

Compiled by the Planning Policy, Projects & Heritage Team
at Brighton & Hove City Council

Proposed Submission City Plan Part 2 Examination

BHCC 52 ai - Proposed Main Modifications Consultation Statement May 2022

(redacted version)

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1.0 Introduction

1.1 Background

The role of the City Plan Part Two is to support the implementation and delivery of the adopted City Plan Part One; to build on the strategic policy framework; to identify and allocate additional development sites and to set out a detailed development management policy framework to assist in the determination of planning applications. The plan covers the same geographical area as the City Plan Part One (the administrative area of the city council that is not within the South Downs National Park) and timeframe to 2030. Once adopted, the policies in the City Plan Part Two will replace the remaining 'saved' policies from the 2005 Local Plan.

1.2 Role of the Statement of Consultation

This statement sets out how the council notified relevant stakeholders of the formal consultation on the Proposed Main Modifications to the City Plan Two. Consultation was undertaken in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and followed the guidance set out in the council's adopted Statement of Community Involvement and temporary addendum which was updated January 2022. This statement provides an overview of the number of representations received and a summary of main issues and officer response.

Redacted copies of the original representations made at the Main Modifications (MMs) consultation and copies of the representations by MMs order are available as separate documents on the council's CPP2 Examination website.

1.3 City Plan Part 2 Examination

Following three earlier stages of consultation (Issues and Options consultation in 2016, Draft Plan consultation in 2018 and Formal Regulation 19 consultation in 2020), the Proposed Submission City Plan Part Two (April 2020) was submitted for examination in May 2021. Inspector Ms R Barrett, MRTPI IHBC was appointed by the Secretary of State to hold an independent examination of the City Plan Part 2. The Inspector held examination hearings in November 2021. As part of an examination process the Inspector indicated where some changes or Main Modifications may be needed before it can be adopted to ensure the Plan is legally compliant and passes the tests of 'soundness'. The Inspector requested that consultation should take place on the Main Modifications (MMs).

1.4 Compliance with Statement of Community Involvement

The council adopted its revised Statement of Community Involvement in March 2015. The SCI is a statutory document that formally sets out the policy and standards for engaging residents, local groups, stakeholders, and statutory consultees in preparing development plans and how the council will consult on planning applications.

A temporary addendum to the Statement of Community Involvement was published on the council website on the 23 October 2020 to reflect the 13 May 2020 updated National Planning Practice Guidance: <https://www.brighton-hove.gov.uk/content/planning/planning-policy/statement-community-involvement> . This reflected guidance in the NPPG that *“Where any of the policies in the Statement of Community Involvement cannot be complied with due to current guidance to help combat the spread of coronavirus (COVID-19), the local planning authority is encouraged to undertake an immediate review and update the policies where necessary so that plan-making can continue.”*¹ The temporary addendum to the SCI ensured that CPP2 examination and other planning policy consultations, were consistent with the latest Covid-19 guidance.

The temporary addendum to the SCI was updated in January 2022 to reflect that the Town and Country Planning (Local Planning, Development Management Procedure, Listed Buildings etc.) (England) (Coronavirus) (Amendment) Regulations 2020 ceased to apply from the 1 January 2021 and to update the addendum with the status of the council’s deposit points for viewing hard copies of the consultation document. As of January 2022, all but one of the libraries had re-opened and Brighton Customer Service Centre had re-opened. Hove Customer Service Centres was still closed during the Main Modifications consultation.

2.0 Consultation on the Main Modifications

2.1 Timing of publication and consultation of the Main Modifications

Following the Inspector’s Post Hearing Note (INSP09) published 26 November 2021, the council updated the CPP2 preparation timetable on the council’s website 15 December 2021 to reflect the published timetable for progressing with the Main Modifications. The January of edition of the Planning Policy Newsletter, sent out to all consultees on the council’s planning policy consultee database alerted consultees that, subject to approval at Committee, consultation on the Main Modifications would start on the 17 March 2022. The Examination Webpage ‘Latest News’ was also updated on the 3 March to provide a link to the committee agenda and papers.

The Schedule of Main Modifications (BHC44) was approved for publication and consultation at the TECC meeting 10 March 2022. The Schedule and supporting documents were published and available to view or download from the council’s City Plan Part 2 Examination Library from 3 March in the run up to the Committee meeting. This allowed consultees an earlier opportunity to view the proposed Main Modifications before the start of the formal consultation.

The consultation period ran for seven weeks from Thursday 17 March 2022 and 23.59 Thursday 5 May 2022.

2.2 The Consultation Documents

Alongside the Schedule of Main Modifications (BHC44), the following accompanying documents were also made available as part of the consultation:

- BHCC45 Sustainability Appraisals Addendum Proposed Modifications February 2022
- BHCC46 Sustainability Appraisal Non-Technical Summary February 2022

¹ NPPG Paragraph: 077 Reference ID: 61-077-201200513, Revision date: 13 05 2020

- BHCC47 HEQIA Addendum Proposed Modifications February 2022
- BHCC48 Schedule of Modifications to Policies Map February 2022
- BHCC49 Schedule of Additional Modifications February 2022

The MMs were also available to be viewed in a tracked change version of the City Plan Part Two (BHCC50). The following document was also published at the start of consultation:

- BHCC51 Statement of Representations Procedure and Availability of Documents – See Appendix 1

2.3 Availability of the Schedule of Main Modifications

In accordance with the Town and Country Planning (Local Planning) (England) (Regulations) 2012 the Main Modifications and supporting documents were made available on the council's website: [Main Modifications Consultation \(brighton-hove.gov.uk\)](https://www.brighton-hove.gov.uk) and the council's consultation portal: [Brighton & Hove City Council - Citizen Space \(brighton-hove.gov.uk\)](https://www.brighton-hove.gov.uk)

Hard copies of the documents were also made available to view at:

- **Brighton Customer Service Centre**, Bartholomew House, Bartholomew Square, Brighton, BN1 1JE (open from 9am to 4:30pm from Monday to Friday (excluding Bank Holidays);
- **14 City libraries*** during normal opening hours

*Carden Library was still closed. The public notice also specified that BHCC45 and BHCC47 were only available to read at Brighton Customer Service Centre, Jubilee, Hove and Portslade Libraries as these libraries had only been sent, due to their size, the full SA and HEQIA when the submission documents were sent to the libraries.

In considering how the council could promote effective community engagement by means which were reasonably practicable, in particular to reach those sections of the community that do not have internet access, the council included in the public notice a telephone number for an answerphone service to enable those who could not view the document online or at the libraries and Brighton Customer Service Centre to call the council and request a paper copy to be sent to them.

The public notice (BHCC51) indicated where help with accessing the council's website and could be found and services available for those needing help to use the library computers were also signposted on the public notice. The public notice can be viewed in Appendix 1.

2.4 Notification of Consultation

The 31 January 2022 edition of the Planning Policy newsletter and the CPP2 Examination website 'Latest News' 3 March was used to alert consultees of the proposed start of consultation. The council's press release was published and made available on the council's website on 16 March 2022.

The Programme Officer alerted Regulation 19 representors of the start of the consultation by email on the 16 March 2022.

An email was sent by the council on the 17 March to notify organisations and individuals who were logged as relevant consultees on the council's City Plan database. The database includes statutory and general consultees bodies and the organisations and individuals in accordance with Regulation 18.

The email provided details of the period for the submission of representations, how representations could be submitted and where the Schedule of Main Modifications and accompanying documents could be viewed. The notification email included a link to the council's website where the documents could be read and downloaded, where hard copies could be viewed and a link to the public notice. A copy of the email is included in Appendix 2. Guidance on making representations was also made available on the Main Modifications consultation webpage, as shown in Appendix 4.

The City Plan database is continuously updated with new consultees that engage during or between consultation periods being added to the database. c.800 consultees (on the Planning Policy consultee database as indicated in Appendix 5) were notified by email at the start of consultation on Schedule of Main Modifications.

People who sign up to notifications of consultation opportunities on the council consultation portal would also have been made aware of the opportunity to comment on the Main Modifications Consultation if they had asked to be notified of planning consultations.

A follow up email was sent by the Programme Officer a week before the deadline to the Regulation 19 representors reminding consultees of the deadline for comments and the council also posted reminders 21 April and 3 May on the council's social media (Twitter and Facebook).

Consultees were able to respond:

- Electronically via the council's Consultation Portal (<http://consult.brightonhove.gov.uk/portal>). This is directly linked to the consultation section on the council's website and gave respondents an opportunity to respond to the response form online.
- By email to planningpolicy@brighton-hove.gov.uk or by post to the address specified in the notice. A Word version of the response form was available on request

A link to the Planning Service Privacy Notice was included on the webpage and the PINS Privacy Notice on the portal questionnaire – see Appendix 6.

2.5 Publicity

At the start of the consultation period, the council's press release was published on the 16 March and made available on the council's website and through social media (Twitter and Facebook). The council's Twitter page has over 66,000 followers and the Facebook page has over 19,000 followers. The notification of the start consultation was also included in the city council's electronic newsletter, 'Your Brighton & Hove' on the 24 March which is sent to c.3,200 residents. Copies of publicity is included in Appendix 7.

Following committee approval there were press articles related to the Main Modifications consultation published in the local newspapers: Brighton & Hove News, and the Brighton & Hove Argus.

Details of the start of the Main Modifications Consultation was also set out to Visit Brighton Partners (c.500 local tourism businesses) via their electronic newsletter and made available on The Brighton

& Hove Living Coast website, newsletter and social media: [New opportunity to contribute to Brighton & Hove's City Plan Part 2 - The Living Coast](#). The Council's Community Engagement Team included details of the consultation in their newsletter to approximately 160 residents and community representatives and on their Facebook and Twitter page ([Community Engagement - Brighton & Hove City Council - Home | Facebook](#)). The council's social media tweet was also shared on the council's Equalities Brighton & Hove City Council's Communities, Equalities & Third Sector including the Safer Communities Team twitter page ([Brighton & Hove Communities and Equalities \(@BHCETS\) / Twitter](#)).

Some local organisations/ groups chose to put details of the consultation on their webpages, emailed to their members or re-tweeted the news feed. This allowed details of the CPP2 consultation to reach a wider audience. The Brighton & Hove Economic Partnership publicised details of the consultation on their webpage for their members: [Post — Brighton & Hove Economic Partnership \(bhep.co.uk\)](#). The Planning Agents Forum shared details of the consultation in the news section for their members: [News - Planning Agents Forum](#).

A consultation flyer was made available to ward councillors electronically and sent to the Brighton Customer Service Centre and Library service for display in the open libraries (see Appendix 8).

3.0 The Number of Formal Representations Received

A total of 20 respondents formally made submissions to the Main Modifications. An overview of the number of respondents by type is summarised in the table below:

Table 2 – Overview of respondents by type

Business	
Civic & Amenity	
Environment, transport	4
Government Agency/Dept	4
Individual	5
Developers/Landowners / Consultants	2
Councillor/political group	
Neighbourhood Forum	1
Parish Council	
Public Sector / Local Authority	3
Utilities	1
Community & Voluntary Sector	
Total	20

Of the 20 respondents, 15 respondents made 49 representations on the MM. The number of representations submitted on each MMs is set out in the table below:

Table 3 – Overview of Representation by MM

Main Modification Number	No of reps
MM08	1
MM09	1
MM14	2
MM16	1
MM18	1
MM19	1
MM20	1
MM21	1
MM22	1
MM23	1
MM24	1
MM25	1
MM28	1
MM29	8
MM31	2
MM32	1
MM36	2
MM37	4
MM38	1
MM40	1
MM41	1
MM42	1
MM43	1
MM44	3
MM45	8
MM46	1
MM47	1
Total Mod Reps	49

4.0 Summary of main issues

A summary of the responses including main soundness issues raised by the representations in Main Modifications order are set out in the Table 1 in Appendix 9 along with an officer response.

There were no comments on the Proposed Changes to the Policies Map (BHCC48) or Health and Equalities Impact Assessment addendum (BHCC47). There was one comment made to the Sustainability Appraisal Addendum (BHCC45).

3 consultees indicated that they had no comments to make on the Main Modifications. These have been included in the schedule of duly made representations for completeness.

The council received no comments on the schedule of Additional Modifications (BHCC49).

In her post hearing action note (INPS09), the Inspector specified that it should be made clear that the consultation relates solely to the proposed Main Modifications. This was explained in the formal notice of consultation and guidance on making comments. Where a representation was made that did not appear to relate to a specific proposed change to a policy or supporting text, the representation has been included in the Main Issues Summary for information, but it is noted in the table that the representation relates to an area of the plan that was not proposed to be changed.

Copies of the original redacted representations are set out electronically as Appendix 10 on the CPP2 website. Appendix 11 provides electronic copies of representations in Main Modifications order, and this is also available on the CPP2 website as part of the examination library.

6.0 Late Representations

No representations were received after the close of consultation.

7.0 Conclusion

This Consultation Statement demonstrates that the council has met the requirements of Regulation 22(1) c of the Town and Country Planning (Local Planning) (England) Regulations 2012 with regards to the consultation undertaken on the Main Modifications. This document will be forwarded to the examining Inspector along with the copies of all representations received.

Appendices



Statement of Representations Procedure and Availability of Documents

City Plan Part Two: Main Modifications Consultation

The City Plan Part Two supports the implementation and delivery of City Plan Part One (adopted March 2016) through the allocation of additional development sites and through a suite of development management policies. It covers the same geographical area as the City Plan Part One (the administrative area of the city council that is not within the South Downs National Park) and timeframe to 2030. Once adopted, it will form part of the statutory development plan for the city from which planning applications will be determined.

What is the purpose of this consultation?

Inspector Ms R Barrett, MRTPI IHBC was appointed by the Secretary of State to hold an independent examination of the City Plan Part 2. The purpose of the examination is to determine whether the Plan is sound and has complied with necessary legal requirements. The Inspector held examination hearings in November 2021. As part of an examination process the Inspector has indicated where some changes or Main Modifications may be needed in order to ensure the Plan is legally compliant and passes the tests of 'soundness' before it can be adopted. The Inspector has requested that consultation should take place on the Main Modifications (MMs).

The Schedule of Main Modifications identifies specific changes to the wording of certain policies and supporting text of the April 2020 City Plan Part Two (as submitted for examination). Consequential changes needed to the Policies Maps are listed in a separate Schedule.

Please note that representations are only to be made on the MMs. This consultation is not an opportunity to raise new matters or to make comments on other areas of the Plan which remain unchanged. There is also no need to repeat representations that have been submitted previously and which have already been provided to the Inspector.

Additional modifications are also proposed, these are non-consequential amendments to the Plan, not necessary for soundness. These generally involve changes that enhance the clarity of the plan without materially affecting the implementation of plan policies and to provide factual updates. The Council has published a schedule of its Additional Modifications for completeness.

The Main Modification consultation documents are:

- BHCC44 Schedule of Main Modifications to City Plan Part Two February 2022
- BHCC45 Sustainability Appraisals Addendum Proposed Modifications February 2022
- BHCC46 Sustainability Appraisal Non-Technical Summary February 2022
- BHCC47 HEQIA Addendum Proposed Modifications February 2022
- BHCC48 Schedule of Modifications to Policies Map February 2022
- BHCC49 Schedule of Additional Modifications February 2022

The MMs can also be viewed in a tracked change version of the City Plan Part Two (BHCC50).

Where to view the Consultation Documents?

The Main Modifications consultation documents can be viewed online here: [City Plan Part 2 examination \(2021\) \(brighton-hove.gov.uk\)](#):

Library members can use the library computers to view the consultation documents online. Find the latest information on [libraries opening and use of the library computers](#) and/or for help on [accessing the council's website](#).

Hardcopies of the consultation documents are available to read at:

- **Brighton Customer Service Centre**, Bartholomew House, Bartholomew Square, Brighton, BN1 1JE (open from 9am to 4:30pm from Monday to Friday (excluding Bank Holidays));
- **City libraries*** during normal opening hours which you can check here: [Local libraries \(brighton-hove.gov.uk\)](#)

*Carden Library is still closed and BHCC45 and BHCC47 are only available to read at Brighton Customer Service Centre, Jubilee, Hove and Portslade Libraries.

If you are unable to access the information online or are not able to reach your library to view an online or a paper version, or if you are aware of anyone in these circumstances, please leave a message on the Policy Team voicemail on 01273 292333 to discuss alternative arrangements (stating clearly your name and contact phone number). We will aim to get back within 5 working days.

Period within which representations must be made

Representations must be received between **Thursday 17 March 2022** and **23.59 Thursday 5 May 2022**.

Only those representations made via the on-line consultation portal, by email or writing which arrive at the address specified within the specified consultation period will have a right to be considered. The representations will be sent to the Inspector for her consideration.

How to make comments (representations)

To help us handle your comments quickly and efficiently we recommend you make your comments using the council's online consultation portal: <http://consult.brighton-hove.gov.uk/portal>

Alternatively, email: planningpolicy@brighton-hove.gov.uk

Or write to: **CPP2 Policy Projects and Heritage Team**
Brighton & Hove City Council
First Floor Hove Town Hall,
Norton Road BN3 3BQ

Guidance is available on making representations. Please note that we cannot take account of responses which are submitted to us confidentially. Any person who has made representations may withdraw those representations at any time by giving notice in writing to the Council either by email or by post at the address given above.

Please be aware that all representations received by the council will be publicly available (personal contact details will not be published).

Read the Planning Service privacy statement: [City plan part 2 main modifications consultation privacy notice \(brighton-hove.gov.uk\)](#)

Request to be notified

Representations may be accompanied by a request to be notified at a specified address of:

- The publication of the inspector's report following the examination
- The adoption of City Plan Part Two

City Plan Part 2 Main Modifications Consultation

17 March - 5 May 2022



Dear Consultee,

Brighton & Hove City Plan Part 2 - Main Modifications Consultation

The City Plan Part 2 is under examination by an independent planning Inspector appointed by the Secretary of State. Public hearing sessions were held in November 2021. The Inspector is considering changes or 'main modifications' to the Plan to ensure it meets legal and soundness requirements. The Inspector has asked that we consult on these proposed Main Modifications (MMs). The proposed MMs are put forward without prejudice to the Inspector's final conclusions.

Additional modifications are also proposed, these are non-consequential amendments to the Plan, not necessary for soundness. The Council has published a schedule of its Additional Modifications for completeness.

The City Plan Part 2 (CPP2) will support the implementation and delivery of City Plan Part One (adopted March 2016) through the allocation of additional development sites and through a suite of development management policies. It covers the same geographical area as the City Plan Part One (the administrative area of the city council that is not within the South Downs National Park) and timeframe to 2030. Once adopted, it will form part of the statutory development plan for the city from which planning applications will be determined.

Consultation on the proposed main modifications will run for 7 weeks from **17 March 2022 until 5 May 2022**.

How to view the consultation documents

- The Schedule of Main Modifications (BHCC44) and accompanying consultation documents (BHCC45-49) are available to view or download from the CPP2 Examination library: [Examination documents from the council \(brighton-hove.gov.uk\)](https://www.brighton-hove.gov.uk/examination-documents)
- If you are a library member, you can use the library computers to view the consultation documents online. Please refer to the latest information on [libraries opening and use of the library computers](#) and/or for help on [accessing the council's website](#).

- Hardcopies of the Schedule of Main Modifications and supporting documents are available to view at:
 - Brighton Customer Service Centre, Bartholomew House, Bartholomew Square, Brighton, BN1 1JE (open from 9am to 4:30pm from Monday to Friday (excluding Bank Holidays);
 - City Libraries* (except Carden Library) during normal opening hours which you can check here: [Local libraries \(brighton-hove.gov.uk\)](http://local-libraries.brighton-hove.gov.uk)
- If you are unable to access the information online or are not able to reach your library to view an online or a paper version, or if you are aware of anyone in these circumstances, please leave a message on the Policy Team voicemail on 01273 292333 to discuss alternative arrangements (stating clearly your name and contact phone number). We will aim to get back within 5 working days.

* The Sustainability Appraisal Addendum (BHCC45) and HEQIA Addendum (BHCC47) are only available to read at Brighton Customer Service Centre, Jubilee, Hove and Portslade Libraries

Read the council's [formal notice of the representations procedure and availability of documents \(BHCC51\)](#) for further information.

How to make comments

To help us handle your comments quickly and efficiently we recommend you make your comments using the council's online [consultation portal](#)

Alternatively email: planningpolicy@brighton-hove.gov.uk

Or write to: CPP2 Policy Projects and Heritage Team, Brighton & Hove City Council, First Floor Hove Town Hall, Norton Road BN3 3BQ

Representations must be received **by the deadline of 23:59 on Thursday 5 May 2022**

The representations will be sent to the Inspector for her consideration. Only those representations made via the on-line consultation portal, by email or writing which arrive at the address specified within the specified consultation period will have a right to be considered. Please be aware that all representations received by the council will be publicly available (personal contact details will not be published). Our privacy notice can be read here: [City plan part 2 main modifications consultation privacy notice \(brighton-hove.gov.uk\)](#) .

Note that comments must be focused only on the proposed main modifications. This consultation is not an opportunity to raise new matters or to make comments on other areas of the Plan which remain unchanged. There is also no need to repeat representations that have been submitted previously and which have already been provided to the Inspector.

Further guidance and information can be read on this webpage: [Main Modifications Consultation \(brighton-hove.gov.uk\)](#)

Kind regards,

Planning Policy Team

Brighton & Hove City Council

You are receiving this email because you are a statutory consultee, provided comments at a previous stage of consultation on the CPP2, or have signed up to receive Planning Policy updates from Brighton & Hove City Council. If you would no longer like to receive these updates you can unsubscribe [here](#)

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

City Plan Part 2 examination (2021)

Main Modifications Consultation

[Home](#) > [City Plan Part 2 examination \(2021\)](#) > Main Modifications Consultation

City Plan Part Two Main Modifications Consultation

Purpose of this consultation

Following the examination hearings in November 2021, the Inspector wrote to the council. Her Post Hearing Action Note (INSP09) sets out the proposed changes or Main Modifications needed to ensure the City Plan Part 2 is legally compliant and passes the government's tests of 'soundness'.

The Inspector has asked that we consult on these proposed Main Modifications (MMs). The proposed MMs are put forward without prejudice to the Inspector's final conclusions. Members of the TECC Committee at their 10 March meeting approved these MM for public consultation.

The Schedule of Proposed Main Modifications (BHCC44) sets out the specific changes to the wording of certain policies and supporting text of the City Plan Part Two.

Changes are needed to how the City Plan Part Two will be shown on the Policies Map. These are set out in a separate schedule (BHCC48).

We are also proposing additional modifications to the City Plan Part 2. These are non-consequential changes and are not necessary for soundness. These changes make the Plan clearer and provide factual updates but don't materially affect the implementation of the plan policies. These are set out in a Schedule of Additional Modifications (BHCC49) which is available as part of the consultation.

Where to view the Main Modifications and other consultation documents

Go to our [Examination documents from the council](#) page to view:

- BHCC44 Schedule of Proposed Main Modifications to City Plan Part Two February 2022
- BHCC45 Sustainability Appraisals Addendum Proposed Modifications February 2022
- BHCC46 Sustainability Appraisal Non-Technical Summary February 2022
- BHCC47 HEQIA Addendum Proposed Modifications February 2022
- BHCC48 Schedule of Modifications to Policies Map February 2022
- BHCC49 Schedule of Additional Modifications February 2022

A tracked change version of the City Plan Part Two (BHCC50) showing the Main Modifications is also available.

Read paper copies of the consultation documents at:

- Brighton Customer Service Centre, Bartholomew House, Bartholomew Square, Brighton, BN1 1JE (open from 9am to 4:30pm from Monday to Friday (excluding Bank Holidays)
- City libraries during [normal opening hours](#) - BHCC45 and BHCC47 are only available to read at Brighton Customer Service Centre, Jubilee, Hove and Portslade libraries.

When comments must be made

Your comments must be received **between Thursday 17 March 2022 and 11:59pm Thursday 5 May 2022**.

Only those representations made via the on-line consultation portal, by email or writing which arrive at the address specified within the specified consultation period will have a right to be considered by the Inspector.

In this section

City Plan Part 2 examination (2021)

- City Plan Part 2 examination (2021)
- Main Modifications Consultation**
- The examination process
- Examination library
- Examination timetable

Need a BSL translation? If so, go to: [SignLive](#)

Read the [council's formal notice of the representations procedure and availability of documents \(BHCCS1\)](#).

How to make comments

We recommend you make your comments using the council's [online consultation portal](#).

This will help us handle your comments quickly and efficiently.

- Alternatively email: planningpolicy@brighton-hove.gov.uk
- Or write to: CPP2 Policy Projects and Heritage Team, Brighton & Hove City Council, First Floor Hove Town Hall, Norton Road BN3 3BQ

Word versions of the Response Form are available on request.

All representations we receive will be publicly available (personal contact details will not be published).

Guidance on making comments

Please note that representations are only to be made on the proposed MMs. This consultation is not an opportunity to raise new matters or to make comments on other areas of the Plan which remain unchanged. There is also no need to repeat representations that have been submitted previously and which have already been provided to the Inspector.

The MMs are numbered MM1 – MM49. Please include the MM number within your response. The City Plan Part Two has been guided by previous consultation, as well as considerable research and evidence gathering. The policies in the plan must be based on evidence, all of which you can view in the Examination Library.

You should provide succinctly all the evidence and supporting information necessary to support your comment and your suggested modification.

If you are part of a representative organisation or group of individuals who share a common view on the Plan, it would be helpful to make a single representation, rather than submitting a large number of separate representations repeating the same points. If you are working as a group, please tell us who you are representing and how your representation has been agreed/authorised.

Below are some questions to consider when commenting on the Main Modifications:

- Are there any Main Modifications you particularly support, and why?
- Are there any Main Modifications which you consider not to be 'sound' or legally compliant? If so, why and what needs changing for the Plan to be found sound?

Government guidance states that to be adopted, a plan must be 'sound', meaning it should be:

- Positively prepared (meeting the area's needs; informed by agreements with other authorities)
- Justified (appropriate; taking into account reasonable alternatives; based on proportionate evidence)
- Effective (deliverable over the plan period; based on effective joint working with other local authorities on cross-boundary strategic matters)
- Consistent with national policy.

Legal compliance means if the Plan has been prepared in accordance with regulations and complies with the duty to cooperate.

If you wish to make a representation on a Main Modification, including any suggested changes to a Main Modification, you should make clear how your comments relate to the tests of soundness, the legal compliance and duty to cooperate.

- You can read the government guidance on soundness (paragraph 35 of the National Planning Policy Framework) on GOV.UK: [3. Plan-making - National Planning Policy Framework - Guidance](#)
- You can read further guidance on taking part in examinations on GOV.UK: [Local plans: taking part in examinations](#)

City Plan Part Two Main Modifications Consultation

Closes 5 May 2022

This service needs [cookies enabled](#).

Your Details

1. What is your name?

(Required)

2. What is your email address?

(Required)

3. What is your organisation? (if applicable)

4. Responding on behalf of (If applicable)

5. Please let us know if you wish to be notified of the following:

- The Publication of the Inspector's Report
- Adoption of the City Plan Part Two

« First

Save and come back later...

Continue >

Representation (1)

1. Main Modification Number

(Required)

2. Submission City Plan Part 2 Reference (e.g. Supporting text to Policy DM4, paragraph 2.28, page 25)

3. With the inclusion of the Main Modification do you consider the Plan is sound?

	Yes	No
Sound	<input type="radio"/>	<input type="radio"/>
Legally Compliant	<input type="radio"/>	<input type="radio"/>

[▶ More Information about Legal Compliance & Duty to Cooperate](#)

[▶ More information about Soundness](#)

4. If you have answered 'no' to the question above please specify on what grounds:

(1) Not
Positively
Prepared

(2) Not
Justified

(3) Not
Effective

(4) Not
Consistent
with National
Policy

Tick all that apply

▶ [More information about Soundness](#)

5. Please set out your representation in full below. Please be as precise as possible.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations.

6. Please set out what change(s) you consider necessary to make the Plan sound.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations.

6. Please set out what change(s) you consider necessary to make the Plan sound.

You will need to say why each change will make the policy legally compliant and sound. It will be helpful if you are able to put forward any suggested revised wording of the policy or supporting text. Please do not use strikethrough text as this will not be shown in your submission.

7. Would you like to comment on another Main Modification?

(Required)

- Yes
- No

« First

Save and come back later...

Continue >

Closes 5 May 2022

This service needs [cookies enabled](#).

Other Documents

Use this page if you have comments on The Schedule of Policies Map Modifications Schedule of Additional Modifications, Sustainability Appraisal, or the HEQIA. If you have no comments on these documents please press continue at the bottom of the page.

1. Please specify which consultation document your comment relates to by ticking one of the following:

-- Please Select --

What is the Modification Number you are responding to (PM, AM), or which part of SA or HEQIA?

Comments

If you have another comment to make on another document from the drop-down list please go to the next box below...

2. Please specify which consultation document your comment relates to by ticking one of the following:

-- Please Select --

What is the Modification Number you are responding to (PM, AM), or which part of SA or HEQIA?

-- Please Select --

What is the Modification Number you are responding to (PM, AM), or which part of SA or HEQIA?

Comments

If you have another comment to make on another document from the drop-down list please go to the next box below...

3. Please specify which consultation document your comment relates to by ticking one of the following:

-- Please Select --

What is the Modification Number you are responding to (PM, AM), or which part of SA or HEQIA?

Comments

If you have another comment to make on another document from the drop-down list please go to the next box below...

4. Please specify which consultation document your comment relates to by ticking one of the following:

What is the Modification Number you are responding to (PM, AM), or which part of SA or HEQIA?

Comments

« First

Save and come back later...

Continue »

City Plan Part Two Main Modifications Consultation

Closes 5 May 2022

This service needs [cookies enabled](#).

Document Upload

Use this page to upload one additional document to support your representations. If you do not require this please press continue at the bottom of the page to reach the end of the survey.

1. If you have any supplementary information supporting your representation that you wish to upload please do so below (alternatively please email planningpolicy@brighton-hove.gov.uk along with your respondent ID)

You can only upload one document to your responses. If you have further information please email us.

Please make sure your file is under 25MB

No file chosen

« First

Save and come back later...

Continue >

Appendix 5 List of Consultees

Appendix 1 List of Consultees

Specific Consultees

Local Authorities

Adur & Worthing Council
Arun District Council
BHCC Property & Design
Chichester District Council
Crawley Borough Council
Ditchling Parish Council
East Sussex County Council
East Sussex Fire Brigade
Eastbourne Council
Falmer Parish Council
Fulking Parish Council
Greater London Authority
Horsham DC
Lewes District Council
London Assembly
Mid Sussex
Poynings Parish Council
Rodmell Parish Council
Rother District Council
Rottingdean Parish Council
South Downs National Park Authority
Sussex Police Authority
Telscombe Town Council
Upper Beeding Parish Council
Wealden District Council
West Sussex county Council

Gov Organisations

Brighton & Hove Integrated Care Services
Brighton & Sussex University Hospitals NHS Trust
Civil Aviation Authority
Coast to Capital LEP
English Heritage - SE Region
Environment Agency
Homes and Communities Agency
Homes England
Marine Management Organisation
Natural England

National Highways
Network Rail
NHS Commissioning Board (Planning)
NHS England
NHS Property Services Ltd
Office of Rail Regulation
South East Coast Ambulance Service
Sussex Community NHS
Sport England
Sussex Partnership NHS Trust

Utilities

BT Openreach
EDF Energy
EE Telecom
Mobile Operators Association
National Grid
Scotia Gas Networks, Plant Protection Team
Scottish & Southern Energy
Southern Gas Networks
Southern Water
The Big Six (Energy Suppliers)
Vodafone and O2

Landowners

University of Brighton
University of Sussex
South East Coast Ambulance
Service NHS Foundation Trust
Shoreham Port Authority

Consultees General

Individuals

Names have been removed from this document in light of the GDPR data protection law

Business

AAA Building Services
Arcus Consultancy Services Ltd
Badgers tennis Club
Best practice consulting Ltd
BHEP
Brighton & Hove Buses
Brighton & Hove Chamber of Commerce
Brighton and Hove News
Brighton Dome & Brighton Festival
Brighton Marina
canton united ltd
Churchill Square Shopping Centre
Hove Business Association
Magnetic Ideals
Oastwood ltd
Pavilion Gardens Café
RTH
Sussex Chamber of Commerce
The Grange
VisitBrighton
Wired Sussex
Yellowwave Ltd

Civic & Amenity

Brighton Marina Residents' Association
Brighton Society
Brighton YIMBY
Campaign for Real Ale
CBB
Coldean Community Organisation
Conservation Advisory Group
Craven Vale Community Association
Friends of Bedford Square
Montpelier & Clifton Hill Association
Friends of Hove Lagoon
Friends of Palmeira & Adelaide
Friends of Preston park
Georgian Group

Goldstone Valley Residents Association
Hampshire Court Resident Ass
Hove Civic Society
Ingram Crescent Residents' Association
KAWHRA
Keep Our Downs Public
Keep The Ridge Green
kemp town enclosures
KempTown
Society
Kingscliffe Society
Kingsway and West Hove Residents Association
Madeira Terraces & Black Rock Past Present & Future
Montpelier and Clifton Hill Association
NLCA
North Laine Community Association (Editor of North Laine Runner)
North Portslade Residents Association
Regency Society of Brighton & Hove
Regency Square Area Society
Residents association
Round Hill Society
SAFE
Saltdean Residents' Association
Save Madeira Terrace
SaveHOVE
Southdown Rise Residents Association
The Round Hill Society
Theatres Trust
West Hill Community Association
West Hove Forum
West Pier Trust
woods house t/a

Community & Voluntary Sector

Amaze
B&H Local Access Fourm
B&H Speakout
Badge Brighton & Hove
Bluebird Society for the Disabled
Brighton & Hove Community Land Trust
Brighton & Hove Food Partnership
Brighton and Hove Speak Out
CAT
Centre for Food Policy

Community Works
 Community Works Parks and Green Spaces Rep
 Community works Rep. Joint organiser Working50p
 Cornerstone Community Centre
 Ditch the Label
 Fabrica
 Gscene Magazine
 Hangleton & Knoll Project
 Hangleton Community Association
 Horsdean Community Sports Association
 Local Access Forum
 Older People's Council
 Portslade Community Forum
 Possibility People
 Ramblers East Sussex Countryside Officer
 rYico (Rwandan youth information community
 organisation)
 St Richard's Community Centre
 T.D.C
 The Carers Centre for Brighton and Hove
 The Hangleton and Knoll project
 The Trust For Developing Communities
 Youthforce

Developers\, Landowners & Consultants

ABIR Architects
 Absolute Planning
 Allied Surveyors
 ARCH-angels Architects
 architect
 Architecture of Calm
 ASP
 Barton Willmore
 Berkeley Group
 BHCLT
 BHT
 Boyer
 Brand Vaughn
 Brighton & Hove Albion Football Club
 Brighton & Hove Seaside Community Homes
 Brighton and Hove Hoteliers Association
 Brighton Pier Group PLC
 Brightonrockhousingco-op@outlook.com
 Brunswick Developments Group PLC
 Carter Jonas

Chartplan
 Claire Haigh Associates Ltd
 Coastal Buildings Surveyors
 Collective Planning
 Collins Planning Services Ltd
 Copesmill Properties Ltd
 Crickmay Chartered Surveyors
 Deloitte
 DevPlan
 DHA Planning
 DK Architects
 DMH Stallard LLP
 Dowsett Mayhew Planning
 DPDS Consulting Group
 DWD Planning + Property
 ECE Planning
 Enplan UK Ltd
 Fludes
 Fredrick Adam Ltd
 G3 Architecture
 GVA
 Home Builders Federation
 Home Group
 HOP Consulting Limited
 Icen Projects
 JDRM Architectural Design
 Landivar Architects
 LCR Property
 Lewis & Co Planning
 Liam Russell Architects Ltd
 Lichfields
 Life Size Architecture
 Lightwood Strategic
 MacConvilles Surveying
 Marcus Laing Land
 Mid Group
 Moat Homes Limited
 Montagu Evans LLP
 NTR Planning
 Oxalis Planning
 Parker Dann
 Planning Resolution Ltd
 Planview Planning Ltd
 Planware
 prospective planning
 Quod

R H Partnership Architects Ltd
Rapleys LLP
Redrow Homes
Reside Developments Ltd
RHPC
RJA Planning & Building Consultants Ltd
ROK Planning
Savills
SHW
Simply Planning Limited
Sirius Planning
SSA Planning
St William
Strutt & Parker
Tetlow King Planning Ltd
thakeham homes
Turley
Whaleback Planning
Wood Plc
WSP
WYG

Environment Transport & Wildlife

Biosphere programme
Bricycles
Brighton & Hove Bus Company
Brighton & Hove Friends of the Earth
Brighton & Hove Green Spaces Forum
Brighton Archaeological Society
Brighton Area Buswatch
Brighton City Airport
Brighton Peace and Environment Centre
Clear Sky sustainable Homes Ltd
Community Works (Transport rep)
community transport
CPRE B&H
Cyrrus (owners of Brighton City Airport)
Friends of Whitehawk Hill
Gatwick Airport Ltd
Green Varndean
H2 Evolution
Low Carbon Trust
Network Rail
Railway Heritage Trust
RSPB

SERA Socialist Environmental Resources Association
South Downs Society
Stanmer Preservation Society
Sussex Gardens Trust
Sussex Local Nature Partnership
Sussex Ornithological Society
Sussex Wildlife Trust
Sussex FA
The Gardens Trust
The National Trust
Woodland Trust

Gov / Local Authority

Air Quality BHCC
Arboriculture BHCC
Arts BHCC
BH Clinical Commissioning Group
Brighton and Hove Liberal Democrats
City Clean BHCC
City Parks BHCC
Coast2Capital
Communities Team BHCC
East Sussex County Council
East Sussex County Architect
East Sussex County Ecologist
East Sussex Strategic Partnership
Economic Development BHCC
Environmental Health BHCC
Hastings Borough Council
Heritage Team BHCC
Historic England
Homes England
Lewes District Council
Marine Management Organisation
Member of Parliament Caroline Lucas
Member of Parliament Lloyd Russell Moyle
Member of Parliament Peter Kyle
Ministry of Defence
MoD Safeguarding Team
Parks Projects BHCC
Planning Projects BHCC
Private Sector Housing BHCC
Property & Design BHCC
South Downs National Park Authority - ChaMP Project
South East Local Enterprise Partnership

Sports Developments Team BHCC
Sussex Police Community Safety
Sustainable Drainage BHCC
Tourism and Leisure BHCC
Transport Planning BHCC
University of Kent
Varndean Secondary School

LATs

BOTLAT
Brighton Old Town Local Action Team
London Road Area Action Team
Portslade LAT

Neighbourhood Forums

Brighton Marina Neighbourhood Forum
Hangleton & Knoll Neighbourhood Forum
Hove Park Neighbourhood Forum
Hove Station Neighbourhood Forum
(Rottingdean Parish Council as above)

City Plan Part Two Main Modifications Consultation

Closes 5 May 2022

This service needs [cookies enabled](#).

Privacy Notice

1. Please tick to confirm you have read our privacy statement

(Required)

Yes

City Plan Part Two Main Modifications Consultation Privacy Notice

Read our privacy notice for information on how we collect, store, and process your data.

Brighton & Hove City Council is committed to protecting your personal information. As a data controller we have a responsibility to make sure you know why your personal information is being collected and how it will be used in accordance with relevant data protection law.

The primary laws which governs how Brighton & Hove City Council collects and uses personal information (known as "data") about you are:

- General Data Protection Regulation (GDPR)
- Data Protection Act (DPA) 1998

This privacy notice explains how personal information collected in relation to the consultation on the City Plan Part Two proposed Main Modifications will be used.

This notice is additional to the standards and notices published by the Planning Service at Brighton & Hove City Council including that made available at the Regulation 19 consultation period and the Examination Stage.

The examining Planning Inspector issued a post hearing note 26 November 2021 (INSP09) indicating that she is considering changes or Main Modifications (MMs) to the Plan to make the plan sound and legally compliant.

The Council is required to consult on these MMs. We are required to submit all representations received to the examining Planning Inspector and make copies of the representations publicly available. Representations made as part of this consultation cannot be treated in confidence.

There is also a specific notice which covers the Planning Inspectorate, the [Planning Inspectorate's Customer Privacy Notice](#)

Who is processing your data

Brighton & Hove City Council will be the data controller for the data you provide to us. The Planning Inspectorate and the Local Planning Authority are joint controllers of your personal data because we jointly determine the purposes and means of processing.

What information will we collect about you

- Name
- Email address
- Organisation (where relevant)
- Your comments/representations

How we will use the information we hold about you

We are required to submit all representations received to the examining Planning Inspector and make copies of the representations publicly available. Representations made as part of this consultation cannot be treated in confidence.

Following consultation, a consultation statement will be produced to summarise the consultation undertaken, will provide details of organisations who responded to the consultation and will include all comments submitted as part of the formal consultation process as required by the Town and Country Planning (Local Planning) Regulations 2012. This will be available on the BHCC website. Names and email addresses will not be published.

How the law allows us to use your information

The council has a legal obligation to process the data. Section 20 (7C) of the Planning and Compulsory Purchase Act requires the Inspector to recommend MMS if asked to do so by the local planning authority. Section 20 (6) of the Town and County Planning Act requires that:

(6) Any person who makes representations seeking to change a development plan document must (if he so requests) be given the opportunity to appear before and be heard by the person carrying out the examination.

In order for the Inspector to give that opportunity they will need to have their name and contact details. The nature of how the representations should be provided to the Inspector is set out in Regulation 22 (c) of the Town and Country (local Planning) (England) Regulations 2012 as amended.

Who we share the information with The Planning Inspectorate

The Programme Officer is appointed by the council but supports the Inspector. The council has a Data Sharing Agreement in place with the Programme Officer and with the Planning Inspectorate. Brighton & Hove City Council will provide the programme officer to support the Inspector, and representations are exchanged between Brighton & Hove City Council and the Inspector through the programme officer.

How long we keep your personal information

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or reporting requirements, which is three months after the date of adoption of the City Plan Part Two.

How your data will be stored

Your personal data will only be stored and processed on servers based within the UK.

How we protect your data

Examples of the security measures we use:

- training for our staff making them aware of how to handle information securely and how and when to report when something goes wrong
- we use encryption when data is sent, meaning that information is scrambled so that it cannot be read without access to an unlock key, the hidden information is said to then be 'encrypted'
- data will be pseudonymised where possible, meaning that your identity will be removed, so work can be done without your identity being known by the people doing the work
- controlling access to systems and networks to stop people who are not allowed to view your personal information from getting access to it
- regular testing of our technology and ways of working, including keeping up to date on the latest security updates (commonly called patches)

Transferring data outside the United Kingdom

Your information is not processed outside of the United Kingdom.

Your rights

You have the following rights in relation to your personal information:

- the right to be informed – you have right to know about the collection and use of your personal data. We will inform you through our service-specific notices
- the right of access – you can request to know what information we hold on you along with an explanation for how it is used by making a "Subject Access Request"

- the right to rectification – you have the right to ask us to update, amend or change your information if it is factually inaccurate or incomplete
- the right to erasure – you have the right to ask us to delete your personal information where it can be shown that we no longer have a lawful basis to retain it or the information was collected on the basis of consent only and you have withdrawn your consent

How to get advice or make a complaint

Contact the council's Data Protection Officer. If you wish to discuss any of your data protection rights, you can contact the Data Protection Team on 01273 29 59 59 or by email at data.protection@brighton-hove.gov.uk.

While we would prefer that you contact us first with any concerns that you might have, you can also contact the Information Commissioner's Office. The ICO is the national regulator with responsibility for ensuring compliance with data protection.

Information Commissioner's Office

You also have the right to lodge a complaint with a supervisory authority. Contact details for the ICO is stated below.

You can contact the ICO:

- [on their website](#)
- by phone: 03031 231 113
- by post: Wycliffe House, Water Ln, Wilmslow SK9 5AF

This privacy notice will be subject to review when there is a change.

Examination Webpage update – 3 March 2022

City Plan Part 2 examination (2021)

Keep up to date with the latest examination news. This web page will be regularly updated and direct you to any new documents or correspondence.

Latest news

3 March 2022

Following the hearing sessions, the Inspector issued her post hearing action points (INSP09). She is considering whether a number of changes (or Main Modifications) to the Plan are needed.

The 10 March Tourism, Equalities, Communities & Culture Committee (TECC) will be asked to approve public consultation on these Main Modifications.

Subject to this approval, a 7 week period of consultation will begin 17 March 2022.

Read the [committee report](#).

Read the [schedule of Main Modifications \(BHCC44\) and supporting documents](#).

13 December 2021

[Read the council's letter](#) which responds to the Inspector's Post Hearings action note (INSP09).

In this section

- City Plan Part 2 examination (2021)
- City Plan Part 2 examination (2021)
- The examination process
- Main Modifications Consultation
- Examination library
- Examination timetable

Need a BSL translation? If so, go to: [SignLive](#)

16 March 2022 Development and planning

City Plan Part 2 Examination – next stages

A new public consultation on the City Plan Part 2 begins on 17 March and will run for 7 weeks.

Adopted in 2016, Part One of the plan set out a strategic planning framework for the city to 2030, including targets for new housing and employment, and where new strategic development should go.

City Plan Part 2 sets out detailed policies for managing new development and further site allocations to help deliver much needed high-quality development.

Following three previous rounds of consultation the City Plan Part 2 is currently being examined by a government planning inspector. After public hearing sessions held in November 2021 the inspector indicated that some changes, known as main modifications, may be needed.

This focused consultation will seek views solely on the main modifications. The inspector will then consider the comments submitted, conclude the examination and issue her report.

Proposed main modifications

The modifications under consultation include changes to policies relating to green infrastructure and nature conservation; shopping areas; energy efficiency and renewable energy.

Changes are also proposed to the supporting wording of the Brighton General Hospital site allocation to safeguard swift colonies during development.

Through the examination the inspector carefully considered all the consultation comments and evidence from the council, respondents and participants concerning urban fringe housing sites. There are proposed changes to urban fringe policies as a result.

These changes would remove one urban fringe site from the plan. Land at and adjacent to Horsdean Recreation Ground in Patcham would be removed from the plan due to the potential impact of the development on a designated local wildlife site.

Newsroom

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Another site – land at a former nursery in Saltdean – is proposed to have its boundary amended and the potential number of dwelling units reduced.

The inspector, having considered all the evidence and representations, has not asked the council to consult on any other changes to the list of urban fringe sites.

Give us your views

Councillor Martin Osborne, Co-chair of Tourism, Equalities, Communities and Culture committee, said: “Policies in the City Plan Part 2 will help meet housing needs and support the city’s aim to become carbon neutral by 2030. It is important that the council has a complete, up-to-date, and robust planning policy framework. We are grateful to all the residents, businesses, developers, and organisations who have already made their voices heard to shape the plan.

“Building on that feedback, this consultation is an important step in enabling the inspector to complete her report. I urge you to take part and give us your views.”

The consultation documents can be viewed online at [City Plan Part 2 examination](#) . From 17 March comments can be submitted through [the council’s online consultation portal](#); by emailing planningpolicy@brighton-hove.gov.uk ; or in writing to: CPP2 Policy, Projects and Heritage Team, Brighton & Hove City Council, First Floor Hove Town Hall, Norton Road BN3 3BQ.

The deadline for submitting comments is 11.59pm on Thursday 5 May 2022.

More like this



City Plan Part 2 online public hearings

From 2 November you will be able to watch live online sessions of the City Plan Part 2 public examination. The City Plan will guide new development in Brighton & Hove.

4 months ago

[Development and planning](#)



City Plan Part 2 – Making a place to call home

Councillors approved the next stage of the City Plan at the first virtual council meeting. The plan will give the city greater local control and ensure new homes meet the needs of residents.

1 year ago

[Development and planning](#)



City Plan will support carbon reduction and biodiversity

Policies in the City Plan Part 2 support the city’s aim to become carbon neutral by 2030 and ensure all new development reduces carbon emissions as far as possible.

1 year ago

[Development and planning](#)


Brighton & Hove City Council Social Media


BHCC Facebook Page - 16 March 2022

Intro

Welcome to the Facebook page for Brighton & Hove City Council.

This page is run by the council's co

 Page · Public & government service

 Brighton & Hove City Council is responsible for this Page

 01273 290000

 brighton-hove.gov.uk

Photos

[See All Photos](#)



 Like

 Comment


 Share



Brighton & Hove City Council

17 hrs · 

A new public consultation on the City Plan Part 2 begins on 17 March and will run for 7 weeks. 

The government's planning inspector has proposed some modifications to the plan. Have your say on these modifications to help shape the plan for our city. 

Find out more  <http://ow.ly/kRoL50IkTl6>



 2

1 comment 2 shares

 Like

 Comment

 Share

BHCC Twitter Page – 16 March 2022

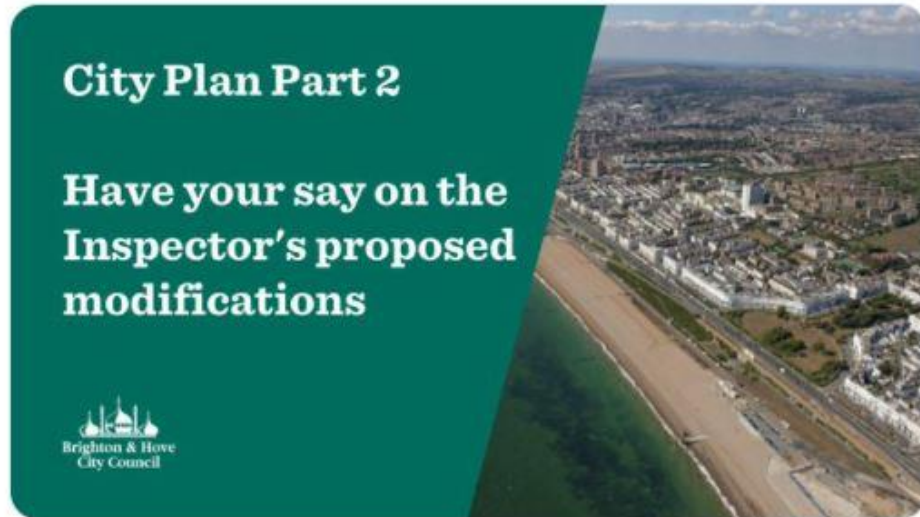


Brighton & Hove City Council @BrightonHoveCC · 17h

A new public consultation on the City Plan Part 2 begins on 17 March.

The government's planning inspector has proposed some modifications to the plan. Have your say on these to help shape the plan for our city.

Find out more ow.ly/pjRA50IkUbG



3

2



Brighton & Hove City Council @BrightonHoveCC · 17h

Last night, members of our Environment, Transport and Sustainability committee approved the city's Local Cycling and Walking Infrastructure Plan (LCWIP).

Your Brighton & Hove

Welcome to the latest edition of Your Brighton & Hove - bringing you fortnightly updates from Brighton & Hove City Council.

[Latest information on supporting the Ukrainian humanitarian crisis.](#)

[Get involved in the Great British Spring Clean!](#)

A rock painting event is being held in Preston Park on Saturday to kick off this year's spring clean. Find out how you can join in to help keep Brighton & Hove tidy...



[Protect your friends, family and the NHS](#)

Positive cases are high and impacting our schools, businesses and the NHS as well as individuals. Do what you can to lower your chances of catching and spreading COVID-19.

[Reducing flood risk in Brighton & Hove](#)

To mark this week's World Water Day, we're highlighting the innovative work being done to reduce the risk of flooding to properties in a vulnerable part of Brighton & Hove.

[City Plan Part 2 examination - have your say by Thursday 5 May.](#)

Reminders (21st April and 3 May 2022)

Intro

Welcome to the Facebook page for Brighton & Hove City Council.

This page is run by the council's co

Page · Public & government service

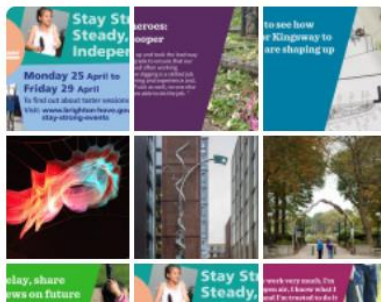
Brighton & Hove City Council is responsible for this Page

01273 290000

brighton-hove.gov.uk

Photos

[See All Photos](#)



important in parks to have toilets and cafes
3 d

[View 3 more comments](#)



Brighton & Hove City Council

21 April at 12:01 · 🌐

The public consultation on the City Plan Part 2 closes on Thursday 5 May. 📅

The government's planning inspector has proposed some modifications to the plan. You still have a chance to have your say on these modifications to help shape the plan for our city. 🗣️

Find out more 📄 <http://ow.ly/kRoL50kTl6>



👍 3

5 comments

👍 Like

💬 Comment

🔗 Share

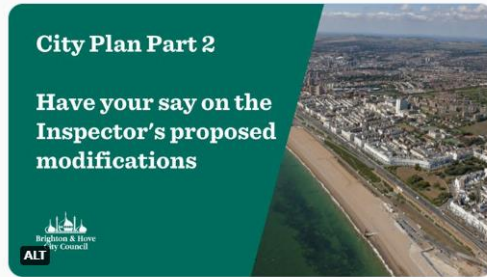


Brighton & Hove City Council @BrightonHoveCC · Apr 21

The public consultation on the City Plan Part 2 closes on Thurs 5 May. 📅

The government's planning inspector has proposed some modifications to the plan. It's not too late to have your say on these & help shape the plan for our city. 🗣️

Find out more 📄 ow.ly/pjRA50lkUbG



💬 1



Brighton & Hove City Council @BrightonHoveCC · Apr 21

[Show more](#)

What's happening

Television · Last night

MasterChef



Deadline Hollywood · Last night
Justin Lin is exiting as director of the next installment in the 'Fast and Furious' franchise



Bloomberg Quicktake · Yesterday
Zookeepers in Ukraine try to save animals from Russian attacks at the cost of their lives



War in Ukraine · LIVE

Russia's state-run energy company Gazprom cuts gas supplies to Poland and Bulgaria



Trending with [Ukraine](#)

Politics · Trending

Brighton &

CO

re

All Photos



Like

Comment

Share



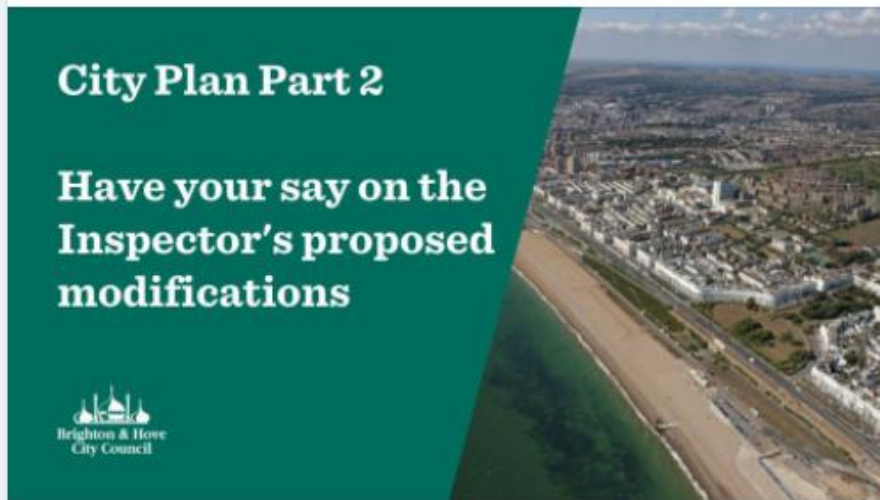
Brighton & Hove City Council

3 May at 09:01 · 🌐

The public consultation on the City Plan Part 2 closes on Thursday 5 May. 🏢

The government's planning inspector has proposed some modifications to the plan. You still have a chance to have your say on these modifications to help shape the plan for our city. 💬

Find out more 👉 <http://ow.ly/kRoL50IkTI6>



2

5 comments

Like

Comment

Share

Weblinks to Press Articles

Brighton & Hove News 11 March 2022: [Brighton and Hove News » Greenfield site given reprieve as housing and planning blueprint takes shape](#)

Brighton & Hove Argus 16 March 2022: [Backing given to build on green spaces in Brighton and Hove | The Argus](#)

have your say

City Plan Part Two Main Modifications Consultation

City Plan Part 2 supports the delivery of the City Plan Part 1 by identifying housing and mixed use sites and including policies to manage new development. These include policies to improve housing quality and to safeguard community facilities and local shops.

The Plan is under examination and the examining Inspector is considering changes or 'Main Modifications' to the Plan.

Tell us what you think about the proposed Main Modifications

You can view the schedule of Main Modifications and have your say at:
consultations.brighton-hove.gov.uk

**Consultation runs from
17th March until 5th May 2022**

For City Plan enquiries, please email
planningpolicy@brighton-hove.gov.uk
or call 01273 292333



Appendix 9 – Main Modification Consultation - summary of Main Issues by Main Modification and Officer Response

Appendix 9 - Summary of Main Issues

Table 1 provides a summary of the main issues raised by the Representations received on the Proposed Modifications consultation (17 March – 5 May 2021). The summary is structured by Main Modification Number and provides an officer response to the issues raised and consideration of whether a change to the proposed modification is required.

Please Note: Individual/ resident names have been redacted for the website version. This Inspector will see all respondent number and names. If you would like to know your unique respondent ID number please email: PlanningPolicy@brighton-hove.gov.uk. This is a different number to the one generated by the council’s consultation portal if you submitted your representations via the portal in May 2022.

Please Note: Where a representation was made that did not appear to relate to a specific proposed change to a policy or supporting text, the representation has been included in the table for information but the officer response will indicate that it does not appear to relate to a Main Modification and the third column (specifying the part of the policy/ supporting text that was proposed to be modified) is left blank.

Table 2 provides a summary of representations made to other documents.

Table 3 includes those representations which made ‘no comment’.

Copies of the full representations by respondent number can be viewed online at Appendix 10 and in Main Modification order in Appendix 11.

Table 1 - Summary of Main Issues and officer response

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
MM08	DM10 Public Houses		(001)	Disagree that all pubs are run as community assets – The Bevy is an exception. No hard evidence of pubs providing a community benefit. Inappropriate for council to dictate how businesses should attempt to make the business viable. The Policy makes no allowance for location of pubs or	This comment appears to relate to part a) of the policy which has not been subject to a proposed Main Modification. The policy does not compel pubs to become live music venues or to provide guest	No change.

² Where this column is left blank this is because the representations appears to relate to a part of the policy/ supporting text that was not proposed to be modified although the respondent has made their representation to the overarching Main Modification reference/ Policy.

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
				nature of surrounding and structure (as CAMRA guidance does). Inappropriate to encourage pubs in residential areas to consider live music or guest accommodation. Negative experience of their local, listed pub which they consider does not provide community asset by operating as live music venue all week with Airbnb above. Policy will contradict DM20 and DM40 by compelling/ demanding businesses to consider live music/ guest accommodation.	accommodation. These are included in the supporting text at 2.88 as options a business could consider exploring to increase viability. Impacts on residential amenity from live music would be controlled through licensing legislation.	
MM09	DM11 New Business Floorspace	Amend policy page 45 Amend Paragraphs 2.97, 2.98 and 2.100, pages 45 - 47	St William Homes LLP (014)	<p>Wording of Policy DM11 (MM09) is not effective nor consistent with national policy on account of the categorisation of sub-uses under Use Class E. Approach is against the spirit of the new class order and does not accord with paragraph 82 of the NPPF, which requires planning policies to be flexible enough to accommodate needs not anticipated in the plan and to enable a rapid response to changes in economic circumstances. Restrictions on specific sub-uses under Class E to which explicit references to Use Class E(g) (former Class B1) are applied throughout the policy and supporting text is at odds with the intended purpose of the new class order and should duly be reviewed.</p> <p>Recommend that Policy DM11 is updated so that it refers to "Use Class E (g), B2 and B8", as applicable business uses, removing reference to sub-uses within Use Class E. This would therefore recognise</p>	This issue was fully considered at the examination hearing 5 November 2021 (Matter 13). The policy is clear in its intention as outlined in paragraph 2.96 of the supporting text. The Policy as proposed to be modified is consistent and complements City Plan Part 1 by ensuring that applications for new office floorspace on allocated sites are delivered successfully, that they are designed and configured appropriately to address the city's identified forecast and market demand for office floorspace over the plan period.	No change

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
				the flexibility intended by the introduction of Use Class E, and also acknowledge that other commercial uses are capable of generating meaningful employment to support CPP2, as demonstrated by the Employment Densities Guide (2010). No explanation has been provided as to why these amendments cannot be incorporated into the Plan.		
MM14	Policy DM18 High quality design and places	All	Historic England (017)	Support MM14	Support welcomed	No change
		Amend the last sentence of the policy, page 63	St William Homes LLP (014)	Impact on public realm: The proposed amendment to the last sentence of Policy DM18 High Quality Design and Places (set out at Figure 2 - please refer to full representation for extract of BHCC44) does not appear to be clear or effective enough meaning it does not meet the soundness test because it is unclear what is meant by 'impact on public realm'. We consider that the previous wording was more appropriate.	The proposed modification was in response to the Inspector Note 9 which requested that the last sentence of the policy be modified to clarify that incorporation of an artistic element will be expected where major development on strategic and/or prominent sites have an impact on the public realm. The wording is considered appropriate because these types of development are likely to have an impact on public realm. SPD17 Urban Design Framework sets out how this impact will be assessed.	No change
		Amend the supporting text at paragraph	St William Homes LLP (014)	References to design guidance: We recognise the purpose behind the introduction of references to the National Design Guide and the Urban Design Framework SPD within	This issue was fully considered at the 12 November Examination Hearing (Matter 14) It is considered appropriate to indicate in the supporting text that the council intends to	No change

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
		2.147, page 63		paragraph 2.147 however it is not clear that references to ‘future design codes or guidance’ that do not yet exist could be found to be sound given the detail of these is currently unknown. The inclusion of a reference to future design codes and guidance should be removed.	bring forward design codes or guidance over the plan period to support the design policies in the City Plan. These design codes or guidance will be subject to consultation in accordance with regulations.	
		Amend the supporting text at paragraph 2.148 after the third sentence page 64	St William Homes LLP (014)	Exceptional site constraints: The constraints of a site are a key factor when considering design solutions for such sites and the previously proposed amendments (representations to the Proposed Submission City Plan Part 2 (30 October 2020) are required to make this policy effective in line with the tests of soundness.	Through the proposed modification, clarification has been added to supporting text to reference the relevance of significant and exceptional site constraints in paragraph 2.148. No further change is considered necessary.	No change
MM16	Policy DM22 Landscape Design and Trees	Amend (d) and (e) of policy, Page 72	Brighton Active Travel (013)	Broadly supports the amendments to the city plan. As well as trees for development there needs to be a proactive policy on new tree planting in existing neighbourhoods with low tree cover	Broad support welcomed. The appropriateness of including an additional tree planting policy in the CPP2 was fully considered at the examination hearing session 12 November (Matter 14). Factors such as underground services, highways and safety matters limit and constrain the ability to plant trees in certain locations were discussed. Tree planting across the city is supported by the emerging Tree Strategy as referenced in paragraph 2.184 of the supporting text.	No change
MM18	Policy DM26	All	Historic England (017)	Support MM18	Support welcomed	No change

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
	Conservation Areas					
MM19	Policy DM27 Listed Buildings	All	Historic England (017)	Support MM19	Support welcomed	No change
MM20	Policy DM28 Locally Listed Heritage Assets	All	Historic England (017)	Support MM28	Support welcomed	No change
MM21	Policy DM29 The Setting of Heritage Assets	All	Historic England (017)	Support MM21	Support welcomed	No change
MM22	Policy DM30 Registered Parks and Gardens	All	Historic England (017)	Support MM22	Support welcomed	No change
MM23	Policy DM31 Archaeological Interest	All	Historic England (017)	Support MM23	Support welcomed	No change

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
MM24	Policy DM32 The Royal Pavilion Estate	All	Historic England (017)	Support MM24	Support welcomed	No change
MM25	Policy DM33 Safe, Sustainable and Active Travel		Brighton Active Travel (013)	Broadly supports the amendments to the city plan but suggests following: 3) cycle parking should include provision of cycle hangars for residential parking with the aim of providing residential hangars to fulfil all existing demand and encourage a switch to bicycles etc as a core means of travel	This comment relates to part of the policy which is not subject to a main modification. The design of cycle parking is addressed in criterion d) of the policy which requires cycle parking to be, wherever possible, under cover and secure. Residential hangars would be a means of achieving this.	No change
		Add sentences to end of paras 2.253 and 2.254 of the supporting text, p. 100	Brighton Active Travel (013)	Supports the inclusion of having regard to the Brighton and Hove bus service improvement plan.	Support welcomed.	No change
MM28	Policy DM36 Parking and Servicing	All	Home Builders Federation (009)	Sound and legally compliant	Support welcomed	No change

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
MM29	Policy DM37 Green Infrastructure and Nature Conservation	All Main Mods listed on page 110	Sussex Wildlife Trust (008)	Sound. Supports all main modifications to DM37 listed on page 110. Agree needed for policy to be consistent with NPPF and that amended/additional footnotes allow better understanding of policy aims and appropriate application.	Support welcomed.	No change
		Amend policy at Part C. Locally protected sites page 112	Sussex Wildlife Trust (008)	<p>Not sound or legally compliant. Whilst amendments to point i) of Part C are preferable to the previous version, objection maintained to this part of the policy. Not consistent with NPPF paragraph 179 or PPG (ID: 8-013-20190721) in regards to the need to safeguard locally designated sites.</p> <p>Disappointed that Inspector Note 9 Post Hearing Action Points [INSP09] does not refer to the Matter 16 discussions at the examination relating to consistency with national policy of developing on locally designated sites. SWT understood that the Inspector had not come to a decision on this issue during the examinations and would take it away as an issue to consider further. Reference to this was expected in INSP09.</p> <p>Allocating locally designated sites within development plans cannot be considered 'safeguarding' and therefore is not consistent with the requirements of national policy. It is particularly problematic when the plan would meet the housing numbers required by the CPP1 without allocating locally designated sites. The economic, social and</p>	<p>Comments noted.</p> <p>The issue of consistency with the NPPF and NPPG were fully considered during the examination hearing session 5 November (Matter 16). BHCC consider the policy to be consistent with the NPPF para 179 which requires components of sites to be safeguarded.</p> <p>The Inspector indicates in her note INSP09 that the reasons for the MMs sought will be contained in her final report.</p> <p>Those site allocations which affect a locally designated site are not considered to adversely impact the overall integrity of the locally designated site; they are located in less sensitive parts of those designations and allow components of the sites to be safeguarded.</p> <p>The CPP2 examination included extensive consideration of the justification for</p>	No change

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
				<p>environmental services provided by these sites should be recognised and should be valued as core components of the city's ecological network.</p> <p>In order to be consistent with the NPPF and NPPG the wording in part C i) should be amended to the following: <u>'...or there are exceptional circumstances that justify the development of the site that can be demonstrated to outweigh the need to safeguard the nature conservation value of the site.'</u></p>	<p>allocating a small number of urban fringe sites for housing, including some land within locally designated sites (Local Wildlife Sites). At the examination hearings, the Council presented detailed site level evidence from the Urban Fringe Assessment studies 2014, 2015 and 2021 [ED21-ED24]. These studies concluded that the potential adverse impacts of development can be avoided, minimised and/or mitigated to an acceptable degree and that Biodiversity Net Gains are achievable.</p> <p>The proposed allocations are therefore considered to be consistent with national planning policy and guidance.</p> <p>The CPP1 housing target is specified as a minimum target, reflecting the fact that it amounts to only 44% of the objectively assessed housing need. The Plan therefore does not meet the required housing number.</p>	
		Amend policy at Part C. Locally protected sites p.112	Sussex Wildlife Trust (008)	Excluding our objection to the modification to point i), other modifications to Part C listed under MM29 are supported. Necessary to ensure consistency with the NPPF and clarity of how the policy should be used by applicants	Support welcomed.	No change

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44)?	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
		Move the final paragraph of Part C Locally Protected Site and place as a footnote linked to the first sentence of Part C. Locally protected sites p.112	Sussex Wildlife Trust (008)	Excluding our objection to the modification to point i), other modifications to Part C listed under MM29 are supported. Necessary to ensure consistency with the NPPF and clarity of how the policy should be used by applicants	Support welcomed.	No change
		Move and amend section of the final paragraph from p. 112 to follow the bullet point list on p. 111	Sussex Wildlife Trust (008)	Movement of this paragraph supported. Required to clarify that the content applies to all sites whether designated or not.	Support welcomed.	No change
		Move and amend section of the final	Sussex Wildlife Trust (008)	Modification supported. Required to demonstrate consistency with NPPF paragraph 180.	Support welcomed	No change

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
		para. from p.112 to follow the new proposed section heading entitled "Designated Sites" on p. 111 ...				
		Amend paragraph 2.279 of supporting text p. 114	South Downs National Park Authority (003)	Support the reference to the People and Nature Network (PANN) 2020 and the Sussex Natural Capital Investment Strategy. The PANN is important in setting out how a range of partners can work together to plan positively for nature and natural services within and around the protected landscapes of the South East.	Support welcomed.	No change
		Add new para. after existing para. 2.282 of supporting text, p. 115	Home Builders Federation (009)	Proposed Modification not considered to be required for soundness and is unnecessary. Modification could create uncertainty in decision making contrary to clarity required by NPPF paragraph 16. Whilst Sussex Local Nature Partnership has an ambition to achieve a 20% target for biodiversity net gain from all development the inclusion of this statement is irrelevant to the soundness of the local plan or what is actually required of development	Comment noted. The reference in the supporting text is not considered to create uncertainty as it is not part of the policy wording. The supporting text indicates that further evidence base work will need to be undertaken to support the aspiration. This will be for the review of City Plan Part 1 to consider.	No change

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
				<p>under the Environment Act 2021. The paragraph could create uncertainty amongst decision makers as to what development is actually required to deliver.</p> <p>Recommend modification is not taken forward.</p>		
		<p>Add new supporting text para. prior to the section entitled “Designated Sites” and new footnote p. 115</p>	<p>Sussex Wildlife Trust (008)</p>	<p>Whilst Sussex Wildlife Trust supports the majority of the modifications to the supporting text for policy DM37, object to the explanation of exceptional circumstances in relation to Part C of the policy. Not consistent with national policy.</p> <p>Locally designated sites are key infrastructure that meet the wider needs of the city, are a finite resource, being core areas within the ecological network. Their development will make the valuable areas of habitat smaller. National policy considers local sites to be key components of wider ecological networks (para 179) and that the planning system should make these more resilient (para 174) and safeguard them (para 179).</p> <p>Given that once built on, these sites are gone forever, the examples of exceptional circumstances in this new paragraph are vague, extensive and do not meet the bar set in the NPPF for equivalent issues e.g. footnote 63. A new bus stop is considered transport related infrastructure, but is clearly not</p>	<p>Support for majority of modifications to supporting text to DM37 welcomed.</p> <p>Matters regarding ‘exceptional circumstances’ and City Plan Part One were discussed in full during the examination hearing session 5 November (Matter 16).</p> <p>BHCC disagree that the examples provided for exceptional circumstances are vague. The exceptional reasons as defined under Footnote 63 of the NPPF has not been used as the definition of exceptional circumstances within DM37, as this footnote relates solely to irreplaceable habitats under para 180c NPPF.</p> <p>BHCC maintain that the city’s very high housing need and significant need for affordable housing is justifies the approach taken to looking for all housing opportunities and site selection.</p>	<p>No change</p>

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
				<p>exceptional enough to warrant adverse impacts on a Local Wildlife Site.</p> <p>Disagree that the CPP1 examination sets out exceptional circumstances. CPP1 Inspector's Report [CD23] clearly states that the CPP1 does not allocate urban fringe sites and that decisions on whether individual sites should be developed, will be made through CPP2 preparation. The City's large unmet housing need is not exceptional and is likely to be the situation for many years to come given city's geography. The majority of Sussex authorities are failing to meet their 5 year housing supply.</p> <p>This explanation opens up a discussion about housing numbers every time a locally designated site is put forward for development. The section of paragraph about allocated sites is not needed because the policy is clear that it is referring to sites that are already allocated in the plan or sites where there are exceptional circumstances. There is no requirement to prove exceptional circumstances for allocated sites. We feel this just confuses things.</p> <p>Amend paragraph to read: <u>'In relation to Part C of the policy, examples of exceptional circumstances include development required as part of nationally significant infrastructure projects or major flood</u></p>	<p>The CPP2 examination included extensive consideration of the justification for allocating a small number of urban fringe sites for housing, including some land within locally designated sites (Local Wildlife Sites). At the examination hearings, the Council presented detailed site level evidence from the Urban Fringe Assessment studies 2014, 2015 and 2021 [ED21-ED24]. These studies concluded that for sites being proposed in the plan, the potential adverse impacts of development can be avoided, minimised and/or mitigated to an acceptable degree and that Biodiversity Net Gains are achievable.</p> <p>The proposed allocations are therefore considered to be consistent with national planning policy and guidance.</p> <p>It is recognised that some Sussex authorities also have difficulty in meeting their objectively assessed housing need. However, this does not mean that the local situation is not exceptional.</p> <p>The proposed modification to Policy DM37 Part C and the supporting text is considered</p>	

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
				<u>defence or transport related infrastructure that meets the wider needs of the city. Any development proposals on locally designated sites, whether allocated or not, will still be required to meet the requirements under section C ii) and C iii) for mitigation and net gain in biodiversity/geodiversity as well as requirements relating to ecological assessment'</u>	robust in that it clarifies that proposals on locally designated sites, whether allocated or not, will still require appropriate ecological assessment and mitigation.	
MM31	DM40 Protection of the Environment and Health – Pollution and Nuisance	Amend criteria (g), Page 123	South Downs National Park Authority (003)	Support. As a result the policy covers all forms of lighting, both indoor and outdoor. The change means the policy provides further protection to the night sky and the sensitivity of the South Downs National Park international Dark Sky Reserve from the potential impact of light spill from poorly designed development.	Support welcomed.	No change
			(007)	Welcome sections reducing and mitigating sensory pollution – noise and light pollution. Welcome reference to the South Downs National Park International Dark Skies status. Light pollution impacts on wildlife and humans important considerations. Should be careful not to encourage the use of floodlighting as a crime deterrent (IDA suggests no evidence it actually works). Good lighting design will make only the things that need to be visible, visible eg Valley Garden lighting design.	Support welcome.	No change

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
		Amend 4 th sentence of para. 2.311, p. 125	(007)	Welcome sections reducing and mitigating sensory pollution – noise and light pollution.	Support welcome.	No change
		Amend supporting text para. 2.314, p. 125	(007)	Welcome sections reducing and mitigating sensory pollution – noise and light pollution. Welcome reference to the South Downs National Park International Dark Skies status. Light pollution impacts on wildlife and humans important considerations. Should be careful not to encourage the use of floodlighting as a crime deterrent (IDA suggests no evidence it actually works). Good design lighting design will make only the things that need to be visible, visible eg Valley Garden lighting design.	Support welcome.	No change
MM32	DM41 Polluted and hazardous substances and land stability	Amend first sentence of policy, page 126	St William Homes LLP (014)	Previously suggested amendments have not been incorporated into the draft CPP2. The management and remediation of contaminated land is tightly controlled and highly regulated and the existing processes in place often result in an iterative process of information gathering and decision making between relevant regulators including the Local Planning Authority and the Environment Agency through the separate land contamination control regime. This allows for some matters to be dealt with via planning condition alongside these parallel processes, even in circumstances when sites are known to be contaminated. Planning conditions	Comments noted. The issues raised by St William Homes LLP's original representation were fully considered at the hearing session 5 November (Matter 16, DM40, question 3). The iterative process is recognised in paragraph 2.317 through reference to phased conditions. Paragraph 2.319 acknowledges there may be cases where additional flexibility can be provided through the ability to grant permission subject to conditions requiring site investigation in cases where contamination risk is not high.	No change

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
				effective for ensuring policy objectives met without unduly delaying the consideration of a planning application.	Policy approach considered consistent with national policy and guidance.	
MM36	SA7 Benfield Valley		Historic England (017)	As previously stated, suggest a heritage assessment is required in relation to the effect the housing allocation may have on the setting of listed Benfield Barn and Conservation Area. The siting form and scale of development would have to be very carefully planned to ensure no harmful impacts arise and the positive benefits sought by the policy are realised.	<p>Comments noted. The representation does not relate to a proposed main modification to this policy or its supporting text. The requirement for development at Benfield Valley to include heritage impact assessment is already fully addressed in the Plan.</p> <p>The extent of land indicated for in principle development took into account the settings of the heritage assets, having regard to topography, distance, archaeology and existing landscape features. The supporting text to SA7 (Para. 3.9) requires proposals for development to be accompanied by a Heritage Statement. The requirement for heritage impact assessment is also addressed through Policy DM29 The Setting of Heritage Assets as proposed to be modified by MM21.</p>	No change
			Sussex Wildlife Trust (008)	Object to a locally designated site being allocated in the local plan. This is not consistent with the requirement of the NPPF to safeguard these sites or the requirement of the NPPG for plans to include policies to secure their protection from harm or loss	Comments noted. This representation does not relate to a proposed main modification to this policy or its supporting text, nor does it relate to any proposed modification to Policy H2 Housing Sites – Urban Fringe.	No change

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
				<p>and also help to enhance them and their connection to wider ecological networks. Locally designated sites are a finite resource and should be protected and enhanced through the planning system.</p>	<p>The CPP2 examination included extensive consideration of the justification for allocating a small number of urban fringe sites for housing, including some land within locally designated sites (Local Wildlife Sites). At the examination hearings, the Council presented detailed site level evidence from the Urban Fringe Assessment studies 2014, 2015 and 2021 [ED21-ED24]. These studies concluded that, for the sites now being proposed in the Plan, the potential adverse impacts of development can be avoided, minimised and/or mitigated to an acceptable degree and that Biodiversity Net Gains are achievable.</p> <p>The proposed allocations are therefore considered to be consistent with national planning policy and guidance. In her Post Hearing Action Points [INSP09], the Inspector has not identified any need to consult on modifications to the policy regarding its consistency with national policy. Nor does INSP09 identify a need for modifications to the proposed housing allocations at Benfield Valley (UF Sites 11 and 12).</p>	

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
					The Plan recognises that more detailed ecological assessments will be required at the planning application stage to identify specific development impacts, and to further inform any appropriate mitigation requirements. This requirement is set out at Paragraph 3.9 of the supporting text to Policy SA7 and is also explicitly stated in both Policy H2 and Policy DM37 and their supporting text.	
MM37	SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road	All	Historic England (017)	Support MM37	Support welcomed	No change
		Delete last two sentences of para. 3.18 and create new para. of supporting text, p. 155	RSPB (004)	Welcome inclusion of MM and considered sound. The additional text provides an appropriate level of measures to protect the important swift colony at the Brighton General Hospital Site through all phases of development (including between demolition of old buildings and construction of new buildings) in accordance with DM7.	Support welcomed.	No change
			Sussex Wildlife Trust (008)	Strongly support the inclusion of this new paragraph and believe it is necessary to ensure the policy is consistent with the requirements of the NPPF to conserve and enhance biodiversity.	Support welcomed.	No change
			Sussex Ornithological	We fully support the new paragraph 3.19 regarding the protection of the existing Swift colony.	Support welcomed	No change

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
			Society (015)			
MM38	SSA2 Combined Engineering Depot	All	Historic England (017)	Support MM38	Support welcomed	No change
MM40	SSA4 Sackville Trading Estate and Coal Yard	Add criterion (k) to policy, P. 162	Environment Agency (005)	Pleased to see the additional criterion k).	Support welcomed	No change
MM41	SSA5 Madeira Terrace and Drive	All	Historic England (017)	Support MM41	Support welcomed	No change
MM42	SSA6 Former Peter Pan leisure site	All	Historic England (017)	Support MM42	Support welcomed	No change
MM43	SSA7 Land Adj. to American Express Community Stadium	All	Historic England (017)	Support MM43	Support welcomed	No change
MM44	Policy H1 Housing Sites and Mixed Use Sites	Policy H1, Amend Table 6 to delete 2 sites and	Sussex Wildlife Trust (008)	Strongly supports the deletion of 2-18 The Cliff from this table. We believe it would not be justified or consistent with the NPPF to allocate development on this Local Wildlife Site. Particularly the requirement to safeguard locally designated sites.	Support welcomed.	No change

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
		associated footnote 147 p. 174	Sussex Ornithological Society (015)	We welcome the removal of Site 5, Land between Marine Drive and the rear of 2- 18 The Cliff from the site allocations as it will safeguard the designated Local Wildlife Site (LWS) and its colony of Common Lizard.	Support welcomed	No change
		Amend Table 6 to add 2 site allocations , page 175	Southern Water (002)	<p>Sound.</p> <p>The proposed new site allocation 154 Shoreham Road - there are no wastewater constraints. The site is within Southern Water's Inner, Outer and Total Capture Zones for groundwater (equivalent to Source Protection Zones 1-3) and development would therefore be required to ensure protection of public water supply source, no other water constraints identified.</p> <p>The proposed new site Land at Preston Road - no wastewater or water constraints identified. Located within Southern Water's Total Capture Zone (SPZ3) and development may therefore be required to ensure protection of the public water supply source.</p> <p>As site specific considerations are not include in the original Table 6 (compared with Table 8) we cannot make a further suggestion on how to incorporate the information we have provided.</p>	Comment noted. This is addressed by paragraph 3.66 of the supporting text which indicates that for those sites located in an area with underground chalk aquifers, development will need to ensure that groundwater sources are protected in line with the requirements of Policy DM42.	No change
MM45	Policy H2 Housing Sites -		Sussex Wildlife	Object to a locally designated site being allocated in the City Plan. This is not consistent with the requirement of the NPPF to safeguard these sites or	Comments noted. This representation does not relate to a proposed main modification to this policy or its supporting text.	No change

Main Mod. Ref.	Proposed Submission City Plan Part 2 Reference	Description of proposed change as listed in BHCC44) ²	Name/ Organisation/ MM represent or No.	Summary of Main Issues	Officer Response	Officer consideration of whether change Required to MM
	Urban Fringe		Trust (008)	<p>the requirement of the NPPG for plans to include policies to secure their protection from harm or loss and also help to enhance them and their connection to wider ecological networks. Locally designated sites are a finite resource and should be protected and enhanced through the planning system.</p> <p>It was demonstrated during the hearing sessions and through our matter statements that allocating on locally designated sites is neither justified, effective nor consistent with national policy. Whilst all locally designated sites would benefit from ongoing management, allowing development of part of them is not an essential or reasonable way to achieve that. Particularly, for those sites that already have active community groups working to enhance them e.g. Benfield Valley Project and Friends of Whitehawk Hill. SWT is particularly concerned that the Land at and adjoining Brighton Racecourse is not referred to in INSP09, as again it was our understanding that the Inspector would be considering this site further and had not come to a decision.</p> <p>It is clear that allocating development on locally designated sites is not a sustainable approach in a City with an astronomically high OAN that can never be met. The sites should be valued for what they already provide to the city and safeguarded.</p>	<p>The CPP2 examination has included extensive consideration of the justification for allocating a small number of urban fringe sites for housing, including some land within locally designated sites (Local Wildlife Sites). At the examination hearings, the Council presented detailed site level evidence from the Urban Fringe Assessment studies 2014, 2015 and 2021 [ED21-ED24]. These studies concluded that, for all the sites now being proposed in the Plan, the potential adverse impacts of development can be avoided, minimised and/or mitigated to an acceptable degree and that Biodiversity Net Gains are achievable.</p> <p>The proposed allocations are therefore considered to be consistent with national planning policy and guidance.</p> <p>In her Post Hearing Action Points [INSP09], the Inspector has not identified any need to consult on modifications to the policy regarding its consistency with national policy. Nor does INSP09 identify a need for modifications to the proposed Policy H2 housing allocations at Benfield Valley,</p>	

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				<p>It is also not clear why there is no modification to DM38 in relation to designating Whitehawk Hill as a Local Green Space. We understood that this had been agreed by BHCC during the course of the examination discussions and expected to see it in the Inspector Note 9 Post Hearing Action Points [INSP09]</p> <p>Add Whitehawk Hill to policy DM38 and designated as a Local Green Space. Delete the following allocations: Land at Oakdene Southwick Hill/Land West of Mile Oak Road Benfield Valley Land north of Valley Halls, Coldean Lane Land at and adjoining Brighton Racecourse Land north of Warren Road (Ingleside Stables)</p>	<p>Whitehawk Hill or the other sites listed in the representation.</p> <p>The Plan recognises that more detailed ecological assessments will be required at the planning application stage to identify specific development impacts, and to further inform any appropriate mitigation requirements including the provision of Biodiversity Net Gains. These requirements are explicitly set out in Policy H2(d) and its supporting text (Paragraphs 3.73 and 376) and also in Policy DM37.</p> <p>The CPP2 examination has also included consideration of arguments for designating Whitehawk Hill as Local Green Space. In its Matter Statement 16 [BHCC21] and at the examination hearings, the Council set out its view that Whitehawk Hill does not fully satisfy the NPPF and NPPG criteria in that it covers an extensive area of the urban fringe without clearly definable boundaries. Further explanation and justification is presented in the Local Green Space Topic Paper [TP04] and the Urban Fringe Assessment 2021 Update [ED24]. In her Post Hearing Action Points [INSP09], the</p>	

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					Inspector has not identified a need for any modifications to Policy DM38.	
			(020)	<p>Land north of Varley Halls, Coldean Lane (Site 21a)</p> <p>As a local Coldean resident, object to the inclusion of this site which is a sensitive ecological site of chalk grassland. The development on the neighbouring Site 21 (which has planning permission and is currently under construction) has been plagued with problems ranging from illegal logging, destruction of wildlife habitat, lack of planning for pedestrians and traffic, failure to consider flood risk and ecological damage, and absence of any planning to secure the safety of residents in respect of the nearby footbridge over the A27.</p> <p>Consider that:</p> <ul style="list-style-type: none"> the original ecological evidence and assessment of housing need in CPP2 were inadequate (badly timed and inaccurate respectively); the original period of consultation was not sufficient or equitable; as indicated in the attached Biological Report (submitted with representation), Site 21a is a habitat for rare and protected species; and the Environment Act imposes new statutory duties on councils that can be met by protecting Site 21a. 	<p>Comments noted. This representation does not relate to a proposed main modification to this policy or its supporting text.</p> <p>Correspondence from the Council's Head of City Planning to the Coldean Neighbourhood Forum has explained that the scope of this consultation is limited to the Examination Inspector's proposed Main Modifications as set out in her Post Hearing Information Note [INS09]. The consultation does not therefore provide opportunity to re-open discussion of matters that the Inspector has already considered or on parts of the Plan not subject to proposed modifications.</p> <p>Preparation of the Plan has followed the legal regulations set out in the Town & County Planning (Local Planning) (England) Regulations 2012. These have given all interested parties the same opportunities to make comments and representations at appropriate stages, as is detailed in the Council's Consultation Statements [SD09, CD18 and CD22].</p>	No change.

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				<p>Specific comments</p> <ol style="list-style-type: none"> 1. Do not accept the BHCC Head of Planning's response to an email from the Coldean Neighbourhood Forum that the Council cannot consider further comments and evidence on the site 'at this late stage'. 2. The CPP2 Main Modifications already include the removal of one proposed housing site (Site 16 Horsdean Recreation Ground, Patcham) on grounds of the potential impact of development on wildlife, and reduction in the size of development on a second site (Site 46a Former nursery in Saltdean). This demonstrates that changes to the Plan are not outside the planning inspector's scope in light of ecological evidence, as presented in the Biological Report (attached). The key site considerations that led to the withdrawal of Site 16 are identical to those for Site 21a. 3. The current development of Site 21 'Bluebell Heights' by Hyde Housing has exposed numerous problems that were overlooked during the consultation. These include: destruction of badger setts and ecologically significant habitats; inadequate and inaccurate evidence of housing need; lack of informed and expert advice on the local ecology; lack of mitigation measures before 	<p>The CPP2 examination hearings included detailed discussions regarding the evidence base supporting the Plan, including that supporting the allocation of urban fringe sites - the Urban Fringe Assessment Studies undertaken in 2014, 2015 and 2021 [ED21-ED24]. This evidence includes Phase One Habitat Surveys. The studies considered whether development was feasible, the likely development impacts and whether mitigation was likely to be achievable. The Plan also recognises that more detailed ecological assessments will be required at the planning application stage to identify specific development impacts, and to further inform any appropriate mitigation requirements and provide for biodiversity net gains. These requirements are clearly stated in both Policy H2 and Policy DM37 and their supporting text.</p> <p>Regarding the impact of Covid-19 restrictions, the Council's Regulation 20 consultation was undertaken in September/October 2020 in accordance with the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020. To allow for the Covid-19</p>	

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				<p>work began; lack of meaningful consultation with residents; no planning for safe access by road and by foot; no risk assessment for the proximity of a footbridge spanning the A27; lack of planning for parking arrangements and access to public transport; and serious risk of damage to Brighton & Hove’s aquifer. These oversights have not given local residents confidence that their concerns will be addressed or heard. We do not believe that the planning inspector was provided with accurate evidence and information to enable her to make a sound judgement on Site 21a.</p> <p>4. Since CPP2 was drafted in May 2021, the Environment Bill has passed into law. It specifies a legally binding 2030 species abundance target, which this extraordinarily rich site has the potential to fulfil, boosting efforts to stem the decline in biodiversity and contributing to the national target of protecting 30% of land and sea for nature by 2030. Other provisions in the Act, notably the statutory 10% Biodiversity Net Gain, as well as the requirements that will emanate from the Nature Recovery Green Paper, may also be secured through the protection of Site 21a.</p> <p>5. The original circulation of CPP2 in May 2021 was limited to online access due to Covid-19 restrictions. There appears to have been no mitigation for this in terms of extending the consultation period or</p>	<p>restrictions, the Council provided just under 8-week consultation period rather than the standard 6 weeks. Where reasonably practicable, the consultation followed the guidance set out in the Council’s adopted Statement of Community Involvement and temporary addendum 2020 (see Paragraph 2.3 in the SD09ai Statement of Consultation). Information on where to seek help on accessing the council’s website, how to use library computers, and help to access the internet was set out in the Council’s consultation communications including the formal notice of publication, guidance note on making comments and press release (all appended to SD09ai) with a contact telephone number provided for those needing to request a paper copy of the consultation documents.</p>	

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				<p>making physical or audio copies available, meaning that anyone without access to the website, whether through lack of digital literacy, visual impairment or due to shielding, has not had an opportunity to have their voice heard, thus failing to meet Objective 1.5 of the Council's Equality & Inclusion Policy Statement and Strategy ('We will ensure that alternative communication routes remain available for people with specific requirements.')</p> <p>6. The consultation events conducted locally indicate that open green spaces and the environment are the top priority for residents of Coldean and there are feelings that Coldean is being overlooked compared to areas such as Patcham.</p> <p>Recent experience tells us that the only certain way of protecting this ecologically significant site is to remove it from CPP2 permanently.</p> <p><The representation included an attached ecology survey of Site 21a titled 'Biological survey and assessment of land at Varley Park, Coldean Lane, February 2020'></p>		
		Table 8 Urban Fringe Allocations	(006)	Sound. As local professional consultant ecologist, wholeheartedly agree with sites removal as its previous allocation was in conflict with council's objectives to protect and enhance biodiversity and	Support welcomed	No change

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		p. 180 – amend table to delete ‘Land at and Adjoining Horsdean Recreation Ground, Patcham’ and associated detail		would threaten the integrity and valuable ecology of this important LWS (Patcham Court Field).		
			Sussex Wildlife Trust (008)	Support deletion of Land at and Adjoining Horsdean Recreation Ground, Patcham. It is a locally designated site and should be safeguarded under paragraph 179 of the NPPF.	Support welcomed	No change
			Sussex Ornithological Society (015)	Welcome the removal of Site 16, land at, and adjoining Horsdean Recreation Ground, from the site allocations, as it will safeguard the designated Patcham Court Field LWS	Support welcomed	No change
		Add new footnote after the words ‘Heritage Statement’ in the final sentence in the supporting text at para. 3.73, p. 184	Historic England (017)	Support added reference within a footnote to the policy noting Historic England Advice Note 12 in relation to the requirement to assess the heritage impacts of developing sites.	Support welcomed	No change
			Coldean Neighbourhood	Replace current wording in paragraph 3.76: “However, detailed surveys (including species surveys) will be required to support development	Comments noted. This representation does not relate to a proposed main modification to this policy or its supporting text.	No change

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			Forum (016)	<p>proposals, and these must be used to inform the development of specific mitigation requirements.”</p> <p>With proposed wording:</p> <p><u>“Proposed Development will not be permitted where there the site is of ecological significance, either in part or whole, established by surveys and species surveys specific to the site or sites. Where a site, regardless of size, is located in an area with underground chalk aquifers identified as Groundwater Source Protection Zones by the Environment Agency, development will need to ensure that groundwater resources are protected from pollution and safeguard water supplies, in line with the requirements of Policy DM42”</u></p>	<p>The first sentence of the proposed wording would be inconsistent with national planning policy in the NPPF (Paragraphs 174 and 175) in ruling out development even where the potential ecological impacts could be acceptably avoided, minimised and/or mitigated. The CPP2 examination has included extensive consideration of the justification for allocating a small number of urban fringe housing sites on land within locally designated sites (Local Wildlife Sites). At the examination hearings, the Council and its consultants, LUC, presented detailed site level evidence from the Urban Fringe Assessment studies 2014, 2015 and 2021 [ED21-ED24]. These studies concluded that, for the sites now being proposed in the Plan, the potential adverse impacts of development can be avoided, minimised and/or mitigated to an acceptable degree and that Biodiversity Net Gains are achievable. The proposed allocations are therefore considered to be consistent with national planning policy and guidance set out in the NPPF and NPPG.</p>	

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					<p>It should also be emphasised that the Plan recognises that more detailed ecological assessments will be required at the planning application stage to identify specific development impacts, and to further inform any appropriate mitigation requirements including the provision of Biodiversity Net Gains. These requirements are explicitly set out in Policy H2(d) and its supporting text (Paragraphs 3.73 and 376) and also in Policy DM37.</p> <p>With regard to Groundwater Source Protection Zones, Paragraph 3.78 in the supporting text to Policy H2 already states that development will need to ensure that groundwater resources are protected from pollution and safeguard water supplies and have appropriate sustainable drainage solutions in line with CPP1 Policy CP8, and CPP2 Policies DM42 and DM43. The urban fringe sites where this is a key consideration are identified in Table 8. The requirements in CPP1 Policy CP8 and CPP2 Policies DM42 and DM43 also apply to any smaller sites which may come forward for development.</p>	
MM46	Policy H3 Purpose	Add new paragraph	Environment	Pleased to see the proposed additional paragraph regarding the Groundwater Source Protection Zones.	Support welcomed.	No Change

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	Built Student Accommodation	after para 3.81 p. 186	Agency (005)			
MM47	Policy E1 Opportunity site for business and warehouse uses	Amend last sentence of supporting text at para. 3.87, p. 188	South Downs National Park Authority (003)	Support the additional wording regarding the use of design and materials being expected to reflect the setting of the National Park and the reference to the relevant sections of the South Downs Integrated Landscape Character Assessment (SDILCA).	Support welcomed	No change
All MMs	All	All	National Highways (019)	Reviewed the Main Modifications and conclude they would not result in the any significant changes to the previously assessed SRN impacts. As such there is no requirement for additional assessment of impacts. No change to their previous position as detailed in 9 November 2021 Statement of Common Ground. There are no current material matters of concerns.	Comments noted.	No change

Table 2 Comments made to other MM consultation documents

Reference	Document	Name/ Organisation/ MM representor No.	Summary of Main Issues	Officer Response	Changes required
BHCC46	BHCC46 Sustainability	(020)	The sustainability monitoring in CPP1 should be updated to ensure it remains appropriate (BHCC46 Para 10.1.1).	This representation does not relate to the proposed main	No change

	Appraisal Addendum		Paragraph 4.1.20 of BHCC46 notes that a significant reduction in carbon emissions needs to be achieved if Climate Change Act targets are to be met. Carbon reduction targets need indicators, thresholds, annual targets (ideally with trajectories) and appropriate remedial actions in a Monitoring Plan, or the monitoring of adherence to UK carbon targets.	<p>modifications, and the issues raised regarding monitoring were fully discussed during the examination hearings.</p> <p>The City Plan’s strategic policy relating to sustainable buildings is CPP1 CP8. Monitoring of this policy is set out the council’s annual AMR. The proposed monitoring approach to DM44 ‘Energy Efficiency and Renewables’ is set out in SD04 and includes a quantitative target for carbon reduction.</p>	
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Table 3 Submissions making ‘no comments’

Name/ Organisation/ MM representor No.	Summary of Main Issues	Officer Response
Horsham District Council (010)	<p>We have no specific comments to provide on your modifications but do note that the City Plan (Parts 1 and 2) do not address the fully current housing needs, as measured against the Governments standard method.</p> <p>We share your commitment to working with other local authorities to address strategic priorities and therefore are glad to see reference to an updated West Sussex and Greater Brighton Statement of Common Ground in the plan. We can confirm that it is our hope that this will be ready for signing imminently.</p>	Comments noted.
Natural England (011)	No comments to make on the Main Modifications consultation.	Comments noted
West Sussex County Council (012)	As a service provider we have no comments to make on the Main Modifications.	Comments Noted

Appendix 10 - Copies of the original representations redacted - available as separate document

Appendix 11 - Copies of representations in Plans order redacted – available as a separate document



Brighton & Hove
City Council