

## H1 Housing Sites and Mixed Use Sites

The sites listed in Tables 6 and 7 below (as shown on the Policies Map) are allocated for housing (Use Class C3) or mixed-use development including housing and other specified uses. Planning permission will be granted for proposals that accord with the Development Plan and which provide the minimum indicative amounts of development shown in the tables.

The following additional criteria apply to certain sites where indicated:

- For sites marked with an omega ( $\Omega$ ), occupation of the development will be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider;
- For sites marked with a hash (#), the layout should be planned to ensure future access to existing water and/or wastewater infrastructure for maintenance and upsizing purposes.

### Supporting Text

3.62 City Plan Part One Policy CP1 Housing Delivery sets out the city's housing target of 13,200 new homes over the Plan period to 2030 and states that additional sites will be allocated in Part 2 of the Plan to help ensure housing delivery is maintained over the plan period. The supporting text to City Plan Part One Policy CP3 Employment Land details the city's employment floorspace provision requirements. The very significant constraints on the capacity of the city to physically accommodate the required amount of development for both land uses mean that it is important to maximise the use of brownfield sites. This policy sets out a schedule of brownfield sites that are allocated for housing or mixed use developments including an element of housing and other uses as specified for each individual site listed. The sites have been identified through an update of the council's Strategic Housing Land Availability Assessment (SHLAA).

3.63 Table 6 contains sites allocated for residential development, and includes information on other uses which may also be suitable as part of the site's redevelopment. Table 7 contains housing sites specifically allocated for mixed use developments, and sets out the minimum requirements for the additional uses which must be provided as part of a development proposal. Both tables include an indicative number of residential units that should be provided on each identified site. The indicated numbers of residential units may be exceeded if this can be justified through detailed examination of site specific considerations.

3.64 Only sites which are expected to bring forward 10 or more residential units are allocated in this policy. It is expected that smaller sites and windfall provision will continue to make a significant contribution towards the city's planned housing requirements as accounted for in Policy CP1.

3.65 The industrial history of some brownfield sites means there is the potential for land contamination. Development proposals should undertake and submit to the Local Planning Authority evidence to support uses where possible land contamination and remediation may prohibit the delivery of the specified uses and amounts, in line with the requirements of Policies DM40 and DM41.

3.66 Where a site 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.

**Table 6 - Residential Site Allocations**

Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses
Former St Aubyn's School, 76 High Street, Rottingdean, Brighton, BN2 7JN	93	See Planning Brief for detailed guidance <sup>146</sup> .
Land between Marine Drive and rear of 2-18 The Cliff, Brighton	10 <sup>147</sup>	
25 Ditchling Rise / rear of 57-63 Beaconsfield Road, Brighton	15	Employment uses.
60-62 & 65 Gladstone Place, Brighton	10	Employment uses.
76-79 & 80 Buckingham Road, Brighton, BN1 3RJ#	34	
87 Preston Road, Brighton, BN1 4QG Ω	25	
Eastergate Road Garages, Moulsecoomb, Brighton, BN2 4PB#	24	

<sup>146</sup> [www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/St%20Aubyns%20Planning%20Brief%20January%202015.pdf](http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/St%20Aubyns%20Planning%20Brief%20January%202015.pdf)

<sup>147</sup> Development will mitigate any adverse impacts on designated sites and provide biodiversity net gains in accordance with Policy CP10 and DM37

<b>Site Name</b>	<b>Indicative number of Residential Units (Use Class C3)</b>	<b>Permitted additional Uses</b>
Land between Manchester Street/Charles Street, Brighton, BN2 1TF#	12	B1 employment floorspace or D2 entertainment uses.
Preston Park Hotel, 216 Preston Road, Brighton, BN1 6UU Ω	22	
George Cooper House, 20-22 Oxford Street, Brighton	10	Retail at ground floor level.
Old Ship Hotel (garage), 31-38 Kings Road Brighton#	18	Hotel floorspace (C1) and ancillary hotel uses
Saunders Glassworks, Sussex Place, Brighton, BN2 9QN#	49	
2-16 Coombe Road, Brighton, BN2 4EA#	33	B1 starter business units/affordable workspace at ground floor.
Outpatients Department, Royal Sussex County Hospital	35	
Whitehawk Clinic, Whitehawk Road, Brighton#	38	
Buckley Close garages, Hangleton #	12	
Former playground, Swanborough Drive, Whitehawk	39	
Former Hollingbury Library	10	
29-31 New Church Road, Hove	45	
189 Kingsway, Hove #	60	

Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses
Kings House, Grand Avenue, Hove #	169	
Victoria Road Former Housing Office (adjacent Portslade Town Hall), Victoria Road, Portslade Ω#	37	
Land at the corner of Fox Way and Foredown Road, Portslade#	10	
Smokey Industrial Estate, Corner of Church Road, Lincoln Road & Gladstone Road Portslade	32	
Land south of Lincoln Street Cottages, 15-26 Lincoln Street, Brighton #	18	
Hove Sorting Office, 88 Denmark Villas, Hove	67	Employment uses
Former Belgrave Centre and ICES, Clarendon Place, Portslade (Site SP2 in Shoreham Harbour Joint Area Action Plan (JAAP) Policy CA3) # <sup>148</sup>	104	
Wellington House (Site SP3 in JAAP Policy CA3)	20	
<b>TOTAL</b>	<b>1,051</b>	

<sup>148</sup> Shoreham Harbour Joint Area Action Plan adopted October 2019: <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Shoreham%20Harbour%20Joint%20Area%20Action%20Plan%20%28JAAP%29.pdf>

**Table 7 - Mixed Use Housing Site Allocations**

**The following sites are allocated for mixed use redevelopment:**

<b>Site Name</b>	<b>Indicative Residential Units (Use Class C3)</b>	<b>Minimum Requirements for Other Uses</b>
City College, Pelham Tower (and car-park), Pelham Street, #	100	Site is allocated for 300 student bedspaces in City Plan Part One Policy CP21. Development should take place as part of a wider redevelopment of the site to improve the existing educational facilities.
71 - 76 Church Street, Brighton	50	B1 Employment floorspace on the ground floor which could include small scale workshop type units.
Post Office site, 62 North Road, Brighton#	110	3000sqm B1 employment floorspace.
27-31 Church Street (corner with Portland Street)#Ω	10	630sqm B1 Offices.
Former Dairy Crest Site, 35-39 The Droveaway, Hove, #	14	500sqm B use class employment uses, ancillary retail.
Kingsway/Basin Road North (Site AB4 in Shoreham Harbour Joint Area Action Plan (JAAP) Policy CA2)#	90	Use classes B1 and B2 at Basin Road North level, use classes A2, B1 and ancillary A1 at Kingsway level, and use class C3 on upper storeys.
Prestwich House, North Street, Portslade (Site SP1 in JAAP Policy CA3)	15	Use class B1 on lower storeys.
Regency House, North	45	Use class B1 on lower

Site Name	Indicative Residential Units (Use Class C3)	Minimum Requirements for Other Uses
Street, Portslade (Site SP4 in JAAP Policy CA3)		storeys.
Former Flexer Sacks, Wellington Road, Portslade (Site SP5 in JAAP Policy CA3)	45	(Use class B1 on lower storeys and use class C3 on upper storeys.  Associated leisure and assembly (use class D) uses may be permitted provided they are demonstrated to be compatible with residential and employment uses in the vicinity.
Church Road/Wellington Road/ St Peter's Road (Site SP6 in JAAP Policy CA3)	25	The southern portion of the site is allocated for new employment development (use classes B1, B2 and B3).
Station Road site, Portslade (Site SP7 in JAAP Policy CA3)	15	Use classes A1, A2, A3 and B1 fronting Station Road.
<b>TOTAL</b>	<b>519</b>	

## H2 Housing Sites – Urban Fringe

The developable areas of the sites listed in Table 8 below (as identified on the Policies Map) are allocated for housing development (Use Class C3). Planning permission will be granted for proposals that accord with the Development Plan (having particular regard to Policies SA4 and SA5) and which address all of the site considerations and indicative development requirements set out in Table 8 together with all of the following criteria:

- a) Provision is made for 3+ bedroom family-sized dwellings in accordance with the indicative percentages set out in Table 8;
- b) Opportunities to secure additional and /or improved publicly accessible open space provision are incorporated within the proposed scheme;
- c) Green infrastructure and local food growing opportunities are incorporated within the proposed scheme;
- d) Development will mitigate any adverse impacts on designated sites and provide biodiversity net gains in accordance with Policies CP10 and DM37;
- e) Provision is made for sustainable transport infrastructure improvements that provide and promote sustainable transport and improved safe pedestrian and cyclist access to and through the site to support the development;
- f) Improved linkages and access to the South Downs National Park and surrounding areas are secured where feasible;
- g) Appropriate regard is given to the need for local community facilities; and
- h) Given the council's ambition to become a carbon neutral city by 2030, development will be encouraged to achieve greater reductions in CO2 emissions through the use of passive design, fabric standards, energy efficiency measures and low and zero carbon technologies, in accordance with Policy DM44.
- i) Provision is made for a proportion of serviced plots for self and/ custom build dwellings unless it can be demonstrated that this would make the scheme unviable.

The following additional criteria apply to certain sites where indicated:

- For sites marked with an omega ( $\Omega$ ), occupation of the development should be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider;
- For sites marked with a hash (#), the layout should be planned to ensure future access to existing water and/or wastewater infrastructure for maintenance and upsizing purposes.

**Table 8 Urban Fringe Allocations**

Site Name	UFA Reference	Total Site Area (Hectares)	Area of Development Potential (Hectares)	Potential Number of Dwelling Units <sup>149</sup>	Indicative Percentage of Family Sized Housing (3+ bedroom)	Key Site Considerations
<b>Land at Oakdene, Southwick Hill / Land West of Mile Oak Road</b>	Sites 1 & 2 (2014 UFA);  Study Area L1/E1 (2015 UFA)	4.75	1.12	30	50%	<ul style="list-style-type: none"> <li>• ecology</li> <li>• open space</li> <li>• ground water flooding<sup>150</sup></li> <li>• landscape</li> </ul>
<b>Land at Mile Oak Road. Portslade Ω #</b>	Sites 4 & 4a (2014 UFA);  Study Area L2/E2 (2015 UFA);  Archaeological Assessment Area A1 (2016)	2.31	2.31	70	50%	<ul style="list-style-type: none"> <li>• ecology</li> <li>• open space</li> <li>• surface and ground water flooding<sup>146</sup></li> <li>• Groundwater Source Protection Zone</li> <li>• landscape</li> <li>• archaeology</li> <li>• wastewater infrastructure</li> </ul>
<b>Land off Overdown Rise, Mile Oak Ω #</b>	Sites 4b, 5 & 5a (2014 UFA);  Study Area L2/E2 (2015 UFA);  Archaeological Assessment Area A1 (2016)	8.76	3.98	125	50%	<ul style="list-style-type: none"> <li>• ecology</li> <li>• open space</li> <li>• surface and ground water flooding<sup>146</sup></li> <li>• Groundwater Source Protection Zone</li> <li>• landscape</li> <li>• archaeology</li> <li>• wastewater infrastructure</li> </ul>

<sup>149</sup> Sites denoted in italics form part of the wider urban fringe site and are not identified for development as required for mitigation

<sup>150</sup> More detail about flood risk is provided in the Strategic Flood Risk Assessment.



Site Name	UFA Reference	Total Site Area (Hectares)	Area of Development Potential (Hectares)	Potential Number of Dwelling Units <sup>149</sup>	Indicative Percentage of Family Sized Housing (3+ bedroom)	Key Site Considerations
<b>Benfield Valley #</b>	Sites 10, 11 & 12 (2014 UFA);  Study Area L3/E3 (2015 UFA);  Archaeological Assessment Area A2 (2016) (site 11 only)	Site 10 – 5.65  Site 11 – 8.75  Site 12 – 10.65	1.6  (Site 11 – 0.93 Site 12 – 0.67)	100  (60)  (40)	50%	<ul style="list-style-type: none"> <li>• archaeology</li> <li>• landscape</li> <li>• ecology</li> <li>• open space</li> <li>• heritage</li> <li>• archaeology</li> <li>• ground water flooding<sup>146</sup></li> <li>• wastewater infrastructure</li> </ul>
<b>Land at and adjoining Horsdean Recreation Ground, Patcham</b>	Site 16 (2014 UFA);  Study Area L4 (2015 UFA);	6.32	1.17	25	50%	<ul style="list-style-type: none"> <li>• ecology</li> <li>• heritage</li> <li>• open space</li> <li>• landscape</li> <li>• Groundwater Source Protection Zone</li> <li>• archaeology</li> <li>• ground water flooding<sup>146</sup></li> </ul>
<b>Land at Ladies Mile, Carden Avenue #</b>	Site 17 (2014 UFA);  Study Area L5/E4 (2015 UFA);  Archaeological Assessment Area A3 (2016)	15.02	1.25	35	50%	<ul style="list-style-type: none"> <li>• ecology</li> <li>• open space</li> <li>• landscape</li> <li>• archaeology</li> <li>• Groundwater Source Protection Zone</li> <li>• ground water flooding<sup>146</sup></li> <li>• wastewater infrastructure</li> </ul>
<b>Land to north east of Coldean Lane</b>	Site 21 (2014 UFA);  Study Area L7/E6 (2015 UFA);  Archaeological Assessment Area A5 (2016)	3.36	1.58	242	35%	<ul style="list-style-type: none"> <li>• ecology</li> <li>• heritage</li> <li>• open space</li> <li>• landscape</li> <li>• Groundwater Source Protection Zone</li> <li>• archaeology</li> <li>• ground water flooding<sup>146</sup></li> </ul>

Site Name	UFA Reference	Total Site Area (Hectares)	Area of Development Potential (Hectares)	Potential Number of Dwelling Units <sup>149</sup>	Indicative Percentage of Family Sized Housing (3+ bedroom)	Key Site Considerations
<b>Land north of Varley Halls, Coldean Lane</b>	Site 21a  Study Area L7/E6 (2015 UFA);  Archaeological Assessment Area A5 (2016)	4.14	0.94	12	35%	<ul style="list-style-type: none"> <li>• ecology</li> <li>• heritage</li> <li>• open space</li> <li>• landscape</li> <li>• Groundwater Source Protection Zone</li> <li>• archaeology</li> <li>• ground water flooding<sup>146</sup></li> </ul>
<b>Land at and adjoining Brighton Race Course Ω</b>	Site 30 (2014 UFA);  Study Area L8/E7 (2015 UFA);  Archaeological Assessment Area A6 (2016)	46.01	1.21	30	50%	<ul style="list-style-type: none"> <li>• ecology</li> <li>• open space</li> <li>• landscape</li> <li>• archaeology</li> <li>• ground water flooding<sup>146</sup></li> <li>• wastewater infrastructure</li> </ul>
<b>Land at South Downs Riding School &amp; Reservoir Site #</b>	Site 32 and 32a (2014 UFA);  Study Area L10/E9 (2015 UFA);  Archaeological Assessment Area A8 (2016)	2.18	0.57	15	50%	<ul style="list-style-type: none"> <li>• archaeology</li> <li>• ecology</li> <li>• landscape</li> <li>• reservoir</li> <li>• ground water flooding<sup>146</sup></li> <li>• wastewater infrastructure</li> </ul>
<b>Land north of Warren Road (Ingleside Stables) #</b>	Site 33 (2014 UFA);  Study Area L11 (2015 UFA);	5.24	1.2	30	50%	<ul style="list-style-type: none"> <li>• ecology</li> <li>• open space</li> <li>• landscape</li> <li>• ground water flooding<sup>139</sup></li> <li>• wastewater infrastructure</li> </ul>
<b>Land at Ovingdean Hall Farm &amp; Land at Bulstrode / Ovingdean Farm Ω</b>	Sites 38, 38a & 39 (2014 UFA);  Study Area L14 (2015 UFA);	4.45	4.17	50	50%	<ul style="list-style-type: none"> <li>• archaeology</li> <li>• heritage</li> <li>• landscape</li> <li>• surface and ground water flooding<sup>146</sup></li> </ul>

Site Name	UFA Reference	Total Site Area (Hectares)	Area of Development Potential (Hectares)	Potential Number of Dwelling Units <sup>149</sup>	Indicative Percentage of Family Sized Housing (3+ bedroom)	Key Site Considerations
Land adjacent to Ovingdean and Falmer Road, Ovingdean	Site 42 (2014 UFA);  Study Area L16/E13 (2015 UFA);	7.47	1.68	45	50%	<ul style="list-style-type: none"> <li>ecology</li> <li>open space</li> <li>landscape</li> <li>surface and ground water flooding<sup>146</sup></li> <li>Groundwater Source Protection Zone</li> </ul>
Land at former nursery, Saltdean #	Site 46a (2014 UFA);  Study Area E14 (2015 UFA);	0.96	0.96	24	50%	<ul style="list-style-type: none"> <li>surface and ground water flooding<sup>139</sup></li> <li>landscape</li> <li>Groundwater Source Protection Zone</li> <li>wastewater infrastructure</li> </ul>
Cluster at Coombe Farm and Saltdean Boarding Kennels, Westfield Avenue North, Saltdean #	Sites 48, 48a, 48b & 48c (2014 UFA);  Study Area L18/E15 (2015 UFA);	5.65	3.47	65	50%	<ul style="list-style-type: none"> <li>archaeology</li> <li>landscape</li> <li>ecology</li> <li>surface and ground water flooding<sup>146</sup></li> <li>Groundwater Source Protection Zone</li> <li>wastewater infrastructure</li> </ul>
Land west of Falmer Avenue, Saltdean	Site 50 (2014 UFA);  Study Area L19 (2015 UFA);	1.3	1.07	32	50%	<ul style="list-style-type: none"> <li>ecology</li> <li>landscape</li> <li>archaeology</li> <li>surface and ground water flooding<sup>146</sup></li> <li>Groundwater Source Protection Zone</li> </ul>

## Supporting Text

3.66 The city is a tightly constrained urban area with very limited opportunities to physically expand to accommodate new development. City Plan Part One (Policies CP1 Housing Delivery and SA4 Urban Fringe) identified potential for some of the land within the city's urban fringe (areas of land that lie between the defined built up urban area boundary and the boundary of the South Downs National Park) to contribute towards meeting the city's housing requirement. The purpose of this policy is to allocate housing development on some of the Urban Fringe sites which were

identified through the 2014 Urban Fringe Assessment and further assessment through the 2015 Urban Fringe Assessment Study.

3.67 The number of dwellings proposed in the allocations schedule are indicative, showing what might reasonably be achieved on each site. Of key importance will be the need to adequately address the considerations identified for each site and other matters including design and layout, biodiversity, green infrastructure, open space provision and the relationship with the surrounding areas including, where relevant, the setting of the South Downs National Park (taking account of City Plan Part One Policy SA5) and Conservation Areas.

3.68 City Plan Part One Policy SA4 Urban Fringe clarifies that development within the urban fringe will not be permitted except where a site has been allocated for development or where a countryside location can be justified; and where it can be clearly demonstrated that proposals have had regard to the downland landscape setting of the city, any adverse impacts of development are minimised and appropriately mitigated and/or compensated for and where appropriate, the proposal helps to achieve the five policy objectives as set out in Policy SA4 Urban Fringe.

3.69 The site allocations on the urban fringe are suitable locations to deliver a significant proportion of family-sized housing (3+ bedrooms) and affordable housing to help meet the needs of the city. Demographic analysis set out in City Plan Part One (paragraph 4.213) identifies a potential demand/need across the city for 42% of housing to be 3 or more bedrooms (31% 3-bed and 11% 4+ bed properties)<sup>151</sup>, whilst Policy CP20 sets a preferred affordable housing mix providing 25% 3+ bedroom units. However, the majority of the city's brownfield sites are more suitable for high density residential development comprising predominantly smaller residential units. For this reason, proposals on the urban fringe allocations will generally be expected to accommodate at least 50% family sized housing. Table 8 sets out the indicative proportion of 3+ bedroom units that will be sought on each allocated site subject to further assessment at the detailed planning stage. In addition, the provision of serviced plots for self-build and custom build housing and proposals for community led housing will be strongly encouraged (see Policy DM1 Housing Quality, Choice and Mix).

3.70 City Plan Part One Policy SA4 Urban Fringe promotes the urban fringe as part of the green network and encourages opportunities for multi-functional open space which can include appropriate recreation, cultural experiences, biodiversity and food growing. The site allocations will provide opportunities to enhance and expand the green network and provide biodiversity net gains (see Policy DM37 Green Infrastructure and Nature Conservation). Proposals should include the provision of public open space where possible and consideration should be given to ensuring long term management and maintenance. Provision for food growing should also be

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<sup>151</sup> Housing Requirements Study Update, October 2012, para. 4.35 – 4.36

incorporated into the development and have regard to the Food Growing and Development Planning Advice Note<sup>152</sup> and any future Council planning guidance on this matter.

3.71 Regard should also be given to the need for community facilities. For example, in some instances the developable area may be able to incorporate a local facility such as a local shop, community meeting space and/or health facility.

3.72 As greenfield sites, the urban fringe housing allocations offer particular flexibility for masterplanning and building design to achieve low carbon and sustainable design<sup>153</sup>. When planning the development of these sites, opportunities should be considered to incorporate passive design, fabric standards, energy efficiency measures and low and zero carbon technologies (LZCs) in accordance with Policy DM44.

3.73 The urban fringe allocations are by their nature sensitive locations for development, comprising greenfield land adjoining open countryside and the South Downs National Park. The suitability and development potential of the sites has been established through the 2014 and 2015 Urban Fringe Assessment studies, taking account of identified constraints such as designated nature conservation sites, historic designations, landscape character, open space designations and other environmental considerations including flood risk. However, in order to ensure that all potential development impacts are identified and that appropriate mitigation is secured developers will be required to submit detailed information/assessments at the planning application stage. This will be expected to include a Landscape Visual Impact Assessment together with other relevant information/studies such as:

- Ecological Assessment including Protected Species Survey
- Arboricultural Report and Plan(s) /Tree Survey(s)
- Archaeology Assessments
- Heritage Statement
- Traffic Assessment
- Flood Risk Assessment
- Drainage Strategy and Sustainable Drainage Report
- Open Space Assessment
- Hydrological/Hydrogeological Survey

3.74 In addition to the above, the following may also be required in order to comply with other City Plan policies:

- Noise Assessment
- Highways Assessment / Transport Statement
- Lighting Assessment
- Air Quality Assessment

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<sup>152</sup> Brighton & Hove City Council Planning Advice Note 06 Food Growing and Development September 2011

<sup>153</sup> Brighton & Hove City Plan Part Two Energy Study (AECOM, 2018) Section 5.4.4

- Land Contamination Survey
- Environmental Impact Assessments
- Sustainability Checklist
- Foul Sewerage and Utilities Assessment

3.75 The design and materials used in development will be expected to reflect the setting and natural beauty of the National Park and should reflect the South Downs Integrated Landscape Character Assessment (SDILCA), specifically the Landscape Management and Development Considerations described in Appendix A, Landscape Type A: Open Downland and A2: Adur to Ouse Open Downs area<sup>154</sup>.

3.76 Several of the allocated housing sites overlap with, or are close to, Local Wildlife Sites (formerly Sites of Nature Conservation Importance) including Local Nature Reserves. All sites where potentially significant impacts on ecology were identified in the 2014 Urban Fringe Assessment have been subject to detailed ecological assessments in the 2015 Urban Fringe Assessment, which included a Desktop Study and Phase 1 Habitat Survey. However, detailed surveys (including species surveys) will be required to support development proposals, and these must be used to inform the development of specific mitigation requirements. In accordance with Policy DM37, development proposals must demonstrate that any adverse effects would not undermine the objectives of the designation, features of interest/importance and/or integrity of the area.

3.77 Development proposals on urban fringe sites will be expected to protect and where possible enhance existing public rights of way, providing for clear and legible pedestrian routes which encourage the active and continuing use of use of public areas and access. All proposals should comply with national policy and guidance on rights of way<sup>155</sup>.

3.78 In addition, a number of the allocated sites are located in areas with underground chalk aquifers identified as Groundwater Source Protection Zones by the Environment Agency. Development in these locations will need to ensure that groundwater resources are protected from pollution and safeguard water supplies and have appropriate sustainable drainage solutions (in line with the requirements of City Plan Part One Policy CP8 Sustainable Buildings and Policies DM42 and DM43).

3.79 Whilst all of the proposed urban fringe allocations are wholly or predominantly greenfield sites, some have been subject to agricultural or other uses which may create potential for land contamination. For such sites, development proposals will need to be supported by appropriate surveys and evidence meeting the requirements of Policies DM40 and DM41.

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<sup>154</sup> <https://www.southdowns.gov.uk/planning/planning-advice/landscape/>

<sup>155</sup> National Planning Policy Framework and Rights of Way Circular (1/09) subject to any updated policy guidance.

### H3 Purpose Built Student Accommodation

The sites listed in Table 9 below (and as shown on the Policies Map) are allocated for Purpose Built Student Accommodation. Planning permission will be granted for proposals that accord with the Development Plan and which provide the indicative amounts of development shown in the table.

**Table 9 Purpose Built Student Accommodation Sites**

<b>Site Name</b>	<b>Indicative number of bedspaces</b>	<b>Other Required Uses</b>
Lewes Road Bus Garage, Lewes Road, Brighton	250	Operational requirements of the bus depot must be maintained
118–132 London Road, Brighton	232	Ground floor uses must comply with Policy DM12
45 & 47 Hollingdean Road, Brighton	40	-

3.80 Development for student accommodation will subject to robust management arrangements and will require appropriate design to minimise any negative impacts on the surrounding residential areas, particularly given the presence of a number of other operational and permitted purpose built student accommodation (PBSA) developments in the localities.

3.81 At the Lewes Road site it is expected that the bus garage will continue to operate and that the PBSA would be located above a reconstructed depot shed and/or on redundant land within the site.

## **E1 Opportunity site for business and warehouse uses**

**Land at Hangleton Bottom, Hangleton Link Road, North Portslade as shown on the Policies Map will be granted permission for the following uses only where these would not prevent or prejudice the delivery of a strategic scale waste management facility:**

- **Business and warehouse premises (Use Classes B1, and B8).**

**Planning permission will be granted for proposals that accord with the Development Plan in particular Policy SP1 in the Waste and Minerals Sites Plan.**

### **Supporting Text**

3.82 Demand for employment floorspace in the city remains strong with existing local firms looking to expand and businesses who want to be located closer to the main focus of economic and business activity within Brighton & Hove and its immediate periphery. Modest growth in jobs in this sector is forecast to 2030. The advanced manufacturing and engineering sector is identified as a priority sector<sup>156</sup>.

3.83 Apart from the refurbishment of some existing industrial estates and new build at Woodingdean Business Park, Brighton and at St Joseph's Close, Hove there have been no significant new warehouse/ light industrial schemes developed in the last ten years. In particular there is a lack of suitable employment space to support the growth needs of small-to-medium sized businesses that have outgrown small commercial units, but do not require large-scale strategic sites to support their space needs<sup>157</sup>.

3.84 Policy CP3 Employment Land in the City Plan Part One sets out the approach to safeguarding employment land over the Plan period and strategic allocations were identified in Development Areas to bring forward new high quality employment floorspace (DA2- DA8) to meet the forecast requirements over the plan period. Policy CP3 is supportive of opportunities to increase the industrial floorspace capacity in safeguarded industrial estates and on specific sites; however this does not address all the forecast requirements. Part 6 of the policy indicated that the City Plan Part Two would seek to allocate additional employment sites and mixed use allocations to help ensure employment land delivery is maintained over the plan period.

3.85 This policy safeguards the potential opportunity for new business and warehouse floorspace to come forward over the plan period.

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<sup>156</sup> Coast to Capital Strategic Economic Plan, March 2014

<sup>157</sup> Brighton & Hove Industrial Estates Audit, Stiles Harold Williams December 2017



3.86 Hangleton Bottom is a key strategic site for the future delivery of waste management infrastructure needed to support further moves towards sustainable waste management in East Sussex and Brighton & Hove. WMP Policy WMP6 states that “*Development proposals which would prevent or prejudice those sites for waste management uses will be resisted.*” Use of any part of the site for alternative uses must therefore ensure that the ability of the site to host a strategic scale waste management facility<sup>158</sup> is not compromised. Given that the planning for strategic scale waste management facilities is undertaken through a strategic level approach to plan-making (in this case through the East Sussex, Brighton & Hove and South Downs Waste & Minerals Plans), any view as to whether or not an alternative use of the site compromises the ability of the site to host its allocated use through Policy WMP6 will need to be obtained and agreed by all three relevant waste planning authorities.

3.87 Following the 2017 LWS Review<sup>159</sup>, the boundary of Benfield Valley LWS overlaps the north east boundary of the site. Foredown Allotments LWS lies to the south west of the site. Regard should be given to the need to conserve and enhance biodiversity in accordance with CP10 Biodiversity and DM37 Green Infrastructure and Nature Conservation.

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<sup>158</sup> Large strategic scale waste management facility with an indicative waste throughput of 100,000 – 150,000 tonnes per annum as defined in the Waste and Minerals Plan 2013.

<sup>159</sup> 2017 Brighton & Hove Local Wildlife Site Review updated February 2020.