018  
RESPONSE ON BEHALF OF MID GROUP**

This response has been prepared by ... on behalf of Mid Group in response to the City Plan Part Two Consultation, which runs between 5<sup>th</sup> July and 13<sup>th</sup> September 2018.

Our client has commented on a number of draft policies. In particular, they wish to submit the Outpatients Department at the Royal Sussex County Hospital for inclusion in CPP2 as an allocation for residential redevelopment.

CPP2 proposes a number of additional site-specific allocations. These do not currently include the Outpatients Building site, although we recognise that this site already sits within a wider development area allocated for development in general in CPP1.

The Outpatients Building is due to become surplus to requirements for the Hospital early in the plan period. We therefore request that the Local Plan provides additional clarity in relation to the suitability of the site for redevelopment by allocating it for residential development in CPP2.

**Policy context**

The site falls within the development boundary, adjacent to a Conservation Area and within the Eastern Road/Edward Street Development Area. This development area has been designated in Policy DA5 of CPP1 to intensify development whilst securing a better public realm, encouraging more cycling and walking and greater use of buses. The main Royal Sussex County Hospital site (excluding the Outpatients Department) is specifically identified as a Strategic Development Site, with the purpose of providing an additional 74,000 sqm of hospital floorspace on the site (including 60,000 sqm for which planning permission has already been granted).



*Above: Extract from the Council's Proposals Map*

As a minimum, adopted CPP1 Policy DA5 seeks to secure at least 515 additional residential units in this area, as well as up to 23,200 sqm of employment floorspace, hospital floorspace as noted above, 400 student accommodation units and various other uses.

The Local Plan notes that this area is suitable for intensive development because it is a sustainable transport corridor and is within an area identified in Policy CP12 as being suitable for tall buildings (defined in the Local Plan as higher than 18m/6 storeys). The Plan refers to the need for a Design Guide to be established for this area, which will be linked to an Urban Development Framework for the city. The supporting text to Policy CP12 notes that opportunities for taller buildings should be focused around existing tall buildings, particularly those at the County Hospital.

### **Site and Surroundings**

The site is located to the south of the main campus of the Royal Sussex County Hospital and comprises an Outpatients Building which has been used in conjunction with the hospital opposite. It is likely that within the plan period, the Outpatients Department will be consolidated within another part of the hospital estate and so this building will no longer be needed, making it available for redevelopment.

The site is surrounded by existing buildings and has no statutory designations as outlined above, however it is within the development area and outlined as a site which could accommodate taller buildings. It is also noted that the site is adjacent to the Conservation Area.





*Above: Image of the existing building*

The site is well connected to local services and amenities and therefore sustainably located.

### **Indicative scheme**

We enclose, for information, an indicative scheme showing how the site could be redeveloped to create 80 residential units. It should be noted that this scheme is purely indicative at this stage, to give an idea of the potential site capacity. Our client would want to enter into pre-application discussions before pursuing further any planning application for redevelopment. It may be that further residential units could be created on the site, so the indicative 80 units should not necessarily be viewed as the maximum capacity. Nevertheless, we trust this information is helpful as a guide to potential capacity.

I trust the above and the enclosed documents are helpful in assessing the site further. We would be happy to meet to discuss this further if that would be of assistance.

Yours sincerely,

12<sup>th</sup> September 2018.

Consultation on the Draft City Plan Part Two  
Brighton & Hove City Council  
Planning Policy Team  
By email to [planning.applications@brighton-hove.gov.uk](mailto:planning.applications@brighton-hove.gov.uk)

Dear Sir/Madam

**Re: Consultation on the Draft City Plan Part Two**

We enclose herewith the response of the Steering Committee of the Brighton Marina Neighbourhood Forum to the City Plan Part Two consultation.

We have in particular commented on those matters which we see as having especial relevance to the Marina. We have sought to align our comments with the contents of the vision statement of the Marina Forum (also enclosed), which will underpin our forthcoming development of a neighbourhood plan for the Forum area.

**Yours faithfully**

**Chair, Brighton Marina Neighbourhood Forum Steering Committee,  
on behalf of the Steering Committee.**



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<b>Organisation Name (If applicable)</b>	Brighton Marina Neighbourhood Forum Steering Group
<b>Name</b>	
<b>Address</b>	
<b>Email Address</b>	
<b>Agent Name (If applicable)</b>	N/A
<b>Agent Name</b>	
<b>Agent Address</b>	
<b>Agent Email Address</b>	

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

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

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

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

Support

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

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

We welcome the policy aspirations of developing sustainable places with high quality of life, and of the range of property and tenures being diverse to accommodate the needs of our diverse City.

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

We suggest that the feasibility assessments for 'affordable' types of tenure give consideration to the service charge liabilities incurred by the residents of the development. For example, residents at the Marina will have a liability for service charges currently between £3.50 and £4.00 per square foot and such a liability may affect the sustainability of some types of tenure.

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

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



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

**Policy Number** (e.g. DM1) DM2

**Policy Name** Retaining Housing and Residential Accommodation

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

Support



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

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

In addition to the reasons in the City plan document, we are concerned at loss of residential accommodation to the short-term-let rental market, particularly as marketed through 'AirBnB.' In practice the lack of regulation of this activity results in loss of residential accommodation as it becomes non-regulated, non-taxpaying guest houses for remote investors who see an opportunity for return that does not have the controls applicable to other opportunities. As well as loss of residential accommodation this has a detrimental effect on hotels (paying business rates) in the City. The City plan's desire to attract more quality hotels to the City will also be negatively affected by unregulated short-term letting.

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

We suggest wording be added to achieve some control and regulation of the prolonged use of properties as short-term lets ('AirBnB') to avoid loss of long-term residential accommodation. This may be an area that warrants a whole policy to deal with it.

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

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

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

**Policy Number** (e.g. DM1) DM7

**Policy Name** (e.g. Housing Quality, Choice and Mix) Houses in Multiple Occupation.

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

Support



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

**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**

In addition to the current content of the policy we would encourage the City Council to develop a register of leasehold and other premises where HMO's are forbidden by covenants entered into by property owners. For example, leaseholders at Brighton Marina are forbidden from using their properties as HMO's and this is doubtless the case elsewhere in the City. A register could allow a cross-check and avoid properties being registered by an owner or agent as HMO's in breach of covenants, either knowingly or unwittingly.

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

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

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

**Policy Number** (e.g. DM1) DM14

**Policy Name** (e.g. Housing Quality, Choice and Mix) Special Retail Area – Brighton Marina.

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

Support



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

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

We support this policy but have some reservations.

We should ensure that the policy does not give greater status to poor quality retail than to high quality services. Nor should the policy seek to turn back the clock - local bank branches, for example, are a thing of the past and do not need to be brought back. There should be much more flexibility for units to change between retail and other uses, such as cafés, restaurants, hair dressers etc., The starting point should be about what will be interesting and vibrant as part of the street scene, and add value to the marina as a destination.

Existing shops at the Marina struggle and always have done. Footfall is insufficient to properly support a retail offer. The diversity of property uses that this policy seems to look towards is desirable. The Marina is a residential district and leisure destination site, as well as an employment area.

The presence of a supermarket and filling station work against the provision of the retail parade type of offer. The premises that do work here are currently represented here – services for example.

More work/employment space is desirable to encourage use and footfall all week and all year (and to meet the need for employment space in the City).

The policy aspires to provide premises desirable to Marina residents. We suggest that if this aspiration is to remain, research should be done to gather evidence as to what Marina residents want.

Retailers thrive today either on convenience or providing an experience. The location context of the premises and sense of place needs to provide synergy for this to be successful (together with sufficient footfall). Successful city centres now have twice as much office space as retail space. Too much retail, even in city centres, does not have the demand to sustain it, hence vacancies often seen in City centres.

The Marina is currently blighted with areas of 'Greyfield' space - some retail and some restaurant – allowing flexibility of use is important to establish sustainable uses for these premises.

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

We suggest that the policy name "Special Retail Area" be changed to "Special **Commercial** Area" which gives equal status to all types of customer-facing trading uses, and seeks to ensure a vibrant street scene and interesting mix of uses while remaining relaxed about whether these

uses are shops or other things.

Also, criteria (a) *"The proposed use would retain and/or complement the existing diversity and mix of retail uses (especially the convenience and service offer) and support non-retail uses such as leisure, tourism and commercial uses within the Marina"* may not be measurable due to subjectivity and as such may not be worth retaining.

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

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

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

**Policy Number** (e.g. DM1) DM15

**Policy Name** (e.g. Housing Quality, Choice and Mix) Special Retail Area – The Seafront

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

Support



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

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

From our viewpoint at the Marina, we are concerned at the general state of decay and dereliction of the lower seafront to the East of the Palace Pier.

The seafront should be a driving force for tourism for the City and East of the Pier is currently deleterious to this.

We welcome encouragement of temporary uses, especially for the Black Rock site which has failed to attract a viable permanent use for over 40 years.

The policy should ensure that the door is open for developments that will bring high quality, sustainable, innovative and attractive development to Black Rock, Madeira Drive, the Madeira Drive arches and Aquarium Terraces all of which currently blight 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?**

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

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

**Policy Number** (e.g. DM1) DM17

**Policy Name:** Opportunity areas for New Hotels and safeguarding conference facilities.

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

Support



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

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

Conference business has become essential to Brighton in recent decades (and does currently contribute economically to the Marina). We are concerned that the ability of the City to draw this business is declining and this decline will continue if City centre conference facilities are not available and developed to a contemporary standard.

We have a two-fold concern regarding the proposed conference facilities at Black Rock centre. Firstly the site is blighted (as currently) for years, with no 'meanwhile' use, on the promise that the conference development may happen. Secondly we are concerned at the prospect of a major conference centre being built which due to its off-centre location proves unattractive to conference organisers and is unused.

As the retail 'landscape' in the UK changes it seems increasingly unlikely that the proposed extension of Churchill Square will remain an attractive development. Consideration should be given to a total review of the Black Rock conference centre plan looking again at redeveloping conference facilities in the current Brighton Centre location.

We would like to see flexibility of use opened up for the whole DA2 area including Black Rock and Gas Works including innovative masterplanning for this area which has the potential to open up a new and thriving district of 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?**

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

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

**Policy Number** (e.g. DM1) DM18

**Policy Name** (e.g. Housing Quality, Choice and Mix) High Quality Design and places.

### **m) 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?**

We welcome the emphasis on high quality design and placemaking, in particular the emphasis on public realm, which has been poor in areas of the city, including the Marina.  
We support the requirement for artistic content in development design.

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

**Policy Number** (e.g. DM1) DM33

**Policy Name** Safe, sustainable and active travel

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

Support



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

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

We strongly support these policies in particular in respect of the public realm where there needs to be sufficient funding available to achieve excellent outcomes, including to fund Council involvement in control of delivery.

We welcome the opportunity to address the lack of pedestrian permeability often caused in developments by divisive road layouts and level changes – the Marina has suffered from this.

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

We would suggest ensuring that the policy addresses the management and control by the Council of investment in the public realm in relation to large developments. Disjointed public realm has been a long-standing problem at the Marina and this should be acknowledged and learnt from, otherwise it will be repeated throughout future large-scale developments.

Cycle routes – We are concerned that the Madeira Drive cycle route needs to be finished (it stops at the bottom of Duke's Mound), and this should be addressed within Black Rock proposals.

The DA2 area overall needs public transport innovation. This should be a major new district of the City and transport needs should be recognised to avoid later problems, policies should exist to encourage innovative solutions, perhaps trams or monorail. The coastal route East from Brighton city centre is reliant on inadequate road infrastructure and future sustainability and development will be blighted by this.

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

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



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

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

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

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

Support

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

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

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

Marina residents connected to a District Heating System comment that they are ambivalent regarding the arrangement. The downside is reported as high fixed costs and there is of course no choice of supplier. These systems are largely unregulated, in contrast to other energy supply arrangements and we would welcome wording that requires suppliers to comply with industry voluntary regulation and best-practices.

**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** SSA5

**Policy Name** Madeira Terrace & Madeira Drive

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

Support



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

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

We welcome access improvements along to the East end of Madeira Drive, to Black Rock and the Marina. Currently there are no streetlights, no cycle lane, no coherent pavement and the whole area does not feel safe, especially after dark.

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

We would urge that employment space be added to the policy to create activity all week and all year and not be seasonal.  
Temporary, or indeed any, use for Black Rock should be included.  
Consideration of the extension of Volks Railway to the Marina should be included in any Black Rock/Madeira Drive scheme.

**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 ?**

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

**Any other comments**

*Please use a separate sheet for each representation*

(Ctrl & click to view):

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

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

## Equalities

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

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

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

Progress should benefit everyone.

<b>Signed*:</b>	
<b>Dated*:</b>	12 <sup>th</sup> September 2018.

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

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

Completed forms should be sent to:

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

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

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

# Brighton Marina Neighbourhood Forum

## Brighton Marina Neighbourhood Forum Vision.

We want Brighton Marina to be developed in a way that realises the full potential of this special place by the sea for residents, workers and visitors.

Our shared aim for Brighton Marina is that future development of the Marina fulfils the objectives of supporting high quality of life, sustainability, connectedness and being a highly-valued asset. A place where residents, tourists and businesses all thrive.

### **OBJECTIVES:**

#### High Quality of Life:

- A positive choice as a feel-good place to live, work and visit.
- Public spaces and facilities that are enjoyable places to be.
- Making the most of our location on the coast and by the sea.

#### Sustainability:

- Economically sustainable. A mix of residential and commercial premises and property uses that are always in demand, maximising numbers of people in the Marina throughout the year.
- Environmentally sustainable. Aiming to have a positive effect on the natural environment and marine wildlife, and to minimise negative impacts.
- Future sustainable. Able to respond to changing requirements and demand to provide a significant contribution to the City's need for homes, workplaces and leisure space.

#### Connectedness:

- Connected within itself. Development plans must bring stakeholders together to make a cohesive and enjoyable place for individual employees, residents, berth holders and visitors.
- Connected to the city. Joined up transport links and welcoming entrances for vehicles, pedestrians, cyclists and boats.
- Development should make the Marina better and easier for pedestrians to get around.
- Residents across long-standing and new developments have a great sense of community, respect and shared interests and work together to build a collective sense of pride and belonging.
- Represented in the city by being an electoral ward.

#### A Valuable Asset

- Valued as a unique part of the city. Brighton's marina and the City's access to the sea. The UK's largest marina.
- Valued for quality of management.
- Valued in the city and region for its positive environmental and economic contribution.

CPPZ Policy PROJECTS  
 & HERITAGE TEAM

Telephone :

6/9/18

BRIGHTON & HOVE CITY COUNCIL  
 1ST FLOOR HOVE TOWN HALL  
 NORTON RD BN3 3BQ

CITY PLAN PART TWO CONSULTATION

Dear Sirs, We have lived at the above address for over 40 years and as long time residents of Patcham write to object strongly against the proposal to allocate the sites of 46-54 Old London Rd Patcham as an area for the development of 30 or more residential units. To our mind the proposal is flawed for the following reasons:

1. The site is too small and such a crowded development would not be in keeping with the distinctive look & feel of Patcham Old Village and would materially detract from the character & appearance of the village
2. 30 or more residential units would result in much more parking & traffic congestion difficulties ~~which~~ which have grown considerably worse in recent years
3. The Council have only recently rejected a planning application from McCarthy & Stone on the site for the above reasons which rejection was upheld on appeal so the Council's proposal smacks of hypocrisy

Accordingly we would urge the Council to remove the Old London Road site from the list of sites allocated for development in the City Plan

Yours faithfully

13<sup>th</sup> September 2018

Draft CCP2 Policy Projects & Heritage Team  
Brighton & Hove City Council  
First Floor Hove Town Hall  
Norton Road, Grand Avenue  
Hove  
BN3 3BQ

**BRIGHTON & HOVE Stage 2 Local Plan, Sept 2018**

**DRAFT Representation content**

LaSalle Investment Management (LaSalle) welcomes the opportunity to comment on the Brighton and Hove *Draft City Plan Part 2*. Albeit only an early draft, the document provides a clear sign of the intended 'direction of travel' of a further suite of policies, and there is much to support and welcome.

LaSalle hopes to play an active role in the ongoing plan-preparation process, and the following comments are intended to provide a clear response and a range of suggestions or ideas which will help shape and inform that process.

The consultation Draft City Plan Part 2 Document ('the Draft Plan') was published in advance of the adoption of the revised NPPF of July 2018. While BHCC clearly attempted to respond to the draft NPPF of March 2018, and sought to pre-empt the final version, the Council will presumably now revisit the document to ensure that it is consistent with the final revised national planning policy. A number of our comments below refer to the updated NPPF which may assist in that regard.

The comments below focus on a handful of policies which are of direct relevance to our ongoing involvement and interest in the site at the Sackville Road Trading Estate and Coalyard where LaSalle is working with our development partners Moda Living and Audley Group to bring forward an application for, and deliver in due course, a comprehensive mixed-use regeneration scheme for the site. There are very strong and clear synergies between the direction of emerging Part 2 policies and the emerging development proposals for the Sackville Road site. Reference to this is made in the context of policy SSA4, but numerous other policies also align very well with the approach being proposed for this site.

In that context there are a number of policies which we are keen to support in principle at this stage in the plan-preparation process. Key policies include:

- *DM1 Housing quality, choice and mix* - the emphasis on a need for a diverse range of housing types and sizes is welcome, and consistent with the national policy emphasis on boosting the delivery of housing to meet a range of housing needs. The inclusion of a reference to the role of 'build for rent' housing is supported.
- *DM4 Housing and Accommodation for Older Persons* – The Council's policy to deliver a sufficient supply and range of accommodation to meet the needs of older people is supported. As for mainstream housing, there are a range of housing and other needs for older people which require a range of different housing (and care) products and providers, and emerging policy seeks to allow for this. The emerging proposals for the Sackville Road site includes an element of purpose built care accommodation for older people, and this is an important component of the housing market which needs to be actively planned for.
- *DM11 New Business Floorspace* – The requirement to deliver a range of unit size and types, incorporating flexibility to meet a range of business needs, is appropriate in the context of Brighton and Hove, and is supported.

- *DM18 High quality design and places* – the emerging policy seeks to provide general design guidance, but we note also includes some very detailed references and comments in the supporting text. However, the overall thrust of the policy and text is supported as a starting point for the Part 2 Plan. We note the reference to “*detailed area- and site-specific design principles will be identified via the Urban Design Framework*” and would appreciate further clarity on what this refers to, and it’s relationship with the Part 2 Plan.
- *DM33 Safe, sustainable and active travel* – the flexibility proposed is supported, and is vital to delivering appropriate types of development which can respond to the accessibility and locational characteristics of specific sites. Prioritising walking, cycling and public transport over the private car is welcome.

Other specific policies of particular note, and on which LaSalle is keen to comment, are set out below:

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

LaSalle strongly welcomes this policy which reflects the NPPF’s emphasis on the importance of maximising and ‘*making effective use*’ of development land. The Draft Plan policy and text identifies the constrained nature of Brighton and Hove, and the particular importance in that context of maximising the potential of available sites. There is clear synergy between this emerging emphasis of local policy and the emphasis of the NPPF on the “*substantial weight*” to be given to the re-use of suitable brownfield land for the delivery of new homes and other development (see NPPF paragraph 118).

The Draft Plan text advocates a design led approach to density, responding to the development needs of particular groups (paragraph 2.154), but balancing this with the need to prevent overcrowding and negative impacts on amenity. Recognition and encouragement of the potential to deliver high-density developments in the City is appropriate, and supported, and of clear and direct relevance to our emerging proposals for the Sackville Road site.

#### **DM6 Build to Rent Housing**

Recognition in the Draft Plan of the importance of delivering a diverse range of new housing, including explicit references to purpose built private rented housing, is welcome, and supported. As referred to in the Draft Plan, build to rent is a growing sector, and Government has been consulting on how to best encourage and enable an increased supply of new purpose built private rented housing.

The NPPF now provides clear and explicit policy on this, and refers to the importance of reflecting and meeting the housing needs of different groups and communities, including “*people who rent their homes*” (NPPF 2018, para 61). We support that both draft policies DM6 and DM1 refer to the delivery of homes to rent, and that the Draft Plan is proposing to encourage this sector of the housing market in Brighton and Hove. Indeed, in revisiting the Plan in light of the new NPPF, the wording of Policy DM6 might be made more explicitly positive and encouraging to better reflect the tone and content of national policy.

LaSalle is working with Moda Living to bring forward a mixed-use redevelopment scheme for this site, with Moda seeking to deliver a high-quality build to rent development. Moda Living are also making separate representations to the Draft Plan. We note with some concern a reference in the draft policy (criterion b)) to resisting an “*over-concentration of build to rent within sites designated as Strategic Allocations in the City Plan*”. The reasons and justification for this element of draft policy is unclear. Unless there is a clearer definition and justification to underpin an understanding of what might constitute an ‘over-concentration’ our view is that this should be removed from the emerging Policy. If this component of DM6 is to be retained, a clear evidence base and explanation of how it will be measured and determined should be provided as part of the next stages of plan preparation.

However, it is unclear to us how this might be implemented in a predictable and consistent way, making this an unsound and ineffective component of policy. If interpreted in an inappropriate way, concerns about ‘over-concentration’ could easily reduce the potential for the BTR sector to deliver



high-quality, amenity rich developments and regeneration outcomes, or worse very quickly undermine the viability and deliverability of BTR schemes altogether by imposing an arbitrary and unjustified limit on the amount of development on one site or in one neighbourhood. This would be contrary to the NPPF.

The draft supporting text (paragraph 2.42) includes a cross-reference to Policy CP19 of the City Plan Part One and the need for a mix of housing. While the importance of the local planning framework delivering a mix of housing at the City-wide level is clearly expressed and understood, the suggested reference to potential 'over-concentration' at strategic sites is unclear, and potentially inconsistent with the plan-level objectives and policies. Therefore, we strongly encourage BHCC to revisit this with a view to removing the reference to 'over-concentration'.

In amending the emerging policy a more positive and appropriate emphasis for criterion b) would be reference to the importance of viewing BTR proposals in the context of wider housing and regeneration objectives, and against the need to deliver a diverse range of housing types and products which meets the needs of a range of groups within the City. The Draft Plan might also refer to the importance of monitoring the delivery of new private rented homes to ensure that BHCC is able to understand the relative level of new build rented homes across the City over the plan-period.

We note (at paragraph 2.49) a reference to the Council's intention to commission further evidence regarding build to rent provision (deliverability and viability), and look forward to further details, and the chance to comment on this evidence in due course.

#### **SSA4 Sackville Trading Estate and Coal Yard**

The proposed allocation of this site for comprehensive, mixed-use redevelopment is strongly supported. LaSalle manages this site on behalf of the underlying landowners, and there have been several previous unsuccessful attempts to bring the site forward for redevelopment. An earlier retail led scheme was granted planning permission in 2009 but never delivered due to a global market downturn. The site has been operating at well below full capacity for several years with a number of low density retail related uses. It is under-performing with regard to its physical contribution to the local community, as well as to the economy of Brighton & Hove. Much of the site has been empty or under-used for approaching 10 years.

The overall tone and content of the emerging allocation policy SSA4 is welcome and supported. LaSalle's intentions are to see the site come forward to deliver a mixed-use residential and employment redevelopment, and we have been engaged in constructive pre-application dialogue with BHCC for some time. The mix of land-uses set out in the first part of draft Policy SSA4 are very well aligned with the emerging proposals. The pre-application dialogue with BHCC is ongoing, but the emerging proposals include B1 and other commercial space which would deliver a range of employment opportunities, as well as a number of ancillary job creating uses including local retail, café/food and drink premises, a crèche/nursery.

The site would make a significant contribution towards meeting the Council's challenging housing needs, while also creating a new, sustainable and attractive neighbourhood. As referred to below, the site would make a meaningful and early step to assist in the delivery of strategic plans to see regeneration and investment in the Hove Station area.

The proposals also include a range of public and semi-public spaces, including a main 'square', and children's play areas on-site within landscaped and green areas. The built development proposed is also considering the potential to deliver additional community facilities on-site, with an emphasis to date on potential health facilities.

Criteria a - g of draft Policy SSA4 identify a number of specific elements and characteristics required by BHCC, and LaSalle supports the focus of these which align well with the dialogue had to date with BHCC. In particular, the emerging masterplan positions the site as part of the early delivery of a new '*Hove Station Quarter*' as envisaged by the emerging Hove Station Neighbourhood Plan being taken forward by the Neighbourhood Forum (the HSNF). The application is being prepared with direct

regard to input and suggestions received from the HSNF and to many of the key principles and the vision of the emerging Neighbourhood Plan as well as policy DA6.

This includes making provision for future pedestrian and cycle links to the east into neighbouring parts of the DA6 area around Newtown Road, as well as ongoing efforts to secure a new link to Hove Station. This latter element is included in the draft Policy (criteria c), but as worded SSA4 requires 'provision' of such a link as one of several potential future links to the east. Given the need for 3<sup>rd</sup> party land and for the agreement of Network Rail for any new bridge the delivery of such a new link is not solely under the control of LaSalle (or Moda). Therefore, while this aspiration is shared between BHCC and LaSalle/Moda, the wording of this requirement should be **modified** to ensure that an inability to secure the agreement of relevant 3<sup>rd</sup> parties does not result in us being unable to comply with the Policy and bring the site forward.

From the outset of our pre-application discussions with BHCC an indicative figure of around 4650 sq.m. (50,000 sq.ft of B1 employment space) has been used to define the approximate amount of employment floorspace considered appropriate. We remain of the view that this is an appropriate level as part of a mixed-use scheme. The proposed introduction of modern B class floorspace to the Sackville Road site will see a transformational increase in the number, quality and range of employment on the site as compared to the existing, and previous uses – we estimate that over recent years the site has accommodated approximately 50 jobs, and even when full it accommodated less than 200. The mix of employment uses (B1 and other commercial space) being proposed now is likely to generate and accommodate in the region of 420 - 450 jobs (excluding those associated with the construction process). The emerging proposals would deliver a range of B1 and other employment, including small-scale studio and other workspaces which would meet local creative or cultural sector requirements, as well as a larger floorplate B1 building.

We note that BHCC identify around 5080 sq.m. of 'B class' employment uses on-site at present. In fact, much of the site is currently in 'A class' retail or trade-counter uses, and there have historically been limited, if any, 'B class' occupiers on-site. Therefore, while a requirement to deliver 'employment' (B class) uses is welcome and supported as part of a mixed-use approach, the suggestion that 6000 sq.m. new B1 space is a minimum requirement is considered a surprising element of the emerging policy, and should be revisited and **modified**. We are keen to ensure a meaningful and high-quality employment component forms part of the scheme, but a more flexible approach is considered appropriate.

Provision of a minimum of 6000 sq.m. of B1 space is not considered an appropriate requirement of SSA4. Existing City Plan Part 1 Policy DA6 identifies a requirement for the wider DA6 area to accommodate retained and new employment space. Policy DA6 includes the following:

***“Outside the Conway Street Industrial Area - retention/replacement of existing with an additional 1,000sqm employment floorspace”***

Footnote 78 of Policy DA6 notes that a net gain of employment floorspace may not be delivered across the DA6 area as a whole.

There are several relevant points which should be considered by BHCC in refining emerging policy SSA4 to provide a more realistic and balanced policy:

- The Sackville Road site is outside of the Conway Street Industrial Area where a number of specific sites and buildings are explicitly identified for retention in employment uses – there are no employment buildings identified by Policy DA6 for retention on the Sackville Road site itself;
- The site does not now, and historically never has, contained high levels of B1 or other B class floorspace – as a 'Trading Estate' the site has seen retail related trade counters, and some small-scale storage and wholesale activity (some of which may be considered B8). Policy DA6 rightly refers to the site as a '*bulky retail*' site (paragraph 3.78) rather than an 'employment site'. A requirement for significant B1 office employment as indicated in the Draft Plan would imply aspirations for a 'business park' element which is not considered relevant or deliverable, or consistent with DA6;

- The Sackville Road site is required by adopted Part 1 Policy DA6 to contribute towards a minimum target of delivering 1000 sq.m. of new employment floorspace in the DA6 area outside of Conway Street – this is significantly below the now draft 6000 sq.m. minimum figure proposed in SSA4 for the Sackville Road site alone. Notwithstanding the inclusion of the 'waste management' site within SSA4, this proposed figure is unrealistically high and could undermine efforts to deliver DA6, and other aspirations of adopted and emerging policies;
- The Sackville Road site is one of numerous sites likely to come forward for redevelopment over the plan period in the DA6 area, all of which are required to adhere to the requirements of Policy DA6 – it is therefore reasonable to expect the level of new employment space (and retail space) outside of the Conway Street area to be significantly higher than the 1000 sq.m. minimum. For example, retained employment sites to the east of the Sackville Road site can reasonably be expected to see higher density employment uses in due course.

LaSalle and our development partners remain committed to delivering new high-quality B1 and other employment floorspace as part of the redevelopment of the Sackville Road site, and in that regard share the aspirations of BHCC to see additional and better quality jobs provided on the site. However, for the reasons give above we are of the view that a requirement to deliver a minimum of 6000 sq.m. would be onerous and inconsistent with adopted Policy DA6, and a different approach should be taken.

We trust that this response to the Consultation Draft Part 2 City Plan is helpful. As referred to above, we and our development partners will continue to work closely with BHCC officers to discuss and prepare the planning application for the Sackville Road site. We look forward to being able to bring the site forward to deliver a high-quality regeneration scheme of value to the City as a whole, with a range of social, environmental, and economic benefits secured.

Yours sincerely,

**For Official Use:**

Respondent Number:

Date Received: / / /2018

Entered onto Portal: Yes/No

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

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

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

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

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

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

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

**Part A: Contact Details**

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

Yes

No

Privacy Notice: (ctrl & click to view)

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

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

<b>Organisation Name (If applicable)</b>	London Road Area Local Action Team (LAT)
<b>Name</b>	
<b>Address</b>	
<b>Email Address</b>	
<b>Agent Name (If applicable)</b>	
<b>Agent Name</b>	
<b>Agent Address</b>	
<b>Agent Email Address</b>	

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

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

(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):

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** SSA2

**Policy Name** Combined Engineering Depot, New England Road

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?**

Because this area needs regeneration and redevelopment

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

c. ADD “and improves the current traffic flow through Preston Circus”  
3.19 Building heights and massing ... ADD and be congruent with the character of nearby residential housing and the amenity of existing residents.

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

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



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

**Site Allocations - Housing Sites**

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

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

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

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

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

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

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

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

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

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

## **H2 – Urban Fringe Housing Sites**

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

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

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

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

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

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

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

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

### **H3 - Purpose Built Student Accommodation Sites**

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

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

Support

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

Object

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

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

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

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

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

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

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

**Site Allocations - Employment Site**

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

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

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

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

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

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

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

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

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

**Any other comments**

*Please use a separate sheet for each representation*

(Ctrl & click to view):

- [Introduction](#)
- [Appendix 1: Glossary of terms](#)
- [Appendix 2 Parking Standards – Policy DM36 Parking and Servicing \(adopted Parking Standards SPD\)](#)
- [Appendix 3 - Local Wildlife Sites \(Policy DM37 Green Infrastructure and Nature Conservation](#)
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- [Supporting documents to the City Plan Part Two](#)
- [Background studies for the City Plan Part Two](#)

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

## Equalities

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

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

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

--

<b>Signed*:</b>	
<b>Dated*:</b>	13 <sup>th</sup> September 2018

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

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

Completed forms should be sent to:

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

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

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

DP270

## Comment

<b>Event Name</b>	Consultation on the Draft City Plan Part 2
<b>Comment ID</b>	267
<b>Response Date</b>	13/09/18 12:51
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

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

**Organisation Name**

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

**Name**

**Name**

**Address**

**Address**

**Email Address**

**Email Address**

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

**SSA5 - Madeira Terrace & Madeira Drive**

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

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

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



DP271

**For Official Use:**

Respondent Number:

Date Received: / / 2018

Entered onto Portal: Yes/No

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

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

**Draft City Plan Part Two – Consultation**

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

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

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

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



**Part A: Contact Details**

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

Yes

No

Privacy Notice: (ctrl & click to view)

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

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

<b>Organisation Name (If applicable)</b>	Legal & General Investment Management
<b>Name</b>	
<b>Address</b>	
<b>Email Address</b>	
<b>Agent Name (If applicable)</b>	
<b>Agent Name</b>	
<b>Agent Address</b>	
<b>Agent Email Address</b>	

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

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

(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, Choise and Mix

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

Support  
Object

  

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

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

Please refer to supporting letter.

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

Please refer to supporting 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**

**Policy Number** DM6

**Policy Name** Build To Rent Housing

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

Support  
Object

  

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

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

Please refer to supporting letter.

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

Please refer to supporting letter.

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

Please refer to supporting letter.

**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 supporting letter.

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

No comments.

**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](#)
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Please refer to supporting letter.

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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.**

<b>Signed*:</b>	
<b>Dated*:</b>	13/09/2018

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

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Planning Policy Team  
1<sup>st</sup> Floor Hove Town Hall  
Norton Road  
Hove BN3 3BQ

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

13 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

**Draft City Plan Part Two  
Representations Made of Behalf of Legal & General Investment Management**

Thank you for providing us with the opportunity to submit representations to Brighton & Hove City Council's (BHCC) Draft City Plan Part Two. We write on behalf of our client, Legal & General Investment Management, who has an interest in the Longley Industrial Estate, Brighton.

The Longley Industrial Estate is allocated within the City Plan Part One for mixed-use redevelopment including a minimum of 3,000sqm of office / research and development floorspace, residential dwellings and ancillary retail floorspace (Strategic Allocation DA4:1b).

In August 2018, Legal & General submitted a full planning application for the following development at the site:

*"Demolition of existing buildings and redevelopment to provide: 3,333sqm of office/research/development floorspace (B1 (a)/(b) use), 308sqm of flexible commercial/retail floorspace fronting Elder Place (B1 (a)/(b) and A1-A4 use), 208 residential units (C3 use) in buildings ranging between 3 and 18 storeys plus roof plant level, together with associated car and cycle parking, further plant at lower ground level, supporting facilities and landscaping."* (LPA Application Ref. BH2018/02598).

The proposed development exceeds the minimum commercial floorspace required on the site as well as providing a significant number of new homes to meet local need. All of the new homes will be provided as Build to Rent accommodation.

Legal & General's proposals for the Longley Industrial Estate follow similar developments in Salford, Leeds, Bristol and Walthamstow (London). It will be their first major investment in Build to Rent within Brighton, and represents a strategically important investment for them within the City for the long term.

Legal & General's Build to Rent developments are not just built by Legal & General, but operated by them over the long term, offering occupiers security, service and certainty. Legal & General's developments typically offer tenancy agreements of up to five years with no agency fees, a range of unit sizes allowing for up and down sizing within the development, and on-site facilities such as gyms, entertaining spaces and outdoor areas.

In this letter we set out our comments on those policies and supporting text which make reference to Build to Rent accommodation. We would like to reserve the right to provide further comments on any future drafts of the City Plan Part Two prior to its formal publication.

As a general comment, we are pleased to note that Build to Rent housing has been included within the Draft City Plan Part Two and that the Council consider that it can help boost the supply of rental accommodation within the City by providing more choice of good quality rented accommodation and secure long term tenancies. However, we have



some concerns with some of the specific details contained within the Draft City Plan Part Two. We set out below our comments on specific policies and supporting text, along with suggested alternative wording where relevant.

### Policy DM1 Housing Quality, Choice and Mix

We are pleased to note that Build to Rent accommodation is mentioned at Policy DM1 which requires proposals for new residential development to make provision for a range and mix of housing / accommodation formats subject to the character, location and context of the site. However, in the context of Build to Rent developments, other formats such as self and custom build housing, community led housing and starter homes, do not easily lend themselves to such developments. The flexibility awarded by Policy DM1 is therefore vital, and we would suggest that this should go further as indicated below:

*“b) make provision for a range and mix of housing / accommodation formats subject to the character, location and context of the site **and subject to the nature and viability of the proposed development**, 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.”*

### Policy DM6 Build to Rent Housing

We are pleased to see that the Draft City Plan Part Two includes a specific policy relating to Build to Rent housing. This policy sets a number of criteria relating to such developments. We address each of these criteria in the table below.

Draft Policy Criteria	Comments
1. Proposals for the development of Build to Rent housing will be required to meet all of the following criteria:	<p>Whilst we do not object to the principle of setting criteria for Build to Rent developments, planning policy which sets too rigidly defined criteria runs the risk of frustrating the delivery of such housing which has been identified as being able to boost the supply of housing within the City. We therefore suggest that the wording of this criteria be amended to:</p> <p>1. Proposals for the development of Build to Rent housing will be <del>required</del> <b>expected</b> to meet all of the following criteria:</p>
a) the development will improve housing choice and make a positive contribution to the achievement of mixed and sustainable communities in accordance with City Plan Part One Policy CP19 Housing Mix;	Whilst we support the strategic aims of Policy CP19, the policy was drafted in the context of more traditional approaches to housing mix. In terms of Build to Rent accommodation, this may undermine the viability of such schemes. Criteria a) should therefore afford sufficient flexibility to reflect the distinct nature of Build to Rent schemes which often provide a greater proportion of smaller unit sizes.
b) the development will not lead to an over-concentration of build to rent within sites designated as Strategic Allocations in the City Plan;	Paragraph 2.22 of City Plan Part One states that Strategic Allocations are sites whose regeneration / redevelopment are considered critical to the overall delivery of housing and employment growth over the plan period. Most of the Strategic Allocations are highly sustainable and accessible brownfield sites which are best placed to address housing and employment need. The Council has acknowledged that Build to Rent accommodation has the potential to address local housing need within the City. However, the current wording of criteria b) has the potential to jeopardise the delivery of such accommodation due to the interpretation of 'over-concentration'. It is considered that a concentration of Build to Rent developments in suitable locations, such as those Strategic Allocations

	<p>which are close to transport hubs or within the city / town centres, would be appropriate for the City. It is therefore requested that this criteria be removed so as not to deter such developments and ultimately jeopardise the delivery of much needed housing. It is considered that if the Council had concerns with the quantum of such accommodation within the City in the future, this could be regulated through Policy CP19 of the City Plan Part One.</p>
c) all of the dwellings are self-contained and let separately;	No comments.
d) the homes are held as build to rent under a covenant for at least 15 years;	A covenant of 15 years is the longest period that funders can adhere to due to fund life and long term market risk testing requirements. Any longer and this could frustrate the delivery of such accommodation within the City.
e) the build to rent housing is under unified ownership and will be subject to common management;	No comments.
f) the development will provide professional and on-site management;	<p>The definition of 'Build to Rent' within the National Planning Policy Framework (NPPF) (Annex 2) states that "...[schemes] will typically be professionally managed stock in single ownership and managed control." (Page 65). There is no reference to <u>on-site</u> management.</p> <p>Whilst the majority of Build to Rent schemes will provide on-site management, the level of management varies between schemes and is often linked to the scale of the development. For some developments, it may more cost effective to provide some of the management services off-site, with the tenant ultimately benefiting from these savings.</p> <p>We therefore suggest that the wording of this criteria be amended to:</p> <p>f) the development will provide professional <del>and on-site</del> management;</p>
g) the development will offer tenancies of at least 3 years available to all tenants with defined in-tenancy rent reviews;	<p>The definition of 'Build to Rent' within the NPPF (Annex 2) states that "<u>Schemes will usually offer longer tenancy agreements of three years or more...</u>" (Page 65, <u>author emphasis</u>). Neither the definition at Annex 2, nor the main body of the NPPF sets prescriptive tenancy lengths. The NPPF affords sufficient flexibility reflecting site specific circumstances and individual schemes.</p> <p>We therefore object to the current wording of criteria g) which would require developments to offer tenancies of <u>at least</u> 3 years. This is contrary to the guiding principles of the NPPF. The current wording would exclude those looking for shorter tenancies and would reduce true tenant choice (a key aspect of Build to Rent schemes).</p> <p>We therefore suggest that the wording of this criteria be amended to:</p> <p>g) the development will offer <del>long term</del> tenancies <del>of at least 3</del> available to all tenants with defined in-tenancy rent reviews;</p>

h) the development provides a high standard of accommodation that complies with the requirements in Policy DM1 Housing Quality, Choice and Mix; and	Please see the above comments relating to Policy DM1.
i) the provision of affordable housing complies with the requirements in City Plan Part One Policy CP20 Affordable Housing, subject to the criteria set out in part 2 of this policy.	Please see the below comments relating to the provision of affordable housing.
2. Build to rent developments will be expected to contribute towards meeting the city's identified need for affordable housing. The council will negotiate to achieve the following requirements:	It is acknowledge that Build to Rent development can play an important part in contributing towards meeting the City's identified need for affordable housing, but only when viable and when it does not prejudice the realisation of other planning objectives.
a) a proportion of affordable housing based on the requirements of Policy CP20 (40% on sites of 15 or more (net) dwellings), normally in the form of affordable private rent;	As well as setting specific affordable housing targets, Policy CP20 also states that these targets may be applied more flexibly where the Council considers this to be justified. In assessing the appropriate level and type of affordable housing provision, Policy CP20 states that consideration will be given to a number of criteria (including local need, accessibility of the site, viability, the delivery of other planning objectives and achieving a successful housing development). Is it considered that this flexibility is not reflected sufficiently enough in the current wording of criteria a), especially given the distinct economics of Build to Rent accommodation.
b) the affordable homes to be offered at discounted rent levels to be agreed with the council;	Whilst we strongly support not specifying specific rent levels as part of criteria b), we have serious concerns with supporting paragraph 2.45 which states that the Council will seek to negotiate 55% of the affordable element provided at Local Housing Allowance rent levels and the remaining affordable provided at a discount of at least 20% against local market rents. The high percentage of Local Housing Allowance rent levels risks undermining the viability of may Build to Rent schemes. We request that this target percentage is lowered.
c) eligibility criteria for the occupants of the affordable homes to be agreed with the council and included in the S106 agreement;	No comments.
d) the size mix of affordable housing units to be agreed with the council in accordance with Policy CP20; and	<p>In terms of affordable housing unit size mix, Policy CP20 states that the preferred mix to be achieved across the City is 30% one bedroom units; 45% two bedroom units and 25% 3+ bedroom units. On individual sites, Policy CP20 states that the preferred affordable housing mix (in terms of unit size and type of dwelling) will be determined through negotiation and informed by up to date assessments of local housing needs and site / neighbourhood characteristics.</p> <p>Policy CP20 was very much drafted with traditional approaches to affordable housing mix in mind, and does not reflect the distinct nature of Build to Rent schemes and the type of affordable hosing that they offer. By referencing Policy CP20, criteria d) may undermine the viability of Build to Rent schemes. We therefore suggest that the wording of this criteria be amended to:</p> <p>d) the size mix of affordable housing units to be agreed with the council <del>in accordance with Policy CP20</del></p>

	reflecting the distinct nature of Build to Rent schemes; and
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.	Whilst we acknowledge the principle of a 'clawback' mechanism, we consider it important for the criteria to be applied in such a way that it is given sufficient flexibility to reflect the viability and delivery of individual schemes to ensure that the requirements do not seek to increase the financial burden on schemes beyond which they can viably afford. This could otherwise frustrate delivery of much needed regeneration and could delay the delivery of other planning benefits associated with new development.

**Appendix 1: Glossary of terms**

We are concerned that the definition of 'Affordable Housing' on page 180 of the Draft City Plan Part Two does not include Affordable Private Rent (also known as Discounted Market Rent). Under Annex 2 of the NPPF, 'Affordable housing for rent' states that *"For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent)."* It is respectfully requested that Affordable Private Rent / Discounted Market Rent, in the context of Build to Rent schemes, is included in the definition of 'Affordable Housing' at Appendix 1 of the Draft City Plan Part Two.

**Summary**

Overall, we are pleased to note that Build to Rent accommodation is included within the Draft City Plan Part Two. However, we have concerns that the current criteria contained at Policy DM6 would frustrate the delivery of such accommodation which the Council acknowledge as being able to help boost the supply of housing within the City. We respectfully request that the criteria are reviewed in light of our comments.

We look forward to confirmation of receipt of these representations and would welcome the opportunity to participate in any future consultations. Please feel free to contact me if you have any queries or would like to discuss.

Yours faithfully

DP272

## Comment

<b>Event Name</b>	Consultation on the Draft City Plan Part 2
<b>Comment ID</b>	268
<b>Response Date</b>	13/09/18 13:41
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

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

### Organisation Name

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

**Name**

**Name**

**Address**

**Address**

**Email Address**

**Email Address**

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

### DM1 - Housing Quality, Choice and Mix

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

### DM2 - Retaining Housing

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

### DM3 - Residential Conversions & Retention of Smaller Dwellings

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

**DM4 - Housing & Accommodation for Older Persons**

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

**DM5 -Supported Accommodation**

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

**DM6 - Build to Rent Housing**

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

**DM7 - Homes in Multiple Occupation**

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

**DM7 Object Reasons**

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

I do not feel that this policy goes far enough to limit the growth of HMOs (especially student HMOs) in residential areas that are not covered by Article 4. The use of 20% of the 'wider neighbourhood' could mean in certain areas there could end up being a greater allowance of HMOs.

I would also like to request that Argyle and Campbell Roads be included in the Article 4 area as there is a high concentration (30%) of HMOs in these two roads which is causing many problems relating to noise, rubbish and fly tipping, parking issues and general degeneration of the area. The roads are literally just outside the Article 4 area and would hugely benefit from being included.

**DM8 - Purpose Built Student Accommodation**

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

**DM9 - Community Facilities**

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

**DM10 - Public Houses**

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

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

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

**DM34 - Transport Interchanges**

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

**DM35 - Travel Plans & Transport Assessments**

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

## **DM35 Support Reasons**

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

Traffic in Brighton & Hove has become a nightmare in recent years. Especially bad is the junction at the end of New England Road, New England Street and Argyle Road leading down to join London Road/Preston Road at Preston Circus. This is the most polluted area in Brighton and I welcome any plans to assess this area.

## **DM36 - Parking & Servicing**

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

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

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

## **DM38 - Local Green Spaces**

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

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

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

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

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

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

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

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

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

## **DM43 - Sustainable Urban Drainage**

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

## **DM44 - Energy Efficiency & Renewables**

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

## **DM45 - Community Energy**

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

## **DM46 - Heating & Cooling network infrastructure**

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