Dear Mrs Jones-Hughes

Brighton & Hove City Plan Part 1 - Your Ref 2130
Response to Matter 2a - i & ii Urban Fringe

8th May 2015

2a/i - No, the City Plan as to be modified does not strike the correct balance between meeting the needs for new housing and the environmental benefits of retaining open space in the Urban Fringe.

2a/ii - No, policy SA4 as proposed to be modified does not provide anything like a robust enough framework to guide the allocation of sites in part 2 of the plan.

Reasoning

Brighton & Hove has a high & increasing volume of students living off campus, a large number of ‘second homes’ and a good supply of Brownfield sites. All of these matters need to be given full consideration when calculating housing need and site allocation otherwise, there is a real risk that the final plan will result in the wrong housing, for the wrong people, in the wrong places: i.e. expensive housing, built on the edge of the National Park, purchased as buy to let or as second homes instead of facilitating genuinely affordable, sustainable brownfield/city centre homes, for those with the real need.

Many of the Urban Fringe sites identified by LUC in the 2014 Urban Fringe Assessment and included in the City Plan Part 1 as having potential for housing, should have been considered unsuitable at the outset. There is plentiful evidence of errors and omissions within the LUC review; sites with no access, sites with Environment Agency high flood risk noted as having no risk, no consideration of amenity views, landscape character or relationship and certainly with no local knowledge or consultation. The report appears to have been hastily commissioned and conducted and our environment is already starting to pay the price.

Specific allocation of sites was to be a matter for part 2 of the City Plan but, the identified Urban Fringes are already being subject to wildly inappropriate planning applications by developers. This is because the City Plan Part 1 (PM064/SA4) states that if proposals for development prior to adoption of Part 2 come forward, the 2014 Urban Fringe Assessment will be a material consideration. We also now have owners of other parcels of land, laying waste to woodland containing protected trees and badger setts, presumably getting ready for their turn in the free for all to come.

Cont...
With the city being in the top 4 in the country for traffic congestion and already having Air Quality Management Areas in place (in fringe areas, not just the city centre), to build on the outer urban fringes would be in direct conflict with the NPPF. Developers can only pay lip service to mitigating the increased traffic and pollution that comes with building on these sites; offering to provide bicycle parking and giving a few free bus passes, but it is acknowledged that car ownership and use in the outlying fringe areas is, through necessity, much greater than city centre. A further major issue regarding increased traffic from Urban Fringe sites is that each planning application is looked at in isolation. There is no assessment of the combined effects of the many multiple developments which are currently being planned by other councils, to the East and West of Brighton and Hove.

We urgently need our city plan, but it must not be a plan which is based on erroneous and incomplete information, which will cause permanent harm to our environment, our current and future residents and leaves the mess for our future generations to live with.

Resolution

Part 1 of the city plan must be changed to state that until part 2 is formalised, building will not be permitted on the urban fringes and, given the clear guidance issued by DCLG, it would be appropriate if part 2 of the plan then went on to record that allocation for building on our Urban Fringes, was to be considered as last resort only.

Failing this, then the guidance for allocation of sites at part 2 must be far more stringent and take into account not only the 'hard' issues such as traffic, pollution, biodiversity, but also all those values which are more intangible, such as the provision of locally prized amenity views, being barriers to urban sprawl, relationship to the National Park and landscape character and history.

Thank you for allowing us this further chance to register our views.

Yours faithfully

J Frowde (Miss)
For and on behalf of
Saltdean Countryside Alliance

Copies:
1 by e-mail
2 by post