

Planning Policy Manager  
Brighton and Hove City Council  
Norton Road,  
Hove  
BN3 3BQ

Dear Sandra,

**Consultation Response to City Plan Part Two on behalf of Boxpark and the “Peoples Promenade” with regards Policy SSA5 Madeira Terrace, Madeira Drive, Brighton.**

I am representing Mr Wade of Boxpark in the matter of Madeira Terraces and efforts to suggest positive ideas for the regeneration of this stretch of seafront. The Madeira Drive Regeneration Framework is already a key published document that any emergent development plan policy must have regard to along with the Seafront Improvement Programme.

**Promoting Change**

Brighton & Hove’s seafront is going through a period of unprecedented development and renewal recognised within The Seafront Investment Plan:

*“the seafront is the city’s flagship destination for both visitors and residents and central to its economic vibrancy. This major investment programme will enhance and upgrade this essential leisure and entertainment resource.”*

The Seafront Infrastructure Scrutiny Panel in 2015 recommended the production of a Seafront Investment Plan. The following year BHCC, through the Coastal Revival Fund bid, secured funding to produce the Madeira Drive Regeneration Framework. The aim, to develop a strategic and comprehensive approach to the regeneration of the whole of the Madeira Drive, including Madeira Terraces and other regeneration projects such as Sea Lanes, Brighton Waterfront, and the Zip wire.

**Current Day**

Madeira Terraces is a critical part of the seafront environment of the City and deeply cherished. Years of under-investment and a lack of proper maintenance of the historic structure has resulted in such severe dilapidation that it has been closed to the public, hidden behind security fencing, for 1655 days at the time of writing.



*Ace Café September 2018*

This area offers a poor public realm at present and, whilst the area hosts many events, its own contribution to them has been reduced since its closure. The Council recognise, within the Policy, Resources & Growth Committee Report of 4<sup>th</sup> May 2017, that the offering is :

*“..often tired and inconsistent public realm and a section of seafront that is inadequately configured relative to the remainder of the city’s famous seafront between the piers. Long overdue an update, the temporary closure of Madeira Terraces, in combination with the above, has resulted in a more urgent need for a strategic approach to the area which can offer a joined up approach to restoration of the terraces, improvement of the public realm and greater overall accessibility.”*

## The Regeneration Framework

The currently adopted Regeneration Framework is not designed to be over-prescriptive but it does set out ‘options’ as to how the area could be improved and sets out the constraints holding back regeneration. The ‘future vision’, which of course the City Plan Part Two will need to embrace, aims to regenerate the area to include:

- Vibrancy/Innovation: By aiming to activate the space through a diverse range of indoor and outdoor uses that resonate with Brighton & Hove’s visitor and creative economies.
- Sensitive/Consistent: Taking account of the unique heritage and culture of the surrounding area but also taking account of stakeholder views in its development.
- Affordable/Deliverable: This recognises that the public sector constraints mean that the solution will require increased commercial development and other self-funding solutions.

On this last point a crowdfunding campaign has been operating very well at bringing in contributions and the hard work of the local community in trying to retain this historic structure is to be applauded. However, at present the ‘Save Madeira Terrace’ crowdfund has raised £460k against the Council’s own ‘estimated cost’ to restore arches at more than £30M.

This remains a significant shortfall in funding and BHCC fully recognise that private investment partners will be needed to make a success of the area with much needed financial contributions within a commercial scheme that works yet remains sensitive to the site constraints.

The Regeneration Framework seeks to:

- Address severance along the seafront and improve access to and along Madeira Drive for visitors from across Brighton & Hove and its surrounding areas.
- Transform the public realm of Madeira Drive through introducing high quality design, better lighting and wayfinding, improved visitor facilities and a greater focus on pedestrians and cyclists.
- Redevelop and activate Madeira Terrace by introducing a variety of leisure, retail, office and accommodation uses.
- Develop an anchor tenant for the area through the redevelopment of the Black Rock site as a major conference centre and arena facility.
- Encourage the development of a variety of permanent and temporary uses along the beach consistent with its role as a centre for sports and family based activities.
- Reinforce Madeira Drive’s role as Brighton & Hove’s primary outdoor events space within the context of a renewed event strategy for the city as a whole.

My client fully supports the Regeneration Framework and its objectives and has already floated a commercial scheme to help move forward the prospects of full regeneration of this area. It is critical of course that emergent development plan policy supports, reflects and is fully consistent with the Framework.

## City Plan Part Two – Policy SSA5

As worded, policy SSA5 of the City Plan Part Two states:

### **“SSA5 Madeira Terrace and Madeira Drive**

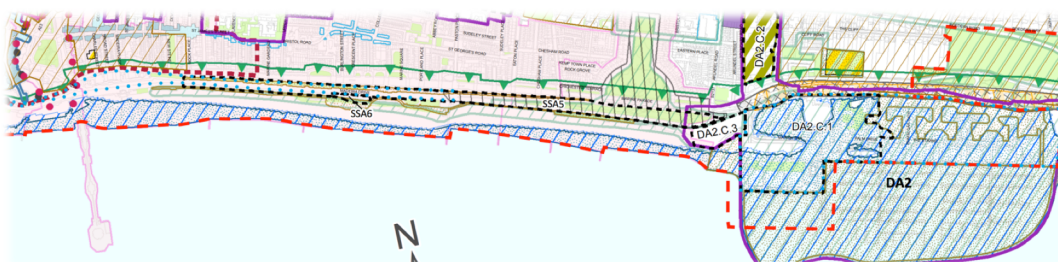
*Madeira Terrace, as shown on the Policies Map is allocated for a vibrant and balanced mix of uses potentially including:*

- *Retail uses (Use Classes A1, A3, A4, A5);*
- *Commercial space (Use Class B1);*
- *Hotel (Use Class C1);*
- *Galleries/museum(s) (Use Class D1); and/or*
- *Leisure uses (Use Class D2) appropriate to the character of the seafront.*

*Planning permission will be granted for proposals that accord with the Development Plan and meet the following site specific requirements:*

- Seek the wider restoration and repair of the remainder of the Terraces and access points;*
- Seek infrastructure improvements (including internet) along Madeira Drive.*
- Provide improved sustainable transport and pedestrian facilities to address severance along the seafront and to improve access to and along Madeira Drive for visitors and residents linking access improvements to the Black Rock site and the Marina;*
- Provide improved access to the beach for visitors of limited mobility;*
- Support and contribute towards a coordinated approach to public realm improvements including shared surfaces; improved lighting, signage and wayfinding;*
- Allow small scale hardstanding areas on the ‘back of the’ beach parallel to Madeira Drive to provide basic visitor amenities such as toilets, shelter, kiosks and lifeguard facilities (see Policy DM39 Development on the Seafront policy);*
- Conserve and enhance biodiversity in the area;*
- Encourage a variety of temporary/ pop up uses consistent with the area’s role as a centre for cultural, sports and family based activities.”*

The policy is also reflected in the East Area Proposals Map extracted below:



This also shows the Marina and Black Rock adopted site specific policies within Policy DA2 of City Plan Part One. This allocates the site for 7,000 sq m of leisure and recreation use, in addition to ancillary retail and café uses associated with the primary leisure use. Given the nature of the adopted policy for Black Rock it seems sensible to include reference to hotel accommodation as part of any Madeira Terrace proposals given the proximity and relationship between the two sites.

My client has tabled preliminary plans in accordance with the Regeneration Framework and the emergent policy as set out above. These can be viewed in greater detail [here](#).



*Proposal*

*Existing*

## **Conclusion**

My client broadly supports the currently worded policy as it balances the heritage and conservation issues with the pragmatic realisation that, to bring about successful regeneration, private funds will be necessary as part of a joint venture. To this end the Seafront Investment Plan, the Regeneration Framework and the emergent City Plan Part Two Policy SSA5 all consistently promote this route to regeneration.

Please let me know if you wish me to provide more information on any point

Yours sincerely

From:
To: PlanningPolicy
Subject: City plan part two consultation
Date: 13 September 2018 20:40:31

Dear CPP2 Policy Projects & Heritage team

We wish to raise objections to the inclusion of 46-54 Old London Road Patcham in the City Plan, and would politely request it is removed from the list. This is for the following reasons -

The potential replacement of 5 sensibly proportioned family homes with significant green space around then by 30 or potentially significantly more units is entirely disproportionate to the available space and will significantly alter the feel & balance of the area which at present retains a variety of residential & small businesses in keeping with its historical village origins. At a time when family values are important to nurture a functional community we want to continue to keep the balance that has established itself over the 20 + years we have lived here of young couples, new young families, growing families, professionals, trades & crafts, & the range of retired people.

There is inadequate infrastructure for what would be a vast increase in traffic, both people & vehicles, entering leaving parking & servicing such a block. The area is already at supramaximal for parking with existing residents competing for space with visiting shoppers,local business owners and increasing use of the area for unofficial park & ride to Gatwick.

The additional traffic would pose a risk to pedestrians including children of all ages going to & from schools & nurseries, scouts & brownies, and to the elderly population on the area who are slower to cross the roads at an already quite complicated junction between Ladies Mile & Old London Road (on this point some traffic management to slow down traffic at the north end of Old London Road would be appreciated.)

The sewerage drainage & surface water drainage for the area is already at its limit & we have seen groundwater flooding & sewage backing up onto the road surface on a number of occasions in the last 10 - 20 years. £0 + new properties will over-burden the existing sewers & water drainage. To concrete over a significant area of important natural ground water drainage downstream of the flood prone area will put a large number of properties, some of which are historically important & in a conservation area, at greater risk. This could include damage to foundations through increased basement flooding risk. If this were to be the case we would feel there were legal grounds to seek compensation from any council or developer that contributed to this.

The well conducted public inquiry last year concluded that the development proposed by McCarthy & sons was inappropriate as it would be so dense as to spoil the village look & feel, and materially detract from the character and appearance of the area. We do not feel the situation has changed at all and that to include 46-54 Old London Road would be to invite planning applications which would make a mockery of the large amount of time & public money expended on the previous consultation.

Thank-you for giving careful consideration to these & other concerns raised by fellow residents.

Yours Faithfully

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## Rottingdean Parish Council (RPC) feedback on Draft City Plan Part 2

Parish Councillors for Rottingdean believe there is much to be welcomed in the Brighton & Hove City Plan Part 2 and are pleased to have been acknowledged as significant consultees (see specific comment below on 1.8).

Councillors for Rottingdean remain nonetheless deeply worried (Page 5 of Plan introduction) that several aspects of City Plan Part 1 and therefore by implication City Plan Part 2 are predicated upon erroneous traffic counts in Rottingdean High Street and therefore stress the vital importance of early and regular review of City Plan Parts 1 and 2.

Specific comments follow: -

**1.8 Duty to Co-operate (page 8)** It would be constructive if this section acknowledged benefits from genuine consultation & joint co-operation with other authorities within Brighton & Hove, namely Rottingdean Parish Council, where there is experience of loss of opportunities for two-way exchange on the specific needs and aspirations of a semi-rural/village environment.

**DM1 Housing Quality, Choice and Mix (part e) (page 12)** Parish Councillors support the policy for 10+ dwellings, 10% of the affordable residential units and 5% of all residential units to be suitable for occupation by a wheelchair user. This is informed by experience of woefully inadequate current provision which allows families to really struggle to care for a child with physical or learning disabilities through not being able to find a suitable home.

RPC highlights also that many reside in properties which will not prove to be 'homes for life' because not enough regard has in the past been given to changing needs as populations age and health issues predominate. Accessible homes benefit everyone, not just people with disabilities.

**DM3 2.22 (page 20)** RPC is pleased to see recognition of the need for smaller homes and the need to retain and build smaller dwellings. This desire is reflected in the Rottingdean draft Neighbourhood Plan which needs enforcing by Planning Committee when developers come forward with plans for sites. Parish Councillors welcome the pragmatism of exceptions i) to iii).

**DM4 2.25 (page 22)** Whilst it is statistically correct to argue Brighton & Hove has a relatively small proportion of older age group residents, it should be acknowledged that many wards & peripheral communities have a far greater proportion than Brighton & Hove as a whole (e.g. Rottingdean) and these variations need informed attention when development is being considered. **2.30 (page 23)** is fully supported.

**DM10 – Public Houses (page 41) Safeguard Public Houses & recognise their contribution to the character and vitality of communities.**

Given the number of pubs in Rottingdean this is particularly relevant both in terms of a community role, economic importance & encouraging visitors to Rottingdean. **RPC** welcome recognition and protection offered by City Plan Part 2 for these valuable community assets.



**DM12 2.103 (page 49)** An example cites the Lanes but Rottingdean's draft Neighbourhood Plan pursues similar restrictions on the enlargement of shop-fronts to retain the historic & vibrant feel of a Village High Street. RPC note that **DM23 and DM24 (page 76 onwards)** addresses shop-fronts in conservation areas and wishes to see shop signage in conservation areas fully addressed too.

**DM22 Landscape Design and Trees (p72)** RPC is delighted to read proposals to protect trees on development sites; sadly, recent experience is a marked disregard by builders of these requirements with trees and hedges unlawfully removed to maximise sites and allow better access during construction. RPC ask BHCC to better enforce these requirements that often deprive neighbours of their privacy and 'expose them to the building site next door'.

**DM27 (page86)** addresses listed buildings and proposed developments. Rottingdean's issues are with the maintenance and repair of listed buildings which need to be more fully addressed.

**DM24 – Advertisements (Sign consent not to harm visual amenity.)** Rottingdean Parish Council is conscious of a plethora of formal & informal signage across the Village and are endeavouring to rationalise signage to ensure only legal and effective signage prevails. RPC is also aware that local businesses tend to place advertising hoardings on paved areas and recognises the importance of working with local traders to ensure that the proper sign consent is obtained and that signs do not harm the visual amenity of Rottingdean particularly in the Conservation area.

**DM30 - Registered Parks and Gardens -how proposals for temporary uses will be assessed.** This is of particular relevance to Rottingdean as there are several events throughout the year which take place on The Green, in Kipling Gardens, and on the Recreation Ground. The current system works well but some clarification as regards when an informal event becomes a formal event would be helpful.



## Travel and Transport

**DM 33 Safe, Sustainable and Active Travel** This Development Policy sets out the aim of the City on prioritizing walking, cycling and Active Travel. It is written with a central urban area in mind and does not acknowledge enough that parts of Brighton & Hove may have different characteristics and demographics to consider. Through traffic on the B 2123, Falmer Road, for instance, includes private cars travelling from or to places not well served by public transport to anywhere other than the City Centre and are beyond a normal person's ability to walk or cycle. We are also concerned about the impact of new developments on bus journey travel time and reliability, particularly at peak travel times. Creating a safe cycle route through the Village would prove extremely challenging.

**DM 34 Transport Interchanges** We welcome this policy and our draft Neighbourhood Plan is permissive re use of the Long Stay Car Park for Park and Ride.

**DM 35 Travel Plans and Transport Assessments** RPC welcomes this policy but believe 2. Should be amended to make provision for traffic generated by new developments which passes through an AQMA. In the Reasoned Justification paragraph 2.253 it states "Travel Plans and Transport Assessments should seek to reduce traffic generation and mitigate the effect the effect of developments..." RPC consider it fundamental any data used in a TA is robust and current i.e. properly reflects how traffic conditions and transport provision actually affect journey times, economic and environmental impact on the area. See Paragraphs 2.254 and 2.255.

The 2016 Adopted City Plan Part 1 is based on road conditions and traffic generated NO2 pollution in the AQMAs staying within limits up to 2030 and planned for road congestion levels. But in fact, by 2017, road congestion on the B2123 and A259 have already exceeded the planned 2030 levels. The Rottingdean AQMA now has levels of air pollution above the legal limits.

**DM37 Green Infrastructure & Nature Conservation (page 109)** this is welcome and supported.

**DM38** (page 115) RPC is disappointed that BHCC **identify** only four additional Local Green Spaces for added protection.

**DM 40 Protection of the Environment & Health – Pollution & Nuisance** Whilst RPC welcomes the overall intention of DM40, the Development Management Policies prioritise a City-Centre perspective. They do not adequately acknowledge different needs & characteristics in outlying parts of Brighton & Hove, particularly infrastructure needs and inadequate road capacity in the Rottingdean area. The volume of vehicle traffic using the B2123 and its junction with the A259 already creates serious problems air pollution, congestion and delay in journey times which affect economic prosperity as well as health and environmental harm.

The Rottingdean AQMA, is above the legal limit in the High Street (See AQMA report 2018) This is despite a move to using lower emission buses.





This represents a serious problem for residents impacting their health, safety and quality of life. RPC would like to see the document amended at 2.298 to read '*new development in or near or adding to traffic in an AQMA assists....*'.

The narrowness of Rottingdean's historic High Street (B2123) already carries too much traffic most of which are commuters using the road as a rat run to go further east on the A259.

The mitigations through travel plans etc. of developments will not have a significant impact on these levels despite various efforts.

The City Plan STA's reliance on additional journeys being absorbed by bus services have not been measured so it cannot be relied upon as an offset for the future.

Developments which risk additional journeys by car in an area in which the AQMA is already above the legal limit must be addressed with adequate mitigating measures.

**DM42 Protecting the Water Environment (page127)** This policy is very welcome. Whilst the case for more homes is well presented in this Plan, RPC observations often conclude a lack of acknowledgement by City Council of the cumulative effects of multiple applications especially with regard to water supply, waste & sewage disposal, air quality, & volume of traffic. Localities such as Rottingdean experience the impact of development in LA areas outside Brighton & Hove, as do other outlying parts of Brighton & Hove.

**SSA1 p149 and SSA7 p163** RPC is worried at the potential increase in traffic on the A259 and the B2123 which will inevitably be generated by future developments at the Brighton General Hospital Site, and Land adjacent to the Amex Stadium which are likely to occur within the Plan period. Parish Councillors assume that the cross-authority Transport Working Group is taking account of these proposals and that current or future Planning Briefs will require comprehensive Transport Impact Assessments to be undertaken in conjunction with any planning applications in respect of these sites.

**Table 5 Residential Site Allocation (page 166)** The indicative number of 40 residential units for the former St Aubyns site is noted and RPC is pleased to see the St Aubyns Planning Brief referenced as a guiding document.

**Grid of Urban Fringe Sites (p 175)** RPC note the inclusion of land behind Falmer Avenue and land off Ovingdean Road but neither of which are correctly recorded as in Rottingdean Parish.

RPC is pleased to see the omission of the three other potential sites previously identified. However, is concerned at the comment that planning applications could still be submitted in connection with these sites which RPC deem wholly unsuitable for development.

The map on **page 211 Land adjacent to Ovingdean and Falmer Road, Ovingdean** does appear to rightly demonstrate that only a very limited space is suitable for building on.

**From:**  
**To:** [PlanningPolicy](#)  
**Subject:** City plan Part 2 consultation  
**Date:** 13 September 2018 21:04:40

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I am writing to object to the above proposals -

1. I cannot understand proposing this site for the 4th time to knock down five perfectly good dwellings.
2. In the past the government inspector would not give permission to this site being used.
3. The site being proposed is part of a village community and as such is not in keeping with the area.
4. The current drainage and sewage system is not adequate for a large development.

**From:**  
**To:** [PlanningPolicy](#)  
**Subject:** City Plan Part Two Consultation  
**Date:** 13 September 2018 22:26:58

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To whom it may concern,

I wish to object to the inclusion of 46-54 Old London Road, Patcham being in the list of sites allocated for development within the City Plan.

I object on the basis of over development of a peaceful village setting.

The density of a proposal for thirty odd houses on the site currently occupied by 5 family homes is totally at odds with the location. It will fundamentally change the feeling and appearance of the area. The village character that exists will be lost, and once gone cannot be recovered. I also feel it is folly to allow development on top of an underground stream which in recent years has continued to flood after heavy rain. Within the Patcham area are other sites, out of the village centre which could be considered, such as Patcham Court Farm and the top of Ladies Mile Road.

I urge you to remove this location from the development site list and preserve the integrity of Patcham Village.

Sent from my iPad

**From:**  
**To:** [PlanningPolicy](#)  
**Subject:** City Plan Part Two Consultation  
**Date:** 14 September 2018 10:17:41

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Dear Sir/Madam

I am writing to object to the plans to include the area between Ladies Mile Nature Reserve and Carden Avenue in the City Plan, and to potentially build 35 new houses on the green space there.

This area is beautiful green space that is well used by the local community for walking, running, playing and cycling. It would be a great shame to destroy this space and would have a knock on effect on the local protected nature reserve.

I hope that my views will be taken into account.

This email is being resent as the one I sent yesterday (before the deadline of 5 pm) bounced back.

Yours sincerely

## **Green Group of Councillors response to the Draft City Plan Part Two**

### ***Introduction***

**One of the finest cities in the United Kingdom deserves a strong approach to how it is planned and how it will serve future generations. But we have to have an approach which can respond faithfully to the many complex challenges posed by our city- a city that is in the throes of housing and environmental crises; a city couched between the Channel and the National Park, begging for creative responses to re-use of land; a city with a large number of heritage assets and conservation areas; a city with burgeoning populations at both end of the demographic spectrum; with a disproportionate share of health problems; and a yawning gap between the richest and the poorest. It is only right that we push this planning document to rise faithfully to the challenges and compose a strong plan-led response.**

The Green Group of Councillors acknowledges the central importance of the City Plan Part Two (CPP2) and appreciates the efforts that have gone into developing it, in particular the substantial number of technical and background studies that have informed it.

As we did through political leadership in the City Plan Part One (CPP1), we also recognise that a well-designed and well-planned built environment creates benefits which go far beyond mere bricks and mortar, such as protecting our fragile environment, boosting other areas of the economy such as tourism, retail and leisure. We commend the efforts made in the document to build on the success of Part 1 with a holistic approach.

We welcome several of the initiatives in the draft plan. However we also note some significant omissions and have some concerns about the overall direction of the document. Although we note the precedence of the National Planning Policy Framework and the need for our plan to accord with the principles in the framework, we feel as if the plan could go much further in seeing the primary challenge as achieving wellbeing

and social justice within ecologically-sound limits. There is little reference to promotion of wellbeing and quality of life which should inform the entire approach of the plan.

## **HOUSING ACCOMMODATION AND COMMUNITY**

### **DM1 Housing quality, choice and mix**

We welcome the moves in the bold text of policy DM1 for a mixture of housing. In City Plan Part One we began the discussion about non-traditional models of housing provision and in a city where a large number of sites are small and we have a quantity of windfall sites, we welcome that the plan includes the movement in the city that has included bodies such as the Brighton and Hove Community Land Trust. We welcome the moves to lessen the housing crisis by placing value on a diverse series of solutions to alleviate the problem.

Although planning committee has been referencing the use of the national space standards document for at least 4 years, the Green Group welcomes the full inclusion of the nationally described space standards and believe it will make the determination of planning applications more straight-forward for officers and members alike. We have seen on a number of prominent occasions living and amenity space sacrificed to quantity of 'units' in new homes<sup>1</sup>. Policy DM3 outlines how the city responds to the harm this sacrifice is causing to amenity and community cohesion- often communities are pitted against one another where this is happening, e.g. streets with long-standing residents and short-term HMO lets. While too much conversion can be harmful, if the city is to retain many of its own young residents and graduates there must be a balanced approach.

There must be recognition in the housing that the city provides that harmful changes to welfare benefits - and spiralling rents in the city - are meaning we are permanently

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<sup>1</sup> Ref application BH2015/01471 [http://present.brighton-hove.gov.uk/Published/C00000118/M00005778/AI00050036/\\$BBH201501471TheAStoria1014GloucesterPlaceBrighton.pdfA.ps.pdf](http://present.brighton-hove.gov.uk/Published/C00000118/M00005778/AI00050036/$BBH201501471TheAStoria1014GloucesterPlaceBrighton.pdfA.ps.pdf)

losing new entrants to the labour market which in turn is harming our economic health and damaging community morale.

As a city with a more substantial older population than the region and with a growing population of older people, we embrace accessible housing. 10 million people are over 65 years old which is predicted to rise by over 50% in 20 years' time and this number will have nearly doubled to around 19 million by 2050. Studies are now asserting how loneliness is affecting older people- it increases the likelihood of mortality by 26%; having a similar influence as cigarette smoking.<sup>2</sup>

Although we note and welcome the inclusion of extra care and assisted living in CPP2, in City Plan Part 1, the Green Group called for "*development that works toward Lifetime neighbourhood principles*"<sup>3</sup> and we reiterate that approach here. In order that we refute the dated model of institutionalising, marginalising and isolating older people and marginalised communities, we call for a stronger push for a more proactive approach to integrated communities. We point to Scandinavian countries where it is now routine for older residents to live alongside and share community facilities with younger people. Intergenerational housing cooperatives across Europe are providing new lessons on how different age groups can benefit from living together. The model piqued interest in the UK through the Channel 4 TV programme *Old People's Home for 4 Year Olds*.<sup>4</sup> Key among the findings at home and abroad are that such housing promotes longer, healthier and more independent ageing. Given that leaders in health now talk about how isolation kills, the holistic housing model helps communities fight isolation, loneliness and vulnerability.

The Green Group held discussions in administration with housing providers who are seriously considering this model in this country. We continue to argue that Toad's Hole

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2 <https://www.campaigntoendloneliness.org/threat-to-health/> Loneliness increases the likelihood of mortality by 26% and has a similar influence as cigarette smoking (Holt-Lunstad, 2015)

3 <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/FINAL%20version%20cityplan%20March%202016compreswith%20forward%200.pdf> City Plan Part 1, p211

4 <https://www.channel4.com/programmes/old-peoples-home-for-4-year-olds>

Valley remains a fantastic opportunity for the city to embrace this approach, which will be better for community morale and for the city's pocket.

The Green Group of Councillors welcomes the connection between housing and community but would go further, focusing in much the same way the Mayor of London has with his *London Housing Design Guide* on a clear manual for communities. It's not just about space standards or compliance with regulations - this is a golden opportunity to push for qualities in the local vernacular which can enhance the way of living in the city into the future. We welcome the work that has been recently put into the Urban Design Framework Supplementary Planning Document<sup>5</sup> and recognise that quality of detail is essential to strong communities with housing and public realm that works. Community led responses to housing are intrinsically about adding dignity.

### **DM2 retaining housing and residential accommodation**

In relation to paragraph 2.17

Residents in the city centre wards regularly contact the Green Group about some of the worst behaviours in the holiday let schemes. Specifically, this is in relation to the threat that the worst forms of holiday let schemes pose to amenity and the retention of residential areas. In 2016 we called for our council to be *"given the powers to bring landlords of HMOs, party houses and AirBnB properties within the scope of business rates in the same way as for example hotels and guest houses are within the scope of business rates."*<sup>6</sup> We repeat our call that focus (and legislation) is needed to enforce commercially minded owners of properties who are solely buying or using homes just as an AirBnB or holiday let business venture— i.e., the 'bigger operators' who let out entire properties solely with the intention of bringing in money via AirBnb. In some ways these types of people could be described as 'non-residents' of their properties, and are the types of people that should be targeted by these changes, rather than homeowners who rent out a bedroom, etc. However at the moment it is hard to define them. In the

<sup>5</sup> [http://present.brighton-hove.gov.uk/Published/C00000969/M00009185/AI00066336/\\$20180612145849\\_016471\\_0057552\\_U DFSPDIpaperJun18lowres.pdfA.ps.pdf](http://present.brighton-hove.gov.uk/Published/C00000969/M00009185/AI00066336/$20180612145849_016471_0057552_U DFSPDIpaperJun18lowres.pdfA.ps.pdf)

<sup>6</sup> [http://present.brighton-hove.gov.uk/Published/C00000117/M00006129/\\$\\$Supp21202dDocPackPublic.pdf](http://present.brighton-hove.gov.uk/Published/C00000117/M00006129/$$Supp21202dDocPackPublic.pdf)



London boroughs, AirBnB had to introduce a 90-day annual limit for London hosts and we have been lobbying government for something similar here. We repeat our call for tougher licensing conditions for 'party houses' and have looked at the Australian system which very recently has reformed to a much tougher regime. We believe in pursuing a balanced approach if possible but we need stronger powers locally and continue to lobby for these.

### **DM5 Supported Accommodation (Specialist and Vulnerable Needs)**

We welcome the majority of the policies here but in terms of achieving the stated aim of "an integrated society which cares for the vulnerable", we continue to argue that many vulnerable people can only be accommodated outside of the city boundaries. This is causing harm to them and meaning we lose their input to society. As such we argue that the policy should specifically include that the council seeks to respond to the problem of a lack of this housing in the city through building in the city and that policy (A) needs to be strengthened. This would also ensure that people are not isolated from their friends and family as a result of needing accommodation for their needs.

### **DM6 Build to rent housing**

We acknowledge that not all homes are or should be built for home-owning. The *Architects' Journal*<sup>7</sup> reported in April last year that "*the private rented sector (PRS) is predicted to grow by up to 40 per cent over the next 10 years*" and The British Property Federation reports that 124,000 homes are now completed, under construction or in the planning system in the UK<sup>8</sup>. The experience from a number of the London Boroughs is that build to rent is proving to be a highly lucrative market. Exponential growth is predicted over the next period and it has not suffered in the same way as other areas of the housing market. We raise some caution with regard to build to rent. Because the built form has to survive for longer than the latest property 'rush', it is a relatively

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7 <https://www.architectsjournal.co.uk/buildings/feature-will-build-to-rent-transform-the-uks-housing-supply/10019004.article>

8 <https://www.architecture.com/knowledge-and-resources/knowledge-landing-page/booming-build-to-rent-sector-defies-uncertainty>

unknown entity in the city and we have no detailed experience of what planning tools we need to effectively manage it.

That said, we welcome many of the proposals in the policy including minimum tenancies which is due to be strengthened with primary legislation. As such this policy must be interpreted in coordination with minimum space standards. We call for high quality design for such build including robust materials that are designed for the marine environment. We would want to include a requirement where possible, for the use of environmentally sustainable materials where they are available at not more than 20% of the cost.

We appeal that this form of housing is no way to assuage the distorted housing market and it should come with as many caveats. Further we raise concerns about keeping such housing genuinely affordable- in the London Boroughs, build to rent homes are 11% more expensive than rental properties nearby, while we also cite the provision in the joint venture between the city council and the registered provider Hyde Housing that genuinely affordable rents are possible and can deliver homes.

Our belief is that the policy should focus on affordability of this housing and linking affordability to incomes, not the market. This could include building on the Living wage rent/Living rent concept or on the rent policy for new council homes which is edging towards more of a range of affordable rents. As the 'Good Landlord' scheme rents are set at the rate of Local Housing Allowance we call for the affordable rented element to be good landlord, assuming the city council would want to retain nomination rights, this would include housing people from the waiting list.

Affordability should be assessed in relation to actual household incomes of renters, not a percentage of a market rent as the market rent will mean very different things depending on where in the country someone resides. An affordable rent should not exceed the Local Housing Allowance (which is less than the 80% market rent figure.<sup>9</sup>) If more than 35% of the median renter households income is needed for the rent, then it is unaffordable. We should build on the idea of Living Wage rents (or Living Rents) and define these in terms of the percentage that rents are of the median renting household

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<sup>9</sup> Affordable Housing Brief, BHCC

income. Affordable provision should include some social rents, even if this means fewer affordable homes may be achieved (since 15,000 households in the city can only afford social rents) and should build on the new council homes rent policy which explores 4 rent level options when setting rents for new homes of social rents; of 27.5% Living wage rents, of 37.5% Living Wage Rents and of Local Housing Allowance rents (but nothing higher than this).

We strongly believe that the most effective way to have more control over appropriate levels of build, to have secure and warm homes, to home some of the most marginalised and to prevent the emigration of younger and poorer populations from our city, is to have the city council allowed to build homes again. This must be done in coordination with lobbying for the 'right to buy' to be scrapped, which has never seen stock wholly replaced and done with no cap on our borrowing (as the public sector is able to borrow at historically low interest rates). Further to the work of the Green Group of Councillors, this is one of the arguments from the Local Government Association<sup>10</sup>.

### **DM7 Houses in Multiple Occupation (HMOs)**

Further to the new policy that was created to begin to address HMOs in the city with CPP1, we welcome the suite of proposals designed to help further address HMOs.

We note the increased quantity of planning enforcement cases<sup>11</sup> which are directly related to HMOs and consider that stronger and clearer policy will help the communities we serve in terms of clearer controls over amenity and cohesion and the local planning authority- both officers and members. In the worst affected areas, it might be good to examine the results of the work from Southampton Council, which has placed a ban on HMOs with an article 4 direction.

### **DM8 Purpose Built Student Accommodation**

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<sup>10</sup> <https://www.local.gov.uk/lga-housing-commission-final-report>

<sup>11</sup> [https://present.brighton-hove.gov.uk/Published/C00000118/M00009173/AI00068733/\\$EnforcementAnnualReport1718reportdraftv4.docxA.ps.pdf](https://present.brighton-hove.gov.uk/Published/C00000118/M00009173/AI00068733/$EnforcementAnnualReport1718reportdraftv4.docxA.ps.pdf)

While we appreciate that PBSA is necessary because of the inability of both universities and other education providers to wholly accommodate all of their student populations on campus, it is where the non-academic community meets the accommodation where the LPA requires most attention.

We believe that in future, stronger tests must be complied with if the LPA is to consider the demolition of housing in favour of PBSA. This should include a clear clause that any genuinely affordable housing within the application site and proposed for demolition must be replaced by the applicant at their own cost.

We believe the policy should have a stronger commitment to quality of materials appropriate for the marine environment. While we agree that *“The majority of new PBSA developments in recent years have been located along the Lewes Road academic corridor”* we believe that the different and often jarring building styles has led to a poor quality street scene, particularly around the Vogue Gyratory where there is little visual relief, a dazzling array of styles and a poor street scene. North of the Gyratory, the Lewes Road is a ‘tall building corridor’ and there may be further potential for poor design without a stronger push for appropriately articulated buildings, built with quality materials. We would point to the Preston Barracks scheme as evidence of a strongly designed set of buildings, but we believe there should be a requirement that -especially where policy is looser- e.g north of the Gyratory, and especially with stand-alone schemes, that applicants through the LPA are able to discuss the cumulative effect of applications. This could be enhanced with CGI showing proposed builds. Further, we call for a ‘vision document’ driving the best quality design for PBSA into the future- this would have a particular focus on: permanently driving out harm to amenity and retaining BRE daylight standards for local communities along Lewes Road as standard; protection of views and vistas from and into Conservation Areas, the national park and Hollingbury Fort.

Because PBSA is sadly sometimes felt as development happening *to* communities, rather than *with* them, we believe that a new 'Assessment of Community Involvement' should be introduced. This would provide a reasonable forum to ask the best applicants to outline what measures they will take to ensure development occurs which involves the residential community. This could include things like retained rights for the community to use communal rooms for community meetings or access to rooftop terraces; the

provision of noticeboards; community use of facilities such as gyms and bars, or other campus facilities such as certain evenings' with community use of sports facilities, etc.

### **DM9 Community facilities**

With the shrinking public estate under austerity, the provision of community facilities has come under serious assault. This has included where it has led to threat to life and limb such as in south London<sup>12</sup>, and the proposed closure of public toilets. The period demands that of the quantity of community facilities remaining, we must do everything we can to retain them and as such we warmly welcome the policies. We have continuing concern about the collapse in GPs in the city and the re-provision of such an important part of community infrastructure. As such as we reluctantly acknowledge that *“Community uses such as dentists, doctors and health clinics may be permitted where they are considered complementary to the town centre, would maintain a window display and draw pedestrian activity into the centre.”* We would point to the success of the Brighton Health and Wellbeing Centre on Western Rd in doing just that.

Community facilities often contain historic fabric, with many having retained continuous use over long periods of time. As such they are important to the history of the community. If loss is to happen, and where appropriate, the LPA should consider recording its functions through photographic/ digital means as an ongoing attempt to hold together the social history, if the built form cannot be retained. Although we fully expect any removal of community space through development to be replaced, it should be done with attention to the local area. For e.g. if there is a reputable community organisation in a purpose-built facility next to a new-build, reasonable applicants would be expected to cooperate with the facility to enhance the infrastructure for the entire community.<sup>13</sup>

### **DM10 Public Houses**

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<sup>12</sup> <https://news.sky.com/story/living-near-station-saved-my-life-victim-calls-for-solutions-to-police-funding-crisis-11465834>

<sup>13</sup> Ref Downsman pub in Hangleton <https://www.brighton-hove.gov.uk/content/press-release/church-and-pub-make-way-almost-60-homes> community facilities could have been co-curated with the HKP instead of provision on site.

The Green group fought to push for public house provision through CPP1. This included the controversial planning application for the Rose Hill Tavern. The Green Group has repeatedly flagged the best practice<sup>14</sup> from the Campaign for Real Ale as a good working document for the LPA. Although the city has thankfully not seen the mass-closures of public houses of other similarly sized cities, a number of significant and high-profile closures came about 3 years ago which has informed a better discussion about how such facilities are retained for future generations.

While we welcome the many tests the policy proposed to help ailing public houses, we point to The Rose Hill Tavern which is still in community use, if not with an alcohol licence. We strongly believe that the model of community/ cooperative/ enthusiast ownership should be drawn into discussions as early as possible, facilitated through the LPA, if public houses report difficulties in retaining their premises.

The rich history of public houses has been subject to some comment and the city hosts many of the historical features which mark out individual brewers with distinctive branding and visually stunning premises e.g. the Freemasons pub. Many features such as stone panels, etched and cut glass, mosaics, metal work, leaded windows, hanging signs denote the special place these buildings have in the city's history. In pre-literate society, coloured tiles were used to help denote brands for e.g. green tiles on the facade of a pub denoted a Tamplins premises such as the Victory Inn, the Lanes as well as United Breweries such as the Montreal Arms, Hanover. This history is architecturally rich and in its own right deserves special attention- it's no accident many public houses were added to the Local List when it was last updated in 2015<sup>15</sup>. In the unfortunate circumstances of pending closure, the LPA should take serious effort to record these details for retention by the public libraries and the Keep.

## **Topc- Employment and Retail**

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<sup>14</sup> <https://www.lgiu.org.uk/wp-content/uploads/2014/06/Public-Houses1.pdf>

<sup>15</sup> <https://www.brighton-hove.gov.uk/content/planning/heritage/local-list-heritage-assets>

**DM11 New Business Floorspace**

Although we support this policy and instinctively want the benefits of employment to be genuinely felt by all communities, we believe there may need to be work done on understanding how suburban sites of newer business floorspaces are being occupied and retained. The LPA rightly has strong policies to protect employment space but there have been several mixed-use applications which have come back for the removal of employment space because it has sadly failed. A survey of occupancy rates should inform if we move to understanding the provision of B1a, b and c uses in purpose built blocks in better connected locations. If we cannot have better locations, we must have transport solutions to purpose built suburban blocks.

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

We welcome that the Regional Centre has been amended to facilitate a new centre called Brunswick Town Local Centre. The Brunswick Town area has a series of historically important businesses and their retention and the 'feel' of Brunswick Town is enhanced through the presence of small and independent retailers.

The Green Group of Councillors continues to have considerable concerns about what is happening to retail and is not alone in doing so. According to a survey published by the Federation of Small Businesses (FSB) in January, 14% of small businesses are now expecting to scale down or stop trading, with retailers among the least optimistic.<sup>16</sup> This has been followed a series of announcements about massive job losses in the sector: House of Fraser announced that 6,000 jobs would be axed in June, in late May M&S announced it would close 100 stores. Shopping habits are changing and there is chronic uncertainty with Brexit. These are all things that will affect how viable shopping and especially big shopping centres are.<sup>17</sup>

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<sup>16</sup> <https://www.retailgazette.co.uk/blog/2018/01/record-number-small-businesses-looking-shut-shop/>

<sup>17</sup> [http://present.brighton-hove.gov.uk/Published/C00000969/M00009185/\\$\\$Supp30174dDocPackPublic.pdf](http://present.brighton-hove.gov.uk/Published/C00000969/M00009185/$$Supp30174dDocPackPublic.pdf)

Recent studies have found that trade in shops in the city is supported by 78% of local people and 22% visitors so a key plank of the policy must be to support what way small and independent retailers are supported by policy.

In the circumstances the LPA should support the protection of local shopping areas with local traders, and focus on the enhanced local flavour and particular characteristics from the local area which are drawn into focus from the offer. There may be a need to look to further expand the Article 4 Direction to explicitly protect certain areas. We also firmly believe that there needs to be recognition of the importance of the provision of post offices to the flourishing of SME retail- see our comment on DM9. We also call for the LPA to work closely with the Local Economic Partnership, Brighton and Hove Economic Partnership, the Federation of Small Business and others on creating resilience for small local traders.

In the circumstances where gaps on the high street become inevitable and the unit is in the council's ownership, the LPA should be part of a systematic and creative response. In peak seasons and in the most prominent streets, such gaps should be filled by new retailers. One of the recognised strengths of the local economy is the strong levels of start-ups. We point to the best practice of what the Green Group did with the Mary Portas fund on London Rd and the 'meanwhile' use of 'The Field' at Preston Barracks which has seen a number of young business people found successful businesses.

We opposed the move from government to liberalise legislation about converting A1 to C3 and considered joining the legal challenge to the ruling from many councils at the time of the change.

We also point to the historically important retail frontages which especially in the Conservation Areas in the city have an amazing diversity of features e.g. original wooden frames, cruttall windows, 'ghost' signs<sup>18</sup>, hanging signs and cut glass. We call for special attention to be made by the LPA that such features are retained in developments and if all attempts to retain features fail, that such features are recorded and kept for local records. We also repeat the call in LP 2005 that bold and inappropriate fascias especially in terms of dimension and unsuitable materials are avoided and that where possible

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<sup>18</sup> <https://twitter.com/ghostsigns>



historic signs uncovered through renovation are carefully retained (and appropriately encased) or incorporated into updated signs.

Although SPD2 talked about excessive internal lighting, and old QD25 addressed the issue of external lighting, we have been concerned also about what is happening to retail parades in Conservation Areas with regard to lighting. We want to avoid the gradual erosion of character in areas such as the Valley Gardens, Old Town and Brunswick Town Conservation Areas through 'drip-drip' development. This is being felt especially through garish, badly designed and executed fascias, inappropriately designed hanging signs and window-wide flashing LED displays that are permanently switched on. We believe a night time survey needs to be conducted at the earliest point to understand the condition of retail frontages in Conservation Areas with regard to harmful artificial light.

#### **DM13 series of sites of local parades**

We believe the Dip in Hollingdean is an important local parade, as is the one at the top of Moulsecomb Way and these should be added to the list of local parades on p51.

#### **DM14 Special Retail Area -Brighton Marina**

We continue to have serious concerns about connectivity and how welcoming the Marina is to visitors who arrive on foot. It can be a confusing warren of tunnels and steps- visitors are not given clear way finders and arrive at a car park. Work must be done to make the Marina much more welcoming, which in turn will increase its footfall.

#### **DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities**

We firmly believe that regardless of the longer-term future of the Churchill Square area, there needs to be a considerable amount of work done on a much-improved public realm in the area which should include an improved bus area. How the area connects to the Lanes, the Clock Tower and Brighton train station are all key to future successful uses of the area.

## Topic– Design & Heritage

### DM18 High quality design and places

We direct you to the many comments we have made above in DM6, 7, 8, 9, 10, 12.

We would amend the policy on P62 of CPP2 to include:

c) the quality, appropriateness and sustainability of building materials and architectural detailing;

And add

e) opportunities to incorporate energy saving technologies and renewable energy generation in the design to reduce the city's carbon footprint

We whole-heartedly support the plan's commitment to striving for excellence in the design of the city's built environment. We welcome new development which responds to the distinctive character of the city's different neighbourhoods. We have particular concern about suitability of materials for the marine environment and point to many schemes with rusting balconies and wind-battered wood elements. 'Form should follow function' and we should embrace bold design. We welcome the work that has been recently put into the Urban Design Framework Supplementary Planning Document<sup>19</sup> and recognises that quality of detail is essential to strong communities with housing and public realm that works.

We applaud the focus on high quality public realm which has on too many occasions been neglected through various applications.<sup>20</sup> As many areas are still quite hard to navigate on foot, we strongly support imaginative public realm responses which enhance walking and cycling through the city centre. Simple signifiers can help transform spaces- e.g. street trees in the city centre of Glasgow have strings of lights,

<sup>19</sup> [http://present.brighton-hove.gov.uk/Published/C00000969/M00009185/AI00066336/\\$20180612145849\\_016471\\_0057552\\_U\\_DFSPDIpaperJun18lowres.pdfA.ps.pdf](http://present.brighton-hove.gov.uk/Published/C00000969/M00009185/AI00066336/$20180612145849_016471_0057552_U_DFSPDIpaperJun18lowres.pdfA.ps.pdf)

<sup>20</sup> See the poor public realm on Black Lion Street with badly patched and cracked paving stones, poor navigation aids and poorly imagined public art.

Chelsea has 'smart' street lamps, while Amsterdam rewards areas with clean air with free wifi<sup>21</sup>. We further strongly believe that designing high quality places for bicycle use deserves to be a priority in the city centre and that failed shared spaces are best left to the past. The Mayor of London has boldly sought to build strong transport projects that have seen foot and cycle journeys grow as people feel welcome. As we have said above, in DM14, we believe much needs to be done to improve the city centre especially around the Clock Tower.

### **Topic- Transport and Travel**

#### **DM33 Safe, Sustainable and Active Travel**

Please see our comments on DM18- particularly public realm.

Further to previous representations by the Green Group to CPP1 we welcome the stated aims of CPP2 to promote and provide for the use of sustainable transport in the city, particularly through the prioritisation of walking, cycling and public transport, in line with the Local Transport Plan. Transport charity Sustrans found that meeting government plans in England for an increase in walking or cycling would reduce deaths from air pollution by more than 8,300 in the next 10 years, and also generate £5.67billion in savings through avoided costs to the NHS associated with poor respiratory health.<sup>22</sup>

Effective promotion and uptake of sustainable transport has the capacity to mitigate impacts of climate change and poor air quality. It also contributes to wider health and wellbeing goals. Schemes introduced by the Green administration such as Valley Gardens have been designed to improve safe, sustainable and active travel and boost the public realm.

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<sup>21</sup> <http://treewifi.org/>

<sup>22</sup> <https://www.theguardian.com/environment/2017/dec/04/death-air-pollution-cut-if-uk-hits-walking-and-cycling-targets>

Accessibility needs for some of the city's most marginalised or isolated residents can also be addressed by the better provision of sustainable transport, with particular regard to street furniture, minimising road safety problems and wheelchair or buggy access - and any policy for safe and inclusive travel should give priority to this.

We note as stated that historically Brighton and Hove has lower levels of car ownership than in other cities. The 2011 census showed that Brighton & Hove has the highest proportion of people walking to work in the South East, the second-highest proportion travelling to work by bus, minibus or coach; and the highest growth rate in cycling to work, outside of London. We strongly believe in the importance of providing suitable infrastructure for low cost, public and community transport – walking, cycling and public transport - which in turn ensures access is increased to those in the city on low incomes.

However, arguably Brighton and Hove still lags behind many other cities in terms of adequate provision of sustainable and active travel infrastructure. Sustainable and active travel requires particular attention if we are to create the conditions necessary for people to feel safe and mobile.

Walking is of primary importance to sustainability and health objectives, and addressing it is important in tackling inequalities since those on the lowest incomes have the least access to other options.

### *Cycling*

We strongly argue in favour of a specific and ambitious strategy to address safe and accessible cycling. This includes the creation of a 'Brighton and Hove Cycle Network', modelled on the successful London Cycle Network. This implies that developments should align any cycling or transport infrastructure with other pre-existing infrastructure; to help create joined up routes, connect sections of 'stranded' routes and improve the cycling experience across road junctions. Increased cycle parking facilities are a city-wide need.

The incorporation of space for the successful bike hire scheme is welcome but provision should also be made for more accessible forms of cycling to those with low mobility, as pioneered by organisations such as 'Cycling Without Age,' and the development of 'rickshaw' bikes and electric bikes. The Bike Hire scheme has raised the profile of cycling

in the city however a recent Department for Transport study<sup>23</sup> shows that three-fifths of adults feel it is too dangerous to cycle on the roads. In Brighton and Hove, there has been a fall in the number of people cycling on a regular basis. Suitable and joined up city-wide infrastructure must be in place to support new schemes and developments that incorporate modes of sustainable and active travel.

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

It is important that transport assessments support development located within or adjacent to an AQMA. However as Air Quality has now been determined one of the biggest environmental threats in Europe, and with poor air quality rising in the city, it is likely that an increasing number of sites will end up in close proximity to an AQMA.<sup>24</sup> Therefore the LPA should take account of this, considering the need for air quality provision at *all* developments, irrespective of its proximity to an already established AQMA.

### **DM36 Parking and Servicing**

In consideration of subsequent comments made in DM40, with specific relation to air quality, we would propose the following amendments in underline:

*“Provision of parking, including ‘blue badge’ holder and cycle parking, in new developments should follow the standards in SPD14 ‘Parking Standards for New Development’ (and any subsequent revisions) as set out in Appendix 2, except where developments are in or adjacent to an AQMA in which case they are required to follow a*

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<sup>23</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/736909/walking-and-cycling-statistics-england-2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/736909/walking-and-cycling-statistics-england-2017.pdf)

<sup>24</sup> BHCC Corporate KPIs, November 2017

<sup>24</sup> <https://www.theguardian.com/environment/2018/sep/11/air-pollution-is-biggest-environmental-health-risk-in-europe>

*menu of transport plan options: e.g be 'car free' development and only accessibility or cycle parking is to be provided.*<sup>25</sup>

### **DM37 Green Infrastructure and Nature Conservation**

We welcome the broad range of policies aimed at promoting the viability of green infrastructure and recognising the importance of nature conservation. Nature conservation plays an integral role in positive policy and decision making. However, developments will always have some level of impact on the natural or local environment and therefore consideration could be given to how developments can contribute to a process of 'nature recovery.' Consideration can also be given to suggestions made by organisations such as the World Wildlife Fund, which recommends that local authorities *"provide spatial plans to help strengthen existing networks of wildlife sites, linking up wildlife rich areas through planning that allows wildlife to move and flourish."* The Green Group broadly encourage this and any moves to establish a Nature Recovery network.<sup>26</sup> 'Spaces for nature' in all new developments should be a paramount consideration in line with this policy aim.

Careful consideration should also be given to the nature of materials used in proposed developments and any associated environmental impacts, especially with regard to the impact as materials display degradation over time. Certain types of materials will have differential impacts on the local environment and their use will affect the capacity of any development to display ecological integration. Full 'Life Cycle' analyses of developments (including their construction, waste involved in production, and other environmental impacts of the material) form a useful basis from which the impact of developments on natural conservation can be understood.

### **DM38 Local Green Spaces**

We support the designation of additional green space areas.

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

<sup>25</sup> BHCC, HO7 Car Free Housing [https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/localplan/pdfs/Pages%20from%20adopted\\_local\\_plan-chapter4-HO7.pdf](https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/localplan/pdfs/Pages%20from%20adopted_local_plan-chapter4-HO7.pdf)

<sup>26</sup> <https://www.wildlondon.org.uk/respond-planning-policy-consultation>

We welcome the majority of policies and recognition of the impact of pollution and nuisance on our communities and environment. However to achieve the stated aims of 'meeting the Government's air quality strategy' and to have the described 'positive impact on air quality', we argue that this policy needs to go further. Exposure to air pollution is linked to around 40,000 early deaths in the UK. According to the City Council, between 1996 and 2017 monitoring results for Lewes Road suggested that Nitrogen Dioxide has exceeded EU recommended levels.<sup>27</sup>

Measures to tackle emissions from all sources are key to improving local air quality. We note the NPPF provision for planning authorities to incorporate air quality into development control. However the Environment Audit Committee noted that *"the NPPF does not provide any guarantee of avoiding worse pollution as a result of development, but rather a means of considering all aspects of sustainability, balancing or trading-off sometimes conflicting economic, social and environmental objectives"*<sup>28</sup>

Findings of the Environment Audit Committee also detail how planning regimes 'make it more difficult to refuse planning permission on the grounds of air quality,' such as the conversion of buildings from offices to residential use.

We have repeatedly raised the vital issue of air quality: as the administration of the Council, we introduced low emission zones, retrofitted buses and kick started green space initiatives like Valley Gardens.

We strongly encourage the inclusion of additional criteria for the promotion of better air quality in regard to planning proposals. We should encourage, via policy, developments that prioritise spatial planning that reduce the need to travel by car, and encourage developments in locations where facilities are already available or sustainable transport options are made readily accessible. Planning developments in proximity not just to an

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<sup>27</sup> BHCC Corporate KPIs, November 2017

<sup>28</sup> <https://publications.parliament.uk/pa/cm201415/cmselect/cmenvaud/212/21206.htm>

existing AQMA but also to buildings or areas frequented by high-risk residents, such as the elderly or school children, should be assessed on grounds of air quality impact. Building design can also play a role in providing effective dispersal of pollution: a recent study from the Office of National Statistics demonstrated that air pollution is removed by the presence of vegetation in a local area.<sup>29</sup> We welcome the reference to efficient street lighting, heating and the connection between this and later policy on heat networks will lead to improvements.<sup>30</sup>

#### **DM44 Energy Efficiency and Renewables**

We propose amending the policy to: *“The following standards of energy efficiency and energy performance will be required unless it can be demonstrated that doing so is not technically feasible”* *[delete ‘and/or would make the scheme unviable’]*:

2. All development to achieve a minimum Energy Performance Certificate (EPC) rating of:

i) EPC ‘B’ *[not ‘C’]* for conversions and changes of use of existing buildings to residential and non residential use

ii) EPC ‘A’ *[not ‘B’]* for new build residential and non residential

The LPA produced a joint study with Bath, Swindon and Wiltshire Councils on the reduction in costs to build to (the now abolished) CFSH levels 5 and 6.<sup>31</sup> That document saw falls of around 40% in cost for level 6 and up to 55% for level 5. Consistently, there is a strong body of professionals and campaigners working to support the fledgling eco-homes industry in a city with strong eco-building practices. More constructive

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<sup>29</sup>

[https://www.ons.gov.uk/economy/environmentalaccounts/articles/ukairpollutionremovalhowmuchpollutiondoesvegetationremoveinyourarea/2018-07-30?utm\\_source=govdelivery&utm\\_medium=email](https://www.ons.gov.uk/economy/environmentalaccounts/articles/ukairpollutionremovalhowmuchpollutiondoesvegetationremoveinyourarea/2018-07-30?utm_source=govdelivery&utm_medium=email)

<sup>30</sup> <https://www.sciencedirect.com/science/article/pii/S0269749117319322>

<sup>31</sup> [https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/EP059%20Costs%20of%20building%20to%20the%20Code%20for%20Sustainable%20Homes%20\(Sept%202013\)%20\(draft\).pdf](https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/EP059%20Costs%20of%20building%20to%20the%20Code%20for%20Sustainable%20Homes%20(Sept%202013)%20(draft).pdf)



discussions should be happening with professionals and other LPAs about how we build above what is required by law, in order that we achieve wellbeing and social justice within ecologically-sound limits.

### **DM46 Heating and Cooling Network Infrastructure**

We strongly support the inclusion of integrated heat networks / communal heating systems in development proposals and the associated inclusion of heat service customer protection. In Brighton and Hove an estimated 14,863 homes struggle to meet their energy costs, a figure higher than both the regional and national averages.<sup>32</sup> The effects of a cold home on health and wellbeing disproportionately impact upon those already vulnerable or in poverty – such as the elderly, or those living with a disability. Furthermore grants that support people with the costs of energy efficiency have an uncertain future. The Council began work on ‘District Heat’ networks under the Green administration. This is reliable, cheap, locally sourced, low-carbon energy. Analysis indicates that half of the UK’s existing heat demand could be met by heat networks – an approach that would save over £30bn.<sup>33</sup>

Given the positive nature of these heat networks, consideration must be given to flexibility within the policy criteria, in order to enable proposals for heat networks to come forward. We would argue that this should, in the first instance be used to help heat homes of the least well-off and vulnerable. This should be taken in conjunction with the positive introduction or applications that introduce other renewable energy sources or sources of low carbon energy infrastructure, such as solar.

### **New special area policy SA7 BENFIELD VALLEY**

We welcome the policy. We draw particular attention to the public rights of way. Any application which cuts across a right of way, directly contradicts the National Planning Policy Framework. Paragraph 69 of the NPPF states: *“Planning policies and decisions ...*

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<sup>32</sup> Brighton and Hove City Council Fuel Poverty and Affordable Warmth Strategy, 2016-2020  
[https://present.brighton-hove.gov.uk/Published/C00000884/M00006159/AI00049300/\\$20160606115747\\_008637\\_0038007\\_Draft\\_BHFuelPovertyAffordableWarmthStrategyv2.docxA.ps.pdf](https://present.brighton-hove.gov.uk/Published/C00000884/M00006159/AI00049300/$20160606115747_008637_0038007_Draft_BHFuelPovertyAffordableWarmthStrategyv2.docxA.ps.pdf)

<sup>33</sup> ibid

*should aim to achieve places which promote ... safe and accessible developments, containing clear and legible pedestrian routes...which encourage the active and continual use of public areas.*<sup>34</sup>

Further the LPA is under an obligation under paragraph 7.11 of the DEFRA guidance on rights of way which states: *"The grant of planning permission does not entitle developers to obstruct a public right of way."*<sup>35</sup>

## **Strategic Site Allocations**

### **SSA1 Brighton General Hospital Site**

We note plans for the redevelopment of Brighton General Hospital site by Sussex Community NHS Foundation Trust (SCFT) which detail several options for its regeneration, including a new community health hub, and the possibility of selling surplus land to private developers for housing. However the Green Group of Councillors expresses concern that the public land could go to private developers, who are not required to provide more than 40% affordable housing. This is why we successfully called<sup>36</sup> on the Council to look in to the availability of land at the site, and options for its development into 100% affordable housing for residents and NHS key workers. We repeat through this consultation response that this public asset must be retained for public good to address the affordable housing crisis as assessed in study into affordable housing from December 2012.

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<sup>34</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/733637/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733637/National_Planning_Policy_Framework_web_accessible_version.pdf)

<sup>35</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69304/pb13553-rowcircular1-09-091103.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69304/pb13553-rowcircular1-09-091103.pdf)

<sup>36</sup> [http://present.brighton-hove.gov.uk/Published/C00000117/M00008112/AI00066436/\\$Item2306HousingatBrightonGeneralSiteGrnGrp.docxA.ps.pdf](http://present.brighton-hove.gov.uk/Published/C00000117/M00008112/AI00066436/$Item2306HousingatBrightonGeneralSiteGrnGrp.docxA.ps.pdf)

Specifically we believe the site should yield: 1) a minimum of 300 (not 200) homes; 2) a requirement that these are 100% affordable in line with the motion passed at July 2018 full council; 3) That a policy of only approving 80-100% affordable housing schemes on development of publically owned sites in recognition of the site being for public benefit and also being necessary to tackle the demonstrable shortage of affordable housing.

### **H1 Housing sites and mixed use sites**

We raise some concerns about some of the sites on Table 5. In particular, Patcham which has a recognised problem with flooding that has been the subject of several planning applications and a planning inquiry in recent years.<sup>37</sup> Surface drainage and sewers all remain salient issues for the area. We call for a strategic discussion with Southern Water on the need for a storm drain and the reintroduction of lost flood plains and that such key parts of the local infrastructure inform the planning process in the relevant areas of Patcham.

### **H2 Housing sites- Urban Fringe**

Given the controversy surrounding the ecological value of one of the Urban Fringe sites when it came to planning committee, we call for a renewed ecology study to be performed.<sup>38</sup>

We draw focus to the Brighton and Hove Way<sup>39</sup> which follows existing rights of way from Saltdean Oval to Portslade and which comes into contact with some of the sites. As above in SA7, any application which cuts across a right of way, directly contradicts the National Planning Policy Framework. Paragraph 69 of the NPPF states: *“Planning policies and decisions ... should aim to achieve places which promote ... safe and accessible*

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<sup>37</sup> <http://present.brighton-hove.gov.uk/mgAi.aspx?ID=55543>

<sup>38</sup> <http://present.brighton-hove.gov.uk/mgAi.aspx?ID=56937>

<sup>39</sup> <http://www.brightonandhoveway.org.uk/#TheWay>

*developments, containing clear and legible pedestrian routes...which encourage the active and continual use of public areas.”<sup>40</sup>*

The LPA is under an obligation under paragraph 7.11 of the DEFRA guidance on rights of way which states: *“The grant of planning permission does not entitle developers to obstruct a public right of way.”<sup>41</sup>*

Further, such sites should constitute environmentally visionary development, incorporating measures to help mitigate or adapt to climate change and reduce greenhouse gas emissions. Environmental sustainability should be key to any development: development should be BREEAM Outstanding, carbon neutral and charged with opening up access to the National Park.

If sites are to be developed, the LPA should liaise with the National Park and local amenity organisations that particular attention is paid to archaeological remains and protection of species of fauna and flora, not raised already by the LPA; and that important views and vistas are protected. The thoughts of Councillors through temporarily convened meetings of the Asset Management Board could be incorporated too for particularly difficult decisions.

If there is to be development on an urban fringe site, we firmly believe that it should only be given planning permission if it can exceed current affordable housing policy. We therefore argue that the sites listed in table 7 must only be developed as 100% genuinely affordable housing. Further these greenfield sites must not be drab dysfunctional suburbs and must have appropriate community facilities that keep use of private vehicles to a minimum. Public transport providers must be included in discussions about any proposals for development on fringe sites in order that

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40

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/733637/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733637/National_Planning_Policy_Framework_web_accessible_version.pdf)

41

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69304/pb13553-rowcircular1-09-091103.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69304/pb13553-rowcircular1-09-091103.pdf)

sustainable modes of transport are designed into any proposals rather than bolted on as an after-thought.

As above in DM7 our belief is that the policy should focus on affordability of this housing and linking affordability to incomes, not the market. This could include building on the Living wage rent/Living rent concept or on the rent policy for new council homes which is edging towards more of a range of affordable rents. As the Good Landlord scheme rents are set at the rate of Local Housing Allowance we call for the affordable rented element to be good landlord, assuming the city council would want to retain nomination rights, this would include housing people from the waiting list.

We know from previous studies that 94% of new homes could be provided on brownfield sites in the city, while development on urban fringe land would jeopardise access to the countryside for City residents and challenge our ambition to become the gateway to the National Park. Although we initiated and welcomed denser schemes in the 7 Development Areas in CPP1, further to appropriate studies conducted by qualified engineers and surveyors, we believe intensification of development could potentially be investigated at many sites including: above M&S on Western Rd and over the storage area; above the NCP car park between King Place and Church St; above Boots on London Road; while reorganisation of space at the corner of Spring Gardens and Church Street, the sorting office and at the BHCC car park at Theobald House could glean more housing sites.

DP308

## Comment

**Event Name** Consultation on the Draft City Plan Part 2  
**Comment ID** 274  
**Response Date** 13/09/18 15:51  
**Status** Submitted  
**Submission Type** Web  
**Version** 0.1

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

**Organisation Name**

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

**Name**

**Name**

**Address**

**Address**

**Email Address**

**Email Address**

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

**SSA5 - Madeira Terrace & Madeira Drive**

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

**SSA5 Object Reasons**

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

A hotel or YHA would close off and privatise a valued public space. I really feel more enlightened and community faced proposals would benefit the city more. Art studios, independent shops - more of a 'lanes' feel. I would hate to see the end of the many motoring events on the parade too. I know involving

commercial partners is a popular option in these financially stretched times, but you can only lose these precious spaces once and then they are gone for good.

DP309

## Comment

<b>Event Name</b>	Consultation on the Draft City Plan Part 2
<b>Comment ID</b>	276
<b>Response Date</b>	13/09/18 16:00
<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)** NA

**Name**

**Name**

**Address**

**Address**

**Email Address**

**Email Address**

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

**SSA5 - Madeira Terrace & Madeira Drive**

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

**SSA5 Object Reasons**

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

I object to the plan because it mentions the possibility of an hotel & YHA.



DP310

## Comment

<b>Event Name</b>	Consultation on the Draft City Plan Part 2
<b>Comment ID</b>	279
<b>Response Date</b>	13/09/18 16:27
<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)** CKC Properties Ltd

**Name**

**Name**

**Address**

**Address**

**Email Address**

**Email Address**

**Agent Name**

**Agent Name**

**Agent Address**

**Agent Address**

**Agent Email**

**Agent Email**

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

. Housing, Accommodation and Community  
. Site Allocations - Housing Sites

### DM1 - Housing Quality, Choice and Mix

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

### DM8 - Purpose Built Student Accommodation

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

### DM8 Object Reasons

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

As an experienced developer of PBSA across the UK (over 600 units under construction, with planning consent or in planning) our clients welcome the general support provided in DM8 for further PBSA across the City and the recognition that there continues to be an unmet need from both Universities for further PBSA. Other higher education establishments also have unmet accommodation needs for which PBSA could provide part of the solution. Our clients however would raise the following comments/objections in respect of the 7 detailed criteria of the Policy.

a) This criterion lacks definition and could, and seems, to require all PBSA schemes to include cluster units and indeed **predominantly** cluster units. Whilst providing a range of unit types may be justified it should not be a requirement that all PBSA schemes include an element of cluster units. The City Council has permitted, in recent times, schemes that are exclusively studio schemes. Those schemes have been successful and popular. Studio units are part of the overall PBSA offer of the City and provide accommodation that is suited to and popular with particular groups (for example mature students). At most the policy should identify the Council's wish to see a balanced mix of provision of varying types of PBSA across the City and not rigidly prescribe that all schemes should include cluster units let alone predominantly cluster units.

c) Communal living, particularly cooking facilities, will not be appropriate to all PBSA schemes and in particular smaller studio schemes. The criterion should be less prescriptive.

d) Whilst we do not object to the wording of the criterion, the explanatory text (2.69) suggests that all rooms should meet the BRE guidance on sunlight and daylight. The BRE's guidance is not policy and is just one consideration in the determination of planning applications. It should not be applied rigidly in this way and the Guidance itself acknowledges as much. Access to sunlight and daylight is determined by several factors, not least site context and rigid insistence on adherence to the Guidance could prevent otherwise acceptable schemes proceeding.

f) A requirement for 24 hour **on site** security is excessive. Some schemes (smaller) may not require an on site presence for a full 24 hours. The criterion should be reworded to require **appropriate** 24 hour security is provided. To require more is overly prescriptive and could stifle innovation in this field.

g) We question the purpose and workability of this criterion. If translated into a planning consent condition it would, in theory, impede the lettings of voids or vacant units mid way through an academic year. It is unclear what the criterion seeks to achieve and it is not supported by any explanatory text. It should be omitted from the policy

### H3 - Purpose Built Student Accommodation Sites

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

### H3 Object Reasons

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

The Council, in formal pre-application advice, has confirmed that 'in principle' PBSA is acceptable on the site of 45 & 47 Hollingdean Road. As such that site should be added to the list of allocated sites under this policy. It is a site which falls within the Lewes Road Development Area and is eminently suited to providing further PBSA.

DP311

## Comment

**Event Name** Consultation on the Draft City Plan Part 2  
**Comment ID** 280  
**Response Date** 13/09/18 16:35  
**Status** Submitted  
**Submission Type** Web  
**Version** 0.1

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

**Organisation Name**

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

**Name**

**Name**

**Address**

**Address**

**Email Address**

**Email Address**

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

- . Housing, Accommodation and Community
- . Employment, Tourism and Retail
- . Design & Heritage
- . Transport and Travel
- . Environmental and Energy
- . Site Allocation - Special Areas policies
- . Site Allocations - Strategic Site Allocations
- . Site Allocations - Housing Sites
- . Site Allocations - Employment Site
- . Make general comments

**DM1 - Housing Quality, Choice and Mix**

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

## DM1 Object Reasons

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

Being a core Policy this should be considered in a re-opened

City Plan Part 1 consultation process; to facilitate achieving full congruence with, and/or amendment to, City Plan Part 1 Policies already approved.

## DM1 Object Wording Changes

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

I reserve my position on specific details pending an official decision on considering this proposed Policy under a re-opened City Plan Part 1.

## SA7 - Benfield Valley

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

Object

## SA7 Object Reasons

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

Given my contentions (in responses at DM1 d) & e), and under Any Other Comments) that proposed Policies DM1 to DM46, + H2 and Appendix 6 maps as Table 1 & Table 2 thereto, are core Policies requiring to be considered under a re-opened City Plan Part 1, I am unable to make detailed representations to proposed Allocations Policies SA7, SSA1 to SSA7, H1 & H3, and to E1 until after the issue of requiring the core Policies identified in the opening lines of this paragraph to be considered under a re-opened City Plan Part 1 has been officially determined.

## SA7 Object Wording Changes

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

Please apply here my above response to SA7 d).

## Any other comments

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

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

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

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

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

For the avoidance of doubt please note the representations I have made at DM1 d) & DM1 e) (about the proposed core Policies needing to firstly be considered under a re-opened City Plan Part 1 process); and with regard to Allocations Policies as stated in my representation at SA7.

Hence my present position of formally OBJECTING to EVERY proposal in this present consultation.

I thus respectfully contend that it is not possible for respondents to rationally consider all of the Policies proposed in this consultation until or unless the newly-proposed core Policies have been incorporated under a re-opened City Plan Part 1 consultation and re-adoption process.

Self-evidently the now-proposed Allocations Policies could also be considered under such a process (whereby we could simply achieve a single City Plan - being one where all Policies are fully congruent with each other, and where the already adopted Policies can be improved and updated to achieve a single homogenous and modernised City Plan, surely?).

## **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.**

Yes, major negatives! To follow.

DP312

## Comment

**Event Name** Consultation on the Draft City Plan Part 2  
**Comment ID** 281  
**Response Date** 13/09/18 16:42  
**Status** Submitted  
**Submission Type** Web  
**Version** 0.1

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

**Organisation Name**

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

**Name**

**Name**

**Address**

**Address**

**Email Address**

**Email Address**

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

**Any other comments**

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

- Proposed CPP2 Implementation and Monitoring Targets [PDF, 506Kb]
- Sustainability Appraisal [PDF, 8MB]
- Sustainability Appraisal Non-Technical Summary [PDF, 385 KB]
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- CPP2 West Policy Map [PDF, 14MB]
- CPP2 Central Policy Map [PDF, 9.4MB]
- Habitats Regulation Assessment [PDF, 18MB]

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

**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.**

1. The loss of community spaces in Hove is severe - from hotels to the impending loss of the King Alfred ballroom. It is hard to book a place for meetings or events now and residents are keen to see this addressed in new developments.
2. The Urban Design SPD guidance omits King Alfred node! The sea is the appropriate terminated vista - not tall buildings at King Alfred or along Kingsway where they darken homes to the north. Please ADD Toads Hole valley as a node !
3. The City Plan must steer developers into clear lanes to reduce expensive try-ons.
4. Please consider creating a special protecting masterplan for the existing Kings Esplanade colony south of Kingsway Hove which contains some of the oldest original bits of Hove from its obscure days as an unloved hamlet on the way to Worthing. The rest is up Hove St to St Andrews church. The remnant wall of its graveyard is unrecognised and unprotected up Haddington St and Close.
5. Hove Pk Gdns is not even in the Tongdean Character Statement & also needs specific recognition.



DP313

## Comment

**Event Name** Consultation on the Draft City Plan Part 2  
**Comment ID** 282  
**Response Date** 13/09/18 16:51  
**Status** Submitted  
**Submission Type** Web  
**Version** 0.1

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

**Organisation Name**

**Organisation Name (if not applicable please put n/a)** Argyle & Campbell Road Residents Association

**Name**

**Name**

**Address**

**Address**

**Email Address**

**Email Address**

**Please tick all of the sections you would like to comment on before proceeding** . Housing, Accomodation and Community  
. Site Allocation - Special Areas policies

**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

**DM7 - Homes in Multiple Occupation**

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

**DM7 Object Wording Changes**

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

I live in an area with 30% plus HMO housing. This high of a concentration does not create pleasant living and neighbourhood environment.

Currently, the no more than 10% rule within 50 metres only applies to areas covered by article 4, which is 5 wards in Brighton, not including our area of Argyle and Campbell Road.

CPP2 is proposing to add for the city as a whole the no sandwiching, no more than 2 HMOs in a row, no more than 20% rule. These are excellent measures, but it needs to go further. Is this only for large HMOs? what about the small HMOs that currently do not require a license for conversion? Our neighbourhood has become a developers heaven and a residents nightmare.

But at the moment there is absolutely nothing to stop every house in Argyle and Campbell Road becoming an HMO!

CPP2 as I understand your current wording, will be better ( no sandwiching etc), but even the 20% limit on HMOs in the area may not help us if you measure it in terms of the wider area. If surrounding areas have lower concentrations, say 10% that could bring the level as a whole in the area below 20%, which could mean more HMOs for us! The surrounding area of Preston Park includes neighbourhoods of higher priced homes and so there are fewer HMOs there.

Thus, all HMO conversions, both small and large, should be required to get a license BEFORE they start converting the building and the above rules set forth in the CPP2 should be addressed in looking in a 50 m area surrounding the house.

We have had enough of inappropriate noise levels, picking up trash they left on doorsteps, and having to park 10 blocks away because parking is never available. The Argyle and Campbell Road Residents Association is going to be doing everything we can until we are 100% sure that the city hears us and is taking action to address the situation.

We know we are not the only ones experiencing these issues with HMOs. Other areas of the city are saying the same things. Please curb HMO development and deal with the student housing issue (the Universities dumped them on the town, let them build new housing on their own sites).

DP314

## Comment

<b>Event Name</b>	Consultation on the Draft City Plan Part 2
<b>Comment ID</b>	140
<b>Response Date</b>	07/09/18 17:19
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

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

**Organisation Name**

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

**Name**

**Name**

**Address**

**Address**

**Email Address**

**Email Address**

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

**DM1 - Housing Quality, Choice and Mix**

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

This policy needs to include party houses, Air BnB houses (where there is no owner occupier) as well as look at the number of HMOs in any one area. The increase in HMOs being used for student accommodation means that they do not pay council tax yet put a significant drain on council services, particularly rubbish collection and the removal of fly tips at the end of every academic year.

There is an increase in the number of properties being used as party houses and air bnbs (whole house), who again do not pay council tax, yet use rubbish and recycling at the cost to those residents who do pay council tax. A number of residences have been converted to party houses that can sleep up to 19 people (depending on the of the property).

Before granting even more licenses for HMOs, the council needs to consider the number of party houses, entire air bnbs in an area, and the impact that an additional HMO will have on council services.

The policy needs to also look at the overall concentration of student accommodation/party houses in a particular area versus residents. For example, does the student population in a 3 mile residence outnumber residents who pay council tax and if so, by what ratio? This should all be taken into consideration and should be included in the planning policy. Also, Party houses and Air bnb (again where there is no owner occupier and the entire property is let out) should require a license, as a minimum to ensure they are following fire regulations and of course, paying council tax.

DP315

## Comment

**Event Name** Consultation on the Draft City Plan Part 2  
**Comment ID** 285  
**Response Date** 13/09/18 16:59  
**Status** Submitted  
**Submission Type** Web  
**Version** 0.1

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

**Organisation Name**

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

**Name**

**Name**

**Address**

**Address**

**Email Address**

**Email Address**

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

**Any other comments**

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

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

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

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

The plan has many useful up dates including cumulative impacts on traffic by other developments

The urban fringe areas of the Deans are different to the rest of the City and should be studied separately with policies to help and protect the shops, countryside and residents,

The Deans are badly served by Public Transport

### **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]

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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.**

Concentrating on cycling, walking and public transport discriminates against old, disabled and others,

DP316

## Comment

**Consultee**

**Email Address**

**Company / Organisation**

Bricycles and Cycling UK

**Address**

**Event Name**

Consultation on the Draft City Plan Part 2

**Comment by**

Bricycles and Cycling UK

**Comment ID**

246

**Response Date**

13/09/18 08:20

**Status**

Submitted

**Submission Type**

Web

**Version**

0.1

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

. Yes

**Organisation Name**

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

Bricycles and Cycling UK

**Name**

**Name**

**Address**

**Address**

**Email Address**

**Email Address**

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

- . Employment, Tourism and Retail
- . Transport and Travel
- . Environmental and Energy
- . Site Allocations - Strategic Site Allocations

Make general comments

### DM15 - Special Retail Area - The Seafront

a) Do you support or object to policy DM15 ? Support

#### DM15 Support Reasons

b) Please explain why you support this policy?

We support the policy to help stop the area falling into dereliction and to assist regeneration, but an amendment to DM15 is needed to ensure that cycling will not be impeded by activities on the seafront. The seafront route is an irreplaceable route for cycling and it is also part of the National Cycle Network, NCN2, the South Coast Cycle Route. The operation of the Seafront in Brighton and Hove appears to be largely detached from the Council's Transport department. **DM15** should not compromise **DM33 Safe, Sustainable and Active Travel, 2. Cyclists**

#### DM15 Support Wording Changes

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

We suggest an additional point e) after the points a) to d) :

**"e) The use of the Seafront Cycle Route (NCN2) and other cycle routes will be preserved for cycling throughout the year."**

### DM16 - Markets

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

#### DM16 Support Reasons

b) Please explain why you support this policy?

Markets provide great interest and an outlet for small businesses, however we are concerned that cycle routes will be blocked by them. DM16 should not compromise **DM33 Safe, Sustainable and Active Travel, 2. Cyclists**

#### DM16 Support Wording Changes

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

We suggest adding **"the use of cycle routes"** to the policy text:

"Proposals for new or improved markets and market stalls will be permitted within defined shopping centres where they would not cause individual or cumulative harm to the local area in terms of residential amenity, pedestrian and highway safety, **the use of cycle routes**, parking congestion or the free flow of traffic, especially public transport.

### DM33 - Safe, Sustainable & Active Transport

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

#### DM33 Support Reasons



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

Promotion and provision for active, healthy travel will bring enormous benefits to the City in terms of better public health both for individuals and air quality objectives, less traffic congestion and greater equity for those who can't/don't want to drive motor vehicles. However, the **standard** of the provision is not defined nor is there a plan of the proposed/existing cycle network or a statement of what proportion of the "high quality" cycle network has been completed in the Council's view. The CPP2 text does not refer to any improvements or upgrading of legacy cycling facilities, many of which urgently need widening and are clearly no longer fit for purpose, notably the seafront route which is obstructed and overcrowded. Desire lines are not mentioned in the cyclist section as they are in the pedestrian section. Directness is also something that cyclists value and is a feature of quality.

It should be noted that "cyclists" includes including disabled cyclists, see <https://wheelsforwellbeing.org.uk/> It is not sufficiently acknowledged that many disabled people cycle and they find cycling easier than walking. They may use hand cycles and not be able to use their legs. By no means are all cyclists young and fit.

We need to see much more robust wording for cycle parking. We need to ensure that the parking provision is accessible and easy to use for people of all abilities. A large proportion of people are not strong enough or agile enough to use the 2-tier cycle racks found at train stations and these are often not convenient anyway as handlebars become entangled with brake cables of neighbouring cycles etc. Aisle width or widths between/around cycle parking places for cycles is often inadequate. Parking must be made available for children's cycles to encourage the next generation, and for all non-standard bikes whether trikes, tandems, trailers, hand cycles or specially adapted bikes. The greater pool of people cycling due to the success of BTN BikeShare and the growing popularity of electric bikes needs to be factored into current and future cycling provision.

## DM33 Support Wording Changes

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

We suggest some amendments to 2 and 4:

#### 2. Cyclists

In order to ensure a safe and accessible environment for cyclists, and to encourage and enable them, new development ~~should~~ must:

- a) provide for safe, easy, convenient and **direct** access for cyclists **including disabled cyclists** to/from proposed development.
- b) provide **high quality cycling infrastructure built to London Cycling Design Standards (or other high quality standard) linking to cycle routes already in place in the City** network of high quality, convenient and safe or as part of the City's **planned** cycle network or contribute towards it.
- c) protect existing and proposed cycle routes unless satisfactory mitigation is provided or provision is made for an alternative alignment to high quality standard.
- d) upgrade and improve existing cyclist provision in the light of increasing numbers of cyclists**
- e) facilitate cyclist desire lines within and outside site boundaries.
- f) provide sufficient levels **of readily accessible, convenient, secure, well-lit and easy to use cycle parking facilities** as close to the main entrance(s) of the premises as is possible, in line with the Parking Standards for New Development (Appendix 2) (and any subsequent revisions) and wherever possible under cover. Short stay visitor cycle parking could be uncovered but must be located close to the building entrance(s) and benefit from high levels of natural surveillance; and
- g) Ensure that a range of cycles can be parked including children's cycles, tandems, tricycles, trailers, cycles with luggage, specially adapted cycles etc.
- h) make provision for high quality facilities that will encourage and enable cycling including communal cycle maintenance facilities, workplace showers, lockers and changing facilities;

Also:

#### 4. Safe and Inclusive Travel

- b) Provide inclusive access for disabled people, **(including disabled cyclists)** older people, and other vulnerable road users wherever it can be reasonably achieved having been afforded significant priority;

## DM34 - Transport Interchanges

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

### DM34 Object Reasons

d) Please explain why you object to this policy?

Park and Ride supports and subsidises private car journeys and will increase the journeys on roads leading to the selected site. P&R is expensive and we object to public funds used for this purpose instead of investment in end to end public transport, cycling or walking facilities.

### DM34 Object Wording Changes

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

Suggest removing **Park and Ride** from DM34 unless a reduction in town centre parking is made that is equivalent to the number of P&R parking spaces.

## 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?

We strongly support traffic reduction and the use of Travel Plans and Transport Assessments to achieve it. We strongly object to people being exposed to poor air quality. Research is linking more and more serious health problems to exposure.

### DM35 Support Wording Changes

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

Suggest an additional point 5:

- 1 **Planning applications will be refused where the transport assessment demonstrates that it would increase vehicle emissions in any AQMA**

## DM36 - Parking & Servicing

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

### DM36 Support Reasons

b) Please explain why you support this policy?

We agree that parking does have a major influence on travel choices and also on whether people buy a car at all. We would like to see reduced numbers of vehicle movements on local streets and more space for sustainable modes, so we support car free developments in Brighton and Hove.

As already mentioned in DM33 above, it should be noted that "cyclists" includes including disabled cyclists and those with reduced mobility or strength. We need to see robust cycle parking standards to ensure that cycle

parking is accessible and easy to use for people of all abilities. Parking must be made available for children's cycles to encourage the next generation, and for all non-standard bikes.

### **DM36 Support Wording Changes**

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

Note: Cyclists can also be disabled.

Cycle parking must be accessible and easy to use.

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

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

#### **DM39 Support Reasons**

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

There is a need for improvement with strong safeguards for the natural environment and the attractiveness of the area. We would like our seafront routes to be protected too.

### **DM39 Support Wording Changes**

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

"Proposals should safeguard the importance of the seafront and beach as an open space and maintain and enhance public access to and along the coast and to sea-based activities (see City Plan Part One policies **CP9 Sustainable Transport** CP16 Open Space and CP17 Sports Provision)."

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

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

#### **DM40 Support Reasons**

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

We support the protection of the environment and health with strong safeguards

### **DM40 Support Wording Changes**

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

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

Suggest stronger wording by removing the loophole "where practicable" from

"have a positive impact, ~~where practicable~~, on air quality when located within or close to an Air Quality Management Area and not worsen the problem. Particular regard must be given to the impacts of emissions from transport, flues, fixed plant, and, heat and power systems; ..."

### **SSA5 - Madeira Terrace & Madeira Drive**

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

#### **SSA5 Object Reasons**

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

There is inadequate reference to cycling. Point C does not specifically mention cycling but only "sustainable transport and pedestrian facilities". In the Reasoned Justification, 3.37 only refers to pedestrian access. The seafront cycle route (NCN2, the South Coast Cycle Route) goes along here. It is very high use and it's use is increasing, but it is constantly obstructed by events, particularly in the summer. **No alternative route is ever provided by the council** or the event organisers. In any case, an alternative route is problematic because people simply want to continue on the flat route east/west by the sea. I am concerned that there is neglect of seafront cycling both in planning, transport and operational matters. Shared space is not an adequate alternative to a cycle path. There needs to be a cycling highway east-west along the seafront and it needs to be wide to accommodate the increasing numbers of riders.

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

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

#### SSA6 Support Reasons

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

We hope to see the statement: "Provide for sustainable means of transport to and from the site and demonstrate good linkages for pedestrians and cyclists;" to be brought into reality. As mentioned in SSA5 above:

The seafront cycle route (NCN2, the South Coast Cycle Route) is very high use and it's use is increasing, but it is constantly obstructed by events, particularly in the summer. No alternative route is ever provided by the council or the event organisers. In any case, an alternative route is problematic because people simply want to continue on the flat route east/west by the sea. I am concerned that there is neglect of seafront cycling both in planning, transport and operational matters. Shared space is not an adequate alternative to a cycle path. There needs to be a cycling highway along the seafront and it needs to be wide to accommodate the increasing numbers of riders.

#### Any other comments

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

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

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

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

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

According to CPP1 CP9, an integrated cycle network will be implemented by 2030. There is little more than 10 years to do this but we are still a very long way from any complete "cycle network". Where is the plan of the cycle network? What are the modern standards? BHCC is behind other authorities, both East and West Sussex in producing its Local Walking and Cycling Infrastructure Plan as per DfT guidance and an up to date Cycling Strategy. This will have implications for funding because it has been made clear that without a LCWIP, government funding is less likely to be awarded.

The seafront cycle route (NCN2) is constantly obstructed. Pedestrians and cyclists have been accommodated very poorly throughout the long and ongoing renovation of the Shelter Hall. The cycle path has been unnecessarily cordoned off at the bottom of West Street to provide parking for the Seafront Operations vehicle for many months

creating a hazardous bottleneck for cyclists and walkers. Walking and cycling are not being taken seriously. The seafront route urgently needs upgrading to a cycle highway with more space and separation for walking and cycling. London Road and many other areas and junctions around the City remain forbidding for cycling. Roads in North Laine are regularly made impassable by cycling. Much more respect needs to be shown for maintaining cycling routes in the city and providing a realistic alternative if obstruction is absolutely unavoidable. Temporary arrangements during roadworks etc. are woefully inadequate.

Cycle routes and facilities will need to be upgraded to accommodate expected higher numbers of cyclists and forecast population growth. The Government's aim is to double cycle activity by 2025 as set out in its Cycling and Walking Investment Strategy. Electric bikes are becoming very popular. They are faster, heavier and have a greater range than most people can cycle manually. This will increase the pool of people who can cycle and their range. BTN BikeShare is enormously successful with about 500,000 miles cycled over the last year, much of which is additional cycle mileage. But where is the upgrade of the seafront path and other facilities? Instead we are seeing greater encroachment by motor vehicles.

On a regional level, we are also concerned that BHCC is not gaining assurances from partners in the Greater Brighton City Region that the less enlightened transport schemes pursued keenly by our neighbours e.g. upgrading the A27 and promoting car use will not wreck BHCC's more sustainable ambitions. The proposed removal of the Sussex Pad crossing over the A27 for walkers and cyclists as part of the New Monks Farm development in Shoreham demonstrates this danger.

## **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.**

It needs to be acknowledged that some cyclists are disabled or have limited strength/mobility. Whilst they are able to cycle, they may not be able to walk. This has implications for cycle facilities, access, cycle parking, "No cycling" signs and requests to "dismount". See <https://wheelsforwellbeing.org.uk/>

The majority of disabled cyclists find cycling easier than walking, with many using their cycle as a mobility aid, just like a wheelchair or mobility scooter.

**From:** Joe Miller  
**Sent:** 17 September 2018 3:50 PM  
**To:** Liz Hobden  
**Cc:** Mary Mears; Lynda Hyde  
**Subject:** CPP2 consultation

DP317

DM13 A)

We would like to see the inclusion of Rottingdean High Street  
Longridge Avenue

Lustrells Vale

As important local shopping parades

Support DM14 Special Retail Area - Brighton Marina

H1 Housing Sites

We object to Land between Marina Drive and rest of 2-18 The Cliff, Brighton being allocated for 16 residential units. This should not be allocated at all in our view.

We note that St Aubyn's is allocated for 40 residential units. We support this as this can be achieved in developing the delapidating brownfield area of the site.

H2 Urban Fringe Sites

We object to land at;

- 1) Ovingdean Hall Farm,
- 2) Ovingdean and Falmer Road
- 3) Former Nursery Saltdean
- 4) cluster at Coombe Farm
- 5) west of Falmer Avenue

To be allocated for residential development.

Land north of Varley Halls should be allocated for PSBA due to it's proximity to the university and not residential units. As they are likely to only become poorly managed HMO's in the long term anyway.

Appendix 3

Ovingdean Copse should be included as a local wildlife site.

Best wishes,

Lynda, Mary and Joe

Councillor Joe Miller

Member of Brighton and Hove City Council for Rottingdean Coastal Ward.

Chair Audit and Standards Committee. Member of the Planning Committee, Procurement Advisory Board and Asset Management Panel.

Member of the Police and Crime Panel.

Governor of Longhill High School.

---

**From:**  
**Sent:**  
**To:**  
**Subject:**

Here is the summary of the points I wish to make on behalf of my wife and myself about the Draft City Plan Part Two. They mostly relate to the draft plans for Patcham (where we have been living since 1970).

1. Land at and adjoining Horsdean Recreation Gound

- Buildings on this proposed site will likely further restrict pedestrian access to the green open space and downland. The open access was dramatically restricted by the construction of the by-pass and is now limited to walking up to the pedestrian bridge albeit through the natural open space to the east of the recreation ground. There was no other restorative concession at the time.
- Buildings on this proposed site will further reduce access to the green space amenity presently enjoyed by walkers and also dog owners in Patcham.
- I may be mistaken but I sensed that the way the figures in the Draft City Plan Part Two were presented was misleading. The figure for the total site area was 6.32 hectares and the figure for the potential development was 1.17 hectares (I believe). If the figures are correct, it seems to imply that only about 1/6<sup>th</sup> of the *theoretical total site area available for development* has being ear-marked. My understanding is that Horsdean Recreation Ground would almost never become available for development as it now has designated status afforded by the charity Fields in Trust. Similarly the allotments to the west of the Ground would surely not be taken away from the community. Hence that inferred ratio of 1/6<sup>th</sup> is very misleading.
- The impact of a housing development overlooking Horsdean Recreation Ground on the summer games of cricket played would include distractions and disruptions due to people and traffic movements on an adjoining access road. Please note that four cricket clubs are currently affiliated to the Horsdean Community Sports Association as well as Patcham United Junior Football Club. [If there absolutely has to be a building on this site it should be an indoor sports facility - in lieu of the by-pass loss of amenity!]
- The proposed site of potential development was originally designated as the eastern terminus of the linear park (which may be a by-pass concession).
- The proposed site would most likely only add to the problem of occasional flooding at the south end of the Recreation Ground unless extensive remedial work was undertaken.
- The proposed site of potential development would seem to add in the region of forty more cars to the local traffic, increasing the burden of pollution (from the nearby A23 and By-pass) for many Patcham residents.

2. Old London Road, Patcham

- Any 'development' on this proposed site, other than residential housing in keeping with the locality, is likely to further adversely change the character, the community dynamic and the traffic problems associated with this fringe ribbon of the conservation area.
- For many local Patcham people, visiting the shops nearby (one of several community focus points) is where you are very likely to meet folk you know. It's important for community cohesion and needs careful protection from random developers with 'development' ideas, as in the recent past.
- Traffic is a big issue around the Co-op and adjacent shops. A further development that increases the load could finally cause grid-lock and critical loss of revenue for the shops.
- The planning blight aspect seems to persist for this site, even after the rejection of a recent developer's scheme that apparently involved buying out reluctant and even unwilling homeowners. It looks to me like burdensome, heavy-handed bribery. That is not good for the community. The Planning Policy should not aid and abet a further attempt at such a conspiracy.
- I was unaware of the depth of local feeling about this site being open for a potential developer to submit a further scheme. At the meeting in Patcham in September at which Planning Officers outlined the plan, there was clearly a huge feeling of despair and resentment that the broad wishes of the local community was being ignored. To have this site on the draft plan suggests that the Planning Policy is skewed against the broad wishes of the local community - not good.
- Flooding. Most agree that the problem of flooding in the Old London Road is only likely to worsen. Further development without more work on a plan to reduce the flooding potential would not be wise.



**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St Aubyns Field, Rottingdean  
**Date:** 20 September 2018 13:08:24

DP319

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn’s Field should also have been designated as an LGS.

The consultation period ran from the 5<sup>th</sup> July to the 13<sup>th</sup> September. All representations received during the consultation period will be taken into account by the Council when preparing the Plan for submission and examination. Following the end of the City Plan Part 2 consultation period, your comments will be published as part of the Council’s consultation report. However, please note that personal details such as your name, address and contact details will not be made public.

Please could you **indicate in reply to this email** if you wish to be added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations?

Regards

Helen

**Helen Pennington**

**Sustainability Appraisal Officer (I work Mondays-Thursday and alternate Fridays)**

City Development & Regeneration

**Brighton & Hove City Council**

E: [helen.pennington@brighton-hove.gov.uk](mailto:helen.pennington@brighton-hove.gov.uk)

T: 01273 292333

W: [www.brighton-hove.gov.uk](http://www.brighton-hove.gov.uk)

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**From:**

**Sent:** 15 July 2018 9:07 PM

**To:** PlanningPolicy

**Subject:** St Aubyns Field, Rottingdean

Dear Sirs,

I understand that there is to be a presentation of the City Plan Part 2 on 17th July, next.

I am extremely concerned to note that St Aubyns Field in Rottingdean is not included as Local Green Space despite the previous recommendations of the Economic Development and Cultural Committee.

Perhaps you could explain why this field has been omitted, as this would appear to be an error?

Yours faithfully,

**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St Aubyn's Field  
**Date:** 20 September 2018 13:08:48

DP320

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

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---

**From:**  
**Sent:** 15 July 2018 9:21 PM  
**To:** PlanningPolicy  
**Subject:** St Aubyn's Field

Why doesn't the plan include St Aubyn's Field, which should be a designated green space?  
C. Watts.

**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St Aubyn's field  
**Date:** 20 September 2018 13:09:11

---

Dear

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---

**From:**  
**Sent:** 16 July 2018 6:41 AM  
**To:** PlanningPolicy  
**Subject:** St Aubyn's field

Why does this plan not include St Aubyn's field? It should be recognised as a Local Green Space.



**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St Aubyns field  
**Date:** 20 September 2018 13:09:38

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

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-----Original Message-----

From:  
Sent: 16 July 2018 6:49 AM  
To: PlanningPolicy  
Subject: St Aubyns field

Good Morning,

I am requesting that you confirm that St Aubyns Field in Rottingdean is in fact a LOCAL GREEN SPACE, as agreed.

I look forward to hearing from you ASAP.

Thank you

Sent from my iPhone

**From:** [PlanningPolicy](#)  
**To:**  
**Subject:** RE: St Aubyns green space  
**Date:** 20 September 2018 13:09:56

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

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-----Original Message-----

From:  
Sent: 16 July 2018 8:08 AM  
To: PlanningPolicy  
Subject: St Aubyns green space

St Aubyns green space

May I ask why the green space connected to St Aubyns in Rottingdean has not been recognised as a GREEN space as promised

Thank you for your time

Sent from my iPad

**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St Aubyns Field  
**Date:** 20 September 2018 13:10:14

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn’s Field should also have been designated as an LGS.

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City Development & Regeneration

**Brighton & Hove City Council**

E: [helen.pennington@brighton-hove.gov.uk](mailto:helen.pennington@brighton-hove.gov.uk)

T: 01273 292333

W: [www.brighton-hove.gov.uk](http://www.brighton-hove.gov.uk)

**Our customer promise to you**

We will make it clear how you can contact or access our services. We will understand and get things done. We will be clear and treat you with respect.

**From:**  
**Sent:** 16 July 2018 8:33 AM  
**To:** PlanningPolicy  
**Subject:** St Aubyns Field

Hello - I was wondering if you would be kind enough to tell me in the city plan Pt 2 why St Aubyns Field is not listed as a green space?



Is this an accidental omission as it is a green space – it's a field, has been for sometime now.

One would hope it's an accidental oversight an not something more sinister like a council bending over to please greedy property developers who no consideration for planning regs etc

I'm sure that would not be the case

I await your answer.

Kind regards

**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St Aubyn's field Rottingdean  
**Date:** 20 September 2018 13:10:36

DP325

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

The consultation period ran from the 5th July to the 13th September. All representations received during the consultation period will be taken into account by the Council when preparing the Plan for submission and examination. Following the end of the City Plan Part 2 consultation period, your comments will be published as part of the Council's consultation report. However, please note that personal details such as your name, address and contact details will not be made public.

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Regards

Helen

Helen Pennington  
Sustainability Appraisal Officer (I work Mondays-Thursday and alternate Fridays)  
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-----Original Message-----

From:  
Sent: 16 July 2018 9:02 AM  
To: PlanningPolicy  
Subject: St Aubyn's field Rottingdean

Dear Planning Committee,

Please consider St Aubyn's field to remain as a 'green space' for the community and visitors to use as a recreational/ quiet area.

Rottingdean is highly polluted and needs this valuable greenery to encourage wildlife and allow the local people and visitors some open safe space to sit, play in and generally enjoy. The village High St is highly congested and dangerous to walk along. Some people avoid the village for this reason. Kipling Gardens was saved from development. It is now a beautiful garden, that is treasured and enjoyed.

Let the field become a treasure too!

Thank you.

Sent from my iPhone

**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St Aubyns Field/City Plan Part 2  
**Date:** 20 September 2018 13:10:54

DP326

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

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---

**From:**  
**Sent:** 16 July 2018 9:14 AM  
**To:** PlanningPolicy  
**Subject:** St Aubyns Field/City Plan Part 2

Good Morning,

I remember well that there was a full Council recommendation to the Economic Development and Cultural Committee that St Aubyns Field be granted recognition as a Local Green Space

without delay.

I am therefore puzzled as to why the City Plan Part 2 does not show St Aubyns Field in Rottingdean as a Local Green Space.

Presumably this is an oversight on your part.

I wonder if you could kindly let me know that this is the case and that you are going to rectify this without delay.

Many thanks,

**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St Aubyns Field, Rottingdean  
**Date:** 20 September 2018 13:11:11

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

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-----Original Message-----

From:  
Sent: 16 July 2018 10:38 AM  
To: PlanningPolicy  
Subject: St Aubyns Field, Rottingdean

Dewar Sir/Madam,

I see that the BHCC City Plan Part 2 does not show the St Aubyns playing field as a local green space although this had been recommended by the full Council.

Please advise why.

Best regards

**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St Aubyns Field  
**Date:** 20 September 2018 13:11:26

---

DP328

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn’s Field should also have been designated as an LGS.

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---

**From:**

**Sent:** 16 July 2018 11:30 AM

**To:** PlanningPolicy

**Subject:** St Aubyns Field

Dear Sir/Madam

On reading the City Plan Part 2 I note with dismay that St Aubyns Field is not included as a Local Green Space.

This, as you are aware, runs counter to the recommendation of the full council. Are you casually disregarding this recommendation?

You owe an explanation and I look forward to your reply.

Yours faithfully

**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St Aubyns Field  
**Date:** 20 September 2018 13:11:45

---

DP329

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

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-----Original Message-----

From:  
Sent: 16 July 2018 1:16 PM  
To: PlanningPolicy  
Cc:  
Subject: St Aubyns Field

Please explain why The City Plan Part 2 does not appear to include the above field as a local Green Space.

There is a full Council re commendation that St. Aubyns Field be granted recognition as a Local Green Space.

Regards,



**From:** PlanningPolicy  
**To:**  
**Subject:** RE: City Plan part 2 17th July  
**Date:** 20 September 2018 13:12:02

---

DP330

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

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-----Original Message-----

From:  
Sent: 16 July 2018 4:15 PM  
To: PlanningPolicy  
Subject: City Plan part 2 17th July

I am a Rottingdean resident and I would like to know why the City Plan does not include St Aubyns Field as a Local Green Space..

Nothing has happened since the full Council recommendation to the Economic Development and Cultural Committee that St Aubyns Field should be granted recognition as a Local Green space as soon as possible. Why has this not happened yet?

Also, It does not appear in the relevant section of the BHCC City Plan Part 2. ( Culture Committee Local Green Space DM38 ) Can this be explained?

This is a very important issue for us in Rottingdean, every green space is vital to the village. Apart from all the benefits, it is a lung of the village that suffers very badly with pollution in the High St .

Yours Sincerely,



**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St Aubyns Plan - Rottingdean  
**Date:** 20 September 2018 13:12:20

---

DP331

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

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Regards

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---

**From:**

**Sent:** 16 July 2018 5:25 PM

**To:** PlanningPolicy

**Cc:**

**Subject:** St Aubyns Plan - Rottingdean

Good afternoon

I am emailing to ask why the City plan part 2 for the St Aubyns School site in Rottingdean does not include St Aubyns Field as a Local Green Space. We were lead to believe from previous statements that this was to be the case!

The understanding was that there was a full Council recommendation to the Economic Development and Cultural Committee that St Aubyns Field be granted recognition as a Local Green Space. Nor does it appear in the appropriate section of the BHCC City Plan Part 2 (Culture Committee Local Green Space DM38).

Could you please explain as I fear that the wider communication and plan around this site is not being clearly communicated or fairly and openly managed.

Yours

**From:** [PlanningPolicy](#)  
**To:**  
**Subject:** RE: St Aubyns Field, Rottingdean  
**Date:** 20 September 2018 13:12:40

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

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Regards

Helen

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---

**From:**  
**Sent:** 16 July 2018 5:28 PM  
**To:** PlanningPolicy  
**Cc:**  
**Subject:** St Aubyns Field, Rottingdean

Dear Sir or Madam

I understand that there is to be a presentation of the City Plan Part 2 on 17th July.

In addition I also understand that there had been two full council votes agreeing that St Aubyns field should be designated as local green space.

The council indicated that this would be granted recognition and the recommendation was sent to the Economic Development and Cultural Committee to be enacted as soon as possible.

This appears not to have happened. Moreover, it does not appear in the appropriate section of the BHCC City Plan Part 2 (Culture Committee Local Green Space DM38).

St Aubyns field is the green lung of Rottingdean and is very dear to me and while I support housing on the brownfield site I do not support building on the playing field.

I am disappointed that democracy seems to have been overruled in this case and request an explanation.

Yours sincerely

**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St. Aubyn's Field, Rottingdean  
**Date:** 20 September 2018 13:12:57

---

DP333

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

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**From:**  
**Sent:** 16 July 2018 8:06 PM  
**To:** PlanningPolicy  
**Subject:** St. Aubyn's Field, Rottingdean

Could you please let me know why there is no mention of St. Aubyn's Field in Rottingdean being a 'local green space'

It does not appear in the appropriate section of the BHCC City Plan Part 2 (Culture Committee Local Green Space DM38).

There was a full Council recommendation to the Economic Development and Cultural Committee that St. Aubyn's Field Rottingdean should be granted recognition as a Local Green Space.

Thank you,



**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St. Aubyn's Field.  
**Date:** 20 September 2018 13:13:15

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

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-----Original Message-----

From:  
Sent: 16 July 2018 8:41 PM  
To: PlanningPolicy  
Subject: St. Aubyn's Field.

Dear Sir/Madam

We are concerned that St. Aubyn's Field is not included as a Local Green Space in the BHCC City Plan Part 2 - this was a recommendation and we are concerned as to its absence-please could you explain?

Thank you.

With regards

**From:** PlanningPolicy  
**To:**  
**Subject:** RE: BHCC City Plan Part 2 - due for decision tomorrow - 17 July 2018  
**Date:** 20 September 2018 13:13:31

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn’s Field should also have been designated as an LGS.

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---

**From:**  
**Sent:** 16 July 2018 9:34 PM  
**To:** PlanningPolicy  
**Subject:** BHCC City Plan Part 2 - due for decision tomorrow - 17 July 2018

Referring to the above I understand that St Aubyns Field (here in Rottingdean) is not to be included. I am concerned about this omission - especially as the High Street has such very high traffic pollution and St Aubyns Field would contribute greatly

towards reduction of same. We live just off the High Street, albeit to the west of it.

Please try and ensure St Aubyns Field (or a sensible part of it) is recognised as a Local Green Space - in BHCC City Plan Part 2 (Culture Committee Local Green Space DM38)

**From:** PlanningPolicy  
**To:**  
**Subject:** RE: Local green space  
**Date:** 20 September 2018 13:13:47

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

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**From:**  
**Sent:** 17 July 2018 7:22 AM  
**To:** PlanningPolicy  
**Subject:** Local green space

This green space on Rottingdean, Newlands road, needs to be in the city plan part 2. We need more open spaces here not more houses and traffic. Please include this with Culture

committee local green space DO. Thank you.

Sent from Samsung Mobile

**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St Aubyns  
**Date:** 20 September 2018 13:14:04

---

DP337

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

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-----Original Message-----

From:  
Sent: 17 July 2018 8:08 AM  
To: PlanningPolicy  
Subject: St Aubyns

May I ask why that St Aubyns Field has not yet been granted recognition as a Local Green Space. This was supposed to have happened as soon as possible. Why does it not appear in the appropriate section of the BHCC City Plan Part 2 (Culture Committee Local Green Space DM38).

I await your response.

Sent from my iPhone

**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St Aubyn's Field, Rottingdean  
**Date:** 20 September 2018 13:14:23

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

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**From:**

**Sent:** 17 July 2018 9:27 AM

**To:** PlanningPolicy

**Subject:** St Aubyn's Field, Rottingdean

Dear Sirs,

It has come to my notice that the current version of the city plan, due for presentation

today, does not define St Aubyns Field, Rottingdean as a Local Green Space.

I believe this field meets the requirements for a Local Green Space and has already been identified as such by the Council, which has recommended to the Economic Development & Cultural Ommitted that this be formally ratified as soon as practicable.

Despite this strong endorsement it has not only been omitted from the City Plan but also from the BHCC City Plan Part 2 (Culture Committee Local Green Space DM38).

This field is a huge asset to the village, provided it remains as open space. If it were to be developed it would, no doubt, prove very profitable for the developer, but would destroy the environmental benefits of this space and put totally unreasonable pressures on local resources and infrastructure.

Would you please explain in detail

1. Why the Council's recommendation has not been actioned
2. Why St Aubyns Field has not been designated Local Green Space in the relevant documents.
3. Who made the decision to omit it.

Yours faithfully,



**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St Aubyn"s  
**Date:** 20 September 2018 13:14:43

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn’s Field should also have been designated as an LGS.

The consultation period ran from the 5<sup>th</sup> July to the 13<sup>th</sup> September. All representations received during the consultation period will be taken into account by the Council when preparing the Plan for submission and examination. Following the end of the City Plan Part 2 consultation period, your comments will be published as part of the Council’s consultation report. However, please note that personal details such as your name, address and contact details will not be made public.

Please could you **indicate in reply to this email** if you wish to be added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations?

Regards

Helen

**Helen Pennington**

**Sustainability Appraisal Officer (I work Mondays-Thursday and alternate Fridays)**

City Development & Regeneration

**Brighton & Hove City Council**

E: [helen.pennington@brighton-hove.gov.uk](mailto:helen.pennington@brighton-hove.gov.uk)

T: 01273 292333

W: [www.brighton-hove.gov.uk](http://www.brighton-hove.gov.uk)

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**From:**  
**Sent:** 16 July 2018 7:56 AM  
**To:** PlanningPolicy  
**Subject:**

Hello,

I am concerned that in the draft city plan 2, there is no mention of St.Aubyn's Field being an open

green space for the future.

I was under the impression that this had been agreed and would you please let me know the current position.

Many thanks.

**From:** [PlanningPolicy](#)  
**To:**  
**Subject:** RE: St Aubyns's Field, Rottingdean  
**Date:** 20 September 2018 13:15:04

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

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Regards

City Development & Regeneration

**Brighton & Hove City Council**

E:

T:

W: [www.brighton-hove.gov.uk](http://www.brighton-hove.gov.uk)

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**From:**  
**Sent:** 17 July 2018 12:39 PM  
**To:** PlanningPolicy  
**Subject:** St Aubyns's Field, Rottingdean

Dear Sir,

I understand that there is to be a presentation of the City Plan Part 2 today, 17th July.

I note that the plan does not include St Aubyn's Field as a local green space. I would like to know why this is?

As I understand there was a full Council recommendation to the Economic Development and Cultural Committee that it be granted recognition as a local green space as soon as possible. Why has this not happened already.

I hope that you will rectify this omission immediately and I look forward to hearing from you.

Yours sincerely,

The General Data Protection Regulation (GDPR), is a really positive step towards you having more control over how your data is used. We have updated our privacy statement to reflect these changes. You will find it on the Contacts Page at: [You don't need to do anything](#), as these changes will automatically apply to you. However, if you would like to withdraw consent and have your details removed, please email

**From:** PlanningPolicy  
**To:**  
**Subject:** RE: City Plan Part 2  
**Date:** 20 September 2018 13:15:17

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

The consultation period ran from the 5<sup>th</sup> July to the 13<sup>th</sup> September. All representations received during the consultation period will be taken into account by the Council when preparing the Plan for submission and examination. Following the end of the City Plan Part 2 consultation period, your comments will be published as part of the Council's consultation report. However, please note that personal details such as your name, address and contact details will not be made public.

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Regards

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---

**From:**  
**Sent:** 17 July 2018 2:04 PM  
**To:** PlanningPolicy  
**Subject:** City Plan Part 2

I have become aware that this plan does not include any reference to St.Aubyn's Field. The full Council recommended that it should be classified as "local green space" as soon as possible. Why has this not happened?

Sincerely,

**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St Aubyns Field, Rottingdean  
**Date:** 20 September 2018 13:15:32

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

The consultation period ran from the 5th July to the 13th September. All representations received during the consultation period will be taken into account by the Council when preparing the Plan for submission and examination. Following the end of the City Plan Part 2 consultation period, your comments will be published as part of the Council's consultation report. However, please note that personal details such as your name, address and contact details will not be made public.

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Regards

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-----Original Message-----

From:  
Sent: 17 July 2018 4:00 PM  
To: PlanningPolicy  
Subject: St Aubyns Field, Rottingdean

Why is St Aubyns Field not considered to be a designated Local Green Space? We need a space like this in the heart of our village. It could be somewhere for people living in flats to go and take their dogs, there could be a small playground with swings etc for very young children, and local sports groups could use it for archery or cricket net practice. We need a green lung right in our village.

**From:** [PlanningPolicy](#)  
**To:**  
**Subject:** RE: St Aubyns Field Local Green Space  
**Date:** 20 September 2018 13:16:36

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

The consultation period ran from the 5th July to the 13th September. All representations received during the consultation period will be taken into account by the Council when preparing the Plan for submission and examination. Following the end of the City Plan Part 2 consultation period, your comments will be published as part of the Council's consultation report. However, please note that personal details such as your name, address and contact details will not be made public.

Please could you indicate in reply to this email if you wish to be added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations?

Regards

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-----Original Message-----

From: Planning Applications  
Sent: 18 July 2018 8:42 AM  
To: PlanningPolicy  
Subject: FW: St Aubyns Field Local Green Space

-----Original Message-----

From:  
Sent: 17 July 2018 2:19 PM  
To: Planning Applications  
Subject: St Aubyns Field Local Green Space

I am writing to ask why the City Plan Part 2, due to be presented today, does not include St Aubyns Field as a Local Green Space as recommended by the full Council.



Sent from my iPad

**From:** PlanningPolicy  
**To:**  
**Subject:** RE: St. Aubyns Field Rottingdean  
**Date:** 20 September 2018 13:16:55

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

The consultation period ran from the 5th July to the 13th September. All representations received during the consultation period will be taken into account by the Council when preparing the Plan for submission and examination. Following the end of the City Plan Part 2 consultation period, your comments will be published as part of the Council's consultation report. However, please note that personal details such as your name, address and contact details will not be made public.

Please could you indicate in reply to this email if you wish to be added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations?

Regards

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**From:**  
**Sent:** 18 July 2018 11:39 AM  
**To:** PlanningPolicy  
**Subject:** St. Aubyns Field Rottingdean

I would like to know the Council's reason for not following through on their previous statement regarding recognition of St. Aubyns Field as a local green space by the Economic and Cultural Committee.

Moreover it does not appear in the appropriate section of the BHCC City Plan Part 2 either. (Cultural Committee Local Green Space DM 38)

I look forward to receiving your comments.

Yours sincerely,

Moreover it

Sent from [Mail](#) for Windows 10

**From:** [PlanningPolicy](#)  
**To:**  
**Subject:** RE: St Aubyn's Fields, Rottingdean  
**Date:** 20 September 2018 13:17:16

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

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Please could you indicate in reply to this email if you wish to be added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations?

Regards

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**From:**  
**Sent:** 09 August 2018 8:35 PM  
**To:** PlanningPolicy  
**Cc:**  
**Subject:** St Aubyn's Fields, Rottingdean

Dear Planning

I am concerned to learn that St Aubyn's Field does not appear in the appropriate section of the B&HCC City Plan, Part Two and I am writing to ask the reason for this.

I also write to express my concern regarding the many developments, either proposed or in progress,

that are rapidly devouring our precious green spaces. In view of a recent national survey, showing that only approximately 20% of the country's new builds on green spaces are viewed as affordable housing and in view of the fact that developers are also allowed to continue to "land bank" many vital and valuable brownfield sites, I should also like to know what percentage of the proposed 4,462 dwellings under your remit will actually transpire to be affordable as opposed to executive homes.

I look forward to hearing from you.

Kind regards.

**From:** [PlanningPolicy](#)  
**To:**  
**Subject:** RE: ROTTINGDEAN - ST AUBYN'S FIELDS  
**Date:** 20 September 2018 13:17:39

---

Dear

Following on from your previous email, please note that your comments have been entered onto the City Plan Part 2 consultation portal as an objection to policy DM38 – Local Green Space, on the grounds that St Aubyn's Field should also have been designated as an LGS.

The consultation period ran from the 5th July to the 13th September. All representations received during the consultation period will be taken into account by the Council when preparing the Plan for submission and examination. Following the end of the City Plan Part 2 consultation period, your comments will be published as part of the Council's consultation report. However, please note that personal details such as your name, address and contact details will not be made public.

Please could you indicate in reply to this email if you wish to be added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations?

Regards

---

**From:**

**Sent:** 10 August 2018 2:33 PM  
**To:** PlanningPolicy  
**Subject:** ROTTINGDEAN - ST AUBYN'S FIELDS

Dear Sir/Madam

I am concerned that St Aubyn,s Field in Rottingdean does not appear in the appropriate section of the Brighton & Hove Council 'City Plan', Part Two.

Please could you respond as to why this is.

It is very alarming that so many of our green spaces are being eaten up by development.

Many thanks,

Yours sincerely,

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

4th September 2018

Dear Sirs

**City Plan Part Two Consultation: 46 - 54 Old London Road Patcham (Site Number 13)**

We strongly object to the inclusion of the above mentioned site in the list of sites allocated for development in the City Plan on the following grounds:

1 Scale and Density of proposed development. The proposed high density development would dominate the village and be totally out of keeping with the character of Patcham village, which retains its charming character as a historical village, located on the edge of a conservation area.

2 Traffic and parking problems. The increased traffic from users of the proposed development would significantly increase traffic movements which would have a disproportionate impact on the small village of Patcham, significantly increasing congestion and pollution. The proposed development is likely to result in significantly increased pressure on the relatively small number of existing parking spaces in the village of Patcham with resultant loss of amenity for local residents. Such problems may potentially threaten the local economy.

3 Flooding and sewage problems. The high density of the proposed development would significantly increase pressure on the local drainage system in an area which has suffered from repeated flooding and sewage problems.

4 Unsuitable location. The proposed development would result in the loss of five family homes which are much needed in this location, to be replaced by inappropriate high density development. The proposed high density development would result in the loss of numerous mature trees with significant loss of wildlife and loss of amenity to local people.

5 Personal Safety. The proposed high density development would add a disproportionately large number of residents and visitors attempting to cross a busy thoroughfare which would significantly increase the risks of serious accidents in the locality.

6 Privacy. The proposed high density development would significantly take away from the privacy enjoyed by surrounding neighbours and would significantly detract from the charming semi-rural character of this part of Patcham Village.

We urge that the Council remove 46 -54 Old London Road, Patcham from the list of sites allocated for development.

Yours faithfully



CPP2

6/8/18

Dear Sirs,

I wish to object to the 3 sites in Patcham that you wish to build on.

1/ Old London Rd

We have just been through this site, the differences are still the same. Not the right place, parking, flooding ect ect.

2/ top of Ladies Mile Rd

If my memory serves me right this site was turned down by MR. ERIC PHELPS MP. in Central Government.

This will be a rat race for Ladies Mile Road. also it will spoil the overall look across Patcham.

P/170

### 3/ Above Horsdean.

Access where would this come from?

A Lot of People use this Place on there Walks To + From Ladies mile N/Resu. TO Horsdean or Back, along the Back of Breaside its Called Lenar Park.

I have been told on two different occasion by two separate people that there ORCIDS on that Piece of Land.

Please use BROWN SITES and leave Patcham alone

Aston House has stood empty for too long. Ideal Place for who you want.

28<sup>th</sup> August 2018

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

Dear Sirs,

**Proposed Housing Site Allocation in Policy H1  
46 – 54 Old London Road, Patcham  
Objection**

I wish to object very strongly to this proposal. It is, in my view, an act of sheer vandalism to demolish five perfectly sound family houses in a delightful mature village setting and replace them with modern “boxes” of inferior quality in a very high density development which will be completely out of place in this environment.

Is this really the same City Council Planning Department that, only twelve months ago, was opposed to another development on this same site? Unbelievable!

Yours sincerely